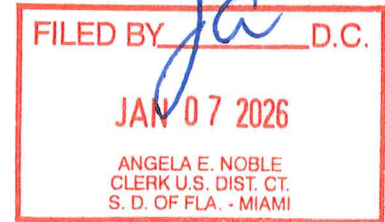


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**IN RE: TAKATA AIRBAG PRODUCTS
LIABILITY LITIGATION**

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

**THIS DOCUMENT RELATES TO:
ECONOMIC LOSS TRACK CASES AGAINST
VOLKSWAGEN DEFENDANT**



**REPORT BY THE SETTLEMENT SPECIAL ADMINISTRATOR ON THE
IMPLEMENTATION OF THE OUTREACH PROGRAMS PURSUANT TO THE
VOLKSWAGEN SETTLEMENT AGREEMENT**

STATUS REPORT NO. 31 FILED JANUARY 5, 2025

The Settlement Special Administrator of the Volkswagen Settlement Agreement (the “Settlement Agreement”) submits this Report to the Court to provide updates and insights into the ongoing efforts of the Outreach Program under the Settlement Agreement¹.

As explained in further detail below, the Outreach Program has 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 greatest extent practicable given the applicable provisions of the Settlement Agreement. To this end, the Settlement Special Administrator and Outreach Program vendors regularly confer and communicate with the automobile manufacturers to coordinate concerted efforts to ensure that

¹ The data and information contained in this report is generally as of mid-Q4 2025.

outreach to affected vehicle owners is conducted as efficiently and 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 previously discussed in prior Status Reports, including specific thematic materials by mail and email (including, but not limited to, “new owner” creative, “missed appointment” creative, and “mobile repair” creative) that have traditionally performed best in terms of response, appointment, and remedy rates, all of which have been described extensively in prior Reports.

In addition to those Outreach types that are continually used and rotated on a periodic basis, the Settlement Special Administrator and Outreach Program vendors have observed that the inclusion of personalized video messages has a significant correlation with increased Appointment Rates and Recall Remedy rates when those videos are viewed by the recipients. In view of this, outreach mailers and emails continue to leverage this technology, especially in large-format, high-visibility mailings to maximize engagement rates. Additionally, these correspondences include very explicit instructions, including visual depictions, for how to scan the QR code to watch the video, to encourage recipients to do so thereby increasing the likelihood that they act.

Additionally, similar to the “personal agent” letters discussed in prior Reports, the Settlement Special Administrator and Outreach Program vendors are implementing the use of letters with handwritten notes from the Recall Team, remarking that the recipient has received several rounds of outreach but has not yet scheduled a Remedy Appointment, with a request that the recipient call the phone number provided to have the Remedy Appointment scheduled. Again,

this form of personalization and individualized assistance has proven highly effective in driving engagement and Recall Remedies.

Secondly, the Settlement Special Administrator and Outreach Program vendors are utilizing a New Year themed mailer, urging recipients to focus on safety-related items in their lives following the rush of the holiday season. These types of holiday-themed materials are helpful in continuing with outreach touches to owners of affected vehicles while also keeping the look and feel of the underlying materials fresh.

Next, the Settlement Special Administrator and Outreach Program vendors are planning a large-format, six-inch by nine-inch “zip strip” style mailer, with the Settlement Special Administrator seal across the backside of the envelope. This imprimatur lends authenticity and legitimacy, increasing the likelihood the recipient opens the envelope. The mailer itself is relatively straightforward and simple, including a diagram of what can happen when a Takata inflator ruptures, with language emphasizing the importance of the safety of the driver and passengers. Both the inside and flip side of the card include a QR code and instructions for how to schedule a Recall Remedy appointment.

Lastly, the Settlement Special Administrator and Outreach Program vendors are excited to roll out a “gift card” incentive letter program, whereby eligible owners can receive a gift card if they have the Recall Remedy performed on the associated vehicle within a provided timeframe. To maximize the likelihood of participation, this “gift card” letter will be sent in a shiny silver large format bubble envelope, increasing the chance of catching the recipient’s eye in the mailbox. In addition to the usual information about the Recall and instructions for how to schedule a Recall Remedy Appointment, the letter also provides information for how eligible owners can participate

in the gift card program after having the Remedy completed on their vehicles. These letters are scheduled to go out in December 2025, with follow up reminder letters and emails in January 2026.

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.² These efforts 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 mailed, similar letters have been mailed or are anticipated to be mailed in the coming months in Texas (its third mailing), New York (its sixth mailing), and Puerto Rico (its third mailing). The fact that several states have now re-engaged on this type of effort for even sixth mailings 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 24,617,896 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	7,154,623	37,613
Emails	3,887,350	1,510

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, Arizona.

Outbound Calls	3,277,393	44,498
Digital/Facebook Impressions	10,288,478	7 ³
Tagging ⁴	10,052	410

d. Overall Results

The Settlement Special Administrator and Outreach Program vendors have performed outreach resulting in a total of 85,124⁵ appointments and “warm transfers” to facilitate consumers to schedule appointments directly with dealers, and 85,912 Recall Remedies have been completed 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

³ Social media deployment on Facebook and other platforms is an extremely low-cost channel used primarily to keep 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 found, place recall notifications on those vehicles. As of January 1, 2025, these efforts were ceased as the specific sub-vendor used to implement tagging dropped this service. However, the Settlement Special Administrator and Outreach Program vendors continue to seek out other sub-vendors that may be able to provide the same or similar services in the future.

⁵ This figure slightly exceeds the aggregate sum of the Total Appointments by Channel in the chart above because some appointments are set through other means more difficult to directly quantify, such as the Outreach Program Landing Page.

⁶ Considering the significant efforts put forth towards indirect outreach methods such as mass media and public relations-type activities, Status Reports 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 Program’s call center to do so. As such, the total Recall Remedy completion count presented here 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 Program under the Settlement Agreement.

the last several years, these earned media strategies aided in raising affected vehicle 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 Program to date. If the Court finds more information helpful, the Settlement Special Administrator stands ready to provide it at the Court's convenience.

/s/ Patrick J. Hron
PATRICK J. HRON
Settlement Special Administrator

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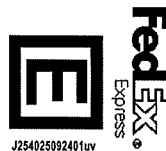
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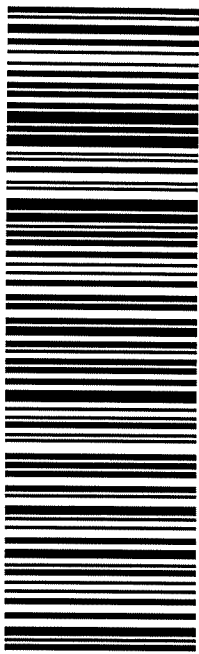
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