

NOTICE OF PENDENCY OF CLASS ACTION

A court authorized this notice. This is not a solicitation from a lawyer. Please read this entire notice carefully. It discusses a class action against Ford Motor Company, and your rights may be affected by the legal proceedings described below.

This notice (“Notice”) concerns **you** and **your legal rights IF** you meet the following criteria:

- (a) you purchased or leased any new 2005 through 2011 Ford Focus vehicle in California,
- (b) you currently own such a vehicle, and
- (c) you currently reside in the United States.

1. THE PURPOSE OF THIS NOTICE.

You are receiving this Notice pursuant to an Order of the United States District Court for the Eastern District of California (the “Court”) dated September 23, 2016, and as amended by an Order dated November 1, 2016, which certified a lawsuit styled, *Daniel, et al. v. Ford Motor Company*, as a class action (the “Class Action”). This Notice is to inform you of the pendency of the Class Action and to advise you of your rights as a potential class member. The members of the Class Action, as certified by the Court’s Orders, include:

A class of individuals who (1) purchased or leased any new 2005 through 2011 Ford Focus vehicle in California, (2) currently own such a vehicle, and (3) currently reside in the United States (the “Class”).

All Class members who do not exclude themselves from the class action on a timely basis (as described below) will be bound by the orders issued by the Court regarding the class action. You should carefully read this entire Notice before making any decision regarding the class action lawsuit.

2. WHAT IS A CLASS ACTION?

Class actions are lawsuits in which the claims and rights of many people are decided in a single court proceeding. Representative plaintiffs (class representatives) are named in the lawsuit to assert the claims of the entire class. This avoids the necessity for a large number of people to file similar individual lawsuits and enables the court system to resolve similar claims in an efficient and economical way. Class actions assure that people with similar claims are treated alike. In a class action, the Court is guardian of class interests and supervises the presentation of the class claims by class counsel to assure that the representation is adequate. Class members are not individually responsible for the costs or fees of counsel, which are subject to Court award.

3. WHAT IS THE CLASS ACTION ABOUT?

In general, the class action alleges that Ford Focus vehicles, model years 2005 through 2011 (referred to hereafter as the “Class Vehicles”), were sold or leased to consumers with an alignment/geometry defect in the Class Vehicles’ rear suspensions that leads to premature rear tire wear, which in turn leads to safety hazards associated with driving on excessively worn tires. Plaintiff asserts that in selling Class Vehicles with the suspension defect, Ford Motor Company violated California consumer protection statutes, namely California’s Unfair Competition Law (“UCL”) and California’s Consumers Legal Remedies Act (“CLRA”), as well as breached the express and implied warranties imposed by California and federal law. You can view the Complaint at www.FocusTireClassAction.com.

Plaintiffs seek to recover approximately \$1,000 for each class member, which they claim represents the cost of retrofitting class vehicles with a nondefective suspension. Plaintiffs do not seek to recover the cost of replacement tires purchased by Class Members.

Ford Motor Company denies the existence of any defect causing premature rear tire wear. Ford Motor Company denies that there is any safety hazard, provided (as with any vehicle) that consumers replace their tires as necessary. Ford Motor Company denies any liability to Plaintiff and the Class on the claims asserted in the Complaint.

The Court has not yet determined whether Plaintiff or Ford Motor Company is correct. This Notice is simply to advise you of the nature of the proceedings, the Court's class certification ruling (discussed below in Section 4), and your rights associated therewith; and does not imply that there has been any finding of any violation of the law by Ford Motor Company specific to you or that recovery may be had by you in any amount.

4. THE COURT'S CLASS CERTIFICATION ORDER.

On September 23, 2016, the Court entered an order certifying the lawsuit *Daniel, et al. v. Ford Motor Company* as a class action. As previously stated, members of the Class consist of: A class of individuals who (1) purchased or leased any new 2005 through 2011 Ford Focus vehicle in California, (2) currently own such a vehicle, and (3) currently reside in the United States.

In its September 23, 2016 Order, the Court also (1) certified Plaintiff Margie Daniel as class representative ("Representative Plaintiff"), and (2) appointed the law firms of Carney Bates, & Pulliam, PLLC and Hicks Thomas LLP as Class Counsel.

In ruling that this action may be maintained as a class action, the Court determined that the action satisfied each of the requirements of Federal Rule of Civil Procedure 23 (the federal rule governing class actions). Specifically, the Court found that (a) the Class size is sufficiently numerous that joinder of all members is impracticable; (b) there are questions of law and fact common to the Class; (c) the claims or defenses of the Representative Plaintiff is typical of the claims or defenses of the Class; (d) Representative Plaintiff and Class Counsel will fairly and adequately protect the interests of the Class; (e) the common questions of law and fact predominate; and (f) the class mechanism is the superior method for fairly and efficiently adjudicating the controversy. The Court's class certification order can be viewed at www.FocusTireClassAction.com.

Representative Plaintiff and Class Counsel represent the interests of the Class. Establishment by the Court of this Class does not necessarily mean that any money or injunctive relief will be obtained for the Class members on the class claims. Certification of this lawsuit as a class action by the Court means only that the ultimate outcome of this lawsuit on the class claims – whether favorable to Representative Plaintiff and the Class or to Ford Motor Company – will apply to all Class members who do not timely elect to be excluded from the Class.

5. OPTIONS OF CLASS MEMBERS.

If you fit the above description of a Class member, you have a choice to (a) remain a member of the Class or (b) request exclusion from the Class. Either choice will have its consequences, which you should understand before making your decision.

If you wish to remain a member of the Class, you are not required to do anything at this time. By remaining a class member, you are agreeing that any of your claims against Ford Motor Company relating to the alleged alignment/geometry defect, as discussed in Section 3 above, will be determined on a class-wide basis in this case and will not be presented individually by you in this case or in any other action. As a member of the Class, you will be bound by the outcome of this lawsuit. **IF** the lawsuit results in a judgment favorable to the Class or a settlement is entered into between the Class and Ford Motor Company, you would be entitled to share in the benefits of that judgment or settlement. **IF** the outcome is favorable to Ford Motor Company, your rights will be determined by the decision rendered in this lawsuit, and you will receive nothing.

If you do not wish to participate in this class action, you can request exclusion from the Class. If you choose to be excluded from the Class, you will (1) not share in the benefits, if any, that Class members may be entitled to as a result of trial or settlement of this lawsuit; and (2) not be bound by any decision in this lawsuit favorable to Ford Motor Company. If you request exclusion from the Class, you will have the right to pursue individually, at your own expense, any claim you may have against Ford Motor Company.

To request exclusion, you must send a written and signed notification entitled “Request for Exclusion” to the following:

Daniel v. Ford Motor Company Class Action
P.O. Box 43434
Providence, RI 02940-3434

To be valid, your Request for Exclusion must be postmarked no later than July 7, 2017 (the “Exclusion Deadline Date”), and must include your name, current address, telephone number, and signature. If the request is not postmarked by the Exclusion Deadline Date, your request for exclusion will be invalid and you will be included in the Class automatically, bound by the final judgment and barred from bringing any claims against Ford Motor Company.

6. CLASS COUNSEL, ATTORNEYS’ FEES AND COSTS OF SUIT.

The Court appointed the following lawyers to represent you as Class Counsel: Carney Bates & Pulliam, PLLC (www.cbplaw.com) and Hicks Thomas LLP (www.hicks-thomas.com). They may be contacted at:

Carney Bates & Pulliam, PLLC
519 W. 7th St.
Little Rock, Arkansas 72201
(888) 551-9944

Hicks Thomas LLP
8801 Folsom Boulevard, Suite 172
Sacramento, California 95826
(888) 299-1086

These lawyers are experienced in handling similar cases and are working on your behalf. You do not have to pay Class Counsel to participate. Instead, if they recover money for the Class, the lawyers may ask the Court for fees, cost, and expenses, which may be deducted from any money obtained from or paid separately by Ford Motor Company. You may hire your own lawyer to appear in Court for you, but if you do, you will be responsible for the legal fees and costs of your personal counsel.

7. ADDITIONAL INFORMATION.

Examination of Pleadings and Papers: This Notice is only a summary of the pending lawsuit and is not intended to be all inclusive. For full details concerning the class action and the claims and defenses which have been asserted by the parties, you may review the pleadings and other papers at the office of the Clerk of the Court, United States District Court for the Eastern District of California, 501 I Street, Room 4-200, Sacramento, California 95814. Relevant pleadings, as stated above, may also be viewed at www.FocusTireClassAction.com.

Notice of Settlement: If you remain a member of the Class, you will be entitled to notice of and an opportunity to be heard regarding any proposed settlement of the class claims. Thus, you are requested to notify Class Counsel in writing of any corrections or changes in your name or address.

Interpretation of this Notice: Except as indicated in the orders and decisions of the Court, no Court has yet ruled on the merits of any of the pending claims or defenses asserted by the parties in this Class Action. This Notice is not an expression of an opinion by the Court as to the merits of claims or defenses.

This Notice is being sent to you solely to inform you of the nature of the litigation, your rights as a Class member, the steps required to be excluded from the Class, and the Court's certification of the Class.

ALL QUESTIONS ABOUT THIS NOTICE OR THE CLASS ACTION SHOULD BE DIRECTED TO CLASS COUNSEL IDENTIFIED IN PARAGRAPH 6 ABOVE. PLEASE DO NOT CALL OR WRITE THE COURT OR THE CLERK'S OFFICE FOR INFORMATION.

BY ORDER OF THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA.