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5 Lead Counsel for Plaintiffs

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION  
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12 IN RE: VOLKSWAGEN “CLEAN  
DIESEL” MARKETING, SALES  
13 PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

MDL No. CRB (JSC)

**DECLARATION OF CAMERON R.  
AZARI, ESQ., RE INTERIM STATUS  
REPORT ON BOSCH SETTLEMENT  
CLAIMS PROGRAM**

14 THIS DOCUMENTS RELATES TO:

15 ALL CONSUMER AND RESELLER  
16 ACTIONS

17 I, Cameron R. Azari, Esq., hereby declare and state as follows:

18 1. My name is Cameron R. Azari, Esq. I have knowledge of the matters set forth  
19 herein, based on personal knowledge and information provided to me by my colleagues, and I  
20 believe them to be true and correct.

21 2. I am the Director of Legal Notice for Hilsoft Notifications, a business unit of Epiq  
22 Class Action & Claims Solutions (“Epiq”).

23 3. On May 16, 2017, the Court appointed Epiq as the Claims Administrator and Notice  
24 Administrator for the Bosch Class Action Settlement in *In re Volkswagen “Clean Diesel”*  
25 *Marketing, Sales Practices, and Products Liability Litigation*, Case No. 3:15-md-2672. Dkt. 3230  
26 at 22. In that role, Epiq has administered the Bosch Settlement claims program, and has provided  
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1 Weekly Administration Reports to the parties detailing the progress of the Settlement. I have been  
2 involved in and helped oversee the reporting process.

3 4. As of April 27, 2018, 460,693 Class Members (79.6% of the Class) have finalized  
4 their Bosch settlement claims and have negotiated (cash/deposited) their settlement  
5 payments. The total of these payments is \$197,938,964.25 (71.9% of the common fund available  
6 for Class compensation). As of April 27, 2018, 23,467 additional checks totaling \$10,118,136.75  
7 have been issued, and those individual settlements will be finalized as soon as those Class Members  
8 cash or deposit their checks.

9 5. The Bosch settlement claim period will remain open until December 31, 2019. As  
10 set forth in the Bosch settlement, Class Members whose claims are approved in either or both of  
11 the Volkswagen 2.0-liter and 3.0-liter settlements will receive an automatic payment in the Bosch  
12 settlement. Dkt. No. 2918 ¶ 5.4. It is my understanding that as of May 1, 2018, approximately  
13 53,100 Volkswagen 2.0-liter settlement claims and 14,900 Volkswagen 3.0-liter claims are in  
14 process. Once finalized, those claims will result in an estimated additional \$37,540,000.00 in  
15 corresponding Bosch payments.

16 6. Including Bosch Settlement claims that are in the process of being finalized, as well  
17 as Bosch Settlement payments that will issue when the corresponding and in-process Volkswagen  
18 settlement claims are finalized, an estimated 552,160 Class Members will have participated in the  
19 Bosch Settlement (97.2% of the Class) and received \$245,597,101.00 (89.2% of the common fund  
20 available for Class compensation).

21 7. Additional Bosch settlement claims will be processed as Class Members complete  
22 their claims in the Volkswagen settlements and/or separately submit claims forms in the Bosch  
23 settlement. The Settlement Benefit Period, the time period during which Class Members may  
24 obtain benefits under the Bosch settlement, ends on April 30, 2020.

25 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
26 May 2<sup>nd</sup>, 2018.

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Cameron R. Azari, Esq.

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**ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))**

In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the filing of this document has been obtained from the signatories.

Dated: May 2, 2018

/s/ Elizabeth J. Cabraser

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 2, 2018, a true and correct copy of the foregoing was electronically filed and served electronically via the Court’s CM/ECF system, which will automatically serve notice to all registered counsel of record.

/s/ Elizabeth J. Cabraser