

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

**MDL No. 2599
Master File No.: 15-MD-02599-MORENO
S.D. Fla. Case No. 1:14-cv-24009-MORENO**

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

THIS DOCUMENT RELATES TO:

**ECONOMIC LOSS TRACK CASES
AGAINST VOLKSWAGEN GROUP OF
AMERICA, INC. AND AUDI OF AMERICA,
LLC**

PLAINTIFFS' NOTICE OF FILING
REVISED PROPOSED PRELIMINARY APPROVAL ORDER IN ADVANCE OF
PRELIMINARY APPROVAL HEARING

In advance of the hearing scheduled for November 9, 2021, on Plaintiffs' unopposed motion for preliminary approval of the class settlement with Volkswagen Group of America, Inc. and Audi of America, LLC (ECF No. 4105), Plaintiffs hereby submit a revised proposed preliminary approval order. The only differences between the prior orders that have been submitted and this proposed order are the dates of settlement-related deadlines. This revision to the proposed order moves the proposed deadlines back approximately six weeks, to provide additional and sufficient time for notice, opt outs, and objections.

Dated: November 8, 2021

Respectfully submitted,

PODHURST ORSECK, P.A.

/s/ Peter Prieto

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via CM/ECF and served on all counsel of record via electronic notices generated by CM/ECF on November 8, 2021.

By: /s/ Peter Prieto
Peter Prieto