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 America

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 9 **UNITED STATES DISTRICT COURT**
 10 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

11 NICHOLAS WYLIE and SHAWNA
 12 WYLIE (fka BROWN), TIMOTHY
 13 RYAN, and GREGORY PERGER,
 individually, and on behalf of a class of
 similarly situated individuals,

14 Plaintiffs,

15 vs.

16 HYUNDAI MOTOR AMERICA, a
 17 California corporation,

18 Defendant.

CASE NO. 8:16-CV-02102-DOC-JCG

**DECLARATION OF DANIEL LEE
 REGARDING CLASS NOTICE
 AND CLAIM ADMINISTRATION**

Date: March 2, 2020
 Time: 8:30 a.m.
 Crtrm.: 9B

Assigned to Hon. David O. Carter

Complaint Filed: 11/22/16

19 I, Daniel Lee, declare as follows:

20 1. I am Manager, Recall Communication and Settlement for Hyundai
 21 Motor America (“HMA”). Among other responsibilities, I am responsible for
 22 supervising HMA’s settlement administration responsibilities in the above-
 23 referenced matter. The facts set forth herein are true of my own personal knowledge.
 24 If called as a witness, I could and would competently testify thereto.

25 2. I am familiar with the parties’ Settlement Agreement, dated July 18,
 26 2019, and the Court’s Order Granting Motion for Preliminary Approval of Class
 27 Action Settlement, dated August 26, 2019 (the “Order”). As described in more
 28

1 detail below, HMA has disseminated class notice in a manner consistent with the
2 terms of the Settlement Agreement and the Order.

3 3. Pursuant to and consistent with the Settlement Agreement and the
4 Order, HMA established a settlement website for the class settlement in the above-
5 referenced matter (DCTSettlement.HyundaiUSA.com). The settlement website was
6 launched on or about October 25, 2019 (“settlement website”). HMA has updated
7 that website from time to time since then.

8 4. Concurrent with the launching of the settlement website, HMA created
9 a toll-free number to field questions from Class Members. The toll-free number
10 HMA set up is (866) 944-7620. As of the close of business on January 15, 2020,
11 there had been 1,225 settlement-related inquiries fielded at this number.

12 5. One of HMA’s primary responsibilities was to cause the Class Notice
13 to be mailed to all known Class Members. HMA worked with a third party
14 provider, IHS Automotive (formerly known as R.L. Polk & Company), to secure the
15 last known addresses of all current and former owners and lessees of the Class
16 Vehicles from state DMV registration databases. This process resulted in HMA’s
17 receipt of files containing 318,031 records containing the names and addresses for
18 known Class Members. As part of the preparation for mailing, the same records
19 were run through the National Change of Address database to obtain the most
20 current and accurate address of Class Members records prior to mailing.

21 6. On October 25, 2019, consistent with the Settlement Agreement and
22 the Order, HMA caused to be mailed via first class mail 313,737 Class Notices to
23 Class Members at the addresses obtained through the process summarized above.
24 The difference from the DMV registration database is due to the incorrect addresses.
25 Class Notice provided the above-mentioned toll-free number and referred
26 Settlement Class Members to the settlement website for purposes of, among other
27 things, filing a claim online, requesting a paper copy of the claim form, and
28 obtaining detailed information relating to the terms of the settlement, including

1 relevant deadlines and the date of the final approval hearing. A true and correct
2 copy of the Class Notice mailed to Class Members is attached hereto as Exhibit "A."

3 7. To date, 23,833 Class Notices had been returned as undeliverable with
4 no forwarding address. These records have been and are being reviewed against
5 HMA's internal customer records for a more current address and, where applicable,
6 Class Notice has been or is being re-mailed to the updated addresses.

7 8. On October 25, 2019, consistent with the Settlement Agreement and
8 the Order, HMA caused to be emailed 137,455 Class Notices to Class Members at
9 email addresses maintained by HMA. The emails to Class Members included a
10 hyperlink to the settlement website discussed above, as well as electronic versions
11 of the Class Notice that listed the above-mentioned toll-free number and referred
12 Settlement Class Members to the settlement website for purposes of, among other
13 things, filing a claim online, requesting a paper copy of the claim form, and
14 obtaining detailed information relating to the terms of the settlement, relevant
15 deadlines and the date of the final approval hearing. A true and correct copy of the
16 notice emailed to Class Members is attached hereto as Exhibit "B."

17 9. To date, 13,985 emails containing Class Notices bounced back as
18 undeliverable.

19 10. Through January 15, 2020, the following metrics apply to the claim
20 forms submitted by class members:

21 a. 2,661 claimants have submitted claim forms (either by mail or online).

22 I declare under penalty of perjury under the laws of the United States of
23 America that the foregoing is true and correct.

24 Executed January 22, 2020, at Fountain Valley, California.

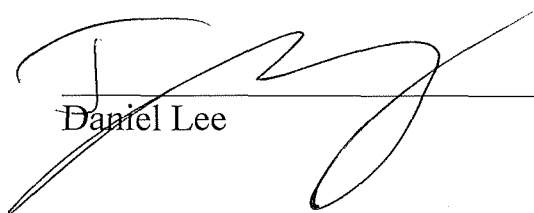
25
26 
27 Daniel Lee
28

EXHIBIT A

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Did you buy or lease a Hyundai 2015–2017 Sonata Eco, 2016–2017 Tucson, or 2016–2017 Veloster vehicle equipped with a **dual-clutch transmission** (“Class Vehicles”)? A proposed class action settlement may affect your rights.

FOR COMPLETE INFORMATION, PLEASE VISIT:

DCTSettlement.HyundaiUSA.com

If you do not have internet access, request more information by calling 866-944-7620.

Submit a Claim Form to Receive the Following Benefits:	
(1) Reimbursement for Diagnostic Visits and Repairs	Class members may claim full reimbursement of reasonable costs incurred for any type of repair, replacement, diagnosis, or inspection related to the dual-clutch transmission (“DCT”) on a Class Vehicle.
(2) Compensation to Troubleshoot, Diagnose, or Repair DCT-Related Symptoms	Class members may claim compensation for having to make multiple visits to an authorized Hyundai dealership to troubleshoot issues with a DCT-equipped Class Vehicle.
(3) Compensation for Trade-Ins or Sales	Individuals who have traded-in or sold (or will trade-in or sell) their Class Vehicle because of DCT-related complaints may claim compensation.

To Opt-Out: If you wish to forego these benefits and not participate in the settlement, you may exclude yourself. Please visit **DCTSettlement.HyundaiUSA.com** for more information.

To Object: If you wish to object to the proposed settlement, you may do so. Please visit **DCTSettlement.HyundaiUSA.com** for more information.



Hyundai Motor America
P.O. Box 2704
Huntington Beach, CA 92647

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE
PAID
HYUNDAI

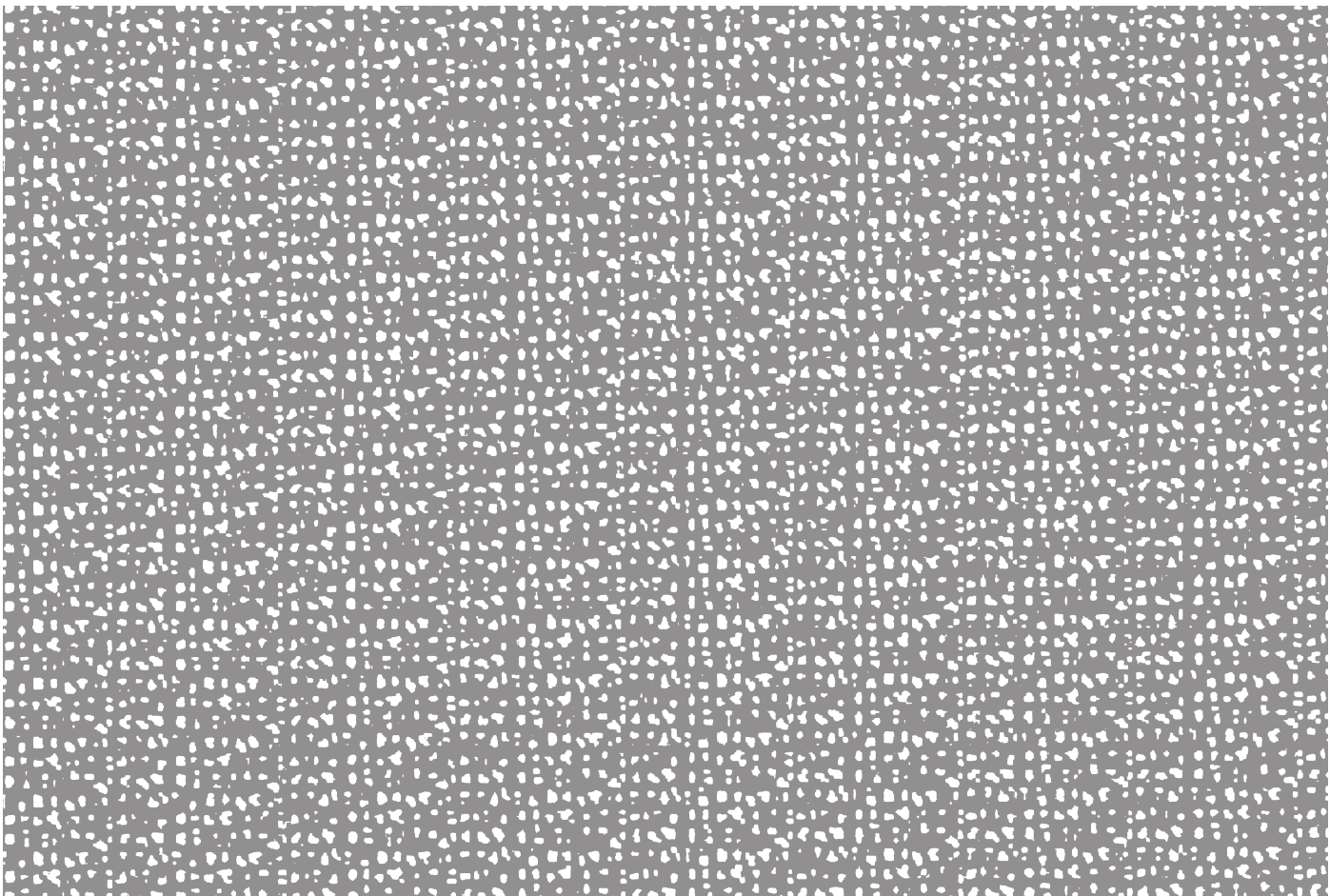
Wylie v. Hyundai Motor America, No. 8:16-cv-02102-DOC-JCG

SEE OTHER SIDE FOR OPENING INSTRUCTIONS.

SEE OTHER SIDE FOR OPENING INSTRUCTIONS.

REMOVE BOTH SIDE STUBS FIRST
FOLD, CREASE AND REMOVE THIS STUB AT PERFORATION

REMOVE BOTH SIDE STUBS FIRST
FOLD, CREASE AND REMOVE THIS STUB AT PERFORATION



REMOVE STUBS AT BOTH ENDS FIRST
THEN FOLD, CREASE AND REMOVE THIS STUB AT PERFORATION

REMOVE STUBS AT BOTH ENDS FIRST
THEN FOLD, CREASE AND REMOVE THIS STUB AT PERFORATION

EXHIBIT B

Notice of Proposed Class Action Settlement

October 2019

RE: Dual-Clutch Transmission Class Action Settlement

Dear Hyundai Owner,

Did you buy or lease a Hyundai 2015–2017 Sonata Eco, 2016–2017 Tucson, or 2016–2017 Veloster vehicle equipped with a dual-clutch transmission (“Class Vehicles”)? A proposed class action settlement may affect your rights.

Submit a Claim Form to Receive the Following Benefits:	
(1) Reimbursement for Diagnostic Visits and Repairs	Class members may claim full reimbursement of reasonable costs incurred for any type of repair, replacement, diagnosis, or inspection related to the dual-clutch transmission (“DCT”) on a Class Vehicle.
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To Object: If you wish to object the proposed settlement, you may do so. Please visit DCTSettlement.HyundaiUSA.com for more information.

For complete information and to submit a claim, please visit: DCTSettlement.HyundaiUSA.com

If you do not have internet access, request more information by calling 866-944-7620

Thank you for choosing Hyundai,