

# KING & SPALDING

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May 24, 2021

VIA PRIORITY MAIL

United States Attorney General  
and the Appropriate Officials  
Identified in Attachment A

**RE: CAFA Notice of Proposed Class Action Settlement**

Dear Attorney General or Appropriate State Official:

This Notice is being provided to you in accordance with the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715 on behalf of Defendant, American Honda Motor Co., Inc., in the below-referenced class action ("the Action"). Plaintiffs' Motion for Preliminary Approval of Class Action Settlement was filed with the Court on May 14, 2021. The preliminary approval hearing is currently scheduled for June 14, 2021, at 1:30 p.m. in the Courtroom of the Hon. Cormac J. Carney, located in Courtroom 9 B at the Ronald Reagan Federal Building and U.S. Courthouse, 411 West Fourth Street, Santa Ana, CA 92701.

**Case Name:** *Conti, et al. v. American Honda Motor Co., Inc.*

**Case Number:** 2:19-cv-02160-CJC-GJS

**Jurisdiction:** United States District Court for the Central District of California

**Date Settlement  
filed with Court:** May 14, 2021

Pursuant to 28 U.S.C. § 1715(b), the enclosed CD-ROM contains the following documents filed in the Action:

**01 –Second Amended Class Action Complaint.pdf**  
Filed November 14, 2019

**02 – Defendant American Honda Motor Co., Inc.'s Answer and Affirmative Defenses to  
Second Amended Complaint.pdf**  
Filed February 3, 2020

May 24, 2021

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**03 – Notice of Motion and Motion for Preliminary Approval of Class Settlement and Direction of Notice Under Fed. R. Civ. P. 23(e).pdf**

Filed May 14, 2021

**04 – Declaration of Sean R. Matt in Support of Plaintiffs' Motion for Preliminary Approval.pdf**

**04.01 - Exhibit 1 – Declaration** of Mediator Hon. Dickran M. Tevrizian (Ret.) in Support of Motion for Preliminary Approval of Class Settlement

**04.02 - Exhibit 2 – Class Action Settlement Agreement and Release**

**04.02a - Exhibit A – [Proposed]Preliminary Approval Order**

**04.02b - Exhibit B – Notices**

**04.02c - Exhibit C – Claim Form (service visit)**

**04.02d - Exhibit D – Claim Form**

**04.02f - Exhibit F – [Proposed] Final Approval Order and Judgment**

**05 – Class Action Settlement Agreement and Release.pdf**

Attached as Exhibit 1 to the Declaration of Sean Matt (above)

Additional case materials are available on the Court's docket, published electronically on PACER ([www.pacer.login.uscourts.gov](http://www.pacer.login.uscourts.gov)).

It is not possible to provide a breakdown of the Settlement Class in accordance with 28 U.S.C. § 1715 (b)(7) at this time. However, we anticipate that the Settlement Class is sufficiently numerous as to include Class Members potentially residing in all 50 U.S. states, as well as the District of Columbia, and may include Class Members residing in Puerto Rico and the U.S. territories.

There are no other settlements or agreements made between Counsel for the parties related to the class defined in the proposed settlement. As of the date of this Notice, no Final Judgment or notice of dismissal has been entered in this case. If you have any questions regarding the details of the case and settlement, please contact Defense Counsel's representative at:

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Sincerely,



Livia M. Kiser  
Partner

Enclosed: CD Rom