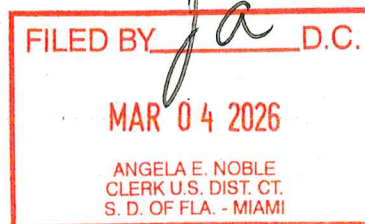


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

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. 32 FILED MARCH 2, 2026

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. The Program focuses on personalized, targeted direct campaigns across 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

¹ The data and information contained in this report is generally as of mid-Q1 2026.

efforts to ensure that 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 plan to send “audio mailers” to vehicle owners with unremedied vehicles. The “audio mailer” will be delivered in a white glossy-style envelope to stand out in the recipient’s mailbox, increasing the likelihood that it is opened. Inside the envelope will be a three-fold greeting-type card. When opened, the greeting card will play an audio message explaining to the recipient the urgency and importance of completing the Takata Recall Remedy. This unique and compelling format is aimed at increasing the probability of action in individuals who have neglected to have their vehicles repaired in the past.

Additionally, a revised round of outreach material emphasizing the severity of a Takata inflator rupture will be sent over the next quarter. These pieces will alert the recipient to the confirmed number of deaths attributed to Takata inflator ruptures. Other pieces will list the potential injuries that can be caused by such ruptures. This outreach is intended to ensure the

recipient knows and understands the risk to the driver and passengers of a vehicle that has not yet had the Recall Remedy performed. At the same time, the materials emphasize that these risks and dangers can be avoided by scheduling a Takata recall appointment.

In a similar vein, another set of outreach materials will be sent to individuals who own vehicles located in the Zone A states. As the Court is aware, due to the high heat and humidity of Zone A states, the risk of a Takata inflator rupture is increased, especially given the age of some of the vehicles with open Takata recalls. This outreach emphasizes those points to alert the recipient to the heightened danger specific to their vehicle's geographic location.

Also planned for the coming quarter, the Settlement Special Administrator and Outreach Program vendors will send a direct mail piece designed around the theme of personal responsibility and protection of loved ones. This piece, referred to as the "Protect Those" letter, is intended to appeal to recipients on an emotional level by reminding them that the safety of those who depend on them — family members, passengers, and others — is directly implicated by their failure to complete the Recall Remedy. The letter will be sent in a distinctive envelope marked "Time-Sensitive Information Enclosed" to encourage prompt opening, and will direct recipients to schedule their free repair by scanning a QR code or calling or texting their Recall ID.

Additionally, a direct mail postcard will be sent specifically to Volkswagen vehicle owners with unremedied vehicles. This postcard will feature a prominent QR code that, when scanned, directs the recipient to the VW Safety Recall website, along with the recipient's personalized Recall ID, to facilitate immediate scheduling of the Recall Remedy appointment. The postcard format is designed to be visually distinctive and require minimal effort from the recipient to take the next step toward repair.

Finally, a "handwritten" letter will be deployed as part of the forthcoming quarter's outreach rotation. This piece is designed to replicate the appearance and tone of a personal, handwritten communication from a member of the Volkswagen/Audi Customer Protection team, creating a sense of individual attention and direct personal appeal. The letter will be sent in a large-format envelope and will convey the urgency of the airbag safety recall in plain, conversational language. This format is intended to reach vehicle owners who may have become desensitized to more formal or institutional outreach materials, and to prompt action from individuals who have thus far failed to schedule their Recall Remedy appointment.

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). That several states have now participated in as many as six rounds of this outreach is encouraging, reflecting 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.

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

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	7,837,456	39,212
Emails	4,062,894	1,526
Outbound Calls	3,538,721	45,942
Digital/Facebook Impressions	11,106,240	25 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 88,293⁵ appointments and “warm transfers” to facilitate consumers to schedule appointments directly with dealers, and 88,686 Recall Remedies have been completed since the transition of outreach to the Settlement Special Administrator and Outreach Program vendors.⁶

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

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 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

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.

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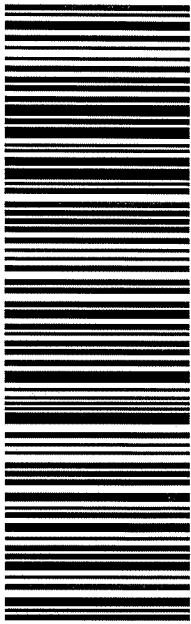
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