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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

MINERVA MARTINEZ, SANDRA
SCOTT, CARL GRAHAM, ANNE
PARYS, DAVID ORTIZ, SEAN
CHAMBERS and TIFFANY JAMES,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

NISSAN NORTH AMERICA, INC., and
NISSAN MOTOR CO., LTD.

Defendants.

Case No. 3:22-cv-00354

CLASS ACTION

**DECLARATION OF LANA COOPER RE:
NOTICE PROCEDURES**

1 I, LANA COOPER, declare and state as follows:

2
3 1. I am a Vice President with KCC Class Action Services, LLC (“KCC”), located in
4 San Rafael, California. Pursuant to the Preliminary Approval Order of Class Action Settlement (the
5 “Preliminary Approval Order”), dated August 17, 2022, the Court appointed KCC as the Claims
6 Administrator in connection with the proposed Settlement of the above-captioned Action.¹ I have
7 personal knowledge of the matters stated herein and, if called upon, could and would testify thereto.

8 **CAFA NOTIFICATION**

9 2. In compliance with the Class Action Fairness Act (“CAFA”), 28 U.S.C. Section
10 1715, and pursuant to Paragraph 68 of the Settlement Agreement, KCC compiled a CD-ROM
11 containing the following documents: Class Action Complaint, Nissan North America's Answer to
12 Class Action Complaint, Notice of Motion for Preliminary Approval of Class Action Settlement
13 with Nissan North America, Memo In Support of Motion, Weiner Declaration and Exhibits,
14 Settlement Agreement, Expedited Resolution Process, Claim Form, Long Form Notice, Summary
15 Notice, Proposed Preliminary Approval Order, Proposed Final Approval Order, Declarations of
16 Cisneros, Deutsch, Bennett, and Zohdy (4), Peak Declaration (Notice Plan), and the Order
17 transferring the Action (Case Transferred to Judge Eli Richardson), which accompanied a cover
18 letter (collectively, the “CAFA Notice Packet”). A copy of the cover letter is presented as Exhibit
19 A.

20 3. On August 10, 2022, KCC caused 58 CAFA Notice Packets to be mailed via Priority
21 Mail from the U.S. Post Office in Memphis, Tennessee to the parties listed in Exhibit B (i.e., the
22 U.S. Attorney General, the Attorneys General of individual states and the District of Columbia, and
23 the five recognized U.S. Territories, as well as parties of interest to this Action).

24 4. On November 29, 2022, KCC caused 58 supplemental CAFA Notice letters to be
25 mailed via Priority Mail from the U.S. Post Office in Memphis, Tennessee to the same parties listed

26 ¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the
27 Settlement Agreement, dated August 1, 2022 (the “Settlement Agreement”) and/or the Preliminary
28 Approval Order.

1 in paragraph three above. This supplemental letter contained an estimate of the number and
2 percentage of Class Members broken down by state. This information was not available at the time
3 of the initial CAFA mailing. A copy of this letter is presented as Exhibit C.

4 5. As of the date of this Declaration, KCC has received no response to the CAFA
5 Notice Packet from any of the recipients identified in paragraph three above.

6 **CLASS LIST**

7 6. On August 19, 2022, Defendant Nissan North America, Inc. (“NNA”) provided
8 KCC with Vehicle Identification Number (“VIN”) information for all Class Vehicles. Pursuant to
9 Paragraph 64 of the Settlement Agreement, using this VIN information provided by NNA, KCC
10 utilized the services of a third-party vendor, IHS Markit, formerly known as R.L. Polk (“IHS”), to
11 obtain mailing address data for the Settlement Class in preparation for mailing the Summary Notice
12 of the proposed settlement. A total of 2,003,819 records were returned by IHS.

13 7. KCC identified and removed 110 records from the Class Member List. These
14 records were removed as they were duplicative of other records on VIN, Name, and Address. A
15 total of 2,003,709 records remained on the Class Member List.

16 8. KCC withheld 49,540 records from the Notice Mailing but maintained them in the
17 Class Member List. Of these 49,540 records, 40,600 were withheld because the address listed was
18 that of a Nissan facility and 8,940 records had missing or incomplete address data. This left
19 1,954,169 records in the Class Member List to whom KCC would mail the Summary Notice of the
20 proposed settlement.

21 9. Next, IHS caused the addresses in the Class Member List to be updated using the
22 National Change of Address database (“NCOA”) maintained by the U.S. Postal Service (“USPS”).
23 A total of 176,917 addresses were updated. Upon receipt of the mailing address data for the
24 Settlement Class provided by IHS, KCC entered the updated Class Member List information into
25 its proprietary database and prepared a data file for the Summary Notice Mailing.

26 **MAILING OF THE SETTLEMENT NOTICE**

1 10. Pursuant to Paragraph 65 of the Settlement Agreement, on December 15, 2022, KCC
2 caused the Summary Notice to be printed and mailed to the 1,482,295 names and mailing addresses
3 in the Class List. A true and correct copy of the Summary Notice is attached hereto as Exhibit D.

4 11. Rather than sending numerous separate Summary Notices to fleet customers who
5 purchased or leased a number of Class Vehicles, KCC sent a single consolidated Fleet Notice to
6 each such Class Member, listing all of the VINs representing that Class Members' vehicles. On
7 December 15, 2022, KCC caused 950 Fleet Notices to be printed and mailed to these Class
8 Members, associated with the 471,874 VINs of their Class Vehicles and representing the 471,874
9 remaining records in the Class List. A true and correct copy of the Fleet Notice is attached hereto
10 as Exhibit E.

11 12. After mailing the Summary Notice and Fleet Notice to the Class Members, KCC
12 received 50,697 Summary Notices and Fleet Notices returned by the USPS with forwarding
13 addresses. KCC promptly caused 46,887 Summary Notices and Fleet Notices to be re-mailed to
14 the forwarding addresses supplied by the USPS. The remaining Summary Notices and Fleet Notices
15 were recently returned and as a result are currently in process of being re-mailed. As of the date of
16 this Declaration, none of these forwarded notices were returned as undeliverable.

17 13. After mailing the Summary Notices and Fleet Notices to the Class Members, KCC
18 received 78,068 Summary Notices and Fleet Notices returned by the USPS with undeliverable
19 addresses. Through credit bureau and/or other public source databases, KCC performed address
20 searches for these undeliverable Summary Notices and Fleet Notices and was able to find updated
21 addresses for 7,158 Class Members. KCC promptly re-mailed Summary Notices and Fleet Notices
22 to the found new addresses. As of the date of this Declaration, none of these re-mailed notices were
23 returned as undeliverable.

24 14. Accordingly, as of the date of this Declaration, KCC's records indicate that
25 1,879,449 of the 1,954,169 mailed Summary Notices and Fleet Notices were successfully mailed
26 to Class Members in accordance with the Court's Preliminary Approval Order approving the notice

1 program.

2 **SETTLEMENT WEBSITE**

3 15. Pursuant to Paragraph 67 of the Settlement Agreement, on December 15, 2022, KCC
4 established a website [www.AltimaSentraVersaCVTSettlement2022.com] dedicated to this
5 proposed settlement to provide information to the Class Members and to answer frequently asked
6 questions. The website URL was set forth in the Summary Notice, Fleet Notice, Long-Form
7 Notice, and Claim Form. Visitors to the website can download copies of the Long-Form Notice,
8 Claim Form, Settlement Agreement and other case-related documents. Visitors can also submit
9 claims online and upload supporting documentation. As of January 4, 2023, the website had
10 received 26,202 visits.

11 **TELEPHONE HOTLINE AND EMAIL ADDRESS**

12 16. KCC established and will continue to maintain, in accordance with Paragraph 67 of
13 the Settlement Agreement, a toll-free telephone number (1-844-591-0204) and an email address
14 (admin@AltimaSentraVersaCVTSettlement2022.com) for potential Class Members to contact the
15 Settlement Administrator to obtain information about the Settlement, and/or request a Long Form
16 Notice and Claim Form. The telephone hotline became operational on December 15, 2022, and is
17 accessible 24 hours a day, 7 days a week. As of January 4, 2023, KCC has received a total of
18 10,518 calls to the telephone hotline. As of January 4, 2023, KCC has also received a total of 141
19 emails to the email address.

20 **CLAIM FORMS**

21 17. The postmark deadline for Class Members to submit a claim for reimbursement for
22 a Qualifying Repair is March 15, 2023, or within thirty (30) days of the Qualifying Repair,
23 whichever is later. To date, KCC has received 2,099 timely-filed claim forms. KCC expects

1 additional timely-filed claims forms to arrive through the duration of the claims period. KCC has
2 not yet reviewed the claim forms and supporting information for validity.

3 **REPORT ON EXCLUSION REQUESTS RECEIVED TO DATE**

4 18. The Notice informs Class Members that any request for exclusion from the
5 Settlement Class must be postmarked no later than February 13, 2023. As of the date of this
6 Declaration, KCC has received 13 requests for exclusion. Of these, two (2) requests did not include
7 a signature and one (1) request reflects a VIN that is not a Class Vehicle included in the Class List.

8 **OBJECTIONS TO THE SETTLEMENT**

9
10 19. The receipt deadline for Class Members to object to the settlement is February 13,
11 2023. The Notice informs Class Members to file objections with the Court and mail a copy to the
12 Settlement Administrator. As of the date of this Declaration, KCC has received one (1) unsigned
13 purported objection to the settlement, which KCC promptly forwarded to Co-Lead Class Counsel.
14

15 I declare under penalty of perjury under the laws of the United States of America that the
16 foregoing is true and correct.

17 Executed on January 10, 2023 at San Rafael, California.

18 

19 _____
20 LANA COOPER

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he caused a copy of the foregoing to be served upon the following counsel of record by the Court's ECF system, this DECLARATION OF LANA COOPER RE: NOTICE PROCEDURES, on the 12th day of January, 2023.

John S. Hicks
**BAKER DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**
211 Commerce Street, Suite 800
Nashville, Tennessee 37201
jhicks@bakerdonelson.com

E. Paul Cauley, Jr.
S. Vance Wittie
**FAEGRE DRINKER BIDDLE &
REATH LLP**
1717 Main Street, Suite 5400
Dallas, Texas 75201
paul.cauley@faegredrinker.com
vance.wittie@faegredrinker.com

Bradley J. Andreozzi
320 S. Canal Street, Suite 3300
Chicago, Illinois 60606
bradley.andreozzi@faegredrinker.com

Attorneys for Defendant Nissan North America, Inc.

/s/ Gregory F. Coleman
Gregory F. Coleman

Exhibit A

August 10, 2022

VIA PRIORITY MAIL

«First» «Last»
«Company_1»
«Company_2»
«Address_1»
«Address_2»
«City», «State» «Zip»

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear «First» «Last»:

Faegre Drinker Biddle & Reath LLP represents Nissan North America, Inc. in a putative class action lawsuit entitled *Minerva Martinez, Sandra Scott, Carl Graham, Anne Parys, David Ortiz, Sean Chambers and Tiffany James, individually and on behalf of all others similarly situated v. Nissan North America, Inc.*, Case No. 3:22-cv-00354. The lawsuit is pending before the Honorable Eli J. Richardson in the United States District Court for the Middle District of Tennessee, Nashville Division.

Pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1715 *et seq.* (“CAFA”), this letter and the documents listed below (CD-ROM enclosed) constitute Notice of a Proposed Class Action Settlement by Defendant Nissan North America, Inc. (“Nissan”), through Nissan’s undersigned counsel in the above-referenced action. Nissan denies the allegations and claims asserted against it in the above-referenced action and denies any wrongdoing or liability whatsoever with regard to the lawsuit, but it has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation.

Case Name: *Minerva Martinez, et al. v. Nissan North America, Inc.*

Case Number: 3:22-cv-00354

Jurisdiction: United States District Court
Middle District of Tennessee, Nashville Division

**Date Settlement
Filed with Court:** August 1, 2022

In compliance with 28 U.S.C. § 1715(b), the following documents referenced below are included on the CD that is enclosed with this letter:

1. Class Action Complaint;
2. Answer to Class Action Complaint;
3. Plaintiffs' Notice of Motion and Motion for Preliminary Approval of the Class Action Settlement with Defendant Nissan North America, Inc. (the "Motion");
4. Plaintiffs' Memorandum of Law in Support of the Motion;
5. The Declarations filed in Support of the Motion, specifically:
 - a. Declaration of Melissa S. Weiner and the following Exhibits:
 - i. Settlement Agreement filed in the Action;
 1. Exhibit A to Settlement Agreement – Expedited Resolution Process;
 2. Exhibit B to Settlement Agreement – Claim Form;
 3. Exhibit C to Settlement Agreement – Long Form Notice;
 4. Exhibit D to Settlement Agreement – Summary Notice;
 5. Exhibit E to Settlement Agreement – Proposed Preliminary Approval Order;
 6. Exhibit F to Settlement Agreement – Proposed Final Approval Order and Judgment;
 - b. Declaration of Norberto J. Cisneros;
 - c. Declaration of Lawrence Deutsch;
 - d. Declaration of Natalie Finkelman Bennett;
 - e. Declaration of Tarek H. Zohdy;
 - f. Declaration of Carla Peak of KCC Class Action Services, LLC ("KCC"), the proposed settlement administrator.
6. Order transferring the Action to Judge Eli J. Richardson.

Please take note that the parties have filed the Settlement Agreement and exhibits thereto in the above-referenced action with the United States District Court for the Middle District of Tennessee (the "Court"). The Court has not issued any written orders regarding the proposed settlement as of the date of this letter, and there are no hearings scheduled at this time.


At this time, it is not feasible to provide the names of each class member who resides in each jurisdiction. Nissan and KCC are in the process of gathering information on this issue but will not have the information until the Settlement is preliminarily approved and they are able to obtain vehicle registration data from the various State motor vehicle departments. Accordingly,

August 10, 2022

pursuant to 28 U.S.C. § 1715(b)(7)(B), Nissan estimates that there are more than one million individuals who are members of the proposed class, based on the fact that the proposed settlement concerns past and present owners and lessees of some one million Class Vehicles, and believes that a significant number of proposed class members may reside in all 50 States, the District of Columbia, and territories and possessions of the United States. Accordingly, we are providing notice to the responsible officials of every State, territory, and possession.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Nissan can address any concerns or questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Paul Cauley, Jr.", with a stylized flourish at the end.

E. Paul Cauley, Jr.

Enclosure – CD ROM

Exhibit B

Last	First	Company 1	Address 1	Address 2	City	State	Zip
Garland	Merrick	Attorney General of the United States	United States Department of Justice	950 Pennsylvania Avenue, NW	Washington	DC	20530-0001
Taylor	Treg	Office of the Alaska Attorney General	1031 W. 4th Avenue, Suite 200		Anchorage	AK	99501-1994
Marshall	Steve	Office of the Alabama Attorney General	501 Washington Avenue	PO Box 300152	Montgomery	AL	36130-0152
Rutledge	Leslie	Arkansas Attorney General Office	323 Center Street, Suite 200		Little Rock	AR	72201-2610
Brnovich	Mark	Office of the Arizona Attorney General	2005 N. Central Avenue		Phoenix	AZ	85004
CAFA Coordinator		Office of the Attorney General	Consumer Law Section	455 Golden Gate Ave., Suite 11000	San Francisco	CA	94102
Weiser	Phil	Office of the Colorado Attorney General	Ralph L. Carr Colorado Judicial Center	1300 Broadway, 10th Floor	Denver	CO	80203
Tong	William	State of Connecticut Attorney General	165 Capitol Avenue		Hartford	CT	06106
Racine	Karl A.	District of Columbia Attorney General	400 6th St., NW		Washington	DC	20001
Jennings	Kathy	Delaware Attorney General	Carvel State Office Building	820 N. French Street	Wilmington	DE	19801
Moody	Ashley	Office of the Attorney General of Florida	The Capitol, PL-01		Tallahassee	FL	32399-1050
Carr	Chris	Office of the Georgia Attorney General	40 Capitol Square, SW		Atlanta	GA	30334-1300
Shikada	Holly T.	Office of the Hawaii Attorney General	425 Queen Street		Honolulu	HI	96813
Miller	Tom	Iowa Attorney General	Hoover State Office Building	1305 E. Walnut Street	Des Moines	IA	50319
Wasden	Lawrence	State of Idaho Attorney General's Office	700 W. Jefferson Street, Suite 210	P.O. Box 83720	Boise	ID	83720-1000
Raoul	Kwame	Illinois Attorney General	James R. Thompson Center	100 W. Randolph Street	Chicago	IL	60601
Rokita	Todd	Indiana Attorney General's Office	Indiana Government Center South	302 West Washington Street, 5th Floor	Indianapolis	IN	46204
Schmidt	Derek	Kansas Attorney General	120 S.W. 10th Ave., 2nd Floor		Topeka	KS	66612-1597
Cameron	Daniel	Office of the Kentucky Attorney General	700 Capitol Ave	Capitol Building, Suite 118	Frankfort	KY	40601
Landry	Jeff	Office of the Louisiana Attorney General	P.O. Box 94095		Baton Rouge	LA	70804-4095
Healey	Maura	Attorney General of Massachusetts	1 Ashburton Place	20th Floor	Boston	MA	02108-1698
Frosh	Brian	Office of the Maryland Attorney General	200 St. Paul Place		Baltimore	MD	21202-2202
Frey	Aaron	Office of the Maine Attorney General	State House Station 6		Augusta	ME	04333
Nessel	Dana	Office of the Michigan Attorney General	P.O. Box 30212	525 W. Ottawa Street	Lansing	MI	48909-0212
Keith Ellison	Attorney General	Attention: CAFA Coordinator	445 Minnesota Street	Suite 1400	St. Paul	MN	55101-2131
Schmitt	Eric	Missouri Attorney General's Office	Supreme Court Building	207 W. High Street	Jefferson City	MO	65101
Fitch	Lynn	Mississippi Attorney General's Office	Department of Justice	P.O. Box 220	Jackson	MS	39205
Knudsen	Austin	Office of the Montana Attorney General	Justice Bldg.	215 N. Sanders Street	Helena	MT	59620-1401
Stein	Josh	North Carolina Attorney General	Department of Justice	P.O. Box 629	Raleigh	NC	27602-0629
Peterson	Doug	Office of the Nebraska Attorney General	2115 State Capitol	P.O. Box 98920	Lincoln	NE	68509-8920
Ford	Aaron	Nevada Attorney General	Old Supreme Ct. Bldg.	100 North Carson St.	Carson City	NV	89701
Formella	John	New Hampshire Attorney General	Hew Hampshire Department of Justice	33 Capitol St.	Concord	NH	03301-6397
Platkin	Matthew J.	Office of the New Jersey Attorney General	Richard J. Hughes Justice Complex	25 Market St., P.O. Box 080	Trenton	NJ	08625-0080
Balderas	Hector	Office of the New Mexico Attorney General	P.O. Drawer 1508		Santa Fe	NM	87504-1508
James	Letitia	Office of the New York Attorney General	Dept. of Law - The Capitol	2nd Floor	Albany	NY	12224-0341
Wrigley	Drew H.	North Dakota Office of the Attorney General	State Capitol	600 E. Boulevard Ave., Dept. 125	Bismarck	ND	58505-0040
Yost	Dave	Ohio Attorney General	Rhodes State Office Tower	30 E. Broad St., 14th Flr.	Columbus	OH	43215
O'Connor	John	Oklahoma Office of the Attorney General	313 NE 21st St.		Oklahoma City	OK	73105
Rosenblum	Ellen F.	Office of the Oregon Attorney General	Justice Building	1162 Court St., NE	Salem	OR	97301-4096
Shapiro	Josh	Pennsylvania Office of the Attorney General	16th Flr., Strawberry Square		Harrisburg	PA	17120
Neronha	Peter	Rhode Island Office of the Attorney General	150 South Main St.		Providence	RI	02903
Wilson	Alan	South Carolina Attorney General	Rembert C. Dennis Office Bldg.	P.O. Box 11549	Columbia	SC	29211
Vargo	Mark	South Dakota Office of the Attorney General	1302 East Highway 14, Suite 1		Pierre	SD	57501-8501
Slatery, III	Herbert H.	Tennessee Attorney General and Reporter	P.O. Box 20207		Nashville	TN	37202-0207
Paxton	Ken	Attorney General of Texas	Capitol Station	P.O. Box 12548	Austin	TX	78711-2548
Reyes	Sean	Utah Office of the Attorney General	P.O. Box 142320		Salt Lake City	UT	84114-2320
Young	Susanne	Office of the Attorney General of Vermont	109 State St.		Montpelier	VT	05609-1001
Miyares	Jason	Office of the Virginia Attorney General	202 North Ninth St.		Richmond	VA	23219
Ferguson	Bob	Washington State Attorney General	1125 Washington St. SE	P.O. Box 40100	Olympia	WA	98504-0100
Morrissey	Patrick	West Virginia Attorney General	State Capitol Complex, Bldg. 1, Rm. E-26	1900 Kanawha Blvd. E.	Charleston	WV	25305
Kaul	Josh	Office of the Wisconsin Attorney General	Dept. of Justice, State Capitol	Rm. 114 East, P.O. Box 7857	Madison	WI	53707-7857
Hill	Bridget	Office of the Wyoming Attorney General	109 State Capitol		Cheyenne	WY	82002
Ala'ilima-Utu	Fainu'ulelei Falefatu	American Samoa Gov't	Dept. of Legal Affairs, c/o Attorney General	P.O. Box 7	Utulei	AS	96799
Camacho	Leevin T.	Office of the Attorney General, ITC Building	590 S. Marine Corps Dr.	Suite 901	Tamuning	Guam	96913
Manibusan	Edward	Northern Mariana Islands Attorney General	Administration Building	P.O. Box 10007	Saipan	MP	96950-8907
Hernández	Domingo Emanuelli	Puerto Rico Attorney General	Torre Chardón, Suite 1201	350 Carlos Chardón Ave.	San Juan	PR	00918
George	Denise N.	Virgin Islands Atty. General, DOJ	3438 Kronprindsens Gade	GERS Complex, 2nd Floor	St. Thomas	VI	00802
Cauley, Jr.	E. Paul	Faegre Drinker Biddle & Reath LLP	1717 Main Street	Suite 5400	Dallas	TX	75201

Exhibit C

November 29, 2022

Via US PRIORITY MAIL

«First» «Last»
«Company_1»
«Company_2»
«Address_1»
«Address_2»
«City», «State» «Zip»

The Attorneys General Identified in the Attached Exhibit A

Re: *Supplemental Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715*

Dear «First» «Last» and Attorneys General:

This letter supplements prior correspondence dated August 10, 2022 previously sent to you with respect to a putative class action lawsuit entitled *Minerva Martinez, Sandra Scott, Carl Graham, Anne Parys, David Ortiz, Sean Chambers and Tiffany James, individually and on behalf of all others similarly situated v. Nissan North America, Inc.*, Case No. 3:22-cv-00354. The lawsuit is pending before the Honorable Eli J. Richardson in the United States District Court for the Middle District of Tennessee, Nashville Division.

At the time the original notice was sent, it was not feasible to provide an estimate of the number of potential class members residing in each state but, pursuant to 28 U.S.C. § 1715(b)(7)(B), Defendant estimated, based on the number of class vehicles, that there were more than one million individuals who are members of the proposed class and believed that proposed class members reside in all 50 States, the District of Columbia, and territories and possessions of the United States. Now that the Settlement Administrator has obtained vehicle registration information in order to mail class notices, we are able to better estimate the numbers of potential class members in each state. Accordingly, we are providing this supplemental notice to you. Please see the attached Exhibit 1.

Sincerely,



E. Paul Cauley, Jr.

Exhibit 1

Minerva Martinez et al. v. Nissan North America, Inc.

(3:22-cv-00354)

U.S.D.C. – Middle District of Tennessee, Nashville Division

2017-2018 Nissan Altima, 2018-2019 Nissan Sentra, 2018-2019 Nissan Versa and
2018-2019 Nissan Versa Note (1,959666 Notices)

State/Region	Percentage of Class Notices
AA	0.00025%
AE	0.00571%
AK	0.06902%
AL	2.01593%
AP	0.00275%
AR	0.93118%
AZ	3.83794%
CA	10.17885%
CO	1.07050%
CT	0.77021%
DC	0.17875%
DE	0.30100%
FL	8.06394%
GA	4.37179%
GU	0.00036%
HI	0.70174%
IA	0.51974%
ID	0.19072%
IL	3.50327%
IN	1.09958%
KS	0.56461%
KY	1.01120%
LA	2.00615%
MA	1.08878%
MD	2.06356%
ME	0.21430%
MI	0.80011%
MN	0.70230%
MO	1.60867%
MP	0.00005%
MS	1.47404%
MT	0.12261%
NC	3.11516%
ND	0.05812%

NE	0.38363%
NH	0.31150%
NJ	2.99657%
NM	0.64301%
NV	0.98324%
NY	3.54173%
OH	3.23945%
OK	9.44267%
OR	0.67846%
PA	3.09091%
PR	0.67296%
RI	0.16912%
SC	1.77596%
SD	0.10784%
TN	3.27720%
TX	10.75269%
UT	0.66344%
VA	2.40369%
VI	0.00020%
VT	0.08767%
WA	0.92511%
WI	0.72293%
WV	0.26188%
WY	0.04982%
TOTAL	100%

Exhibit D

LEGAL NOTICE

A Federal Court authorized this Notice.

Attention current or former owners or lessees of 2017- 2018 Nissan Altima and 2018-2019 Nissan Sentra, Versa, and Versa Note vehicles equipped with a Continuously Variable Transmission (“CVT”).

Under a proposed class action settlement, Nissan will extend the warranty on your CVT. You could also be eligible for reimbursement for prior CVT repairs or replacements under the extended warranty. Claims for reimbursement are subject to strict time limits.

This Notice is a summary only. Please read this Notice and then visit the settlement website or call the number below for further important information about the Settlement.

1-844-591-0204

or

www.AltimaSentraVersaCVTSettlement2022.com

NAM

Nissan CVT Litigation Settlement Administrator
P.O. Box 6150
Novato, CA 94948-6150



Postal Service: Please Do Not Mark Barcode

CLAIM#: NAM-«CLAIMID» - «MAILREC»
«FIRST1» «LAST1»
«CO»
«ADDR2»
«ADDR1»
«CITY», «ST» «ZIP»
«COUNTRY»

What is this? You have been sent this Notice because records indicate that you purchased or leased a 2017-2018 Nissan Altima or 2018-2019 Nissan Sentra, Versa, or Versa Note vehicle equipped with a “CVT” or Continuously Variable Transmission (the “**Class Vehicles**”). A Settlement has been proposed in a class action lawsuit against Nissan North America, Inc. (“**NNA**”) regarding the CVT in the Class Vehicles.

What is this lawsuit about? Plaintiffs allege that the Class Vehicles have a defective CVT which can lead to poor transmission performance or failure. NNA denies Plaintiffs’ claims, and believes the litigation is without merit. The Settlement is not an admission by either side. The Court did not rule in favor of either party. Instead, the parties agreed to a proposed Settlement to avoid the expense and risks of litigation. The Settlement is subject to final approval by the Court.

Am I a Member of the Class? The proposed Settlement Class consists of those who purchased or leased **Class Vehicles** in the U.S. or its Territories.

What does the Settlement Provide?

- **Warranty Extension:** An extension by 24 months or 24,000 miles (whichever occurs first) of the New Vehicle Limited Warranty on your vehicle’s transmission. As part of the Warranty Extension, you may also be eligible for reimbursement of:
 - **Repairs Made Within the Extended Warranty Period:** Reimbursement for parts and labor you paid to repair or replace your vehicle’s transmission (within the time and mileage limits of the Warranty Extension), (limited to \$5,000 for work done at non-Nissan repair shops). You must submit a Claim Form by March 15, 2023 or within 30 days of the qualifying repair, whichever is later.
 - **Dealer Recommended Repairs:** If a Nissan dealer previously recommended repair or replacement of your vehicle’s transmission and/or Automatic Transmission Control Unit (“ATCU”) within the time and mileage limits of the Warranty Extension, but your car was not repaired at that time, you may still be reimbursed so long as you had, or have, the recommended repair made no later than March 15, 2023 or prior to 90,000 miles, whichever occurs first. You must submit a Claim Form by March 15, 2023 or within 30 days of the qualifying repair, whichever is later.
- **Vouchers for Certain Current and Former Owners:** If you are a current or former owner of a Class Vehicle, you may receive a Voucher of \$1,000 towards the purchase or lease of a new Nissan or Infiniti vehicle, if you qualify. If you are also eligible for reimbursement of repair costs, you may elect either reimbursement or a Voucher, but not both.
- **Release for Nissan:** Class Members will release all transmission-related claims against NNA and related parties, as explained more fully in the Long Form Notice and Settlement Agreement.

Class Counsel will ask the Court to award up to \$3,500,000 in attorneys’ fees and expenses, and a service award of \$5,000 for each Class Representative. The Court will decide whether to approve the Settlement at the **Fairness Hearing on March 20, 2023 at 1:00 p.m.** You have the right to attend the Fairness Hearing, or you may appear through an attorney of your choice.

What Are My Options?

1. **Do Nothing:** You will be in the Settlement Class, and you will automatically receive the Warranty Extension. If you are eligible for a Voucher, you will be notified. You will also be bound by the Settlement Agreement and any judgment in the case.
2. **Submit a Claim Form:** If you submit a Claim Form and otherwise qualify, you will also be reimbursed for qualifying transmission/ATCU replacements or repairs made to your Class Vehicle.
3. **Object to the Settlement:** You can file a written objection explaining what you do not like about the Settlement. The objection must be filed with the Court, and copies mailed to the Settlement Administrator, by **February 13, 2023**. Further details are contained on the settlement website.
4. **Exclude Yourself from the Settlement:** You can opt out of the Settlement. You will no longer be a member of the Class and will receive no benefits under the Settlement but will retain any claims you may have against NNA. Your request must be postmarked by **February 13, 2023**. Further details for requesting exclusion are contained on the settlement website.

This Notice summarizes the Settlement. For important additional information including the full Long Form Notice, the Settlement Agreement and Claim Form, go to www.AltimaSentraVersaCVTSettlement2022.com or call 1-844-591-0204.

Exhibit E

NAM

«Barcode»

Postal Service: Please do not mark barcode

CLAIM#: NAM-«CLAIMID» - «MAILREC»
«FIRST1» «LAST1»
«CO»
«ADDR2»«ADDR1»
«CITY», «ST» «ZIP»
«COUNTRY»

LEGAL NOTICE

A Federal Court authorized this Notice.

Attention current or former owners or lessees of 2017-2018 Nissan Altima and 2018-2019 Nissan Sentra, Versa, and Versa Note vehicles equipped with a Continuously Variable Transmission (“CVT”).

Under a proposed class action settlement, Nissan will extend the warranty on your CVT. You could also be eligible for reimbursement for prior CVT repairs or replacements under the extended warranty. Claims for reimbursement are subject to strict time limits.

This Notice is a summary only. Please read this Notice and then visit the settlement website or call the number below for further important information about the Settlement.

1-844-591-0204 or www.AltimaSentraVersaCVTSettlement2022.com

What is this? You have been sent this Notice because records indicate that you purchased or leased a 2017-2018 Nissan Altima or 2018-2019 Nissan Sentra, Versa, or Versa Note vehicle equipped with a “CVT” or Continuously Variable Transmission (the “**Class Vehicles**”). A Settlement has been proposed in a class action lawsuit against Nissan North America, Inc. (“NNA”) regarding the CVT in the Class Vehicles.

What is this lawsuit about? Plaintiffs allege that the Class Vehicles have a defective CVT which can lead to poor transmission performance or failure. NNA denies Plaintiffs’ claims, and believes the litigation is without merit. The Settlement is not an admission by either side. The Court did not rule in favor of either party. Instead, the parties agreed to a proposed Settlement to avoid the expense and risks of litigation. The Settlement is subject to final approval by the Court.

Am I a Member of the Class? The proposed Settlement Class consists of those who purchased or leased **Class Vehicles** in the U.S. or its Territories.

What does the Settlement Provide?

- **Warranty Extension:** An extension by 24 months or 24,000 miles (whichever occurs first) of the New Vehicle Limited Warranty on your vehicle’s transmission. As part of the Warranty Extension, you may also be eligible for reimbursement of:
 - **Repairs Made Within the Extended Warranty Period:** Reimbursement for parts and labor you paid to repair or replace your vehicle’s transmission (within the time and mileage limits of the Warranty Extension), (limited to \$5,000 for work done at non-Nissan repair shops). You must submit a Claim Form by March 15, 2023 or within 30 days of the qualifying repair, whichever is later.
 - **Dealer Recommended Repairs:** If a Nissan dealer previously recommended repair or replacement of your vehicle’s transmission and/or Automatic Transmission Control Unit (“ATCU”) within the time and mileage limits of the Warranty Extension, but your car was not repaired at that time, you may still be reimbursed so long as you had, or have, the recommended repair made no later than March 15, 2023 or prior to 90,000 miles, whichever occurs first. You must submit a Claim Form by March 15, 2023 or within 30 days of the qualifying repair, whichever is later.
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Class Counsel will ask the Court to award up to \$3,500,000 in attorneys' fees and expenses, and a service award of \$5,000 for each Class Representative.

The Court will decide whether to approve the Settlement at the **Fairness Hearing on March 20, 2023 at 1:00 p.m.** You have the right to attend the Fairness Hearing, or you may appear through an attorney of your choice.

What Are My Options?

1. **Do Nothing:** You will be in the Settlement Class, and you will automatically receive the Warranty Extension. If you are eligible for a Voucher, you will be notified. You will also be bound by the Settlement Agreement and any judgment in the case.
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This Notice summarizes the Settlement. For important additional information including the full Long Form Notice, the Settlement Agreement and Claim Form, go to www.AltimaSentraVersaCVTSettlement2022.com or call 1-844-591-0204.

You have been identified as a Class Member with multiple Vehicle Identification Numbers (“VINs”). Below is a list of your personal VINs.

Claim ID <<ClaimID>>

Your VINs are:

<<VIN1>>

<<VIN2>>

<<VIN3>>

<<VIN4>>

<<VIN5>>

<<VIN6>>

<<VIN7>>

<<VIN8>>

<<VIN9>>

<<VIN10>>