

**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

SUPPLEMENTAL DECLARATION OF MATTHEW NEYLON ON BEHALF OF KROLL SETTLEMENT ADMINISTRATION LLC REGARDING REPORTING OF TIMELY REQUESTS TO OPT OUT AND UNTIMELY OBJECTIONS RECEIVED TO DATE IN CONNECTION WITH FINAL APPROVAL OF SETTLEMENT

I, Matthew Neylon, declare and state as follows:

1. I am a Senior Manager of Kroll Settlement Administration LLC (“Kroll”)¹, the Settlement Notice Administrator appointed in the above-captioned case,² whose principal office is located at 2000 Market Street, Suite 2700, Philadelphia, Pennsylvania 19103. I am over 21

¹ Capitalized terms shall have the meanings ascribed to them in the Settlement Agreement (as defined below).

² The Settlement Agreement appoints Kroll Notice Media as the Settlement Notice Administrator. Kroll Notice Media Solutions is a business unit of Kroll Settlement Administration LLC.

years of age and am authorized to make this declaration on behalf of Kroll and myself. The following statements are based on my personal knowledge and information provided by other experienced Kroll employees working under my general supervision. This declaration is being filed in connection with final approval.

2. Kroll has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities fraud, labor and employment, consumer, and government enforcement matters. Kroll has provided notification and/or claims administration services in more than 3,000 cases.

3. Pursuant to the Court's Preliminary Approval Order, dated September 16, 2022 [ECF. 167], Kroll was appointed as the Settlement Notice Administrator to provide notification and administration services in connection with a settlement agreement (the "Settlement Agreement") [ECF 162] entered into in connection with the above-captioned case, referred to herein as the "Settlement". Kroll's duties in connection with the Settlement include, among other responsibilities, receiving and processing opt outs.

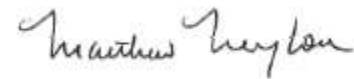
4. On December 8, 2022, I submitted a Declaration [ECF. 182] regarding the reporting of timely requests to opt out and untimely objections received as of December 7, 2022. The purpose of this declaration is to provide the Court with supplemental information regarding additional timely opt-out requests Kroll has received.

5. As of December 13, 2022, Kroll's records indicate that it has received an additional three (3) timely opt-out requests. A list of the additional timely opt-outs received to date is attached hereto as Exhibit A. That list has been redacted for privacy reasons.

6. As of December 13, 2022, Kroll has not received any other objections to the Settlement.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, under the laws of the United States of America, that the foregoing is true and correct.

Executed: December 13, 2022, in La Grange, KY

A handwritten signature in cursive script that reads "Matthew Neylon".

Matthew Neylon

Exclusion List			
Count	Reference Number	First Name	Last Name
1	58337HJBK228G	A*****	L***
2	58337G27925N0	S****	J****
3	58337FTP7M1YS	S*****	H*****