

A class action lawsuit may affect your rights because:

You have been identified as a resident of the State of California who purchased or leased a 2012-2015 Model Year Toyota Camry and may be a class member.

A court authorized this notice. This is not a solicitation from a lawyer.

- Purchasers of certain Toyota Camry vehicles filed a lawsuit against Toyota Motor Sales, U.S.A., Inc. (“Toyota”), claiming that Toyota violated the law by concealing a defect in the Heating, Ventilation, and Air Conditioning (“HVAC”) system that Plaintiffs claim causes emissions of noxious and foul odors from contamination in the HVAC system.
- The “Class Vehicles” are the 2012-2015 model year Toyota Camry vehicles in all trim levels, including:

Model Year	Standard	Hybrid
2012	L, LE, SE, and XLE	LE, XLE
2013	L, LE, SE, and XLE	LE, XLE
2014	L, LE, SE, SE Sport, and XLE	LE, SE, XLE
2015	LE, SE, XSE, and XLE	LE, SE, XLE

- The Court has allowed the lawsuit to be a class action on behalf of persons in California who purchased or leased a Class Vehicle from an authorized Toyota dealer. These persons are defined later in this notice at Question 7.
- Toyota denies all the claims in the lawsuit. Toyota contends that there is no HVAC defect in the Class Vehicles and that Toyota has not done anything wrong.
- The Court has not decided whether Toyota did anything wrong. There is no money available now, and there is no guarantee that there will be in the future. However, your legal rights are affected, and you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

DO NOTHING

If you are a class member, stay in this lawsuit. Await the outcome. Give up certain rights.

If you are a class member, by doing nothing, you keep the possibility of getting money that may come from a trial or a settlement. You may also receive nothing. If you stay in the lawsuit, you give up any rights you may have to sue Toyota separately about the same legal claims in this lawsuit. Because the Court has not yet decided what issues will be decided on a class-wide basis at trial, you must preserve all evidence, including documents, pertaining to your claims and your vehicle. Depending on the outcome of a class trial, you may be required to present evidence at a later stage. You may have routine maintenance performed on your vehicle and necessary repairs and services (including any recall services). You may also transfer ownership of your vehicle; however, if you transfer ownership, it may affect your potential recovery.

ASK TO BE EXCLUDED	<p>If you are a class member, get out of this lawsuit. Get no benefits from it. Keep rights.</p> <p>If you are a class member and ask to be excluded, any claim you might have will not be part of the lawsuit. If money is later awarded, you won't share in those benefits. But, you keep any rights to sue Toyota separately about the same legal claims in this lawsuit. To ask to be excluded, you must act before XX, XXXX.</p>
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- The named Class Plaintiffs must prove the class claims against Toyota at a trial. If money is or may be obtained from Toyota, you will be notified about further steps.
- **Any questions? Read on and visit www.com.**

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BASIC INFORMATION

1. Why did I get this notice?

Our records show that you purchased or leased a Class Vehicle that was registered in California. This notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you. If you are a class member as defined below in Question 7, you have legal rights and options that you may exercise before the Court holds a trial. The purpose of the trial is to decide whether the claims being made against Toyota on your behalf have merit. Judge Fernando M. Olguin of the United States District Court for the Central District of California is overseeing this class action. The lawsuit is titled *Salas v. Toyota Motor Sales, U.S.A., Inc.*, Case No.: 2:15-cv-08629-FMO-E.

2. What is this lawsuit about?

This case is about whether Toyota violated the law by concealing an alleged defect concerning the HVAC system installed in the Class Vehicles and failing to timely implement a design change to correct the defect. Plaintiffs claim that the HVAC system is defective in that its design creates an ideal habitat for the growth of biological matter, that emits foul, noxious odors from accumulated debris and contamination.

Toyota denies all the claims in the lawsuit. Toyota asserts that there is no defect in the HVAC systems of the Class Vehicles and that Toyota did not conceal anything from customers. Toyota further contends that HVAC odor will impact only a small percentage of Class Vehicles, that HVAC odor can be caused by many different sources (not due to any defect), and that HVAC odor can occur in any vehicle made by any manufacturer.

3. Why is this lawsuit a class action?

In a class action, one or more people called Class Representatives (in this case Alfred Salas and Gloria Ortega), sue on behalf of people who have similar claims. All these people are a Class or Class Members. One court resolves common issues for all Class Members, except for those who exclude themselves from the Class. Judge Fernando M. Olguin is in charge of this class action.

More information about why the Court is allowing this lawsuit to proceed as a class action is in the Order Re: Motion for Class Certification available at [website](#).

THE CLAIMS IN THE LAWSUIT

4. What are the Plaintiffs asking for?

The Plaintiffs are asking for money damages in the form of money payments to each class member who purchased or leased a Class Vehicle.

5. Has the Court decided who is right?

The Court has not decided whether Toyota or the Plaintiffs are correct. By establishing the class and issuing this Notice, the Court is not suggesting that the Plaintiffs will win or lose this case. The Plaintiffs must still prove their claims at trial before a jury or juries.

6. Is there money available now?

No money is available now because the Court has not decided whether Toyota did anything wrong, and the two sides have not reached a settlement in this case. There is no guarantee that money will be obtained on behalf of class members. If you are a class member and do not opt-out, you will be notified about how to share in that monetary amount.

7. Am I part of the Class?

Judge Olguin has certified two different classes as part of this lawsuit: (1) a California Class; and (2) a California Consumer Sub-Class.

You are a member of the California Class if you are a California resident who purchased or leased a 2012-2015 model year Toyota Camry model vehicle in any trim level (including L, LE, SE, XSE and XLE, and the Toyota Camry Hybrid LE, SE, and XLE) from an authorized Toyota dealer.

You are a member of the California Consumer Sub-Class if you are a California resident who purchased or leased a 2012-2015 model year Toyota Camry model vehicle in any trim level (including L, LE, SE, XSE and XLE, and the Toyota Camry Hybrid LE, SE, and XLE) for personal, family, or household purposes from an authorized Toyota dealer.

Please note, the two classes are not alternatives, and you may be a member of both the California Class and the California Consumer Sub-Class.

8. I'm still not sure if I am included?

If you are still not sure whether you are included, you can get free help at www._____.com, or by calling or writing to the lawyers in this case, at the phone number or address listed in question 16.

YOUR RIGHTS AND OPTIONS

You have to decide whether to stay in the class or ask to be excluded before the trial, and you have to decide this now.

9. What happens if I do nothing at all?

If you are a class member and want to retain the right to potentially receive money from this lawsuit, you don't have to do anything now other than to preserve any relevant evidence. By doing nothing, you remain in the class. If you are a class member and remain in the class and the Plaintiffs win a class action trial or achieve a settlement, either as a result of a trial or a settlement, you will be notified about next steps, including but not limited to how to apply for a share. If Toyota wins, you will receive nothing. Keep in mind that if you do nothing now, regardless of whether the Plaintiffs win the trial, you will not be able to sue, or continue to sue Toyota -- as part of any other lawsuit -- about the same issues that are the subject of this lawsuit. This means that with respect to the allegedly defective HVAC system in the Class Vehicles at issue in this case, if you do nothing, you will be legally bound by all of the orders the Court issues and judgments the Court makes in this class action. You may have routine maintenance performed on your Class Vehicle and necessary repairs and services (including any recall services). You also may transfer ownership of your Class Vehicle, but, if you do, it may affect your potential recovery. You must preserve all evidence, including documents, pertaining to your claims and Class Vehicles.

10. How do I get out of the class?

To get out of the class if you are a class member, you must send an “Exclusion Request” in the form of a letter sent by mail, stating that you want to be excluded from *Salas v. Toyota Motor Sales, U.S.A., Inc.* Be sure to include your name and address, and sign the letter. You must mail your Exclusion Request postmarked by [Date], to **Salas v. Toyota Motor Sales, c/o Simpluris, Inc., P.O. Box 26170, Santa Ana, CA 92799**. You may also find an Exclusion Request form at the website [Website] and email it by [Date] to **Simpluris, Inc.** at [email address]. An Exclusion Request submitted by email is not effective until you receive and email confirmation from the Administrator.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in this case?

The Court decided that the law firm Capstone Law APC is qualified to represent the class and is referred to as “Class Counsel.” Capstone Law is experienced in handling similar class action cases. More information about these law firms, their practices and their lawyers’ experience is available at www.capstonelawyers.com.

12. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you are a class member and want your own lawyer, you will have to pay that lawyer. For example, you can ask him or her to appear in Court for you, if you want someone other than Class Counsel to speak for you.

13. How will the Lawyers be paid?

If Class Counsel is successful in getting money for the class, they will ask the Court to recover their fees and expenses associated with this case. You won’t have to pay these fees and expenses out of your own pocket. If the Court grants Class Counsel’s request, the fees and expenses would be either deducted from any money obtained for the class or paid separately by Toyota.

THE TRIAL

14. How and when will it be determined who is right?

As long as the case is not resolved by a settlement, pretrial ruling, or otherwise, Plaintiffs will have to prove the claims at a trial. The Court has not decided yet what issues will be decided on a class-wide basis at that trial. During the trial, a Jury or the Judge will hear all of the evidence to help them reach a decision about whether Plaintiffs or Defendant are right about the common issues in the lawsuit. There is no guarantee that the Plaintiffs will win, or that they will get any money for the Class.

15. Do I need to appear at trial?

You do not need to attend the class action trial. Class Counsel will present the case for the Plaintiffs, and Toyota will present the defenses. You or your own lawyer are welcome to appear at trial at your own expense. Depending on the outcome of the class action trial, it is possible that you will have to present evidence or information to secure money. The Court has not yet determined this issue.

GETTING MORE INFORMATION

16. Are more details available?

If you want more detailed information you can visit the website, [\[Website\]](#), where you will find the Court's Order Certifying the Class and other case related documents. You may also speak to one of the lawyers by calling Class Counsel:

Capstone Law APC
1875 Century Park East, Suite 1000
Los Angeles, California 90067
Telephone: (888) 959-1185

Please do not contact the Court, as the Judge will not be able to speak with you. Please also do not call counsel for Toyota unless you have opted out or excluded yourself from the lawsuit, or do not meet the definition in this notice at Question 7, as ethical rules provide that they may not speak to persons in the class who are represented by Class Counsel.