

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

SHARON CHENG, CRISTINA DIAS,  
RHONDA SANFILIPO, BRUCE PULEO,  
ZINA PRUITT, RON ZIMMERMAN,  
CHERYL SILVERSTEIN, TINA FENG,  
ROBERT HAKIM, BERNADETTE GRIMES,  
ELIZABETH GENDRON, ROGER CARTER,  
MARLENE RUDOLPH, PATRICIA  
BARLOW, TERESA EDWARDS, ISAAC  
TORDJMAN, JAMES HETTINGER, DIEU  
LE, CHRIS BOHN, DANIEL DEWEERDT,  
CRAIG BOXER, BETTY DENDY,  
ELIZABETH PERSAK, KRISTI ROCK,  
JENNIFER CHALAL, JOHN TORRANCE,  
LENARD SHOEMAKER, MICHAEL  
MITCHELL, ROBERT SKELTON, JEFFREY  
JONES, ISABEL MARQUES, PAYAM  
RASTEGAR, and SYED ABDUL NAFAY,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

TOYOTA MOTOR CORPORATION,  
TOYOTA MOTOR NORTH AMERICA, INC.,  
and DENSO INTERNATIONAL AMERICA,  
INC.,

Defendants.

Case No: 1:20-cv-00629-WFK-JRC

**AMENDMENT NO. 1 TO SETTLEMENT AGREEMENT**

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The Settlement Agreement dated September 6, 2022, is amended to include the following vehicles:

<b>Model Year &amp; Model</b>	<b>Number of Vehicles</b>	<b>Type of Covered Vehicles</b>
2018 Toyota Camry	848	Subject Vehicles
2019 Lexus NX200T / NX300	9	Subject Vehicles
2019 Lexus RX 350L	1	Subject Vehicles
2019 Lexus ES300h	494	SSC Vehicles

These vehicles are hereby included in the above-referenced Court-approved class action settlement and the Class Members who own(ed) and/or lease(d) these newly-included and/or newly-categorized vehicles are eligible for the relief provided in the Settlement Agreement for these Subject Vehicles and/or SSC Vehicles. Toyota shall promptly, but no later than sixty (60) days after the Court approves the Amendment (“Second Notice Date”), notify the Class Members associated with these vehicles to inform them of the benefits, terms, and conditions in the Settlement Agreement.

For purposes of this Amendment, “Added Class Members” are defined as Class Members associated with the 848 Toyota Camry vehicles, the nine (9) Lexus NX200T/NX300 vehicles, and the one (1) Lexus RX 350L vehicle that were not previously a part of the Court-approved Settlement. Class Members associated with the 494 2019 Lexus ES300h vehicles, which were “Additional Vehicles” under the Settlement and are newly-categorized as “SSC Vehicles” in this Amendment, remain covered by the Settlement, but now as Class Members who own(ed) or lease(d) SSC Vehicles.

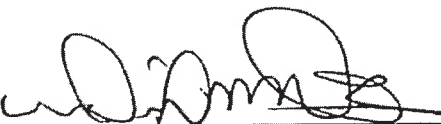
In addition to other Settlement benefits, Added Class Members may submit Claims for previously paid out-of-pocket expenses incurred to repair or replace a Fuel Pump of Covered

Vehicles that were not otherwise reimbursed and that were either (a) incurred prior to the Second Notice Date; or (b) incurred after the Second Notice Date and before ninety (90) days after the Second Notice Date. For costs that were incurred after the Initial Notice Date and before the ninety (90) days after the Second Notice Date, the Added Class Member must provide proof that they were denied coverage by the Toyota dealer prior to incurring the cost.

To submit a claim, the Added Class Member must visit the Settlement Website, [www.toyotafuelpumpssettlement.com](http://www.toyotafuelpumpssettlement.com), and follow the instructions provided to submit the Claim. In order to be considered, Added Class Members must file a Claim no later than ninety (90) days after the Second Notice Date. The rest of the terms of the Out-of-Pocket Claims Process for the Added Class Members will follow the same process as is outlined for Class Members in Section III.C. paragraphs 2 through 8 of the original Settlement Agreement.

Agreed to on the date indicated below.

APPROVED AND AGREED TO BY CLASS COUNSEL  
AS AUTHORIZED BY CLASS REPRESENTATIVES

BY   
W. DANIEL "DEE" MILES III

DATE: December 11<sup>th</sup>, 2025

BY   
DEMETRI BASAR


DATE: December 11, 2025

APPROVED AND AGREED TO ON BEHALF OF TOYOTA MOTOR CORPORATION AND TOYOTA MOTOR NORTH AMERICA, INC.

BY   
ELIZABETH GIBSON  
GROUP VICE PRESIDENT AND GENERAL COUNSEL  
TOYOTA MOTOR NORTH AMERICA, INC.

DATE: December 12, 2025

APPROVED AND AGREED TO AS TO FORM BY TOYOTA'S COUNSEL

BY   
JOHN P. HOOPER  
KING & SPALDING LLP

DATE: December 12, 2025

APPROVED AND AGREED TO ON BEHALF OF DENSO INTERNATIONAL AMERICA, INC.

BY \_\_\_\_\_  
JON M. CANTY  
DIRECTOR AND GENERAL COUNSEL

DATE: December \_\_, 2025

APPROVED AND AGREED TO AS TO FORM BY DENSO'S COUNSEL

BY \_\_\_\_\_  
DANIEL R.W. RUSTMANN  
BUTZEL LONG, P.C.

DATE: December \_\_, 2025

APPROVED AND AGREED TO ON BEHALF OF TOYOTA MOTOR CORPORATION AND TOYOTA MOTOR NORTH AMERICA, INC.

BY \_\_\_\_\_  
ELIZABETH GIBSON  
GROUP VICE PRESIDENT AND GENERAL COUNSEL  
TOYOTA MOTOR NORTH AMERICA, INC.

DATE: December \_\_, 2025

APPROVED AND AGREED TO AS TO FORM BY TOYOTA'S COUNSEL

BY \_\_\_\_\_  
JOHN P. HOOPER  
KING & SPALDING LLP

DATE: December \_\_, 2025

APPROVED AND AGREED TO ON BEHALF OF DENSO INTERNATIONAL AMERICA, INC.

BY Jon Canty  
JON M. CANTY  
VICE PRESIDENT AND GENERAL  
COUNSEL

DATE: December 14, 2025

APPROVED AND AGREED TO AS TO FORM BY DENSO'S COUNSEL

BY   
DANIEL R.W. RUSTMANN  
BUTZEL LONG, P.C.

DATE: December 15, 2025