Press Release

If You Own or Lease, or Previously Owned, Purchased or Leased a Toyota Tacoma (2005-2010), Toyota Tundra (2007-2008) or Toyota Sequoia (2005-2008), You Could Be Eligible to Benefit from a Class Action Settlement

Waterloo, Ontario [June 21, 2018] -- The following statement is being jointly issued by Toyota Canada Inc. (Toyota) and the representative plaintiffs' legal counsel through Crawford & Company, which is acting as the settlement notice and claims administrator, regarding the Forbes and Lagace v. Toyota Canada, Inc. and Muraton v. Toyota Canada, Inc. cases;

Who is affected?

There is a proposed settlement of class action lawsuits started in Ontario and Quebec against Toyota concerning purchased or leased Model Year 2005–2010 Toyota Tacoma, 2007–2008 Toyota Tundra, and 2005–2008 Toyota Sequoia vehicles distributed for sale or lease in Canada (collectively referred to in this press release as "Subject Vehicles").

What about the approval hearings?

The Courts will hold **settlement and counsel fees approval** hearings in Ottawa on September 7, 2018 at 10:00AM and in Montreal on September 5, 2018 at 9:30AM.

What is the settlement relief?

Frame Inspection and Replacement Program: The proposed settlement provides a free Frame Inspection and Replacement Program through which Toyota dealers will, upon a class member's request, inspect the frame, free of charge, on the class member's Subject Vehicle to determine whether the frame should be replaced. This determination will be made based on a "Rust Perforation Standard" specified in the proposed settlement agreement. If the frame needs to be replaced because it satisfies the Rust Perforation Standard, replacement of the frame and associated parts will be at no cost to the class member. If the frame does not meet the criteria for frame replacement, under certain circumstances, the Toyota dealer will apply corrosion-resistant compounds, at no cost to the class member, pursuant to an inspection protocol agreed to by Toyota and the representative plaintiffs. Class members can contact their Toyota Dealer beginning on July 21, 2018 to have their Subject Vehicles inspected as part of this program.

<u>Claim Reimbursement Program:</u> The settlement also reimburses class members for out-of-pocket expenses incurred prior to June 8, 2018 for the replacement of their Subject Vehicle's frame due to rust perforation that satisfied the Rust Perforation Standard and that were not otherwise reimbursed.

What are my options?

If the settlement is approved, <u>and class members do nothing</u>, they will remain in the class and receive the benefits of the settlement, but will not be able to sue Toyota.

<u>Class Members have the right to appear in court</u> to object to the proposed settlement or to comment on the proposed settlement (including the right to appear in court and to submit their comments. The due date to submit an objection or comment in writing is **August 29**, **2018**.

<u>Class Members can exclude themselves from the class action by **October 22, 2018**</u>. If they do so, Class Members will not get any settlement benefits, but maintain the right to sue Toyota about the issues in the lawsuit.

The full length notice describing how to <u>obtain settlement relief</u>, object to the settlement, or exclude oneself after approval is available at www.Toyotaframesettlement.ca.

For more information or to obtain a claim form or opt-out form call 1-866-343-1858 or visit Toyotaframesettlement.ca.

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For more information, please contact:

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