

# epiq precision

**With experience administering the largest automotive settlements, Epiq is uniquely situated to provide comprehensive notice, efficiently adjudicate claims and ensure a positive customer experience for vehicle owners.**

## What we offer

**Unmatched notice expertise.** Epiq's notice expert firm, Hilsoft Notifications, designs notice programs that satisfy due process requirements and withstand judicial scrutiny, uniquely blending both traditional media notice and innovative digital campaigns.

**Focus on the Claimant.** Claims adjudication, both simple and complex, is backed by the power of our software platform, ClaimsMatrix™. Our contact centers provide the support necessary to assist claimants and protect brand reputation.

**Close working relationship with IHS Markit (Polk).** We work closely with the automotive industry's marketing partner, IHS Markit, to coordinate with state DMV's for updated class member data.

## Representative cases

**In re: Takata Airbag Products Liability Litigation:** Massive individual notice mailing to over 40 million class members in two phases of settlements with Toyota, Mazda, Subaru, BMW, Honda and Nissan. Comprehensive nationwide media accompanied each phase, comprised of radio ads, consumer magazine ads and extensive online notice.

## How we deliver

**Plan.** Expert consultants partner with clients to develop a comprehensive project plan, define repeatable procedures and assemble a dedicated case team that meets project requirements.

**Execute.** As we implement your plan, you have immediate access to your dedicated Epiq team leader by phone or email and we are fully staffed to ensure that challenges are overcome and results are delivered as expected.

**Report.** We provide the highest level of efficient client service and transparency, and provide timely, accurate project reports. You will have access to all information 24/7/365.

**In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Product Liability Litigation (Bosch Settlement):** Comprehensive notice program within the Volkswagen Emissions Litigation that provided individual notice to more than 946,000 vehicle owners via first class mail and to more than 855,000 via email. A targeted internet campaign further enhanced the notice effort.

**People. Partnership. Performance.**

[epiqglobal.com](http://epiqglobal.com)

## Automotive Experience

## Representative cases con't

**Callaway v. Mercedes-Benz USA, LLC**

This matter involved allegations that the original-equipment seat heaters in Mercedes-Benz vehicles from model years 2000-2014 could potentially overheat causing damage. Epiq mailed to over 700,000 class members and has received and processed over 7,000 claims.

**Kia Motors America, Inc. Matter**

This matter involved reimbursement for a specific repair to 2003-2006 Kia Sorrento vehicles. Epiq mailed notice to approximately 527,000 potential claimants and received approximately 6,000 claim submissions. Epiq's website for this matter received over 7,000 visits.

**Toyota Prius Headlights Litigation Settlement**

In a nationwide class settlement relating to an alleged defect in certain Toyota vehicles, Epiq obtained the names and most current addresses of approximately 300,000 current and former vehicle owners and mailed over 300,000 notice and claim packets. Epiq also established a dedicated settlement website, handled over 4,000 class member calls, received and processed over 11,000 claims.

**Porsche Cars North America, Inc. Windshield Matter**

This matter involves reimbursement for out-of-pocket expenses incurred to lessen windshield glare in 2007-2012 Porsche vehicles. Epiq mailed notice to approximately 164,000 potential claimants and has received approximately 3,500 claims.

**Eisen v. Porsche Cars North America, Inc.**

Epiq was retained for this settlement stemming from an alleged consumer product defect in some Porsche Boxster and 911 vehicles manufactured by Porsche Cars North America, Inc. In this administration, Epiq mailed over 230,000 notices, handled over 3,400 class member calls, and processed over 3,300 claims. Epiq's settlement website for the case received over 3,000 visits.

**In re: Volkswagen Timing Chain Product Liability Litigation**

This settlement involved timing chain defects causing economic damages in various Volkswagon and Audi

vehicles. Epiq mailed to over 375,000 class members and received and processes over 15,000 claims.

**Falco, et al. v. Nissan North America Inc**

This settlement involved timing chain defects causing economic damages in various Nissan models from 2004-2009. Epiq mailed to over 550,000 class members and received and processes over 5,000 claims.

**In re: Porsche Cars North America, Inc. Products Liability Litigation**

Epiq was retained to administer this settlement relating to an alleged consumer product defect in some Porsche Cayenne vehicles manufactured by Porsche Cars North America, Inc. Epiq mailed over 160,000 notices, handled over 8,000 class member calls and processed over 8,000 claims. Epiq's settlement website for the case received over 17,000 visits.

**GM Brake Repair Litigation Settlement**

In administering this settlement involving owners or lessors of General Motors cars who may have suffered economic damage because of a potential defect in the caliper pins, Epiq disseminated millions of claim packets, evaluated the brake repair receipts for claims, and calculated eligible reimbursement distributions.

**Volvo**

Epiq managed the fulfillment of a recovery administration in a case involving all current and former owners of new and used vehicles of a particular model and year, each of which was equipped with a particular size tire. Eligible class members could select one of three recovery options: new tires, a certificate towards the purchase of a new vehicle, or a check. Epiq designed, implemented and coordinated the process that satisfied all of the entities involved, including Volvo headquarters, Volvo dealers, the tire manufacturer, tire dealers, and claimants, while still meeting the intent of the settlement. Epiq implemented regularly scheduled check distributions and certificate issuances, instituted reconciliation procedures with the tire manufacturer and the distributors, and successfully met counsel's expectations in a timely and efficient manner.