

**NOTICE OF THE CERTIFICATION AND SETTLEMENT APPROVAL HEARING IN THE
MATTER OF THE 2008-2009 HONDA ACCORD AND 2009 ACURA TSX CLASS ACTION**

Read this Notice Carefully as it May Affect Your Rights

TO:

Canadian residents who own or lease, or have previously owned or leased, as first users, a 2008 or 2009 Honda Accord **OR** a 2009 Acura TSX (the “Settlement Class Member(s)”) c

(9134-9258 Québec Inc. v. Honda Canada Inc. & al., the “Proceedings”). Subject to the approval of the Superior Court of Québec (the “Court”), the action has been settled with Honda Canada Inc. (“Honda”). 9134-9258 Québec Inc. (the “Petitioner”) will seek a confirmation of the Settlement of the Proceedings. A hearing to approve the Settlement Agreement and to approve the fees and disbursements plus applicable taxes of Consumer Law Group Inc. (“Class Counsel”) will be held on **MAY 6, 2016 at 9:30 A.M.** in room 2.08 at the Montréal Courthouse located at **1, rue Notre-Dame East, Montréal, Québec** (the “Approval Hearing”). As per the terms of the Settlement Agreement, the Petitioner will discontinue the Proceedings against Honda Motor Co., Ltd.

This Notice informs the Settlement Class Members of the Proceedings and the Settlement, and describes their rights, options and choices. This Notice and the Settlement Agreement in its entirety are posted on Class Counsel’s website at www.clg.org.

B. Nature of the Lawsuit

In 2010, Proceedings were initiated in Québec by Class Counsel on behalf of Canadians who own or lease, or have previously owned or leased, as first users, a 2008, 2009 or 2010 Honda Accord or a 2009 or 2010 Acura TSX. The Proceedings allege that the braking system of these vehicles suffers from a defect that causes excessive force to be applied to the rear wheels and that this results in the rear brake pads wearing out prematurely and requiring replacement. Honda does not admit and expressly denies the allegations of the Proceedings.

C. Settlement

1. Terms of Settlement

Starting in or around January 2010, Honda launched a Customer Satisfaction Campaign (the “Program”) applicable to Canadian residents owning or leasing, or previously owning or leasing, as first users: (1) a 2008 or 2009 Honda Accord and (2) a 2009 Acura TSX, (the “Vehicles”). Under the Program, if any of the Vehicles’ rear brake pads required

replacement, Honda agreed to install new brake pads or, if necessary, replace rear brake callipers, which included the new brake pads, at no charge. If the Vehicles' rear brake pads had already been replaced and if the owner/lessee paid for a part or all of the related work, he/she became eligible for reimbursement from Honda for 50% of the amount paid, up to a maximum amount of CAN \$125.00, by mailing to Honda an *Application for Reimbursement* and supporting documentation by July 5, 2010. See Schedules A and B for more details on the Program.

The Petitioner accepted the Program as a settlement of the Proceedings, including the fact that owners and lessees of 2010 Honda Accord and 2010 Acura TSX models did not receive benefits under the Program. A total of 21,607 owners and lessees of 2008 and 2009 Honda Accord models and a total of 1,921 owners and lessees of 2009 Acura TSX models received benefits under the Program. The benefits under the Program were granted to Settlement Class Members at the Petitioner's full and complete satisfaction. The Program ended on January 15, 2014 and no additional benefits will be offered by Honda or by anyone else.

Honda also agreed to pay an amount of CAD \$15,000.00 to the Montreal Children's Hospital Foundation.

Honda did not admit any wrongdoing or liability in connection with the Proceedings and has denied all allegations of wrongdoing or of liability contained in the Proceedings.

2. The Approval Hearing

The Petitioner recommends that the Proceedings be settled. The Settlement Agreement remains, nevertheless, subject to approval by the Court. A motion to approve the Settlement Agreement will be heard by the Court on MAY 6, 2016 at 9:30 A.M. in room 2.08 at the Montréal Courthouse located at **1, rue Notre-Dame Est, Montréal, Québec**. At this Approval Hearing, the Court will determine whether the Settlement is fair, reasonable and in the best interests of the Settlement Class Members. The time, date and location of the Approval Hearing may be changed by the Court without further notice to you. If you plan to attend the Approval Hearing, you should confirm its time, date and location by contacting Class Counsel.

You are entitled to appear and make submissions at the Approval Hearing. If you do not oppose the proposed Settlement, you do not need to appear at the Approval Hearing or take any other action at this time.

If you wish to comment on or make an objection to the Settlement Agreement, you must serve a written submission to Class Counsel and to Honda's counsel ("**Defence Counsel**") at the addresses listed below by no later than **30 days** after receipt of this Notice. Class Counsel will file all such submissions and all filed written submissions will be submitted to the Court. If you do not deliver a written submission by the deadline, you may not be entitled to participate, through oral submissions or otherwise, in the Approval Hearing. If you object and the Settlement is approved, you will be barred from bringing a legal proceeding in respect of any allegations asserted in the Proceedings and you will be bound by the judgment approving the Settlement.

Class Counsel	Defence Counsel
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QUESTIONS ? PLEASE CONTACT CLASS COUNSEL

Consumer Law Group Inc. Attention: Jeffrey Orenstein 1030 rue Berri Suite 102 Montréal, Québec H2L 4C3 Phone: 1-888-909-7863 Fax: (514) 868-9690 Email: jorenstein@clg.org	Lavery, de Billy Attention: Luc Thibaudeau 1 Place Ville Marie Suite 4000 Montréal, Québec H3B 4M4 Fax : (514) 871-8977
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In the written submission, you must indicate that you are commenting on the Settlement in **9134-9258 Québec Inc. v. Honda Canada Inc. & al.**, Court File No. 500-06-000510-103, and you must include:

- (i) your full name, address and telephone number;
- (ii) the model year and VIN of your Honda Accord or Acura TSX;
- (iii) a written statement of all factual and legal grounds for the objection accompanied by any legal support for your objection;
- (iv) copies of any papers, briefs, or other documents upon which the objection is based;
- (v) a list of any persons who will be called by either you or your counsel to testify in support of the objection;
- (vi) a statement of whether either you or your counsel intend to appear at the Approval Hearing; and
- (vii) your signature, even if you are also represented by counsel. If you intend to appear at the Approval Hearing through counsel, the objection must also state the identity of all counsel representing you who will appear at the Approval Hearing.

If you file an objection, Class Counsel or Defence Counsel are allowed to take your deposition, consistent with the *Code of Civil Procedure*, at an agreed-upon location before the Approval Hearing and to seek any documentary evidence or other tangible things that are relevant to the objection. Failure to comply with discovery requests may result in the Court refusing to hear your comment or objection.

A Settlement Class Member who opts out (see heading D below) of the Proceedings may not comment or make an objection to the Settlement Agreement.

If the Settlement Agreement is approved by the Court, no further notice will be sent to advise Settlement Class Members of such approval.

D. Opting Out of the Proceedings

As outlined above, you are a Settlement Class Member if you are a Canadian resident who owns or leases, or has previously owned or leased, a 2008 or 2009 Honda Accord or a 2009 Acura TSX, as a first user, unless you opt out of the Proceedings. If you wish to continue to be included as a Settlement Class Member, you do not need to do anything at this time. As a Settlement Class Member, you will be legally bound by the result of the Proceedings.

If you do not opt out, you will be bound by the Settlement. You will not be able to bring or maintain any other claim or legal proceeding in respect of any allegations asserted in the Proceedings. No further right to opt-out of the Proceedings will be provided. Settlement Class Members who choose not to opt out will not receive any additional benefits than those received or those for which they were eligible to receive under the Program.

If you opt-out of the Proceedings, you will not be legally bound by the result of the Settlement. However, you will waive the rights you received under the Program and you will be obliged to reimburse Honda for the monetary benefits you received under the Program. You may be able to bring your own lawsuit at your own expense.

To opt-out, please complete the enclosed opt-out form and send it to the addresses listed therein. The enclosed opt-out form **must be received no later than THIRTY (30) days after the date of court approval of the Settlement by the Court.**

E. Class Counsel Fees

Class Counsel fees and disbursements plus applicable taxes must be approved by the Court. Honda has agreed to pay an amount of CAN \$85,000.00 as Class Counsel's fees and disbursements, plus applicable taxes.

F. The Lawyers Representing you

Class Counsel is:

Jeffrey Orenstein
Consumer Law Group Inc.
1030 rue Berri
Suite 102
Montréal, Québec H2L 4C3

G. Questions about the Settlement

This Notice contains only a summary of the Settlement Agreement and Settlement Class Members are encouraged to contact Class Counsel by phone at toll free 1-888-909-7863 ext. 2, by e-mail at jorenstein@clg.org or by mail, should they have any questions that are not answered by this Notice. **INQUIRIES SHOULD NOT BE DIRECTED TO THE COURT.**

H. Interpretation

This Notice contains a summary of some of the terms of the Settlement Agreement. If there is a conflict between the provisions of this Notice, including the schedules, and the Settlement Agreement, including the schedules, the terms of the Settlement Agreement shall prevail.

THIS NOTICE HAS BEEN AUTHORIZED BY THE SUPERIOR COURT OF QUÉBEC

2008-2009 HONDA ACCORD AND 2009 ACURA TSX CLASS ACTION OPT-OUT FORM

I, _____ (print full name), elect to opt out of the 2008-2009 Honda Accord and 2009 Acura TSX Class Action, do not wish to be a Settlement Class Member, and elect to be excluded from any judgment entered pursuant to the Settlement in *9134-9258 Québec Inc. v. Honda Canada Inc. & al.*, Court File No. 500-06-000510-103.

I understand and accept the consequences of opting out, including but not limited to:

1. Class Counsel cannot represent me and is not permitted to assist me in any way.
2. I will be responsible for all legal fees and costs that may be incurred by me if I choose to pursue my own individual claim.

I confirm that I am legally entitled to opt out of this litigation and I do not require the consent of any third party in order to do so.

Date

Signature

Name: _____

Address: _____

Telephone Number: _____

Alternative Telephone Number: _____

E-mail: _____

Vehicle: Honda Accord 2008

Honda Accord 2009

Acura TSX 2009

Vehicle Identification Number-17 digits: _____

Please complete the opt-out form in its entirety and return the completed form to the addresses below on or before 30 days after the date of court approval of the Settlement by the Court.

Please send the completed opt-out form by mail or fax to the following:

Class Counsel	Defence Counsel (Honda)	Superior Court of Québec
Consumer Law Group Inc. Attention: Jeffrey Orenstein 1030 rue Berri Suite 102 Montréal, Québec H2L 4C3 Fax: (514) 868-9690	Lavery, de Billy Attention: Luc Thibaudeau 1 Place Ville Marie Suite 4000 Montréal, Québec H3B 4M4 Fax: (514) 871-8977	Clerk of the Superior Court of Québec Palais de Justice de Montréal 1, rue Notre-Dame Est Montréal, Québec H2Y 1B6 Court File No. 500-06-000510-103



January 2010

Customer Satisfaction Campaign: Rear Brakes

Dear Honda Accord Owner:

Honda Canada has decided to undertake a Customer Satisfaction Campaign that applies to the rear brakes of your 2008-2009 Honda Accord. We wish to assure you that this action is being taken as a customer satisfaction measure and not due to safety concerns. We request that you follow the instructions in this letter in order to secure the service described for your rear brakes, at no cost to you, or to obtain reimbursement for past rear brake repairs described in this letter.

Check your VIN

We try to ensure that our records are complete but sometimes they are not. Please check the 17-digit Vehicle Identification Number (VIN) at the top of this letter to ensure that it matches the 17-digit VIN on the lower driver's side corner of your vehicle's windshield or on the driver's side door jamb sticker. If it does not, please contact our Customer Relations Department and a representative will verify whether your vehicle is in fact included in this Customer Satisfaction Campaign. If you no longer own this vehicle, or some information in this notice is incorrect, please fill out and return the included postage paid Information Change Card or forward this notice to the new owner if possible.

What is the issue?

Honda Canada wishes to address the possibility that certain driving habits or conditions in Canada may cause premature rear brake pad wear. As stated in your Owner's Manual, the disc brakes on your vehicle are equipped with audible brake pad wear indicators. If you hear a distinct, metallic screeching sound when you apply the brake pedal, this is a signal that your brake pads need replacing. If you do not have the brake pads replaced, they will begin to screech continuously. (Note that it is normal for the brakes to occasionally squeal or squeak when you apply them - that is not the more sustained sound we are describing here.)

What should you do?

When your rear brake pads require replacement, as signalled by a consistent screeching sound, please contact your authorized Honda dealer to schedule an appointment. If your rear brake pads need to be replaced, new brake pads will be installed or, if necessary, your rear brake calipers which include the new brake pads will be replaced, at no charge. This service work will typically take less than a day.

What if you have already paid to have your rear brake pads replaced?

If the rear brake pads on your vehicle have already been replaced and you paid for some or all of the related work, you may be eligible for reimbursement from Honda for a portion of what you paid.

Please refer to the enclosed Reimbursement Form for information on how to determine eligibility, what supporting documentation is required and how to calculate the amount of the reimbursement.

Time Limit


Your vehicle is eligible for the benefits under this Campaign for a period beginning three years from the date the vehicle was first purchased or leased as a brand new vehicle from a Canadian Honda dealer. After that date, your vehicle will no longer be eligible under this Campaign.

Who to contact if you need more information?

If you would like more information, require assistance locating a Honda Dealer or have any concerns regarding any work done under this campaign, please contact Honda Canada's Customer Relations Department at the telephone number or address below, or visit our website at www.myhonda.ca.

We thank you for your co-operation.

Sincerely,



Jerry Chenkin
Executive Vice President

Rear Brake Pad Replacement Reimbursement Form

Eligibility

To be eligible for reimbursement for a past rear brake pad replacement and related work you must be a resident of Canada who currently owns or leases, or previously owned or leased, a 2008 or 2009 model year Honda Accord.

Required Time Frame for Past Replacement

To be eligible for reimbursement, the rear brake pad replacement and related work must have been (a) performed within three years of the date that the vehicle was first purchased or leased as a new vehicle, (b) necessitated by wear and tear (replacements and work necessitated by accident and abuse are excluded), and (c) completed before the date of this letter.

Eligible Costs

The costs that are eligible for this reimbursement are the cost of the parts and labour that were required to replace the rear brake pads and any related work for which money was actually paid by you or on your behalf and not otherwise reimbursed by Honda or another third party. If you received compensation or reimbursement from another party (including Honda), the amount of this compensation or reimbursement will be deducted from the Eligible Costs reimbursed to you under this Campaign.

The Reimbursement Amount

Subject to the adjustments described in the Eligible Costs section, upon receipt of a properly completed Reimbursement Form and the required supporting documentation, Honda will reimburse you 50% of the Eligible Costs described above to a maximum of \$125.

You may be eligible for more than one reimbursement for past rear brake pad replacement and related work. You may also be eligible for both a reimbursement for a past rear brake pad replacement and related work AND for a future replacement as outlined under "What Should You Do?" in the Customer Satisfaction Campaign letter.

Claim Deadline

Claims for past rear brake pad replacement and related work must be received by Honda by no later than July 5, 2010.

Examples:

1 If your vehicle was first purchased on November 30, 2007, you had a rear brake pad replacement done in May 2009, and you paid \$200 for the replacement and related work with no compensation or reimbursement from another party, you will be entitled to a reimbursement from Honda of \$100 (50% of the amount you paid).

2 If your vehicle was first purchased on November 30, 2007, you had a rear brake pad replacement done in May 2009, the cost of the replacement and related work was \$200, you paid \$200 and later received a \$60 reimbursement from a third party (including Honda), you will be entitled to a reimbursement from Honda of \$70 (\$200 - \$60 x 50%).

This 'Application for Reimbursement' and required documentation must be submitted by mail to:

Application for Reimbursement
Honda Canada Inc.
Customer Relations Department
715 Milner Avenue
Toronto, ON M1B 2K8

Each application will be considered and processed on an individual basis, provided *the required information and documentation* have been submitted with it (see below). Any application submitted without all required information will be returned to the customer.

Please note: Application for reimbursement must be submitted (post office dated) by July 5, 2010. Applications received after that date will not be accepted.

SUPPORTING DOCUMENTATION YOU MUST ATTACH TO YOUR APPLICATION:

Proof that you are the current or previous owner of the vehicle:

- Copy of the current vehicle registration if you are the current owner
- Bill of Sale evidencing your initial purchase or later sale of the vehicle if you are a previous owner

Original repair order, or true copy thereof indicating:

- Name, address and telephone number of the repair facility
- Your full name and address at the time of the repair
- Full vehicle identification number (VIN)
- License plate number
- Odometer reading at time of repair
- Date of repair
- Clear description of the nature of the problem requiring repair
- Clear description of all labour, parts and materials used to make the repair
- Clear indication of the repair charges, or portion thereof, you were required to pay

Your Name: _____

Address: _____

Home Tel.: _____ Business Tel.: _____

Vehicle Identification Number (VIN-17 digits): _____

I verify that I am the purchaser or lessee of the vehicle described above, that I was a resident of Canada at the time of its purchase or lease, that the vehicle was purchased or leased in Canada, and that to the best of my knowledge, the information provided in this claim form and the supporting documentation are true and correct.

Signature _____ Date: _____



January 2010

Customer Satisfaction Campaign: Rear Brakes

Dear Acura TSX Owner:

Honda Canada Inc. has decided to undertake a Customer Satisfaction Campaign that applies to the rear brakes of your 2009 Acura TSX. We wish to assure you that this action is being taken as a customer satisfaction measure and not due to safety concerns. We request that you follow the instructions in this letter in order to secure the service described for your rear brakes, at no cost to you, or to obtain reimbursement for past rear brake repairs described in this letter.

Check your VIN

We try to ensure that our records are complete but sometimes they are not. Please check the 17-digit Vehicle Identification Number (VIN) at the top of this letter to ensure that it matches the 17-digit VIN on the lower driver's side corner of your vehicle's windshield or on the driver's side door jamb sticker. If it does not, please contact our Acura Client Services and a representative will verify whether your vehicle is in fact, included in this Customer Satisfaction Campaign. If you no longer own this vehicle, or some information in this notice is incorrect, please fill out and return the included postage paid Information Change Card or forward this notice to the new owner if possible.

What is the issue?

Honda Canada Inc. wishes to address the possibility that certain driving habits or conditions in Canada may cause premature rear brake pad wear. As stated in your Owner's Manual, the disc brakes on your vehicle are equipped with audible brake pad wear indicators. If you hear a distinct, metallic screeching sound when you apply the brake pedal, this is a signal that your brake pads need replacing. If you do not have the brake pads replaced, they will begin to screech continuously. (Note: that it is normal for the brakes to occasionally squeal or squeak when you apply them - that is not the more sustained sound we are describing here.)

What should you do?

When your rear brake pads require replacement as signalled by a consistent screeching sound, please contact your authorized Acura dealer to schedule an appointment. If your rear brake pads need to be replaced, new brake pads will be installed or, if necessary, your rear brake calipers which include the new brake pads will be replaced, at no charge. This service work will typically take less than a day.

What if you have already paid to have your rear brake pads replaced?

If the rear brake pads on your vehicle have already been replaced and you paid for some or all of the related work, you may be eligible for reimbursement from Acura for a portion of what you paid.

Please refer to the enclosed Reimbursement Form for information on how to determine eligibility, what supporting documentation is required and how to calculate the amount of the reimbursement.

Time Limit

Your vehicle is eligible for the benefits under this Campaign for a period beginning three years from the date the vehicle was first purchased or leased as a brand new vehicle from a Canadian Acura dealer. After that date, your vehicle will no longer be eligible under this Campaign.

Who to contact if you need more information?

If you would like more information, require assistance locating an Acura Dealer or have any concerns regarding any work done under this campaign, please contact Acura Client Services at the telephone number or address below, or visit our website at www.myacura.ca.

We thank you for your co-operation.

Sincerely,



Jerry Chenkin
Executive Vice President

Rear Brake Pad Replacement Reimbursement Form

Eligibility

To be eligible for reimbursement for a past rear brake pad replacement and related work you must be a resident of Canada who currently owns or leases, or previously owned or leased, a 2009 model year Acura TSX.

Required Time Frame for Past Replacement

To be eligible for reimbursement, the rear brake pad replacement and related work must have been (a) performed within three years of the date that the vehicle was first purchased or leased as a new vehicle, (b) necessitated by wear and tear (replacements and work necessitated by accident and abuse are excluded), and (c) completed before the date of this letter.

Eligible Costs

The costs that are eligible for this reimbursement are the cost of the parts and labour that were required to replace the rear brake pads and any related work for which money was actually paid by you or on your behalf and not otherwise reimbursed by Acura or another third party. If you received compensation or reimbursement from another party (including Acura), the amount of this compensation or reimbursement will be deducted from the Eligible Costs reimbursed to you under this Campaign.

The Reimbursement Amount

Subject to the adjustments described in the Eligible Costs section, upon receipt of a properly completed Reimbursement Form and the required supporting documentation, Honda Canada Inc will reimburse you 50% of the Eligible Costs described above to a maximum of \$125.

You may be eligible for more than one reimbursement for past rear brake pad replacement and related work. You may also be eligible for both a reimbursement for a past rear brake pad replacement and related work AND for a future replacement as outlined under "What Should You Do?" in the Customer Satisfaction Campaign letter.

Claim Deadline

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Examples:

1 If your vehicle was first purchased on November 30, 2007, you had a rear brake pad replacement done in May 2009, and you paid \$200 for the replacement and related work with no compensation or reimbursement from another party, you will be entitled to a reimbursement from Acura of \$100 (50% of the amount you paid).

2 If your vehicle was first purchased on November 30, 2007, you had a rear brake pad replacement done in May 2009, the cost of the replacement and related work was \$200, you paid \$200 and later received a \$60 reimbursement from a third party (including Acura), you will be entitled to a reimbursement from Acura of \$70 (\$200 - \$60 x 50%).

This 'Application for Reimbursement' and required documentation must be submitted by mail to:

Application for Reimbursement
 Honda Canada Inc.
 Acura Client Services
 715 Milner Avenue
 Toronto, ON M1B 2K8

Each application will be considered and processed on an individual basis, provided *the required information and documentation* have been submitted with it (see below). Any application submitted without all required information will be returned to the customer.

Please note: Application for reimbursement must be submitted (post office dated) by July 5, 2010. Applications received after that date will not be accepted.

SUPPORTING DOCUMENTATION YOU MUST ATTACH TO YOUR APPLICATION:

Proof that you are the current or previous owner of the vehicle:

- Copy of the current vehicle registration if you are the current owner
- Bill of Sale evidencing your initial purchase or later sale of the vehicle if you are a previous owner

Original repair order, or true copy thereof indicating:

- Name, address and telephone number of the repair facility
- Your full name and address at the time of the repair
- Full vehicle identification number (VIN)
- License plate number
- Odometer reading at time of repair
- Date of repair
- Clear description of the nature of the problem requiring repair
- Clear description of all labour, parts and materials used to make the repair
- Clear indication of the repair charges, or portion thereof, you were required to pay

Your Name: _____

Address: _____

Home Tel.: _____ Business Tel.: _____

Vehicle Identification Number (VIN-17 digits): _____

I verify that I am the purchaser or lessee of the vehicle described above, that I was a resident of Canada at the time of its purchase or lease, that the vehicle was purchased or leased in Canada, and that to the best of my knowledge, the information provided in this claim form and the supporting documentation are true and correct.

Signature _____ Date: _____