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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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

ALL CASES AGAINST
MITSUBISHI

MDL No. 2905

Judge: John A. Kronstadt

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

1 Pursuant to Federal Rules of Civil Procedure 23 and 58, and the Court’s Final
2 Order Approving Class Action Settlement, And Granting Attorneys’ Fees,
3 Expenses, and Service Awards (the “Final Approval Order”), the Court hereby
4 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 1017). The Court fully and
7 finally approves the Settlement in the form contemplated by the Settlement
8 Agreement (ECF 941-1, Ex. C) and finds its terms to be fair, reasonable and
9 adequate within the meaning of Fed. R. Civ. P. 23. The Court directs the
10 consummation of the Settlement pursuant to the terms and conditions of the
11 Settlement Agreement.

12 2. The Court **CONFIRMS** the appointment of Co-Lead Plaintiffs’
13 Counsel and the members of the Plaintiffs Steering Committee listed in the Order re
14 Motion for Preliminary Approval of Class Settlement and Direction of Notice
15 Under Fed R. Civ. P. 23 (e) (ECF 985 at 24), and the Settlement Agreement (ECF
16 941-1, Ex. C), as Settlement Class Counsel.

17 3. The Court **CONFIRMS** the appointment of Gaylynn Darling
18 (Sanchez), Michael Nearing and John Sancomb as Settlement Class
19 Representatives.

20 4. The Court **CONFIRMS** the appointment of the JND Legal
21 Administration LLC as the Settlement Notice and Claims Administrator that will
22 oversee the Class Notice Program and administer the Settlement Fund.

23 5. The Court **GRANTS** Settlement Class Counsel’s request for attorneys’
24 fees and costs, and **AWARDS** Settlement Class Counsel \$2,500,000 in attorneys’
25 fees and \$50,000 in reasonable expenses, to be paid from the Settlement Fund and
26 allocated by Co-Lead Counsel among the firms that performed work consistent
27 with the Common Benefit Order (ECF 111).

28

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

4 7. As set forth in the Final Approval Order, the Release from Section VII
5 of the Settlement Agreement (ECF 941-1, Ex. C) shall take effect from the date of
6 this Final Judgment.

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

9 9. The Court hereby permanently bars and enjoins any Mitsubishi 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 10. 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 11. 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 Gaylynn Darling
18 (Sanchez), Michael Nearing and John Sancomb in this Action against Defendants
19 Mitsubishi Motors Corporation and Mitsubishi Motors North America, Inc. are
20 dismissed with prejudice, without costs to any party, except as otherwise provided
21 in the Final Order or in the Settlement Agreement.

22 12. Under Rule 54(b) of the Federal Rules of Civil Procedure, no just
23 reason exists for delay in entering final judgment pursuant to the Final Order. The
24 Court accordingly directs the Clerk to enter final judgment pursuant to Rule 58 of
25 the Federal Rules of Civil Procedure in accordance with the Final Order.

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SO ORDERED this ____ day of _____ 2025.

HON. JOHN A. KRONSTADT
United States District Court