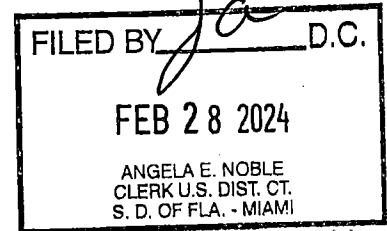


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

IN RE: TAKATA AIRBAG PRODUCTS
LIABILITY LITIGATION

Case No. 1:15-md-02599-FAM

THIS DOCUMENT RELATES TO:
ECONOMIC LOSS TRACK CASES AGAINST
FORD AND VOLKSWAGEN DEFENDANTS



**REPORT BY THE SETTLEMENT SPECIAL ADMINISTRATOR ON THE
IMPLEMENTATION OF THE OUTREACH PROGRAMS PURSUANT TO THE FORD
AND VOLKSWAGEN SETTLEMENT AGREEMENTS**

STATUS REPORT NO. 24 FILED FEBRUARY 27, 2024

The Settlement Special Administrator of the Ford and Volkswagen Settlement Agreements (collectively, the "Settlement Agreements") submits this Report to the Court to provide information and insight as to the ongoing efforts of the Outreach Programs under the Settlement Agreements¹.

As explained in further detail below, the Outreach Programs have been designed through discussion with the Parties, the National Highway Traffic Safety Administration, and the Independent Monitor of the Takata recalls to utilize techniques and approaches not previously applied in the recall industry, with a focus on personalized, targeted direct campaigns aimed at increasing the volume of outreach attempts per consumer via traditional and non-traditional channels with the goal of maximizing the recall remedy completion rate to the extent practicable given the applicable provisions of the Settlement Agreements. Consistent with this, the Settlement Special Administrator and Outreach Program vendors regularly confer and communicate with the

¹ The data and information contained in this report is generally as of mid-Q1 2024.

automobile manufacturers to coordinate concerted efforts to ensure that outreach to affected vehicle owners is conducted as efficiently and as effectively as possible and to continually improve the overall process.

1. Direct Outreach

a. Current and Future Campaigns in Direct Outreach to Affected Consumers

The Settlement Special Administrator and Outreach Program vendors continue to deploy various direct outreach activities which have been discussed in prior Status Reports, including “new owner,” “missed appointment,” and “mobile repair” themed materials as well as the “commercial” strategies aimed at owners of multiple affected vehicles, all of which have been summarized previously.

Utilizing some of the same themes of past direct outreach mailings, the Settlement Special Administrator and Outreach Program vendors plan to test different letter paper stocks/weights (thickness) as well as different envelopes and packaging over the next few mailing cycles. These tests will inform whether a heavier, thicker paper increases response and repair rates due to the heightened perceived legitimacy generally associated with letters on sturdier rather than on lighter, flimsier paper. Similarly, utilizing different envelopes, whether more brightly colored or appearing to be from a specialized courier service, will inform whether doing so cuts through the clutter of the mailbox, resulting in increased open rates and therefore increased response and repair rates as well.

For example, the Settlement Special Administrator and Outreach Program vendors plan to send a “greeting card” notifying the recipient that their vehicle is affected by the Takata recall and providing information as to how a Recall Remedy appointment can be made. This card will be

mailed in a golden envelope, with the aim of standing out in the recipient's mailbox to increase the likelihood that the recipient sees and opens the card, and subsequently takes action.

Lastly, the Settlement Special Administrator and Outreach Program vendors also plan to re-deploy materials explaining the story of Stephanie Erdman, a Lieutenant for the United States Air Force, who was injured by a Takata inflator rupture. These pieces explain how the rupture and resulting injury changed Ms. Erdman's life, providing a real-life example of how important it is for consumers to have this safety recall performed. Some of these materials even include graphic imagery of Ms. Erdman's injuries to emphasize this concern in the hopes of persuading people who may be skeptical of having the Recall Remedy performed. In order to maximize the effectiveness of these materials, large brown 6-inch x 9-inch envelopes will be used to stand out to recipients.

b. Continued Efforts with State Departments and Other Entities

As reported, the Settlement Special Administrator and the automobile manufacturers have engaged various state departments to endorse the deployment of letters on behalf of their respective states to inform affected citizens of the Takata inflator recall and its severity, as well as to provide information on how to have the Recall Remedy completed. These efforts generally have resulted in some of the highest response rates and remedy rates of any communications in the Outreach Program. In addition to the states in which these letters have previously been mailed², similar letters have been mailed or are anticipated to be mailed in the coming months in Texas (its second mailing), Alabama (its third mailing), and California (its second mailing). The fact that several states have now re-engaged on this type of effort for second, third, fourth, and even fifth mailings

² Louisiana, Michigan, New York, Mississippi, Alabama, Kentucky, Wisconsin, Minnesota, North Carolina, Virginia, Arkansas, Florida, Georgia, Pennsylvania, South Carolina, Ohio, Nebraska, Tennessee, Florida, Texas, Idaho, California, Puerto Rico, Colorado, New Mexico, Massachusetts, Nevada.

is encouraging considering the significant success of these letters in generating repairs. The Settlement Special Administrator and the automobile manufacturers continue to contact state departments to seek their cooperation in this valuable and effective effort.

c. Overall Deployment and Response

A total of 163,798,848 outbound deployments across all available channels have been made by the Settlement Special Administrator and Outreach Program vendors to affected consumers. These deployments are broken out by primary channels below:

<u>Channel</u>	<u>Volume</u>	<u>Total Appointments</u>
Direct Mail Pieces	30,047,370	51,202
Emails	17,678,376	1,920
Outbound Calls	11,474,097	107,930
Digital/Facebook Impressions	104,474,181	6 ³
Tagging ⁴	118,110	5,798

d. Overall Results

The Settlement Special Administrator and Outreach Program vendors have performed outreach resulting in a total of 348,556⁵ appointments and “warm transfers” to allow consumers to schedule appointments directly with dealers, and 804,151 Recall Remedies have been completed

³ Social media deployment on Facebook and other platforms is an extremely low-cost channel used primarily to maintain consumer awareness and a social presence to support other outreach activities which more regularly result in appointments and repairs, such as direct mail and outbound phone calls.

⁴ “Tagging” refers to the process referenced in this and prior reports, whereby the Settlement Special Administrator’s Outreach Program vendors actively search for affected vehicles on the road and, when located, place recall notifications on those vehicles.

⁵ This figure exceeds the aggregate sum of the Total Appointments by Channel in the chart above because many of the inbound calls resulting from Outreach Program materials for Ford vehicles are currently being routed directly to Ford’s call center for appointment scheduling purposes. Also see Footnote 6 below which is similarly applicable here.

since the transition of outreach to the Settlement Special Administrator and Outreach Program vendors.⁶

2. Additional Activities and Efforts

At the end of 2021, the Settlement Special Administrator discontinued the use of earned media efforts as part of its Takata Outreach Program. Given the significant media coverage over the last several years, these earned media strategies greatly assisted in raising affected vehicles owners' awareness and understanding of the legitimacy and gravity of the Takata recalls. In ongoing consultation with the Parties and the National Highway Traffic Safety Administration, the Settlement Special Administrator and Outreach Program vendors continue to evaluate other activities to be performed in addition to and in conjunction with direct outreach to consumers.

3. Conclusion

The Settlement Special Administrator offers this Report to ensure that the Court is informed of the status of the Outreach Programs to date. If the Court would find additional information helpful, the Settlement Special Administrator stands ready to provide it at the Court's convenience.

/s/ Patrick A. Juneau

PATRICK A. JUNEAU
Settlement Special Administrator

⁶ Considering the significant efforts put forth towards indirect outreach methods such as mass media and public relations-type activities, Status Reports now provide the total number of Recall Remedies performed, irrespective of whether direct outreach had been performed on a vehicle. As previously mentioned, consumers often schedule repair appointments directly with the automobile manufacturer or their local dealership rather than by calling the Outreach Programs' call center to do so. As such, the total Recall Remedy completion count presented herein cannot be attributed solely to those direct activities conducted by the Settlement Special Administrator and Outreach Program vendors and exceeds the number of appointments and "warm transfers" set by Outreach Program vendors. This is also consistent with the fact that each automobile manufacturer continues significant and extensive outreach efforts beyond those activities performed by the Settlement Special Administrator in the Outreach Programs under the Settlement Agreements.

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