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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

*In re ZF-TRW Airbag Control Units
Products Liability Litigation*

MDL No. 2905

Case No. 2:19-ml-02905-JAK

**[PROPOSED] FINAL JUDGMENT AS
TO THE TOYOTA PLAINTIFFS'
CLAIMS**

1 Pursuant to Federal Rules of Civil Procedure 23 and 58, and the Court’s
2 [DATE] Final Order Approving Class Action Settlement, And Granting Attorneys’
3 Fees, Expenses, And Service Awards (the “Final Approval Order”), the Court
4 hereby orders, adjudges, finds, and decrees as follows:

5 1. The Court hereby **CERTIFIES** the Settlement Class and **GRANTS**
6 the Motion for Final Approval of the Settlement (ECF 815). The Court fully and
7 finally approves the Settlement in the form contemplated by the Settlement
8 Agreement (ECF 756-3) and finds its terms to be fair, reasonable and adequate
9 within the meaning of Fed. R. Civ. P. 23. The Court directs the consummation of
10 the Settlement pursuant to the terms and conditions of the Settlement Agreement.

11 2. The Court **CONFIRMS** the appointment of Co-Lead Plaintiffs’
12 Counsel and the members of the Plaintiffs Steering Committee listed in the Court’s
13 Preliminary Approval Order (ECF 770) as Settlement Class Counsel.

14 3. The Court **CONFIRMS** the appointment of Mark Altier, Alejandra
15 Renteria, Samuel Choc, Tatiana Gales, Gary Samouris, Michael Hines, Brent
16 DeRouen, Danny Hunt, Evan Green, Joy Davis, and Dee Roberts as Settlement
17 Class Representatives.

18 4. The Court **CONFIRMS** the appointment of the Kroll Notice Media as
19 the Notice Administrator.

20 5. The Court **CONFIRMS** Patrick Hron and Patrick Juneau, of Juneau
21 David APLC as the Settlement Special Administrator that will oversee and
22 administer the Settlement Fund.

23 6. The Court **GRANTS** Settlement Class Counsel’s request for attorneys’
24 fees and costs, and **AWARDS** Settlement Class Counsel \$25,000,000 in attorneys’
25 fees and \$472,730.40 in reasonable expenses, to be paid from the Settlement Fund
26 and allocated by Co-Lead Counsel among the firms that performed work consistent
27 with the Common Benefit Order (ECF 111).
28

1 7. The Court **AWARDS** service awards of \$2,500 to each of the 11
2 Settlement Class Representatives identified in paragraph 3 above, to be paid from
3 the Settlement Fund.

4 8. As set forth in the Final Approval Order, the Release from Section VII
5 of the Settlement Agreement (ECF 756-3) shall take effect from the date of this
6 Final Judgment.

7 9. The individuals and entities listed in Appendix A to the Final Approval
8 Order are excluded from the Settlement Class.

9 10. The Court hereby permanently bars and enjoins any Toyota Class
10 Member from instituting or prosecuting any claims released pursuant to this
11 Settlement against the Released Parties, as those terms are used and defined in the
12 Settlement Agreement.

13 11. The Court further reserves and retains exclusive and continuing
14 jurisdiction over the Settlement concerning the administration and enforcement of
15 the Settlement Agreement and to effectuate its terms.

16 12. For the reasons stated in the Court's Final Order, judgment is entered
17 in accordance with the Final Order, and the claims of Plaintiffs Mark Altier,
18 Alejandra Renteria, Samuel Choc, Tatiana Gales, Gary Samouris, Michael Hines,
19 Brent DeRouen, Danny Hunt, Evan Green, Joy Davis, and Dee Roberts in this
20 Action against Defendants Toyota Motor Sales, U.S.A., Inc., Toyota Motor North
21 America, Inc., and Toyota Motor Engineering & Manufacturing North America,
22 Inc. are dismissed with prejudice, without costs to any party, except as otherwise
23 provided in the Final Order or in the Settlement Agreement.

24 13. Under Rule 54(b) of the Federal Rules of Civil Procedure, no just
25 reason exists for delay in entering final judgment pursuant to the Final Order. The
26 Court accordingly directs the Clerk to enter final judgment pursuant to Rule 58 of
27 the Federal Rules of Civil Procedure in accordance with the Final Order.
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SO ORDERED this ____ day of _____ 202_.

HON. JOHN A. KRONSTADT
United States District Court