

December 17, 2019

SENT BY EMAIL

The Honourable Pierre-C. Gagnon, J.S.C.
Superior Court of Québec
Longueuil Courthouse
1111 Jacques-Cartier Blvd. East, Room R-142
Longueuil, Québec J4M 2J6

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Dear Justice Gagnon:

Re: Class Action: 500-06-000825-162 (Muraton v. Toyota) (“Action”)

As a follow-up to your request, Plaintiff and Toyota Canada, Inc.¹ respectfully submit this interim report regarding the implementation of the settlement relief in the above-referenced Action. You will also find attached herewith a letter from the Administrator dated December 17, 2019, regarding same. We are pleased to report that the Frame Inspection and Replacement Program continues to be offered to eligible Class Members. We are also pleased to report that the Frame Replacement Reimbursement Program is nearing completion.

Pursuant to the terms of the Court-approved Settlement Agreement, Toyota is providing the Frame Inspection and Replacement Program to eligible Class Members. The duration of this program is 12 years from the Date of First Use of the Subject Vehicle or, if the Class Member has owned or leased the vehicle beyond 12 years from the date of First Use, then for 1 year beginning 30 days following the occurrence of the Initial Notice Date (this period expired on July 22, 2019).

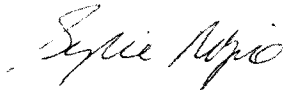
As of December 4, 2019, Quebec Class Members have had a total of: (i) 907 frames replaced on their Subject Vehicles; (ii) 2,931 inspections performed on their Subject Vehicles; and (iii) 1,847 Corrosion Resistant Compounds applied to their Subject Vehicles. In addition, the Settlement Notice and Claims Administrator and/or Class Counsel have requested Toyota’s assistance to respond to 201 inquiries from Quebec Class Members’ issues via email, telephone, and mail related to the Frame Inspection and Replacement Program and other terms of the Settlement Agreement.

¹ All terms are as defined in the Settlement Agreement, unless otherwise defined herein.

In addition to the Frame Inspection and Replacement Program, eligible Class Members were able to submit Claims for previously paid out-of-pocket expenses for frame replacement incurred to address a condition that satisfies the Rust Perforation Standard. As of October 31, 2019, the Administrator informs the Parties that a total of 3 Claims were submitted by Class Members residing in Quebec, one claim has been accepted for payment and is in the process of being paid. A further 2 claims from Quebec Class Members are in the process of being validated by the Settlement Notice and Claims Administrator. A total of 15 Quebec Class Members submitted opt out forms to remove themselves from the settlement.

Again, the Court-approved Settlement Agreement has been implemented according to its terms. We are working on numbers for the class as a whole and will revert to Your Honour when we have that data. In the meantime, we trust that this report satisfies Your Honour. Thank you for your consideration of this submission.

Respectfully submitted,



Sylvie Rodrigue, Ad. E.

SR/cr

Attachment: Letter from the Administrator, dated December 17, 2019

cc: Mtre. David Assor, *Lex Group Inc.*