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NOTE: CHANGES MADE BY THE COURT

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA—WESTERN DIVISION

OMAR VARGAS, ROBERT  
BERTONE, MICHELLE HARRIS,  
and SHARON HEBERLING  
individually, and on behalf of a class  
of similarly situated individuals,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant

Case No. CV12-08388 AB (FFMx)  
Hon. Judge André Birotte Jr.  
Crt Rm No. 790

**CLASS ACTION**

**[PROPOSED] ORDER RE CURING  
DEFICIENT OPT-OUT REQUESTS**

1 The Court HEREBY orders as follows:

2 1. Exhibit A includes a list of Class Members, represented by attorneys,  
3 whose submitted opt-outs may be deficient because they were not personally  
4 signed by Class Members or because they contain a typed signature that may not  
5 constitute a valid e-signature. These class members have until ~~November 6, 2017~~  
6 **November 13, 2017** to correct these deficiencies by submitting a new opt-out  
7 request personally signed by the class member or by confirming that previously  
8 submitted typewritten signatures are valid e-signatures.

9 2. To be considered timely under this Order, new opt-out requests or  
10 confirmation that previously submitted typewritten signatures are valid e-  
11 signatures must be sent to the Claims Administrator and postmarked affixed by the  
12 United States Post Office no later than ~~November 6, 2017~~ **November 13, 2017**. If  
13 the opt out request is delivered by the United States Post Office but is not  
14 postmarked by the post office, it shall be deemed timely if it is received by the  
15 Claims Administrator on or before ~~November 9, 2017~~ **November 16, 2017**.

16 3. New opt-out requests with typewritten signatures by class members shall  
17 be deemed to have been personally signed by the class member if (a) the typed  
18 signature shows on its face that it was created by a recognized e-signature  
19 program such as DocuSign or (b) counsel representing the class members certify  
20 that the typed signatures were personally affixed by the class members using an e-  
21 signature program or otherwise.

22 4. Counsel may confirm that previously submitted typewritten signatures of  
23 Class Members are valid e-signatures by certifying that the typed signatures were  
24 personally affixed by the class members using an e-signature program or  
25 otherwise.

26 5. When certifying e-signatures as valid, counsel representing multiple  
27 class members may submit one certification with respect to all typed signatures  
28 submitted on behalf of those clients. The following language shall be sufficient to

1 certify a valid e-signature: “I, [attorney name] hereby certify that the typewritten  
2 signature on opt-outs submitted by my firm on behalf of [list clients] were affixed  
3 by those individuals using an e-signature service or were otherwise personally  
4 affixed by those individuals.”

5 6. ~~By November 13, 2017,~~ **November 20, 2017** the Claims Administrator  
6 shall file a supplemental declaration listing the class members listed on Exhibit A  
7 who have timely corrected the deficiencies set forth above.

8 7. If class members listed on Exhibit A fail to timely cure the deficiencies  
9 set forth above, their opt-out requests shall be deemed invalid.

10 8. The Claims Administrator shall mail a copy of this order to attorneys  
11 representing class members on Exhibit A no later than seven (7) days after entry  
12 of this Order.

13 **IT IS SO ORDERED.**

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16 Dated: October 18, 2017



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18 By: \_\_\_\_\_  
19 Hon. André Birotte Jr.  
20 U.S. District Judge

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# EXHIBIT A

ClaimID	First Name	Last Name	Additional Name	City	State	VIN	Opt Out PM
FVS-113009607	RICHARD W	AIKMAN		ST PETERSBURG	FL	1FAHP3M25CL147533	8/29/2017
FVS-119210410	CATHERINE M	ALVAREZ	PEDRO ALVAREZ	LA QUINTA	CA	1FADP3R43EL271411	9/1/2017
FVS-800000528	CHRIS	BACHMAN		COACHELLA	CA	1FADP3F26EL169894	9/1/2017
FVS-118195751	COREY W	BARNARD	GINA BARNARD	MORENO VALLEY	CA	1FADP3F20EL241754	8/16/2017
FVS-100894895	MARIZA L	BARONE		TAMPA	FL	1FADP3F24EL239120	8/28/2017
FVS-100793266	PEDRO A	BARRAZA		SAN TAN VLY	AZ	1FADP3FE9FL232224	8/29/2017
FVS-106811266	STACY M	BASS		OLDSMAR	FL	1FADP3K25EL180391	8/22/2017
FVS-113927711	LESLIE A	BECK		GREEN CV SPGS	FL	3FADP4AJ9FM189884	8/29/2017
FVS-103790365	JENNIFER L	BELL		JACKSONVILLE	FL	1FADP3F25DL174292	8/29/2017
FVS-101105282	NELSON C	BOWERS JR	SUE BOWERS	CASA GRANDE	AZ	1FADP3F28DL115558	8/29/2017
FVS-115317074	JESSICA L	BRADLEY		LAS VEGAS	NV	3FADP4BJ6CM173426	8/29/2017
FVS-103606033	RITA	BROWN	FRANKIE BROWN	ATWOOD	TN	1FADP3F24DL217259	7/18/2017
FVS-113286350	FREDRIC A	CALVIN		BULLHEAD CITY	AZ	1FAHP3N27CL245414	9/6/2017
FVS-108957527	ROWAN L	CATTELL	FKA KAREN CATTELL	SCOTTSDALE	AZ	1FADP3N2XEL258773	8/29/2017
FVS-115181326	COURTNEY N	CONNOLLY		NAPLES	FL	3FADP4BJ5EM233327	8/29/2017
FVS-116151935	JOHN A	COOPER	DIANA COOPER	GOODYEAR	AZ	3FADP4CJXEM177075	8/29/2017
FVS-102258104	BOBBY J	DASHER		LAKELAND	FL	1FADP3F26EL147569	8/29/2017
FVS-800000552	MATTHEW	DASHIELL		CORONA	CA	1FAHP3M25CL382255	9/1/2017
FVS-104555661	KRISTA	DAVIS		LEBANON	TN	1FADP3E22GL309007	7/26/2017
FVS-115172017	BERTHA SILVIA V	DE GONZALEZ		PHOENIX	AZ	3FADP4BJ6DM159351	9/1/2017
FVS-116719621	ANTHONY	DIAZ		MIRA LOMA	CA	3FADP4EJ4GM165116	9/5/2017
FVS-119132087	ANTHONY	DIAZ		MIRA LOMA	CA	1FAHP3F25CL436005	9/5/2017
FVS-118635395	CAITLIN J	DOBSON		HERMOSA BEACH	CA	1FADP3F2XDL290328	9/1/2017
FVS-100613870	JAMES B	EADES III		ORLANDO	FL	1FADP3F28EL417045	8/29/2017
FVS-104069180	BARBARA	ELIAS	JONATHAN ELIAS	BOCA RATON	FL	1FADP3F21GL249820	9/5/2017
FVS-107049368	KEVIN W	ENTZ	ANGELA ENTZ	BELL	FL	1FADP3K26EL304717	7/17/2017
FVS-800005074	CARLOS	FIGUEROA		VICTORVILLE	CA	3FADP4BJ1DM167597	9/5/2017
FVS-118558285	MARLINA L	FORTIEUNDO NUDO	RALPH NUDO	CHINO HILLS	CA	1FADP3F29DL201073	8/30/2017
FVS-107033305	CARIDAD	GARCIA		TAMPA	FL	1FADP3K26EL104002	8/30/2017
FVS-103746323	DARIO F	GARCIA IBANEZ		MIRAMAR	FL	1FADP3FEXFL235276	8/30/2017
FVS-103067329	MELISA M	GARCIA VALLEJO		MORRISTOWN	NJ	1FADP3F23FL364997	8/29/2017
FVS-110123360	DANIEL R	GIBB		GILBERT	AZ	1FAHP3F25CL392281	9/1/2017
FVS-119011140	JOSEPH P	GLYNN		SAN JOSE	CA	1FADP3R42EL176645	8/15/2017

FVS-800001630	STEPHANIE	GOODYEAR	JESSE MONTGOMERY	TAMPA	FL	1FADP3F25GL236813	8/30/2017
FVS-101161700	KARIS H	GREEN		EDEN PRAIRIE	MN	1FADP3F24DL123804	8/22/2017
FVS-119979772	ADAM F	GRYMONPREZ		SAN DIMAS	CA	3FADP4CJ0CM118520	8/16/2017
FVS-119406179	MARK R	HALL	JACQUELINE HALL	RIVERSIDE	CA	1FAHP3K25CL392190	8/31/2017
FVS-120424614	JOHN G	HENNIGAN		LEVITTOWN	PA	1FADP3F22DL326304	9/1/2017
FVS-102808260	ROSEMARIE	HEUSINGER	JAMES HEUSINGER	POUGHKEEPSIE	NY	1FADP3F20EL215364	8/22/2017
FVS-115722670	TINA	HUNT	BRITTANY TODD	PIEDMONT	AL	3FADP4BJ8GM103240	7/18/2017
FVS-119401673	JAMES	HURST	DENISE HURST	SANTA ROSA	CA	1FAHP3K25CL215980	9/1/2017
FVS-116008881	LINDA G	JAMES-ECKHART		MESA	AZ	3FADP4CJ4DM119428	8/28/2017
FVS-110751892	GARY H	JOHNSON		JAX BCH	FL	1FAHP3F28CL377872	8/29/2017
FVS-119318717	JUDY	JOHNSON	SCOTT JOHNSON	BERMUDA DUNES	CA	1FAHP3H27CL366780	9/1/2017
FVS-107333333	ROWLAND T	JONES		SALEM	OR	1FADP3K27EL399918	8/25/2017
FVS-800000323	BRUCE	KIEFERT		HEMET	CA	1FADP3K22GL209364	9/1/2017
FVS-102671770	ALICE S	LEBAIR		ST CLOUD	FL	1FADP3F22DL230141	8/29/2017
FVS-107218070	ANDREW R	LOCKWOOD		NEW LONDON	CT	1FADP3K26EL188189	8/28/2017
FVS-113922787	PEDRO M	LOPEZ BORRERO		WINTER HAVEN	FL	3FADP4AJ8DM175018	8/29/2017
FVS-104839635	ADAM	LURIE	TERESA LURIE	MARANA	AZ	1FADP3F21EL363619	8/29/2017
FVS-118419463	AMANDA K	MARQUEZ		PATTERSON	CA	1FADP3F27DL164525	9/5/2017
FVS-107018209	SCOTT D	MATEJKA		RIVERVIEW	FL	1FADP3K25GL236798	8/30/2017
FVS-105150215	CAROLE	MATHIS		OAK LAWN	IL	1FADP3F28EL192285	8/31/2017
FVS-105733474	RICHARD	MICHAEL		JACKSON	TN	1FADP3K20EL457903	9/5/2017
FVS-800002296	CHRISTINE	MITCHELL		TEMPE	AZ	1FADP3F29DL164316	8/28/2017
FVS-102812195	MICHELE L	MONTOYA		LITCHFIELD PK	AZ	1FADP3F20EL219396	9/1/2017
FVS-112025617	ELIZABETH K	MURRAY	STEVE MURRAY	TEMPE	AZ	1FAHP3K21CL324369	9/5/2017
FVS-107350874	KIRBY L	NELSON		CHANDLER	AZ	1FADP3K27DL264453	9/1/2017
FVS-800009770	LAUREN	NICHOLSON		CHARLOTTE	NC	1FAHP3H20CL472620	9/5/2017
FVS-108827020	DONNA R	PAGLUIGHI		LAKE WORTH	FL	1FADP3N27EL448207	8/30/2017
FVS-108836258	BOBBIE W	PAYNE		JACKSONVILLE	FL	1FADP3N24EL360019	8/29/2017
FVS-800000544	TERI L	PHILLIPS		PALM DESERT	CA	3FADP4BJ0DM226008	9/1/2017
FVS-109926544	TYRONE W	RAYMOND	CARLIE RAYMOND	MARANA	AZ	1FAHP3F24CL263528	8/29/2017
FVS-107507757	ZOLA L	REED		HENDERSON	NV	1FADP3K28EL176397	8/29/2017
FVS-120622491	ROBIN	RITCHIE		GREENCASTLE	PA	1FADP3K2XEL310021	7/20/2017
FVS-119560844	KAYLA	SADLAK		LAKE ELSINORE	CA	3FADP4AJXDM205085	9/5/2017
FVS-117651800	MAUREEN T	SMITH		GILBERT	AZ	3FADP4FJ2BM177210	9/2/2017

FVS-105015164	KIM E	STEVENS		PALM COAST	FL	1FADP3F24EL180473	8/29/2017
FVS-105337285	STEVEN R	STRICKLAND	JOYCE STRICKLAND	ORLANDO	FL	1FADP3F22DL349596	8/30/2017
FVS-118842870	JUDY	SUMPTER		APPLE VALLEY	CA	1FADP3K2XEL374415	8/28/2017
FVS-104115637	MARY E	TAYLOR	WILLIAM N TAYLOR	PRINCETON	WV	1FADP3F23EL380325	9/5/2017
FVS-116129247	ALYSSA R	TAYLOR		PORT ST LUCIE	FL	3FADP4CJ8CM106034	9/5/2017
FVS-115722688	BRITTANY	TODD	TINA HUNT	PIEDMONT	AL	3FADP4BJ8GM103240	7/18/2017
FVS-101160232	MELANIE C	VILLANUEVA		CHICAGO	IL	1FADP3F24DL121955	8/18/2017
FVS-107753189	ARTURO R	VISSO		MIAMI	FL	1FADP3K29FL252839	8/30/2017
FVS-103913491	MACY M	WALKER		MESA	AZ	1FADP3F2XDL221414	8/29/2017
FVS-114328757	ALLIE M	WALKER		LUTZ	FL	3FADP4BJ1EM102802	8/29/2017
FVS-106197096	MAUREEN P	WARD	JAMES SHEEHAN	CORAL SPRINGS	FL	1FADP3K22DL187362	8/30/2017
FVS-103427384	OLIVIA A	WEBER		MILTON	FL	1FADP3F25FL382059	8/29/2017
FVS-117925683	WANDA J	WEST TURNER		ELLENWOOD	GA	3FADP4FJ8BM239449	8/24/2017
FVS-101576595	SHAWNNA N	WHITEHURST		APACHE JCT	AZ	1FADP3F28DL320782	8/29/2017
FVS-102769273	ADRIANA A	WILLIAMS		TAMPA	FL	1FADP3F25DL133256	8/29/2017
FVS-800000536	FREDERICK	YODER		CABAZON	CA	1FADP3F23DL337151	9/1/2017
FVS-107628899	CHRISTINE G	ZOLINE		PORT ORANGE	FL	1FADP3K28GL368082	8/29/2017