

**Bosch Settlement in the Volkswagen “Clean Diesel”
Marketing, Sales Practices, & Products Liability Litigation**



Bosch Settlement in the Volkswagen “Clean Diesel” Marketing, Sales Practices, & Products Liability Litigation

A federal court authorized this Notice. This is not a solicitation from a lawyer.

Robert Bosch GmbH and Robert Bosch LLC (“Bosch”) have reached a settlement (the “Bosch Settlement”) with counsel for the consumer class related to allegations that defeat device software was installed to bypass emissions standards in certain 2.0-liter and 3.0-liter diesel vehicles manufactured by Volkswagen, Audi and Porsche. The Bosch Settlement is part of a lawsuit called *In re Volkswagen “Clean Diesel” Marketing, Sales Practices, and Products Liability Litigation*, Case No. 3:15-md-02672-CRB (“MDL 2672”), in the United States District Court for the Northern District of California. The lawsuit is sometimes referred to as the “Clean Diesel Cases.” Claims against the Volkswagen, Audi and Porsche defendants also have recently settled (the “2.0-liter Class Action Settlement” and “3.0-liter Class Action Settlement,” together the “VW Settlements”).

The Bosch Settlement is in addition to the VW Settlements. The Bosch Settlement provides additional compensation to vehicle owners, former owners, lessees and former lessees, including reseller dealers, (“VW Class Members”) who filed or will file approved claims in the VW Settlements. The Bosch Settlement also provides the opportunity for compensation to VW Class Members who opted out of or who are otherwise not participating in the VW Settlements.

Again, this notice is for a settlement separate from and in addition to the VW Settlements. Regardless of whether you are participating in the VW Settlements, you may be entitled to compensation and have additional rights that you need to consider under the Bosch Settlement.

The following diesel engine vehicles (“Eligible Vehicles”) are included in the Bosch Settlement:

2.0-liter Class Vehicles	
Model	Model Years
Volkswagen Jetta	2009-2015
Volkswagen Jetta SportWagen	2009-2014
Volkswagen Beetle	2013-2015
Volkswagen Beetle Convertible	2013-2015
Audi A3	2010-2013; 2015
Volkswagen Golf	2010-2015
Volkswagen Golf SportWagen	2015
Volkswagen Passat	2012-2015

3.0-liter Class Vehicles	
Model	Model Years
Volkswagen Touareg	2009-2016
Audi Q7	2009-2015
Audi A6	2014-2016
Audi A7	2014-2016
Audi A8, A8L	2014-2016
Audi Q5	2014-2016
Porsche Cayenne Diesel	2013-2016

YOUR LEGAL RIGHTS UNDER THE BOSCH SETTLEMENT ARE AFFECTED EVEN IF YOU DO NOTHING.

PLEASE READ THIS NOTICE CAREFULLY. QUESTIONS?

Go to www.BoschVWSettlement.com or call 1 (844) 305-1928

You are eligible to participate in the Bosch Settlement if you are a class member in either or both of the VW Settlements—for more details, see Question 3 below. If you don't want to receive compensation through the Bosch Settlement, the date by which you must exclude yourself (opt out of) the Bosch Settlement is **April 14, 2017**.

Summary of the Bosch Class Action Settlement

Bosch will pay \$327.5 million to resolve all claims of consumers and reseller dealers that are pending in the Clean Diesel Cases. The lawyers representing the class ("Class Counsel") will seek attorneys' fees of a maximum of 16% of the Bosch Settlement fund plus expenses, but the Court must approve any fees and expenses before they are paid.

Class members in the VW Settlements whose claims in those settlements are approved and who do not exclude themselves from this Bosch Settlement will automatically receive a cash payment, as described in this Notice, via a check in the mail.

For more information about the VW Settlements, including whether or not you can participate, please go to www.VWCourtSettlement.com. For more information about this Bosch Settlement visit www.BoschVWSettlement.com.


Those who did not, and do not in the future, file a claim in either of the VW Settlements, including anyone who opted out of either or both of the VW Settlements, must file a separate claim form to receive a payment from this Bosch Settlement. The deadline for class members who opted out of the VW Settlements to file a Bosch Settlement claim form is **August 15, 2017**. Eligible Sellers who missed the Identification Deadline in the 2.0-liter Settlement, and Eligible Former Owners who do not file a claim in the 3.0-liter Settlement, have until **May 1, 2017** to file a Bosch Settlement claim form. The deadline for Eligible Owners and Lessees who did not opt out of the VW Settlements, but also do not file a claim in the VW Settlements, to file a Bosch Settlement claim form is **December 31, 2019**.

The Federal Trade Commission ("FTC") is an independent government agency whose mission is to prevent business practices that are anticompetitive, or deceptive or unfair to consumers. Acting as an independent third party to the litigation between Class Counsel and Bosch, the Commission's counsel met with Bosch and directed an allocation of the Bosch Settlement fund among members of the Bosch Settlement Class that Commission counsel would recommend that the Commission accept. The FTC required that the parties accept its allocation, so the Settlement depended upon the parties accepting the FTC's determination. Bosch tendered a final offer consistent with this allocation and Class Counsel accepted that allocation:


- Persons eligible to participate in the 2.0-liter Class Action Settlement will receive a total of \$163,267,450, to be shared among 2.0-liter Class Members as set forth below.
- Persons eligible to participate in the 3.0-liter Class Action Settlement will receive a total of \$113,264,400, to be shared among 3.0-liter Class Members as set forth below.

Class members who want to opt out of the Bosch Settlement will have until **April 14, 2017** to do so.

This notice is only a summary of the Bosch Settlement. The full details of the Bosch Settlement are available online at www.BoschVWSettlement.com.



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BASIC INFORMATION

1. What options do I have?



Your Legal Rights And Options In The Bosch Settlement	
Participate	<p>If you filed in the past or file in the future an approved claim in either of the VW Settlements and you do not exclude yourself from the Bosch Settlement, you will automatically receive a cash payment if the Bosch Settlement receives final approval. You will also give up your right to ever be part of any other lawsuit against the Bosch Defendants about the claims being resolved in the Bosch Settlement.</p> <p>If you were an Eligible Seller in the 2.0-liter Class Action Settlement but you missed the Eligible Seller Identification Deadline, or are an Eligible Former Owner who does not file a timely claim in the 3.0-liter Class Action Settlement, you must file a claim in the Bosch Settlement no later than May 1, 2017 to participate. Eligible Sellers whose claims were timely and approved in the 2.0-liter Class Action Settlement and Eligible Former Owners whose claims are approved in the future in the 3.0-liter Class Action Settlement will automatically receive cash payments from the Bosch Settlement.</p> <p>If you exclude yourself from either of the VW Settlements, you may still participate in the Bosch Settlement, but you must file a claim by August 15, 2017 to do so.</p>
Request Exclusion	<p>Get no payment from the Bosch Settlement fund. This is the only option that allows you to sue the Bosch Defendants separately over the claims being resolved by this settlement. The deadline for this is April 14, 2017.</p>
File a Claim	<p>If you do not file an approved Claim in the VW Settlements that applies to your vehicle, or if you request exclusion from the applicable VW Settlements, you will not receive an automatic payment from the Bosch Settlement for that vehicle. If this describes you, you must file a claim form in the Bosch Settlement to participate in the Bosch Settlement and to receive a payment.</p>
Object	<p>Comment on or object to the Bosch Settlement, without excluding yourself.</p>
Go to a Hearing	<p>Ask to speak in Court about the fairness of the Bosch Settlement.</p>

2. If I don't request exclusion, when will I receive my payment?



The earliest possible time payments can begin is shortly after May 11, 2017. The Final Approval Hearing is currently set for May 11, 2017 (see Question 35 below), but it could be re-scheduled. It is a good idea to check the website to see when the Final Approval Hearing will be held. If the Court grants final approval of the Bosch Settlement, payments will begin shortly after the Court issues its order.

CLASS MEMBERSHIP QUESTIONS

3. Am I included in the Bosch Settlement?



The Bosch Settlement Class includes all Class Members in the VW Settlements (both the 2.0-liter and 3.0-liter Settlement Classes):

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2.0-liter Settlement Class: All persons (including individuals and entities) who:

- On September 18, 2015, were registered owners or lessees of, or, in the case of Non-Volkswagen Dealers, held title to or held by bill of sale dated on or before September 18, 2015, an Eligible Vehicle in the United States or its territories; or
- Between September 18, 2015, and December 30, 2018, become a registered owner of, or, in the case of Non-Volkswagen Dealers, hold title to or hold by bill of sale dated after September 18, 2015, but before the end of the Claims Period, an Eligible Vehicle in the United States or its territories.

3.0-liter Settlement Class: All persons (including individuals and entities) who:

- Owned or leased an Eligible Vehicle in the United States or its territories at any time between September 18, 2015, and November 2, 2015, inclusive; or
- Become the owner of a Generation One Eligible Vehicle in the United States or its territories between November 3, 2015, and June 1, 2019; or
- Become the owner of a Generation Two Eligible Vehicle in the United States or its territories between November 3, 2015, and December 31, 2019; or
- Own an Eligible Vehicle in the United States or its territories at the time of participation in the 3.0-liter Class Action Settlement Program.

4. Is anyone excluded from the Bosch Settlement?



The following entities and individuals are **excluded** from the class:

- Owners who acquired a 2.0-liter Eligible Vehicle after September 18, 2015, and transferred title before participating in the VW Settlement Program;
- Owners who sell or otherwise transfer ownership of their 2.0-liter Eligible Vehicle between June 28, 2016, and September 16, 2016 (the “Opt-Out Deadline”), inclusive of those dates;
- Owners whose 2.0-liter vehicle (i) could not be driven under the power of its own 2.0-liter TDI engine on June 28, 2016, or (ii) had a Branded Title of Assembled, Dismantled, Flood, Junk, Rebuilt, Reconstructed, or Salvage on September 18, 2015, and was acquired from a junkyard or salvage yard after September 18, 2015;
- Owners who acquired a 3.0-liter Eligible Vehicle after November 2, 2015, and transferred title on or before January 31, 2017;
- Owners whose 3.0-liter vehicle had a Branded Title of Assembled, Dismantled, Flood, Junk, Rebuilt, Reconstructed, or Salvage on September 18, 2015, and was acquired from a junkyard, salvage yard, or salvage dealer after September 18, 2015;
- Owners who sell or otherwise transfer ownership of their 3.0-liter Eligible Vehicle after January 31, 2017, but on or before the Opt-Out Deadline, unless the Eligible Vehicle is (i) unintentionally damaged after January 31, 2017, in a manner that renders it a total loss (i.e., “totaled”) and (ii) transferred to an insurance company or otherwise permanently removed from commerce;
- Lessees of any vehicle that is leased from a leasing company other than VW Credit, Inc. or Porsche Financial Services;
- Bosch’s officers, directors, and employees; and Bosch’s affiliates and affiliates’ officers, directors, and employees;
- Volkswagen, Porsche and Audi officers, directors, and employees; and Volkswagen’s, Porsche’s and Audi’s affiliates and affiliates’ officers, directors, and employees;
- Any Volkswagen, Porsche or Audi franchise Dealers;
- Judicial officers and their immediate family members and associated court staff assigned to this case; and

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- All those otherwise in the Class who or which timely and properly exclude themselves from the Class as provided in this Class Action Settlement Agreement.

5. What are the “Clean Diesel” cases about?

On September 18, 2015, the Environmental Protection Agency (“EPA”) and the California Air Resources Board (“CARB”) issued a notice of violation to Volkswagen and Audi relating to the 2.0-liter Eligible Vehicles sold under the Volkswagen and Audi brands in the United States since 2008. On November 2, 2015, the EPA and CARB issued a notice of violation to Volkswagen, Audi and Porsche relating to the 3.0-liter Eligible Vehicles in the United States sold under Volkswagen, Audi and Porsche brands.

The class action alleges that Volkswagen, Audi and Porsche hired Bosch to program the computers in Eligible Vehicles to detect when the cars were undergoing official emissions testing. The class action alleges the cars turned on their full emissions control systems only during testing, but that they were not turned on during normal road use, which caused the cars to emit significantly more pollutants than permitted, in violation of U.S. and state clean air laws.

The United States on behalf of the EPA, the State of California by and through CARB and the Attorney General of California, the FTC, and attorneys who represent owners and lessees of Volkswagen, Audi and Porsche vehicles, filed lawsuits against various Volkswagen entities. The lawsuits filed by DOJ/EPA and CARB assert that Volkswagen, Audi and Porsche violated the Clean Air Act and the California Health and Safety Code, and the lawsuits filed by Plaintiffs and the FTC assert that Volkswagen and others intentionally misled consumers about the qualities and characteristics of the diesel engine vehicles sold under the Volkswagen and Audi brands. The government entities did not sue Bosch, but the private Plaintiffs did. The Bosch Settlement resolves the claims the private Plaintiffs brought against Bosch.

6. I filed an approved claim in the 2.0-liter Class Action Settlement, the 3.0-liter Class Action Settlement, or in both Settlements. Am I a Class Member here?

Yes, the Bosch Settlement includes those whose claims are approved in the VW Settlements. If you filed (or will file) a claim in one or both of those settlements and the claim is approved, you are a Class Member here and will be eligible for an automatic payment if you do not opt out of the Bosch Settlement. Remember, if you filed an approved claim in either the 2.0-liter or 3.0-liter settlements, you will get an automatic payment in the Bosch Settlement. You do not have to file a claim.

7. What if I timely registered as an Eligible Seller in the 2.0-liter Class Action Settlement or an Eligible Former Owner in the 3.0-liter Class Action Settlement? Am I a Class Member here?

Yes, the Bosch Settlement includes those who timely registered and were verified as an Eligible Seller in the 2.0-liter Class Action Settlement or an Eligible Former Owner in the 3.0-liter Class Action Settlement. If you registered and were or will be verified as an Eligible Seller in the 2.0-liter Settlement or an Eligible Former Owner in the 3.0-liter Settlement, you are a Class Member here and will be eligible for an automatic payment if you do not opt out.

Note that the deadline to register as an Eligible Seller has passed for the 2.0-liter Settlement. If you believe you would have qualified as an Eligible Seller in the 2.0-liter Settlement and did not identify yourself in time, you may still file a claim in the Bosch Settlement. The deadline for Eligible Sellers who missed the Eligible Seller deadline in the 2.0-liter Settlement to file a claim in the Bosch Settlement is **May 1, 2017**.

Eligible Former Owners who do not file a claim in the 3.0-liter Settlement can also file a claim in the Bosch Settlement before **May 1, 2017**.

8. What if I requested exclusion from one or both of the VW Settlements?

If you requested exclusion from the 2.0-liter Settlement or if you choose to do so in the 3.0-liter Settlement, you can still be paid in the Bosch Settlement for your claims against Bosch. You should read the Bosch Settlement

Class definition in Question 3 above. Note that if you previously requested exclusion from the 2.0-liter Settlement or if you choose to do so in the 3.0-liter Settlement, and if you want to receive a payment from the Bosch Settlement, you must file a claim form in the Bosch Settlement before **August 15, 2017**.

9. What if I have not yet filed my eligible claim in the 2.0-liter Class Action Settlement or the 3.0-liter Class Action Settlement?

If you have not yet filed a claim in either of the VW Settlements, you may still receive a payment from the Bosch Settlement. If you file a timely and valid claim in either Settlement before the relevant claim filing deadline, you will receive an automatic settlement payment from the Bosch Settlement unless you exclude yourself from the Bosch Settlement by April 14, 2017. The claim filing deadline for the 2.0-liter Class Action Settlement is **September 1, 2018**, and the claim filing deadline for the 3.0-liter Class Action Settlement is **December 31, 2019**.

10. What if I am not sure whether I am included in the Bosch Settlement?

If you are not sure whether you are included in the Bosch Settlement, you may call toll-free 1 (844) 305-1928. Live operators are available 9:00 a.m. to 9:00 p.m. (Eastern Time), Monday through Friday, except for recognized holidays.

CASH BENEFITS AVAILABLE

11. What cash payment will I receive if I do not request exclusion from the Bosch Settlement?

The Federal Trade Commission (“FTC”) is an independent government agency whose mission is to prevent business practices that are anticompetitive, or deceptive or unfair to consumers. Acting as an independent third party to the litigation between Class Counsel and Bosch, the FTC chose, the parties agreed to and the Court approved the allocation of the Bosch Settlement fund among members of the Bosch Settlement Class.

The Bosch Settlement funds will be allocated to Class Members as follows:

- An Eligible Owner of an Eligible Vehicle in the VW 2.0-liter Settlement will receive \$350 in the Bosch Settlement, except that if an Eligible Seller has identified himself or herself and filed an approved claim for the Eligible Vehicle, or if an Eligible Lessee has identified himself or herself and filed an approved claim for the Eligible Vehicle, the Eligible Owner will receive \$175.
- An Eligible Seller in the VW 2.0-liter Settlement who has identified himself or herself and filed an approved claim will receive \$175 in the Bosch Settlement.
- An Eligible Lessee in the VW 2.0-liter Settlement will receive \$200 in the Bosch Settlement.
- An Eligible Owner of an Eligible Vehicle in the 3.0-liter Settlement will receive \$1,500 in the Bosch Settlement unless:
 - An Eligible Former Owner has identified himself or herself and filed an approved claim for the Eligible Vehicle in the 3.0-liter Settlement, in which case the \$1,500 payment will be split equally (\$750 each) between the Eligible Former Owner and the Eligible Owner.
 - An Eligible Former Lessee has identified himself or herself and filed an approved claim for the Eligible Vehicle in the VW 3.0-liter Settlement, in which case the Eligible Owner will receive \$750 in the Bosch Settlement.
 - Two Eligible Former Owners have identified themselves and filed approved claims for the Eligible Vehicle in the 3.0-liter Settlement, in which case the \$1,500 will be split among the Eligible Owner and the two Eligible Former Owners, with \$750 going to the Eligible Owner and \$375 each to the two Eligible Former Owners.

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- An Eligible Lessee in the VW 3.0-liter Settlement will receive \$1,200 in the Bosch Settlement.

The above payments are net payments to Class Members. They will not be reduced by attorneys' fees or expenses for Class Counsel.

The entire Bosch Settlement fund, plus any interest, will be distributed over the course of the settlement process through a combination of one or more payments to Bosch Settlement Class Members, and if approved by the Court, payment of attorneys' fees and expenses from the Bosch Settlement. If any money remains in the fund at the end of the claims process, the parties may request that the Court approve *cy pres* payments (generally payments to a charity or charities related to the terms of a settlement) if it is not administratively and/or economically feasible to distribute the remaining money *pro rata* to the Bosch Settlement Class Members.

12. I did not file a claim in either the 2.0-liter Class Action Settlement or the 3.0-liter Class Action Settlement. How do I file a claim here?



If you do not file a claim in either the 2.0-liter Settlement or in the 3.0-liter Settlement, you will need to file a claim in the Bosch Settlement to receive a payment from the Bosch Settlement. You can file your claim online at www.BoschVWSettlement.com or by mail or fax, as the Claims Supervisor provides, to Bosch Settlement Claims Administrator, PO Box 5110, Portland, OR 97208-5110.

The deadline to file a claim in the Bosch Settlement is **December 31, 2019**. There are two exceptions:

- if you excluded yourself from either or both of the VW Settlements, the deadline is **August 15, 2017**; and
- if you missed the deadline to identify yourself as an Eligible Seller in the 2.0-liter Settlement or do not identify yourself as an Eligible Former Owner in the 3.0-liter Settlement, the deadline is **May 1, 2017**.

13. If I must file a claim, what supporting documents are needed?



To start your claim, go to www.BoschVWSettlement.com and submit your VIN (Vehicle Identification Number). You will be asked to submit supporting documentation, including (depending on your particular circumstances):

- Vehicle registration;
- Vehicle title (owners with no lien);
- Lease contract (Lessees); and/or
- Driver's license (or other state-approved government-issued photo identification).

14. When will I receive my payment?



If you have already filed a 2.0-liter or 3.0-liter claim that was approved in the 2.0-liter or 3.0-liter VW Class Action Settlements, you will automatically receive a payment from the Bosch Settlement once the Settlement is approved (if you do not request exclusion). The earliest this could take place is shortly after May 11, 2017. If you file a claim in one of the VW Settlements in the future, you will receive a payment from the Bosch Settlement after your claim in the VW Class Action Settlement is approved. If you do not file a claim in either of the VW Class Action Settlements, but file a claim in the Bosch Settlement, you will receive a payment as soon as your claim is approved.

15. What are the tax implications of receiving a settlement payment?



While it is the intention of the parties that any payments made as a result of the Bosch Settlement not be subject to taxation, you should consult a tax professional to assess the specific tax implications of any payment you may receive. A tax professional will help you understand the specific tax implications for you.

HOW TO UPDATE YOUR INFORMATION

16. How do I change my address?

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To change your address in the administrator's database, please send a letter signed by you requesting an address update, which includes your former and current mailing addresses to the Claims Administrator at Bosch Settlement, PO Box 5110, Portland, OR 97208-5110.

Important Note: Changing your address with the Bosch Administrator will only update your records for the Bosch Settlement. Please follow the prescribed procedures in the VW Settlements for changing your address in those matters.

17. How do I update my name?

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To change your name in the administrator's database, please send a letter signed by you requesting a name change, which includes your former and current name, along with supporting documentation (i.e. valid driver's license, state ID, and/or marriage certificate) to the Claims Administrator at Bosch Settlement, PO Box 5110, Portland, OR 97208-5110.

Important Note: Changing your name with the Bosch Administrator will only update your records for the Bosch Settlement. Please follow the prescribed procedures in the VW Settlements for changing your name in those matters.

UNDERSTANDING THE CLASS ACTION PROCESS

18. Why did I receive this Notice?

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You received a Notice because you may be a Class Member of the Bosch Settlement involving certain VW Diesel vehicle owners and lessees. The Court in charge of this case authorized this Notice because Class Members have a right to know about the proposed settlement of this lawsuit, and to understand all of their options before the Court decides whether or not to approve the Bosch Settlement. The Notice summarizes the Bosch Settlement and explains Class Members' legal rights and options under the Bosch Settlement.

Judge Charles R. Breyer of the United States District Court for the Northern District of California is in charge of this case. The case is known as *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, No. 3:15-md-2672. The people who sued are called the "Plaintiffs." Bosch is a "Defendant."

19. What is a class action?

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A class action is a representative lawsuit. One or more plaintiffs (who are also called "class representatives") sue on behalf of themselves and all other people with similar claims, who are not named, but are described in the class definition and are called "Class Members." When a class action is settled, the Court resolves the issues in the lawsuit for all Class Members, except for those who request exclusion from (or "opt out" of) the class. Opting out means that you will not receive benefits under the Bosch Settlement. The opt out process is described in Questions 25 to 29 of this Notice.

20. Who are the Bosch Defendants?

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Bosch is the manufacturer of the software in the 2.0-liter and 3.0-liter Eligible Vehicles (see page 1 of this Notice for a list of Eligible Vehicles) that controlled whether the emissions systems operated in a manner compliant with EPA and CARB standards.

21. How were these Settlements reached?

After extensive Court-ordered negotiations, supervised by former FBI Director Robert Mueller (the Court-appointed Settlement Master), Class Counsel and Bosch agreed to settle the claims in this case. There are multiple settlements in this case, including settlements with certain states and other U.S. government agencies, because there are multiple lawsuits brought or contemplated by different government entities, and by the vehicle owners themselves. The Bosch Settlement, if approved, will resolve most of the claims related to the affected 2.0-liter and 3.0-liter TDI diesel engine vehicles that were brought against the Bosch Defendants.

A settlement is an agreement between a plaintiff (or multiple plaintiffs) and a defendant (or multiple defendants) to resolve a lawsuit. Settlements end all or part of a lawsuit without a trial, and without the court or a jury ruling in favor of the plaintiff(s) or the defendant(s). A settlement allows the parties to avoid the costs and risks of a trial, and the very significant time delays of litigation. Class Counsel believe that the proposed Bosch Settlement is fair and reasonable for the class, and that it is in the public and environmental interest.

22. What am I giving up in exchange for receiving the Bosch Settlement benefits?

In exchange for your payment from Bosch, you will give up your right to sue the Bosch Defendants for the claims being resolved by the Bosch Settlement (see Question 26 below). The Bosch settlement has no effect on claims concerning other Bosch products, or for vehicles not included in the Bosch Settlement.

Section 9 of the Bosch Settlement Agreement contains the complete text and details of what Class Members give up unless they exclude themselves from the Bosch Settlement, so please read it carefully. The Bosch Settlement Agreement is available at www.BoschVWSettlement.com. If you have any questions, you may talk to the law firms listed in Question 30 for free, or you may talk to your own lawyer.

23. Am I releasing any personal injury or wrongful death claims if I participate in the Bosch Settlement?

No. The Bosch Settlement does not affect or release any personal injury or wrongful death claims you may have, now or in the future.

24. What are my potential legal claims and remedies in this class action?

There are over 150 claims for relief in this nationwide class action, including some claims that seek treble or punitive damages. The list of claims starts on page 208 of the Consolidated Consumer Class Action Complaint, filed on February 22, 2016, in the Northern District of California. The Consolidated Consumer Class Action Complaint can be found at this link <http://www.cand.uscourts.gov/crb/vwmdl> or by visiting the settlement website at www.BoschVWSettlement.com and reviewing the "Court Documents" section. If you have any questions about the claims and remedies in the class action, you may talk to the law firms listed in Question 30 for free, or you may talk to your own lawyer.

25. How do I get out of the Bosch Settlement?

If you do not want to receive benefits from the Bosch Settlement, and you want to retain the right to sue the Bosch Defendants about the legal issues in this case, then you must take steps to remove yourself from the Bosch Settlement. You may do this by asking to be excluded from—sometimes referred to as "opting out" of—the Bosch Settlement. To do so, you must mail a letter or other written document to the Court-Appointed Claims Administrator. Your request must include:

- Your name, address, and telephone number;
- A statement that says "I wish to exclude myself from the Bosch Settlement in *In re: Volkswagen 'Clean Diesel' Marketing, Sales Practices, and Products Liability Litigation*, No. 3:15-md-2672 (N.D. Cal.); and
- Your personal signature and date.

You must mail your exclusion request, **postmarked** no later than **April 14, 2017**, to Opt Out Bosch Settlement, P.O. Box 5110, Portland, OR 97208-5110

YOUR LEGAL RIGHTS UNDER THE BOSCH SETTLEMENT ARE AFFECTED EVEN IF YOU DO NOTHING.

PLEASE READ THIS NOTICE CAREFULLY. QUESTIONS?

Go to www.BoschVWSettlement.com or call 1 (844) 305-1928

26. If I do not exclude myself, can I sue the Bosch Defendants for the same thing later?

No. Unless you exclude yourself, you give up the right to sue the Bosch Defendants for all of the claims that the Bosch Settlement resolves.

27. If I exclude myself, can I still get full benefits from the Bosch Settlement?

No. If you exclude yourself, you will not get a payment from the Bosch Settlement.

28. If I excluded myself from the VW 2.0-liter or the 3.0-liter Class Action Settlement, can I still get a payment from the Bosch Settlement?

Yes. If you excluded yourself from either or both of the VW Settlements, you can still participate in the Bosch Settlement and receive a payment. If you are a Bosch Settlement Class Member, you are eligible to participate in the Bosch Settlement. **Note that if you requested exclusion from a VW Settlement, you must file a claim in the Bosch Settlement to receive a payment from the Bosch Settlement.**

If you requested exclusion from one of the VW Settlements and you also want to preserve your rights to sue the Bosch Defendants, you must also request exclusion here as described in Questions 25 to 27 above.

29. If I opt out and pursue my case, could I get a larger recovery?

The law of most states provides for various remedies, including actual damages, punitive or multiple damages, and rescission, if a claim is proved at trial and upheld on appeal. None of these can be predicted with certainty, and all take additional time and may be subject to offsets or deductions for attorneys' fees and costs. The Bosch Settlement is designed to provide benefits that are certain, not subject to the delay and risk of trial and appeal, and not reduced by fees or costs.

30. Do I have a lawyer in the case?

Yes. The Court has appointed a number of lawyers to represent all Class Members as "Class Counsel," without charge to you. They are:

Elizabeth Cabraser, Lead Counsel Lieff Cabraser Heimann & Bernstein, LLP 275 Battery Street, 29th Floor San Francisco, CA 94111	Joseph F. Rice Motley Rice LLC 28 Bridgeside Boulevard Mt. Pleasant, SC 29464
Lynn Lincoln Sarko Keller Rohrback L.L.P. 1201 Third Avenue, Suite 3200 Seattle, WA 98101	Christopher A. Seeger Seeger Weiss LLP 77 Water Street New York, NY 10005
Steve W. Berman Hagens Berman Sobol Shapiro LLP 1918 Eighth Avenue, Suite 3300 Seattle, WA 98101	Jayne Conroy Simmons Hanly Conroy, LLC 112 Madison Avenue New York, NY 10016
Benjamin L. Bailey Bailey and Glasser LLP 209 Capital Street Charleston, WV 25301	Paul J. Geller Robbins Geller Rudman and Dowd LLP 120 East Palmetto Park Road, Suite 500 Boca Raton, FL 33432
David Boies Boies Schiller and Flexner 333 Main Street Armonk, NY 10504	Robin L. Greenwald Weitz & Luxenberg, P.C. 700 Broadway New York, NY 10003

David Seabold Casey, Jr. Casey Gerry Schenk Francavilla Blatt & Penfield LLP 110 Laurel St San Diego, CA 92101	Michael D. Hausfeld Hausfeld LLP 1700 K Street NW, Suite 650 Washington, DC 20006
James E. Cecchi Carella Byrne Cecchi Olstein Brody & Agnello, P.C. 5 Becker Farm Road Roseland, NJ 07068	Michael Everett Heygood Heygood, Orr, Pearson 6363 North State Highway 161, Suite 450 Irving, TX 75038
Roxanne Barton Conlin Roxanne Conlin and Associates 319 7th Street, Suite 600 Des Moines, IA 50309	Adam J. Levitt Grant & Eisenhofer P.A. 30 North LaSalle Street, Suite 1200 Chicago, IL 60602
W. Daniel "Dee" Miles III Beasley Allen Crow Methvin Portis & Miles 218 Commerce Street P.O. Box 4160 Montgomery, AL 36103	J. Gerard Stranch IV Branstetter, Stranch & Jennings, PLLC 223 Rosa L. Parks Avenue Suite 200 Nashville, TN 37203
Frank Mario Pitre Cotchett Pitre & McCarthy LLP San Francisco Airport Office Center 840 Malcolm Road, Suite 200 Burlingame, CA 94010	Roland K. Tellis Baron Budd, P.C. 15910 Ventura Boulevard Encino Plaza, Suite 1600 Encino, CA 91436
Rosemary M. Rivas Levi & Korsinsky LLP 44 Montgomery Street, Suite 650 San Francisco, CA 94104	Lesley Elizabeth Weaver Bleichmar Fonti & Auld LLP 1999 Harrison Street, Suite 670 Oakland, CA 94612

You will not be charged for contacting these lawyers.

31. I've received solicitation letters from attorneys. Do I need to hire my own attorney to get money from the Bosch Settlement?



No. Class Counsel will represent you at no charge to you apart from the Court-approved attorneys' fees and expenses awarded from this Settlement. If you want to be represented by your own lawyer, you may hire one at your own expense. It is possible that you will receive less money overall if you choose to hire your own lawyer to litigate against the Bosch Defendants rather than receive compensation from this Settlement.

32. How will the Lawyers be paid?



Class Counsel will ask the district court to award attorneys' fees of a maximum of 16 percent of the Settlement fund plus expenses from the Bosch Settlement fund, and those fees and expenses are subject to approval by the Court. Bosch Defendants will not have to pay any attorneys' fees or expenses in any amount over and above the Bosch Settlement fund. Class Members will have an opportunity to comment on and/or object to this request at an appropriate time.

33. How do I tell the Court if I do not like the Bosch Settlement?



If you do not exclude yourself from the Bosch Settlement, you may object to it. The Court will consider your views. To comment on or to object to the Bosch Settlement, you or your attorney must submit your written objection to the Court, including the following:

- Your name, address, and telephone number;
- A statement saying that you object to the Bosch Settlement in *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, No. 3:15-md-2672 (N.D. Cal.);
- The reasons you object to the Bosch Settlement, along with any supporting materials;

- The VIN of your Eligible Vehicle and the dates you owned or leased the Eligible Vehicle; and
- Your signature and date.

In addition, if you wish to speak at the final approval hearing (the “Fairness Hearing”), you must submit a written notice of your intent (see Questions 36 and 37 below).

You must mail your objection to the three addresses below **postmarked** no later than **April 14, 2017**:

Court	Class Counsel	Defense Counsel
Clerk of the Court/Judge Charles R. Breyer Phillip Burton Federal Building & United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	Elizabeth Cabraser Loeff Cabraser Heimann & Bernstein, LLP 275 Battery Street, 29th Floor San Francisco, CA 94111	Matthew D. Slater Cleary Gottlieb 2000 Pennsylvania Avenue, NW Washington, D.C. 20006

34. What is the difference between objecting to the Bosch Settlement and opting out?



You can object only if you do not opt out of the class. Opting out is telling the Court that you do not want to be part of the Bosch Settlement, and you do not want to receive any payment from the Bosch Settlement. If you opt out, you have no basis to object to the Bosch Settlement by telling the Court you do not like something about it, because the case no longer affects you.

35. When and where will the Court decide whether to approve the Bosch Settlement?



The Court will hold the final approval or “Fairness Hearing” on **May 11, 2017, at 8:00 a.m.**, at the United States District Court for the Northern District of California, located at the United States Courthouse, 450 Golden Gate Avenue, 17th Floor, San Francisco, CA 94102, before determining whether to approve the Bosch Settlement. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.BoschVWSettlement.com or call 1 (844) 305-1928 for updates. At this hearing, the Court will hear evidence about whether the Bosch Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them and may listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the Bosch Settlement. We do not know how long that decision will take.

The Court also may consider the request for attorneys’ fees and reasonable costs by Class Counsel (see Question 32) during the Fairness Hearing, or at a time that will be set at a later date by the Court. Please check the Bosch Settlement website to determine when the Court will hear the attorneys’ fees and expenses motion.

36. Do I have to attend the hearing?



No. Class Counsel will answer questions the Court may have. You are welcome to attend at your own expense. If you timely file an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You also may have your own lawyer attend at your expense, but it is not necessary.

37. May I speak at the hearing?



You may ask the Court for permission to speak at the Fairness Hearing. The Court will determine whether to grant you permission to speak. To do so, you must send a letter stating that it is your “Notice of Intention to Appear at the Bosch Settlement in *In re: Volkswagen ‘Clean Diesel’ Marketing, Sales Practices, and Products Liability Litigation*, No. 3:15-md-2672 (N.D. Cal.)” Be sure to include your name, address, telephone number, and your signature. Your notice of intention to appear must be postmarked no later than **April 14, 2017**, and sent to all of the addresses listed in Question 33.

GETTING MORE INFORMATION

38. How do I get more information?



This Notice summarizes the proposed Bosch Settlement. More details are in the Bosch Settlement Agreement. You can get a copy of both of these documents and others at www.BoschVWSettlement.com. You also may write with questions to the Claims Administrator at Bosch Settlement, P.O. Box 5110, Portland, OR 97208-5110 or call toll-free 1 (844) 305-1928. Live operators are available 9:00 a.m. to 9:00 p.m. (Eastern Time), Monday through Friday, except for recognized holidays.

