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*Co-Lead Plaintiffs' Counsel for
Economic Loss Cases*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

IN RE: TOYOTA MOTOR CORP.
UNINTENDED ACCELERATION
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

Case No. 8:10ML2151 JVS (FMOx)

**PLAINTIFFS' UNOPPOSED *EX*
PARTE APPLICATION FOR
CERTIFICATION OF SETTLEMENT
CLASS, PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT,
AND APPROVAL OF CLASS
NOTICE**

THIS DOCUMENT RELATES TO:

ALL ECONOMIC LOSS CASES

Judge: Hon. James V. Selna

**PLAINTIFFS' *EX PARTE* APPLICATION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Pursuant to Rule 23, the Economic Loss Plaintiffs (“Plaintiffs”) move for an
3 order certifying a national settlement Class, preliminarily approving the proposed
4 Settlement, and approving the form and manner of Notice.
5

6 In support of this motion, Plaintiffs attach the following documents:

- 7 1. Settlement Agreement
- 8 2. Exhibit 1 – List of Economic Loss Actions in the MDL
- 9 3. Exhibit 2 – Claim Form for Alleged Diminished Value
- 10 4. Exhibit 3 – Claim Form for Cash in Lieu of BOS Fund
- 11 5. Exhibit 4 – Long Form Notice
- 12 6. Exhibit 5 – [Proposed] Final Order Approving Class Action
Settlement
- 13 7. Exhibit 6 – [Proposed] Final Judgment
- 14 8. Exhibit 7 – [Proposed] Order, *Inter Alia*, Granting Preliminary
15 Approval of Class Settlement, Provisionally Certifying
16 Settlement Class, Directing Notice to the Class, and Scheduling
Fairness Hearing
- 17 9. Exhibit 8 – Summary Settlement Notice
- 18 10. Exhibit 9 – Settlement Notice Administrator’s Declaration
- 19 11. Exhibit 10 – List of Subject Vehicles
- 20 12. Exhibit 11 – List of BOS-Eligible Subject Vehicles
- 21 13. Exhibit 12 – Short Form Notice
- 22 14. Exhibit 13 – Short Form Notice for Alleged Diminished Value
- 23 15. Exhibit 14 – Claim Review Protocol
- 24 16. Exhibit 15 – Automobile Safety and Education Program
- 25 17. Exhibit 16 – Plan of Allocation

1 Plaintiffs are also filing an accompanying Memorandum in Support of *Ex*
2 *Parte* Application for Certification of Settlement Class, Preliminary Approval of
3 Class Action Settlement, and Approval of Class Notice.
4

5 DATED: December 26, 2012

6 HAGENS BERMAN SOBOL SHAPIRO LLP
7

8 By: /s/ Steve W. Berman
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