

Fuel Economy Settlement for Gasoline-Powered Audi, Bentley, Porsche, and Volkswagen Vehicles

A federal court authorized this Notice. This is not a solicitation from a lawyer.

Volkswagen, Audi, Porsche, and Bentley (the “Defendants”) have agreed to a Consumer Class Action Settlement Agreement and Release (the “Settlement”) resolving claims by vehicle owners and lessees that certain gasoline-powered vehicles sold in the United States are equipped with software that may cause them to emit more carbon dioxide (CO₂) and obtain worse fuel economy on the road than in testing conditions.

The vehicles affected by this software and included in this Settlement (the “Class Vehicles”) have been identified through rigorous expert testing evaluated and confirmed by Plaintiffs’ counsel, and submitted to the Environmental Protection Agency (“EPA”) and the California Air Resources Board (“CARB”) for their review. Each of the Class Vehicles had a software function that, as calibrated, could decrease fuel economy up to 1 MPG in the City, Highway, and/or Combined fuel economy ratings.² These changes have been reviewed by the EPA and have been modified on www.fueleconomy.gov. The Class Vehicles are listed in the chart below, and each Vehicle’s original and revised fuel economy rating is listed in Attachment A to this Notice.

Make	Model	Engine Capacity	Model Year(s)
Audi	A8L	4.0L	2015
Audi	A8L	6.3L	2013–2016
Audi	RS7	4.0L	2014–2016
Audi	S8	4.0L	2013–2016
Bentley	Continental GT	4.0L	2013–2017
Bentley	Continental GTC	4.0L	2013–2014
Bentley	Continental GT Convertible	4.0L	2015–2017
Bentley	Flying Spur	4.0L	2015–2016
Bentley	Flying Spur	6.0L	2014–2016
Porsche	Cayenne	3.6L	2013–2014, 2016
Porsche	Cayenne GTS	3.6L	2016
Porsche	Cayenne GTS	4.8L	2013–2014
Porsche	Cayenne S	3.6L	2015–2016
Porsche	Cayenne S	4.8L	2013–2014
Porsche	Cayenne Turbo	4.8L	2013–2014
Porsche	Cayenne Turbo S	4.8L	2014, 2016
Volkswagen	Tiguan 4MOTION	2.0L	2017
Volkswagen	Touareg	3.6L	2013–2014

Through this Settlement, owners and lessees of the Class Vehicles will receive compensation for driving vehicles for which the actual, on-road fuel economy is up to 1 MPG less than was originally represented. Original and sole owners of the Class Vehicles will be entitled to an amount certain, ranging from \$518.40 to \$2,332.80. Lessees and owners who purchased their Class Vehicles used and/or sold them before August 30, 2019 will be entitled to receive an amount certain, prorated based on the number of months they possessed their Class Vehicles. The monthly compensation for each Class Vehicle is listed in the answer to Question 4 of this Notice, and more information about how to calculate the compensation for each Class Vehicle is detailed in the answer to Question 5 of this Notice. Class Members can submit a claim with the required documentation online. The total amount of potential compensation to the Class through this Settlement is approximately \$96.5 million, and any money that is not claimed by Class Members will be directed to environmental remediation efforts approved by the Court.

¹ Capitalized terms have the meaning assigned to them in the Settlement.

² There was an approximately two mile per gallon discrepancy discovered in the city fuel economy rating of one model, the 2016 Porsche Cayenne 3.6L, because the original fuel economy label contained an unrelated error.

For their work in securing this Settlement, Class Counsel will request \$13 million in attorneys’ fees and costs which, if approved by the Court, Defendants will pay in addition to cash benefits available to the Class. The Class compensation will not be reduced to pay Class Counsel’s attorneys’ fees and costs. As a condition of settlement, **Defendants will not pay attorneys’ fees and costs to any attorneys other than Class Counsel and attorneys authorized to perform work by Class Counsel.**

This notice is only a summary of the Settlement. The full details of the Settlement are available online at www.VWmpgSettlement.com.

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BASIC INFORMATION

1. What options do I have?

YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENT

PARTICIPATE BY FILING A CLAIM	To obtain compensation under this Settlement, you must submit a valid claim. Please refer to Question 6 for details on how to submit a valid claim. You can submit your claim now , and must electronically submit or postmark it no later than 30 days after final approval. Under the current schedule, the claim deadline is March 29, 2020 . This schedule may change, so please visit the Settlement Website regularly for updates.
REQUEST EXCLUSION	If you wish to exclude yourself from the Settlement, you must submit a request to exclude yourself from, or “opt out” of, the Settlement, by January 17, 2020 . If you do so, you will receive no compensation under this Settlement, but you will preserve your rights to sue the Defendants over the claims being resolved by this Settlement.
OBJECT	Write to the Court explaining what you dislike about the Settlement by January 17, 2020 . If you object to the Settlement, you are expressing your views about the Settlement but remain a member of the Class (if you are otherwise eligible) and are releasing the claims covered by this Settlement. If you make an objection, you must still submit a claim to receive compensation under the Settlement.
GO TO A HEARING	If you object to the Settlement as described above, you may ask to speak in Court about the fairness of the Settlement.

CLASS MEMBERSHIP

2. Am I included in the Settlement?

The Settlement Class includes all persons (including individuals and entities) in the United States (including Puerto Rico) who own or lease a Class Vehicle as of **August 30, 2019**, or who previously owned or leased one of the Class Vehicles before that date. The list of Class Vehicles is found in the Introduction to this Notice, in Section 2.15 of the Settlement, and in the answer to Question 4, below.

If you are not sure whether you are included in the Settlement, you may visit www.VWmpgSettlement.com (or call 1-855-942-0395).

3. Is anyone excluded from the Settlement?

The following entities and individuals are **excluded** from the Class:

- Defendants’ officers, directors and employees and participants in Volkswagen’s Internal Lease Program, and/or Porsche Associate Lease Program; Defendants’ affiliates and affiliates’ officers, directors and employees; Defendants’ distributors and distributors’ officers, directors and employees;
- Judicial officers and their immediate family members and associated court staff assigned to this case; and
- All those otherwise in the Class who or which timely and properly exclude themselves from the Class, as provided in the Settlement.

CASH BENEFITS AND CLAIM SUBMISSION

4. How much can I get in this Settlement?

You are eligible for cash compensation based on the specific Class Vehicle you own(ed) or lease(ed) and the number of months that you owned or leased it, as detailed in the chart below. Class Members who are the original owners of their Vehicles and continued to own them on **August 30, 2019** will receive the maximum compensation for that Vehicle. Class Members who held active leases as of **August 30, 2019** are eligible for compensation for the full duration of their lease. Class Members who

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purchased their Vehicles used, but owned them as of **August 30, 2019** will be entitled to compensation for the months they have owned their Class Vehicles, as well as any remaining months up to a total of 96 months after their Class Vehicles were first sold.

Make	Model	Engine Capacity (liters)	Model Year(s)	Compensation Per Month Owned/Leased	Maximum Compensation Per VIN
Audi	A8L	4.0L	2015	\$11.10	\$1,065.60
Audi	A8L	6.3L	2013–2014	\$21.30	\$2,044.80
Audi	A8L	6.3L	2015–2016	\$18.80	\$1,804.80
Audi	RS7	4.0L	2014	\$8.00	\$768.00
Audi	RS7	4.0L	2015–2016	\$9.00	\$864.00
Audi	S8	4.0L	2013–2014	\$14.90	\$1,430.40
Audi	S8	4.0L	2015	\$7.20	\$691.20
Audi	S8	4.0L	2016	\$14.90	\$1,430.40
Bentley	Continental GT	4.0L	2013–2014	\$9.00	\$864.00
Bentley	Continental GT	4.0L	2015–2017	\$14.90	\$1,430.40
Bentley	Continental GTC	4.0L	2013	\$10.10	\$969.60
Bentley	Continental GTC	4.0L	2014	\$8.20	\$787.20
Bentley	Continental GT Convertible	4.0L	2015–2017	\$18.80	\$1,804.80
Bentley	Flying Spur	4.0L	2015–2016	\$10.10	\$969.60
Bentley	Flying Spur	6.0L	2014–2016	\$24.30	\$2,332.80
Porsche	Cayenne	3.6L	2013	\$8.00	\$768.00
Porsche	Cayenne	3.6L	2014	\$13.40	\$1,286.40
Porsche	Cayenne	3.6L	2016	\$12.20	\$1,171.20
Porsche	Cayenne GTS	3.6L	2016	\$14.90	\$1,430.40
Porsche	Cayenne GTS	4.8L	2013–2014	\$18.80	\$1,804.80
Porsche	Cayenne S	3.6L	2015–2016	\$13.40	\$1,286.40
Porsche	Cayenne S	4.8L	2013–2014	\$9.00	\$864.00
Porsche	Cayenne Turbo	4.8L	2013–2014	\$18.80	\$1,804.80
Porsche	Cayenne Turbo S	4.8L	2014	\$21.30	\$2,044.80
Porsche	Cayenne Turbo S	4.8L	2016	\$18.80	\$1,804.80
Volkswagen	Tiguan 4MOTION	2.0L	2017	\$5.40	\$518.40
Volkswagen	Touareg	3.6L	2013–2014	\$8.00	\$768.00

5. How was the Settlement compensation determined?

The Settlement is designed to compensate Class members for driving vehicles for which the actual, on-road fuel economy is up to 1 MPG less than was originally represented. Differences between the original and revised fuel economy ratings among the Class Vehicles resulted in different compensation amounts for each make, model, and model year. Specifically, calculating the specific monthly compensation available for each Class Vehicle involves three steps.

Step 1: Calculate Fuel Consumption Based on *Original Fuel Economy Rating*. The first step is to determine the number of gallons of gasoline that a Class Vehicle would require to drive a fixed number of miles (1,250) under the Vehicle’s initial EPA-estimated Combined fuel economy rating. A Vehicle with a Combined rating of 20 MPG, for example, would require 62.5 gallons to drive that distance (1,250 miles divided by 20 miles per gallon).

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Step 2: Calculate Fuel Consumption Based on the Revised Fuel Economy Rating. The second step is to determine the number of gallons required to drive that same fixed number of miles under the Vehicle's revised fuel economy ratings. If the Combined rating decreased by 1 MPG, then the denominator would be reduced by one. Using the example above of an initial Combined rating of 20 MPG, the gallons required under the revised label (19 MPG) would be 65.79 (1,250 miles divided by 19 miles per gallon). The same is true if the City *and* Highway ratings *both* decreased by 1 MPG, but the Combined rating did not change.

If, however, *only* the City or *only* the Highway rating decreased by 1 MPG, then the denominator would be reduced by 0.55 or 0.45, respectively, based on the weighting that the EPA applies to City and Highway fuel economy ratings in the EPA's formula for calculating Combined MPG. So, if a Vehicle's initial Combined rating was 20 MPG and that Vehicle's City rating decreased 1 MPG, the revised fuel economy rating for the compensation calculation would be 19.45 MPG and the Vehicle would require 64.27 gallons/month (1,250 miles divided by 19.45 miles per gallon) under the revised label. If only the Highway rating decreased, the revised fuel economy rating for the compensation calculation would be 19.55 MPG and the Vehicle would require 63.94 gallons/month (1,250 miles divided by 19.55 miles per gallon) under the revised label.

Step 3: Calculate the Cost of the Additional Gallons and the Goodwill Payment. The third step is to calculate the *extra* monthly gallons required as a result of the label revisions—by subtracting the result of step one from the result of step two—multiply that number by the cost of gasoline. The gasoline price used in the Settlement calculations is \$3.54/gallon, and a 15% goodwill payment is added for any inconvenience customers may have experienced.

To illustrate this formula, these principles are applied to three Class Vehicles in the examples below:

Combined MPG Reduction Example: 2015 Audi A8L 4.0L	
Fuel Economy Reduction	1 MPG Combined
Original Combined MPG Rating	22 MPG
Monthly Gallons Estimated under Original Label (1,250 miles / 22 MPG)	56.82 gallons
Revised Combined MPG Rating	21 MPG
Monthly Gallons Estimated under Revised Label (1,250 miles / 21 MPG)	59.52 gallons
Extra Gallons Per Month (59.52 – 56.82)	2.71 gallons
Cost of Extra Gasoline (2.71 x \$3.54)	\$9.58
15% Goodwill (\$9.58 x 0.15)	\$1.44
Total Monthly Compensation (rounded up)	\$11.10
Maximum Compensation (total monthly compensation x 96 months)	\$1,065.60

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City MPG Reduction Example: 2013 Bentley Continental GT 4.0L	
Fuel Economy Reduction	1 MPG City
Original Combined MPG Rating	18 MPG
Monthly Gallons Estimated under Original Label (1,250 miles / 18 MPG)	69.44 gallons
Revised MPG Rating (Reduced by 0.55 MPG to account for 1 MPG reduction in City only)	17.45 MPG
Monthly Gallons Estimated under Revised Label (1,250 miles / 17.45 MPG)	71.63 gallons
Extra Gallons Per Month (71.63 – 69.44)	2.19 gallons
Cost of Extra Gasoline (2.19 x \$3.54)	\$7.75
15% Goodwill (\$7.75 x 0.15)	\$1.16
Total Monthly Compensation (rounded up)	\$9.00
Maximum Compensation (total monthly compensation x 96 months)	\$864.00

Highway MPG Reduction Example: 2017 Volkswagen Tiguan 4MOTION 2.0L	
Fuel Economy Reduction	1 MPG Highway
Original Combined MPG Rating	21 MPG
Monthly Gallons Estimated under Original Label (1,250 miles / 21 MPG)	59.52 gallons
Revised MPG Rating (Reduced by 0.45 MPG to account for 1 MPG reduction in Highway only)	20.55 MPG
Monthly Gallons Estimated under Revised Label (1,250 miles / 20.55 MPG)	60.83 gallons
Extra Gallons Per Month (60.83 – 59.52)	1.30 gallons
Cost of Extra Gasoline (1.30 x \$3.54)	\$4.61
15% Goodwill (\$4.61 x 0.15)	\$0.69
Total Monthly Compensation (rounded up)	\$5.40
Maximum Compensation (total monthly compensation x 96 months)	\$518.40

The original and revised fuel economy ratings for each Class Vehicle are listed in Attachment A to this Notice.

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6. How do I submit a claim for cash compensation?

You will need to submit a claim and supporting documentation to receive compensation. To start your claim, go to www.VWmpgSettlement.com, insert your VIN, and fill out the Claim Form (a VIN is a 17-character number that can be found on the driver's side dashboard and/or driver's side door post). You will also be asked to submit documentation to establish the period during which you own(ed) or lease(ed) your vehicle, including, for example (and depending on your particular circumstances), your:

- Purchase agreement;
- Sale agreement;
- Lease contract; and/or
- Proof of current registration.

If you would prefer to submit your Claim Form and supporting documentation by mail, you can download and print forms from the Settlement Website or request them by mail by calling 1-855-942-0395. **For faster claims processing, you should submit your claim online at www.VWmpgSettlement.com, not by mail.**

Submit claims online: www.VWmpgSettlement.com.

Submit claims via mail: Volkswagen Fuel Economy Settlement, Claims Administrator, P.O. Box 3240 Portland, OR 97208-3240.

7. What is the deadline to submit a claim for cash compensation?

You can submit your claim now, and must electronically submit or postmark it no later than 30 days after final approval. Under the current schedule, the final approval hearing is scheduled for February 28, 2020, and **the claim deadline is March 29, 2020**. This schedule may change, so please visit the Settlement Website regularly for updates. If your claim is missing information or necessary documentation, however, you will be notified, and you will have an additional 60 days from the date you are notified to fix the deficiency.

Class Members who do not submit a claim by the deadline will not receive Settlement compensation but will still be members of the Class.

8. When and how will I receive my payment?

Your Settlement check will be mailed to you within thirty days of the later of: (i) the date the Court grants Final Approval of the Settlement, or (ii) the date the Settlement Administrator receives your completed Claim.

9. What are the tax implications of receiving a Settlement payment?

While it is the intention of Class Counsel that any payments made as a result of the Settlement not be subject to taxation, you should consult a tax professional to assess the specific tax implications of any payment you may receive. A tax professional will help you understand the specific tax implications for you.

10. What happens to money that is not claimed?

The total Settlement Value was calculated based on the assumption that all potentially eligible Class Members will submit timely and valid Claims. If, however, there are any funds remaining in the Settlement Value after all valid, complete, and timely Claims are paid to Class Members, the remaining money will be directed to environmental remediation efforts, subject to Court approval. This may include, for example, the purchase of greenhouse gas credits, environmental projects, and/or other, environmentally-focused recipients, as agreed by the Parties and approved by the Court.

Please check www.VWmpgSettlement.com regularly for updates regarding the specific entities/projects that the Parties select to receive unclaimed funds.

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UNDERSTANDING THE CLASS ACTION PROCESS

11. Why am I getting this Notice?

You are receiving this Notice because you may be a member of the Settlement Class. The Court in charge of this case authorized this Notice because Class Members have a right to know about the proposed settlement of this lawsuit, and to understand all of their options before the Court decides whether to approve the Settlement. This Notice summarizes the Settlement and explains Class Members' legal rights and options under the Settlement.

Judge Charles R. Breyer of the United States District Court for the Northern District of California is in charge of this case. The case is known as the "Audi CO₂ Case" and has been consolidated in the *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, No. 3:15-md-2672. The people who sued are called the "Plaintiffs." Audi, Bentley, Porsche, and Volkswagen are the "Defendants."

12. What is a class action?

A class action is a representative lawsuit. One or more plaintiffs (who are also called "class representatives") sue on behalf of themselves and all other people with similar claims, who are not named, but are described in the class definition and are called "class members." When a class action is settled, the Court resolves the issues in the lawsuit for all class members, except for those who request to be excluded from (or "opt out" of) the class. Opting out means that you will not receive benefits under the Settlement. The opt out process is described in Question 15 of this Notice.

13. What am I giving up in exchange for receiving the Settlement benefits?

In exchange for your payment from Defendants, you will give up your right to sue the Released Parties for the claims being resolved by the Settlement, and will give up your right to obtain compensation other than the set value provided by the Settlement (*see* Question 4 above). The Settlement has no effect on claims concerning vehicles not included in the Settlement.

Section 10 of the Settlement Agreement contains the complete text and details of what class members give up unless they exclude themselves from the Settlement, so please read it carefully. The Settlement Agreement is available at www.VWmpgSettlement.com. If you have any questions, you may talk to the law firm listed in Question 19 for free, or you may talk to your own lawyer at your own expense.

14. What are my potential legal claims and remedies in this class action?

There are many claims for relief in this nationwide class action, including some claims that seek treble or punitive damages. The list of claims starts at paragraph 114 of the Amended Consolidated Consumer Class Action Complaint, filed on August 30, 2019, in the Northern District of California. The Amended Consolidated Consumer Class Action Complaint can be found on the Settlement Website at www.VWmpgSettlement.com, under the "Documents" section. If you have any questions about the claims and remedies in the class action, you may talk to the law firms listed in Question 19 for free, or you may talk to your own lawyer at your own expense.

15. How do I get out of the Settlement?

If you do not want to receive benefits from the Settlement, and you want to retain the right to sue the Defendants about the legal issues in this case, then you must take steps to remove yourself from the Settlement. You may do this by asking to be excluded—sometimes referred to as "opting out" of—the Settlement. To do so, you must mail or e-mail a letter or other written document to the Court-Appointed claims supervisor. Your request must include:

- Your name, address, telephone number, and the VIN of your Class Vehicle;
- A statement as to whether you own/owned or lease/leased the Class Vehicle, and the dates of your ownership or lease of the Class Vehicle (i.e., start date and, if applicable, end date of possession);
- A statement that "I wish to exclude myself from the Class in Volkswagen/Audi/Porsche/Bentley Fuel Economy Class Action Settlement in *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, No. 3:15-md-2672-CRB (N.D. Cal.) (MDL 2672)" or substantially similar clear and unambiguous language; and

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- Your personal signature and date (electronic signatures, including DocuSign, are invalid and will not be considered personal signatures). Opt-out requests that are signed by an attorney but not by the Class Member are also invalid.

Your exclusion request must be **postmarked or emailed** no later than **January 17, 2020**, and must be mailed to Volkswagen Fuel Economy Settlement, Claims Administrator, P.O. Box 3240 Portland, OR 97208-3240 or e-mailed to info@VWMPGSettlement.com.

16. If I do not exclude myself, can I sue the Defendants for the same thing later?

No. Unless you exclude yourself, you give up the right to sue the Defendants for all of the claims that the Settlement resolves.

17. If I exclude myself, can I still get full benefits from the Settlement?

No. If you exclude yourself, you will not get a payment from the Settlement.

18. If I opt out and pursue my own case, could I get a larger recovery?

The law of most states provides for various remedies if a claim is proved at trial and upheld on appeal. None of these can be predicted with certainty, and all take additional time. The Settlement is designed to provide benefits that are certain, not subject to the delay and risk of trial and appeal, and not reduced by Class Counsel's fees and costs.

19. Do I have a lawyer in the case?

Yes. The Court previously appointed Lead Counsel and a Plaintiffs' Steering Committee to prosecute all consumer claims pending before Judge Charles R. Breyer as part of the "Clean Diesel" cases in *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, No. 3:15-md-2672-CRB (N.D. Cal.) (MDL 2672). Elizabeth J. Cabraser of Lief Cabraser Heimann & Bernstein, LLP is Lead Counsel and has been appointed Interim Settlement Class Counsel ("Class Counsel") in this case. She can be contacted in that capacity at no charge to you at:

**Elizabeth Cabraser, Lead Counsel
Lief Cabraser Heimann & Bernstein, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
ecabraser@lchb.com**

20. I've received solicitation letters from attorneys. Do I need to hire my own attorney to get money from the Settlement?

No. Class Counsel will represent you for purposes of the Settlement at no charge to you. As explained in Question 21, any attorneys' fees and costs awarded to Class Counsel by the Court will be paid by the Defendants in addition to the compensation available to Class members. Please note, however, if you have been or are currently represented by your own lawyer, any moneys you may owe to your lawyer will not be covered by this Settlement. If you want to be represented by your own lawyer, you may hire one at your own expense. It is possible that you will receive less money overall if you choose to hire your own lawyer to litigate against the Defendants rather than receive compensation from this Settlement.

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21. How will the lawyers be paid? And how much?

Any attorneys' fees and costs awarded to Class Counsel by the Court will be paid separately by Defendants in addition to the Class compensation, and will not reduce benefits to Class Members.

Defendants will pay reasonable attorneys' fees and costs to Class Counsel as awarded by the Court in addition to the benefits provided to the Class Members in the Settlement. Class Counsel will ask the Court to award \$13 million in attorneys' fees and costs in a document to be filed on December 13, 2019. That document will be available on the Settlement Website shortly after it is filed and will describe the methodology and rationale behind Class Counsel's request. Class Members will have an opportunity to comment on and/or object to this request, as explained further in Question 22. Defendants are free to contest the fee amount if they do not agree that the requested amount is reasonable. The Court must approve any attorneys' fees and costs before they are paid by Defendants.

Defendants will not pay attorneys' fees and costs to any attorneys other than Class Counsel and attorneys working under Class Counsel's direction. If you have hired or choose to hire attorneys that have not been appointed as Class Counsel, you may incur additional charges, subject to your agreement with your personally-retained attorneys. No attorneys other than Class Counsel or other attorneys authorized by Class Counsel to perform work in connection with this Action will receive fees or expenses from Defendants under this Class Action Agreement or any fee-shifting statute.

22. How do I tell the Court if I do not like the Settlement?

If you do not exclude yourself from the Settlement, you may object to it. The Court will consider your views. To comment on or to object to the Settlement or Class Counsel's request for attorneys' fees and costs, you or your attorney must submit your written objection to the Court, including the following:

- Your name, address, telephone number, and the VIN of your Class Vehicle;
- A statement as to whether you own/owned or lease/leased the Class Vehicle, and the dates of your ownership or lease of the Class Vehicle (i.e., start date and, if applicable, end date of possession);
- A statement saying that you object to the Volkswagen/Audi/Porsche/Bentley Fuel Economy Class Action Settlement in *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, No. 3:15-md-2672-CRB (N.D. Cal.) (MDL 2672)" or substantially similar clear and unambiguous language;
- The reasons you object to the Settlement, along with any supporting materials;
- A statement that you have reviewed the Class definition and have not opted out of the Class; and
- Your signature and date.

If you object through your own lawyer (hired at your own expense), your lawyer must comply with additional requirements contained in Section 8.2 of the Class Action Settlement.

In addition, if you intend to appear at the final approval hearing (the "Fairness Hearing"), you must submit a written notice of your intent (*see* Questions 24 and 26 below).

You must mail your objection to all the addresses below postmarked no later than **January 17, 2020**:

COURT	CLASS COUNSEL	DEFENSE COUNSEL
Clerk of the Court/Judge Charles R. Breyer Phillip Burton Federal Building & United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	Elizabeth Cabraser Lieff Cabraser Heimann & Bernstein, LLP 275 Battery Street, 29th Floor San Francisco, CA 94111	Sharon L. Nelles SULLIVAN & CROMWELL LLP 125 Broad Street New York, NY 10004 Cari Dawson Alston & Bird LLP 1201 W. Peachtree St. NE #4900 Atlanta, GA 30309

**YOUR LEGAL RIGHTS UNDER THE SETTLEMENT ARE AFFECTED
EVEN IF YOU DO NOTHING. PLEASE READ THIS NOTICE CAREFULLY.
QUESTIONS? GO TO WWW.VWMPGSETTLEMENT.COM OR CALL 1-855-942-0395**

23. What is the difference between objecting to the Settlement and opting out?

You can object only if you do not opt out of the Class. Opting out is telling the Court that you do not want to be part of the Settlement, and you do not want to receive any payment from the Settlement. If you opt out, you have no basis to object to the Settlement by telling the Court you do not like something about it, because the case no longer affects you.

If you object to the Settlement, you are expressing your views about the Settlement but remain a member of the Class (if you are otherwise eligible). If you make an objection, you must still submit a claim in order to receive compensation under the Class Action Settlement.

24. When and where will the Court decide whether to approve the Settlement?

The Court will hold the final approval or “Fairness Hearing” on **February 28, 2020**, at the United States District Court for the Northern District of California, located at the United States Courthouse, 450 Golden Gate Avenue, 17th Floor, San Francisco, CA 94102, before determining whether to approve the Settlement and Class Counsel’s request for attorneys’ fees and costs. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.VWmpgSettlement.com or call 1-855-942-0395. At this hearing, the Court will hear evidence about whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them and may listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the Settlement and Class Counsel’s request for attorneys’ fees and costs. We do not know how long that decision will take.

25. Do I have to attend the hearing?

No. Class Counsel will answer questions the Court may have. You are welcome to attend at your own expense. If you timely file an objection, you do not have to come to Court to talk about it. As long as you submitted your written objection on time, the Court will consider it. You also may have your own lawyer attend at your expense, but it is not necessary.

26. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. The Court will determine whether to grant you permission to speak. To do so, you must file with the Court a written notice of your intent to appear. Be sure to include your name, address, telephone number, and your signature. Your notice of intention to appear must be filed or postmarked no later than **January 24, 2020** and must also be sent to all of the addresses listed in Question 22.

GETTING MORE INFORMATION

27. How do I get more information?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You can get a copy this Notice, the Settlement Agreement, and other documents at www.VWmpgSettlement.com. You also may write with questions to Volkswagen Fuel Economy Settlement, Claims Administrator, P.O. Box 3240 Portland, OR 97208-3240 or call 1-855-942-0395.

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Attachment A
MPG Differential and Cash
Compensation for Each Class
Vehicle

Make	Model	Engine Capacity (liters)	Model Year	Current Fuel Economy Label			Modified Fuel Economy Label			Compensation Per Month Owned/Leased ¹	Maximum Compensation Per VIN
				City	Hwy	Comb.	City	Hwy	Comb.		
Audi	A8L	4.0L	2015	18	29	22	18	29	21	\$11.10	\$1,065.60
Audi	A8L	6.3L	2013	13	21	16	13	20	15	\$21.30	\$2,044.80
Audi	A8L	6.3L	2014	13	21	16	13	20	15	\$21.30	\$2,044.80
Audi	A8L	6.3L	2015	14	22	17	13	22	16	\$18.80	\$1,804.80
Audi	A8L	6.3L	2016	14	22	17	13	22	16	\$18.80	\$1,804.80
Audi	RS7	4.0L	2014	16	27	19	15	27	19	\$8.00	\$768.00
Audi	RS7	4.0L	2015	15	25	18	14	25	18	\$9.00	\$864.00
Audi	RS7	4.0L	2016	15	25	18	14	25	18	\$9.00	\$864.00
Audi	S8	4.0L	2013	15	26	19	15	26	18	\$14.90	\$1,430.40
Audi	S8	4.0L	2014	15	26	19	15	26	18	\$14.90	\$1,430.40
Audi	S8	4.0L	2015	17	27	20	16	27	20	\$7.20	\$691.20
Audi	S8	4.0L	2016	15	25	19	15	25	18	\$14.90	\$1,430.40
Bentley	Continental GT	4.0L	2013	15	24	18	14	24	18	\$9.00	\$864.00
Bentley	Continental GT	4.0L	2014	15	24	18	14	24	18	\$9.00	\$864.00
Bentley	Continental GT	4.0L	2015	15	25	19	15	25	18	\$14.90	\$1,430.40
Bentley	Continental GT	4.0L	2016	15	25	19	15	25	18	\$14.90	\$1,430.40

¹ Class Members who held active leases as of the date of the Motion for Preliminary Approval will be entitled to compensation for the full duration of their lease. Class Members who owned their Class Vehicles as of the date of the Motion for Preliminary Approval will be entitled to compensation for the months they have owned their Class Vehicles, as well as any remaining months up to 96 months after the Class Vehicles were first sold.

Make	Model	Engine Capacity (liters)	Model Year	Current Fuel Economy Label			Modified Fuel Economy Label			Compensation Per Month Owned/Leased	Maximum Compensation Per VIN
				City	Hwy	Comb.	City	Hwy	Comb.		
Bentley	Continental GT	4.0L	2017	15	25	19	15	25	18	\$14.90	\$1,430.40
Bentley	Continental GTC	4.0L	2013	14	24	17	13	24	17	\$10.10	\$969.60
Bentley	Continental GTC	4.0L	2014	14	24	17	14	23	17	\$8.20	\$787.20
Bentley	Continental GT Convertible	4.0L	2015	14	24	17	13	23	16	\$18.80	\$1,804.80
Bentley	Continental GT Convertible	4.0L	2016	14	24	17	13	23	16	\$18.80	\$1,804.80
Bentley	Continental GT Convertible	4.0L	2017	14	24	17	13	23	16	\$18.80	\$1,804.80
Bentley	Flying Spur	4.0L	2015	14	24	17	13	24	17	\$10.10	\$969.60
Bentley	Flying Spur	4.0L	2016	14	24	17	13	24	17	\$10.10	\$969.60
Porsche	Flying Spur	6.0L	2014	12	20	15	12	20	14	\$24.30	\$2,332.80
Porsche	Flying Spur	6.0L	2015	12	20	15	12	20	14	\$24.30	\$2,332.80
Porsche	Flying Spur	6.0L	2016	12	20	15	12	20	14	\$24.30	\$2,332.80
Porsche	Cayenne	3.6L	2013	17	23	19	16	23	19	\$8.00	\$768.00
Porsche	Cayenne	3.6L	2014	17	23	20	17	23	19	\$13.40	\$1,286.40
Porsche	Cayenne	3.6L	2016	19	24	21	17	24	20	\$12.20	\$1,171.20
Porsche	Cayenne GTS	3.6L	2016	16	23	19	16	23	18	\$14.90	\$1,430.40
Porsche	Cayenne GTS	4.8L	2013	15	21	17	14	20	16	\$18.80	\$1,804.80
Porsche	Cayenne GTS	4.8L	2014	15	21	17	14	20	16	\$18.80	\$1,804.80
Porsche	Cayenne S	3.6L	2015	17	24	20	16	24	19	\$13.40	\$1,286.40
Porsche	Cayenne S	3.6L	2016	17	24	20	16	24	19	\$13.40	\$1,286.40
Porsche	Cayenne S	4.8L	2013	16	22	18	15	22	18	\$9.00	\$864.00

Make	Model	Engine Capacity (liters)	Model Year	Current Fuel Economy Label			Modified Fuel Economy Label			Compensation Per Month Owned/Leased	Maximum Compensation Per VIN
				City	Hwy	Comb.	City	Hwy	Comb.		
Porsche	Cayenne S	4.8L	2014	16	22	18	15	22	18	\$9.00	\$864.00
Porsche	Cayenne Turbo	4.8L	2013	15	22	17	14	21	17	\$18.80	\$1,804.80
Porsche	Cayenne Turbo	4.8L	2014	15	22	17	14	21	17	\$18.80	\$1,804.80
Porsche	Cayenne Turbo S	4.8L	2014	14	20	16	13	20	15	\$21.30	\$2,044.80
Porsche	Cayenne Turbo S	4.8L	2016	14	21	17	14	21	16	\$18.80	\$1,804.80
Volkswagen	Tiguan 4MOTION	2.0L	2017	20	24	21	20	23	21	\$5.40	\$518.40
Volkswagen	Touareg	3.6L	2013	17	23	19	16	23	19	\$8.00	\$768.00
Volkswagen	Touareg	3.6L	2014	17	23	19	16	23	19	\$8.00	\$768.00