

1 LEWIS BRISBOIS BISGAARD & SMITH LLP ROY M. BRISBOIS, SB# 53222 2 E-Mail: brisbois@lbbslaw.com 221 North Figueroa Street, Suite 1200 3 Los Angeles, California 90012 Telephone: 213.250.1800 Facsimile: 213.250.7900 4 CONFORMED COPY ORIGINAL FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF LOSANGELES 5 Attorneys for Defendant AMERÍCAN HONDA MOTOR CO., INC. SEP OR ZUIT 6 John A. Clarke, Executive Officer/Clerk 7 BY Kin Hilaire, Deputy SUPERIOR COURT OF THE STATE OF CALIFORNIA 8 COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST 9 10 CASE NO. BC448670 THERON COOPER and ALICE TRAN, 11 individually and on behalf of all others 12 (Assigned to the Honorable William F. similarly situated. Highberger, Department 307) 13 Plaintiff. DECLARATION OF JULIE LI FO SJOE 14 v. 15 AMERICAN HONDA MOTOR CO., INC., a 16 September 16, 2011 California corporation, Date: Time: 11:00 a.m. 17 Defendant. 307 Dept.: 18 I, Julie Li Fo Sjoe, do hereby declare under penalty of perjury as follows: 19 I am employed by American Honda Motor Co., Inc. ("Honda") and hold the position of 20 Assistant Manager, Customer Service, Campaign Center. All the facts set forth below are personally 21 known to me and I would so testify if called as a witness in this matter. 22 On or about May 10, 2011, American Honda Motor Co., Inc. implemented an 23 2. Adjustment Program for certain Honda Civics relating to sun visor warranty and reimbursement. It is 24 my understanding that the Adjustment Program mirrors the terms and scope of the proposed class 25 26 action settlement in the above-captioned matter. 27 I am familiar with Honda's documentation regarding claims processing under the

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Adjustment Program as well as the warranty claims submitted for sun visors on the class vehicles

under the extended warranty.

- 4. The information set forth below is based upon Honda documentation of the reimbursement claims and warranty data as of August 31, 2011.
 - 5. The total reimbursement claims received is 8960.
 - 6. The total reimbursement claims processed is 8960.
 - 7. The total number of reimbursement claims approved is 7886.
- 8. The total number of reimbursement claims that were deemed deficient and cure letters sent to consumers to allow them to resubmit the claims is 729.
 - 9. A total of 345 reimbursement claims are in review status.
 - 10. As of August 31, 2011 no reimbursement claims have been rejected.
- H. The total monetary amount of reimbursement claims paid, or in which payment is being processed, is \$521,721.00.
- 12. The Adjustment Program includes a warranty extension for visors for 7 years or 100,000 miles, whichever first occurs. In respect to the extended warranty, the total of warranty claims that have been processed for vehicles beyond 36 months or 36,000 miles (the original standard warranty) is 60,210. All such warranty claims were paid by Honda to dealers and were free of charge to the consumer. Assuming an average of \$50 per visor replacement paid by Honda to authorized dealers, the estimated cost through August 31, 2011 for warranty claims is \$3,010,500.00.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Declaration was executed on September 2, 2011 at Torrance, California.

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CALIFORNIA STATE COURT PROOF OF SERVICE THERON COOPER v. AMERICAN HONDA - File No. BC448670

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At the time of service. I was over 18 years of age and not a party to the action. My business address is 221 North Figueroa Street, Suite 1200, Los Angeles, California 90012.

On September 6, 2011, I served the following document(s): **DECLARATION OF** JULIE LI FO SJOE. I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable) on the attached service list:

The documents were served by the following means:

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

(BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an X agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 6, 2011, at Los Angeles, California.

Antoinette J. Musicel

SERVICE LIST

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