

EXHIBIT 1

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LIST OF ACTIONS IN THE MDL

<i>Steve Croft et al. v. ZF Friedrichshafen AG et al</i>	2:19-cv-04256-JAK-FFM
<i>Mark Altier et al. V. ZF-TRW Automotive Holdings Corp. et al</i>	8:19-cv-00846-JAK-FFM
<i>William Bell et al v. ZF Friedrichshafen AG et al</i>	8:19-cv-00963-JAK-FFM
<i>Adalgisa Santos et al v. ZF Friedrichshafen AG et al</i>	2:19-cv-06895-JAK-FFM
<i>Gary E. Samouris et al v. ZF-TRW Automotive Holdings Corporation et al</i>	2:19-cv-06896-JAK-FFM
<i>Barry Adams et al v. ZF Active Safety and Electronics US LLC</i>	2:20-cv-09668-JAK-MRW
<i>Thomas Payne et al v. ZF Friedrichshafen AG et al</i>	2:19-cv-06894-JAK-FFM
<i>David Radi et al v. FCA US LLC et al</i>	2:19-cv-06900-JAK-FFM
<i>Sigfredo Rubio et al v. ZF-TRW Automotive Holdings Corp, et al</i>	2:19-cv-06898-JAK-FFM
<i>Michael Van Ness v. FCA US LLC et al</i>	2:19-cv-07153-JAK-FFM
<i>Robert A. Underwood v. Kia Motors America, Inc et al</i>	2:19-cv-07097-JAK-FFM
<i>Ryan Baldwin et al v. Kia Motors America, Inc et al</i>	8:19-cv-01376-JAK-FFM
<i>Kaya Lawrence v. ZFTRW Automotive Holdings Corp et al</i>	2:19-cv-07608-JAK-FFM

EXHIBIT 2

EXHIBIT 2
SUBJECT VEHICLES

Recalled Vehicles

<u>Model Years</u>	<u>Make and Model</u>
2011-2019	Toyota / Corolla
2011-2013	Toyota / Corolla Matrix
2012-2018	Toyota / Avalon
2013-2018	Toyota / Avalon HV

Unrecalled Vehicles

<u>Model Years</u>	<u>Make and Model</u>
2012-2017	Toyota / Sequoia
2012-2019	Toyota / Tacoma
2012-2017	Toyota / Tundra

EXHIBIT 3

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**TOYOTA AIRBAG CONTROL UNIT SETTLEMENT INSPECTION PROGRAM
PROTOCOL¹**

Toyota will provide a documented inspection for the Subject Vehicles based on the terms of this Toyota Airbag Control Unit Settlement Inspection Program Protocol (“Protocol”).² This Settlement Inspection Program will last for 10 years, measured from the date that the Preliminary Approval Order is entered.

The Subject Vehicles are as follows:

<u>Model Years</u>	<u>Make and Model</u>
2011-2019	Toyota / Corolla
2011-2013	Toyota / Corolla Matrix
2012-2018	Toyota / Avalon
2012-2017	Toyota / Sequoia
2012-2019	Toyota / Tacoma
2012-2017	Toyota / Tundra
2013-2018	Toyota / Avalon HV

See Exhibit 2 to the Settlement Agreement.

Under this Protocol, and as detailed in Sections I and II, below, Toyota will offer an inspection for Subject Vehicles that:

- are involved in a frontal crash; and
- when Toyota has been notified of a claim that a ZF-TRW airbag control unit (“ZF-TRW ACU”), seatbelt pretensioner, and/or airbag did not deploy.

¹ All capitalized terms have the same meaning ascribed to them in the Settlement Agreement.

² Nothing in this Protocol imposes any obligation upon ZF-TRW.

I. SUBJECT VEHICLE INSPECTION

When Toyota receives notice of a claim – including notice from a Toyota Dealer and/or Toyota’s Brand Engagement Center – that meet the criteria above, Toyota will inspect the Subject Vehicle as follows:

1. Toyota will contact the then-current owner/lessee of the Subject Vehicle to request authority to:
 - a. Download the Event Data Recorder data (“EDR”);
 - b. Perform a “Store-All” Healthcheck relating to the vehicle’s electrical systems; and
 - c. Perform a visual inspection and photographically document the Subject Vehicle, including but not limited to the Subject Vehicle’s damage, and, to the extent practicable, the ZF-TRW ACU’s wire harness and sensors.
2. If the inspection steps described in Paragraph I.1.a, above, are not successful and/or if the data download is incomplete or does not provide coherent data, or the results otherwise are consistent with Airbag Control Unit (“ACU”) failure, Toyota will escalate the inspection to recover, with the customer’s consent, the Subject Vehicle’s ACU and attempt a further download.
 - a. If Toyota determines in good faith that the ACU does not communicate with the crash data retrieval tool correctly or that the ACU returned a partial or interrupted crash record or no crash record for the at-issue incident, the ACU will be sent to ZF-TRW with a request for further inspection. The request will specifically ask for ZF-TRW to check for diagnostic trouble codes that indicated a shutdown or reset during the crash and to measure the resistance to ground on the ACU.
 - b. Toyota, at its discretion and as necessary, can perform further downloads of other data from the Subject Vehicles, to complete its analysis.

II. DOCUMENTATION OF INSPECTION

To the extent Toyota has downloaded the Subject Vehicle’s EDR data, the information downloaded from the EDR will be provided to the current owner/lessee of the Subject Vehicle. To the extent there is an electrical overstress condition, Toyota shall provide the Settlement Special Master with the photographs and other information related to the inspection. The Settlement Special Master will be required to provide Toyota’s counsel and Co-Lead Counsel a quarterly report providing the number of electrical overstress events along with the model and model year of each such vehicle.