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QUALITY ACTION

CAMPAIGN BULLETIN

White Paint Class Action Owner Notification
Dealer Notification

Reference: Pearl White Paint
Date: October 17, 2019

Attention: Dealer Principal, Sales, Service & Parts Managers

In October, owners of white Nissan Rogues produced between January 11, 2013 and April 23, 2013, will receive a notice from a settlement administrator informing them of the terms of a **proposed class action settlement**. The settlement, **if approved** by the presiding court, **could** extend the warranty on the paint for four years and provide a one-time full vehicle repaint (subject to a co-pay). Eligible owners can also obtain coverage for any reasonable and necessary rental car coverage arising from the repaint, or reimbursement of amounts previously incurred for a one-time repaint and any reasonable and necessary rental car services arising from the repaint. The settlement also provides for eligibility in Nissan's Vehicle Purchase Program.

To be clear, **unless and until the proposed settlement is approved by the presiding court, there is no warranty extension or other remedy** and you should proceed with paint-related claims in the ordinary course.

The proposed settlement, and the associated potential warranty extension, include many terms and conditions. Rather than attempting to address questions about the proposed settlement terms from customers, **Nissan recommends dealers refer customers to the website listed below**. This will enable owners to receive information from appropriate sources and avoid providing incorrect and/or incomplete information to customers. The website is currently live and available to inquiring customers.

******* What Dealers Should Do *******

1. No action is necessary at this time. Nissan will provide additional instructions once the proposed settlement is approved by the court.
2. If a customer contacts the dealer with a white paint concern and/or references this settlement notification, dealers should refer the customer to the third party administrator's website for additional information.

www.vehiclepaintsettlement.com

NISSAN NORTH AMERICA, INC.
Aftersales DIVISION

Frequently Asked Questions (FAQ):

- Q. When will owners of the affected vehicles be notified of this proposed settlement?**
- A. The class action settlement administrator will be mailing potential class members notification of the proposed settlement during the month of October 2019.
- Q. What can a customer with this concern do if their vehicle is not included in this settlement?**
- A. If a customer has a white paint peeling concern on a vehicle not included in this proposed settlement, they can contact Nissan Consumer Affairs at 1-800-NISSAN1 (647-7261) with their concern. Owners should have proof of vehicle ownership and documentation of any expenses incurred.

Revision History:

Date	Announcement	Purpose
October 17, 2019	Original	White Paint Class Action Owner Notification

Nelson v. Nissan Settlement Administrator
P.O. Box 43502
Providence, RI 02940-3502

2D

LEGAL NOTICE



Postal Service: Please Do Not Mark Barcode

NSN-«<Claim8>>-«<CkDig>>

See other side for details

«FirstNAME» «LastNAME»

«Addr1» «Addr2»

«City», «State»«FProv» «Zip»«FZip»

«FCountry»

NSN

If you bought any White Nissan Rogue produced between January 11, 2013 and April 23, 2013 and/or any White Infiniti QX56s produced between November 20, 2009 and December 12, 2012, you may be eligible for benefits under a class action settlement.

A proposed Settlement has been reached in two class actions against Nissan North America, Inc. (“NNA”) involving allegations that certain vehicles were painted with white exterior paint that peeled off in whole parts. The cases are *Nelson v. Nissan North America, Inc.*, Case No. 3:17-cv-01114 (M.D. Tenn.), and *Anglin v. Nissan North America, Inc.*, Case No. 1:17-cv-04240 (N.D. Ill.).

These cases were brought as class actions alleging that NNA knew about the paint defects but refused to honor warranties and replace the paint if the affected vehicle owners requested a repaint. NNA denies the allegations. The Court has not decided who is right, and the Parties have chosen to settle their dispute. This notice provides only a summary of the allegations.

Records available to NNA indicate that you may be a Class Member. If you are a Class Member, your rights may be affected, even if you take no action. You must take action to receive Settlement benefits or to protect your rights.

If you are a Class Member, you may be eligible for a full vehicle repaint (subject to a co-pay), rental car coverage, or reimbursement for repaint or rental car services you have previously purchased, and eligibility in Nissan’s Vehicle Purchase Program.

If you think you may be a Class Member, ***you should immediately review the Long Form Notice at www.vehiclepaintsettlement.com for more information.*** Please visit www.vehiclepaintsettlement.com for information about the benefits available to you under this Settlement, including your options and the deadlines for exercising them.