

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

No. 14-MD-2543 (JMF)

GENERAL MOTORS LLC IGNITION
SWITCH LITIGATION

This Document Relates to:

ALL ECONOMIC LOSS ACTIONS

**SUPPLEMENTAL DECLARATION OF JENNIFER M. KEOUGH
REGARDING SETTLEMENT ADMINISTRATION**

I, JENNIFER M. KEOUGH, declare and state as follows:

1. I am the Chief Executive Officer (“CEO”) of JND Legal Administration (“JND”), a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class action cases. As CEO of JND, I am involved in all facets of our Company’s operations, including monitoring the implementation of our notice and claims administration programs.

2. JND is serving as the Class Action Settlement Administrator¹ and an employee of JND is serving as the Qualified Settlement Fund Administrator and Trustee in the above-captioned litigation, pursuant to the Court’s Order Granting Preliminary Approval of Class Settlement, Directing Notice Under Rule 23(e), and Granting Related Relief, dated April 27, 2020. This Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees. I am over the age of 18 and, if called upon to do so, I could and would testify competently thereto.

¹Capitalized terms used and not otherwise defined herein shall have the meanings given such terms in the Settlement Agreement and my Declaration of Class Action Settlement Administrator, dated March 26, 2020.

3. This Supplemental Declaration is being submitted at the request of Counsel and is intended to supplement my Declaration dated November 9, 2020.

OPT-OUT REQUESTS

4. On November 9, 2020, there were 195 Class Member opt-out requests (66 valid and 100 deficient) and 29 invalid opt-out requests.

5. Four of the deficient opt-out requests were submitted by Persons purporting to act on behalf of a deceased Class Member, but they did not provide required documentation to evidence their authority to act in a representative capacity. Following the submission of my November 9, 2020 Declaration, JND performed additional outreach to each of the four Persons referenced above via telephone or mail, depending on the contact information available. In each case, we requested additional documentation in order to resolve the deficiency, informed them that additional documentation must be received by JND no later than the date of the Final Approval Hearing,² and provided them with JND's contact information for any questions they may have. JND's outreach with the four Persons is summarized below:

- a. JND called Edna Trader, whose opt-out request is on behalf of Class Member Mottrom Trader. JND subsequently received a mailed letter from Ms. Trader confirming that she does not want to provide the required supporting documentation, and she understands that this may affect the status of her opt-out request. As such, her opt-out request remains deficient and will become invalid if JND does not receive the required documentation prior to the deadline.
- b. JND mailed a letter to Jamie Rovelli, whose opt-out request is on behalf of Class Member James Rovelli. As of the date of this Supplemental Declaration, JND has not received a response from Ms. Rovelli. As such, her opt-out request remains

²Pursuant to Footnote 5 of the Proposed Final Order and Final Judgment Granting Final Approval of the Economic Loss Class Action Settlement, Confirming Certification of the Economic Loss Settlement Class, and Dismissing all Actions with Prejudice, the four Persons seeking to opt-out who are missing documentation have until the Final Approval Hearing to provide the required documentation.

deficient and will become invalid if JND does not receive the required documentation prior to the deadline.

- c. JND mailed a letter to Joan Davis, whose opt-out request is on behalf of Class Member Mary Munyon. As of the date of this Supplemental Declaration, JND has not received a response from Ms. Davis. As such, her opt-out request remains deficient and will become invalid if JND does not receive the required documentation prior to the deadline.
- d. JND mailed a letter to Pam Santanasto, whose opt-out requests are on behalf of Class Member Joanne Ellis in connection with two Subject Vehicles. JND subsequently received an email from Ms. Santanasto with a copy of documentation with sufficient proof of authority. As such, her opt-out requests are now valid.

6. As of December 11, 2020, there are 195 Class Member opt-out requests (68 valid and 98 deficient) and 29 invalid opt-out requests. A list of the names and the last five digits of the VIN associated with the Persons who requested to opt out, separated by opt-out status, is attached hereto as **Exhibit A**.

7. JND will continue to submit regular reports to the Parties regarding opt-out correspondence received.

CLAIMS RECEIVED

8. As of November 9, 2020, JND had received a total of 509,268 Settlement Claim Forms. Of those, 407,549 Settlement Claim Forms were filed electronically through the Settlement Website, and 101,719 Settlement Claim Forms were submitted via mail or email.

9. As of December 11, 2020, JND has received a total of 519,501 Settlement Claim Forms. Of those, 414,949 Settlement Claim Forms were filed electronically through the Settlement Website, and 104,552 Settlement Claim Forms were submitted via mail or email.

10. The Subject Vehicles for which a claim was submitted belong to the below Subclasses. A Subject Vehicle may belong to more than one Subclass. The below counts represent the number of unique Subject Vehicles in each Subclass. As the number of total claims received may include claims on behalf of more than one Subject Vehicle, as well as claims with an ineligible VIN provided, the count of unique Subject Vehicles is less than claims received:

- a. 71,306 Subject Vehicles belong to Subclass 1: The Delta Ignition Switch Subclass.
- b. 347,073 Subject Vehicles belong to Subclass 2: The Key Rotation Subclass.
- c. 11,212 Subject Vehicles belong to Subclass 3: The Camaro Knee-Key Subclass.
- d. 47,286 Subject Vehicles belong to Subclass 4: The Electronic Power Steering Subclass.
- e. 31,517 Subject Vehicles belong to Subclass 5: The Side Airbag Subclass.

11. As of December 11, 2020, there are claims submitted for 217,678 Subject Vehicles for which recall repairs had not been obtained as of the Settlement. Of the 217,678 Subject Vehicles, after the Settlement JND received claims for 32,151 Subject Vehicles in which the Claimant indicated that the recall repair was completed. After the Final Effective Date, as JND reviews and evaluates the claim submissions, JND will keep the Parties informed regarding the count of VINs with open Recall repairs that have been performed during the Settlement Claim Period.

12. JND continues to receive Settlement Claim Form submissions, as the Settlement Claim Period is still open. JND will continue to submit regular reports to the Parties regarding Settlement Claim Forms received.

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

Executed on December 14, 2020 at Seattle, Washington



JENNIFER M. KEOUGH

EXHIBIT A



GM Ignition Switch Economic Settlement

USDC Southern District of New York, Case No. 14-MD-2543 (JMF) ("MDL 2543")

List of Valid Opt-Outs

NAME	Last 5 Digits of VIN
Araceli Berumen	43470
Barbara M. Allen	20094
Beverly Moore	73219
Bobby Pryor	56897
Brenda Miller	28962
Cesar Augusto Gonzalez M	43408
Craig May	85951
Dana Watson	79513
Daron Arnold	93408
David Williamson	02836
David Williamson	72481
Diane Piscopo	93084
Diane Tomasic on behalf of Rita Tomasic	90894
Donna M. Slyster	61035
Elizabeth Hyzy	26315
Elliott Peaks	05492
Eric Sherman	36132
Gabriel Ochoa	15645
Gail L. Keyser	23230
Glen Gargus	97815
Glenn E. Hansen	28590
Glenn E. Hansen	11107
Gregory Fischer	03470
James Arbaugh	17313
James Banks	15097
James E Farrell	51111
Jami Harrison	73183
Jeannette Mabee	37905
Jessie Montalvo	45128
Joe Young	69940
Joe Young	08201
John F. Slyster, Jr.	61035
Joseph Falisi	42312
Karen Eder	29012
Kerry A Esparza	54875

Kevin Reber	81435
Kevin Shill	34842
Kimberly Gray	59095
Larry VanHook	84151
Leslie Rose	29787
Linda Diane Persson Grill	08592
Lois Helen Friedrichsen	59488
Lori Jackson	10513
Lory Ochoa	15645
Lynn Sutton	92862
Lynn Sutton	27022
Maria Shill	34842
Mary Inez M Portillo	65660
Mary May	85951
Maureen McCafferty	29124
Melissa Ann Robbins	24552
Melissa Shoemate	95022
Mervin Volker	49526
Nicole Leitner	18415
Omar Espinosa	34079
Pam Santanasto on behalf of Joanne Ellis	25534
Pam Santanasto on behalf of Joanne Ellis	02855
Patti Frye	40179
Rafael O. Vicente	63502
Richard Guerrero	98525
Russel Miller	28962
Sebastian Montecristo	09373
Steven Sowa	41527
Steven Sowa	14724
Travis Manteuffel	31493
Victor Walker	70527
Vilayvan Phaouthoum	35019
Wanda Volker	70814

TOTAL: 68



GM Ignition Switch Economic Settlement

USDC Southern District of New York, Case No. 14-MD-2543 (JMF) ("MDL 2543")

List of Deficient Opt-Outs

NAME	Last 5 Digits of VIN
Alexander MacKenzie	64359
Andrew Klotzbach	75171
Andrew Klotzbach	17214
Angela Coyle	46853
Anita Cornelius	08368
Ann Trimble-Ray	76837
Anthony Palumbo	74025
Arlene J. McKnight	53350
Bettye Ames	77896
Beverly Mytko	31889
Beverly Thompson	37540
Beverly Thompson	83507
Carol Riley	85264
Carolina Aguero	63679
Charles B. Gosling	32804
Charles J. Bocchicchio	50635
Colleen Phillips	25677
Connie Xanders	60631
Constance Diaz	76172
Constance Shelley	63024
Dale Gray	87972
Darlene Xanders	60631
David J. Bulcavage	27336
Dennis Barnoski	95022
Dixie Lynn LoVerde	20809
Donetta Richardson	17751
Donna F. Kelly	89309
Donna Fisher	35894
Edmund B. Nightingale	82035
Edna Trader on behalf of Mottrom Trader*	51296
Edward Sanders	51134
Elton Lee	75199
Eugene Chapman	03176
Eugene Chapman	39022
Feldkamp Feldkamp	98185

Francine Rosman	00947
Gene Hansen	76133
Gladys Harris	15896
Helen M. Seidel	10757
Ina J. Porter Brasher	11811
James B Rhoden	05015
James Bevins	49546
James Bevins	59509
James Kaspszak	31665
James Kaspszak	91302
James Kaspszak	50247
James Kaspszak	13203
Jamie Rovelli on behalf of James Rovelli*	00649
Jerilyn Lanagan	46699
Joan Davis on behalf of Mary Munyon*	57536
John Karhoff	37977
John Karhoff	04494
Joyce A. Berkovitz	09453
Kaci Frame	00067
Kevin Williams	22028
Kristopher Beard	00310
Lana Doolin	61034
Linda Robison	24480
Lisa Tarantino	26966
Lydia Renteria	95418
Margaret Beard	00310
Margaret Sanford	N/A
Maria Parmer	89797
Marlene Hobbs	07250
Mary Lou Yindra	06235
Melissa L York	N/A
Oliver White	03925
Pat Frye	40179
Patricia Rowland	55126
Patricia Shealy	57387
Philip R. Jones	71020
Rachel D Laird	76926
Raymond Scarazzo	93332
Reanna Barnoski	95022
Rebecca J. Nightingale	82035
Rhonda Stewart	05676
Richard Johnson	10763
Robert L Wood	22400
Robert Rowland	13228
Rosie Penrod	43683
Ruby Chapman	19124
Ruby Chapman	69682

Sarah Miller	08457
Scott Lanagan	67439
Shane North	07327
Sharon Moeller	95614
Sharon Moeller	32486
Shirley A. Kalleker	83326
Shirley Bock	04048
Steven Feldkamp	98185
Steven Lawrence LoVerde	21121
Steven Lawrence LoVerde	00910
Susana Mendoza	48497
Teresa L. Kunz, Trustee of The Alice A. Rafidi Revocable Trust of 2016	57739
Theresa Emch	48497
Virginia Whitfill	73623
Vivian Richeson	52616
Walter Hundertmark	08377

TOTAL: 98

*These exclusion requests did not provide required documentation to evidence the requesting party's authority to act on behalf of a deceased Class Member



GM Ignition Switch Economic Settlement

USDC Southern District of New York, Case No. 14-MD-2543 (JMF) (“MDL 2543”)

List of Invalid Opt-Outs

NAME	Last 5 Digits of VIN
Alisha Nelson	04266
Bobby Pryor	59750
Charles A Johnson, Jr	72427
Charles J. Bocchicchio	19869
Elton Lee	54226
Enrique Perez Ojeda	49289
James S. Flaherty	89882
James S. Flaherty	86153
James S. Flaherty	58341
John Karhoff	35804
John Karhoff	03278
John Karhoff	24186
John Karhoff	07707
John Karhoff	70795
Keith Nickens	30237
Kimmie Dyess	07822
Luvenia Carr	04266
Mary Kiaunis	00096
Nancy E Currie	N/A
Nancy E Currie	42606
Ragena Kay Combs	43117
Richard Arnold Hampton	81954
Roxie Lee Pacheco	17597
Tasha Elder	40278
Teresa L. Kunz, Trustee of The Alice A. Rafidi	36439
Theresa Emch	78128
Thomas Tyrell	84537
Virginia Whitfill	05866
Walter Lapusheski	15899

TOTAL: 29

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party through the Court's electronic filing service on December 14, 2020, which will send notification of such filing to the e-mail addresses registered.

/s/ Steve W. Berman

Steve W. Berman