

**PROPOSED CLASS ACTION  
SETTLEMENT**

**DID YOU BUY OR LEASE A CAR IN  
CANADA BETWEEN 2002 AND 2018? THIS  
NOTICE AFFECTS YOUR LEGAL  
RIGHTS**

A class action settlement has been reached in *Kett v. Kobe Steel, Ltd. et al*, S.C.B.C. S-1710805, and *Dallaire v. Kobe Steel, Ltd. et al*, S.C.Q. 500-06-007027-198. The BC Supreme Court and the Superior Court of Quebec have respectively certified and authorized class actions for settlement purposes. The settlement is a compromise of disputed claims and is not an admission of liability, wrongdoing or fault by any of the defendants. The settlement is subject to the approval of the BC Court and the Quebec Court.

The BC Class is all persons in Canada (excluding Quebec) who (1) purchased or leased a new or used vehicle manufactured by Toyota (including Lexus), Honda (including Acura), Subaru, Mazda, Mitsubishi, Nissan (including Infiniti), Kia, Hyundai, Tesla or GM, or (2) purchased parts or replacement parts containing automotive metal manufactured by the defendants, between 2002 and 2018. The Quebec Class is all Quebec residents meeting the same criteria.

For the payment of \$1,950,000 by Kobe Steel, Ltd., the Classes will release the defendants from all claims. The remaining settlement funds, after payment of Class Counsel fees, expenses, any honouraria to the plaintiffs, and any amounts owed to the *Fonds d'aide aux actions*

*collectives*, will be donated to the Law Foundation of British Columbia and Éducaloi in Quebec.

You are automatically included in the BC Class or the Quebec Class, and will be bound by the settlement if approved by the BC Court and the Quebec Court, unless you opt out. If you do not want to be part of the lawsuit, you must opt out of the proceeding by delivering an opt out form to Class Counsel by no later than **November 18, 2020**.

Residents of Quebec are additionally required to give notice to the Clerk of the Superior Court of Quebec and file it with Class Counsel by no later than **November 18, 2020**.

If you wish to object to the settlement, fees or payment to the plaintiffs, you must notify Class Counsel no later than **November 18, 2020** in the manner set out in the long form notice.

Class Counsel are Klein Lawyers LLP, Mathew P Good Law Corporation, and Klein Avocats Plaideurs Inc.

More information on the settlement (including the long form notice, opt out form, and Settlement Agreement) is available at <https://www.callkleinlawyers.com/class-actions/current/>

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