

**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 connection with Plaintiffs' pending 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 initial order and the revised order are the proposed dates of settlement-related deadlines. The deadlines in the initial order contemplated the occurrence of preliminary approval in early September. The revised order moves the proposed dates back approximately six weeks, to provide additional and sufficient time for notice, opt outs, and objections. The Court, in its discretion, may rule on Plaintiffs' unopposed motion without a hearing, as Rule 23 only requires a hearing for final approval, not preliminary approval and authorization of notice.

Dated: September 30, 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 September 30, 2021.

By: /s/ Peter Prieto  
Peter Prieto