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**CONFORMED COPY
ORIGINAL FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES**

SEP 06 2011

5 Attorneys for Defendant
6 **AMERICAN HONDA MOTOR CO., INC.**

John A. Clarke, Executive Officer/Clerk
BY Kin Hilaire, Deputy

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST**

10
11 **THERON COOPER and ALICE TRAN,**
12 individually and on behalf of all others
similarly situated,

CASE NO. BC448670

(Assigned to the Honorable William F.
Highberger, Department 307)

13 **Plaintiff,**

DECLARATION OF JULIE LI FO SJOE

14 v.

15 **AMERICAN HONDA MOTOR CO., INC., a**
16 California corporation,

Date: September 16, 2011

Time: 11:00 a.m.

17 **Defendant.**

Dept.: 307

18
19 I, Julie Li Fo Sjoe, do hereby declare under penalty of perjury as follows:

20 1. I am employed by American Honda Motor Co., Inc. ("Honda") and hold the position of
21 Assistant Manager, Customer Service, Campaign Center. All the facts set forth below are personally
22 known to me and I would so testify if called as a witness in this matter.

23 2. On or about May 10, 2011, American Honda Motor Co., Inc. implemented an
24 Adjustment Program for certain Honda Civics relating to sun visor warranty and reimbursement. It is
25 my understanding that the Adjustment Program mirrors the terms and scope of the proposed class
26 action settlement in the above-captioned matter.

27 3. I am familiar with Honda's documentation regarding claims processing under the
28 Adjustment Program as well as the warranty claims submitted for sun visors on the class vehicles

1 under the extended warranty.

2 4. The information set forth below is based upon Honda documentation of the
3 reimbursement claims and warranty data as of August 31, 2011.

4 5. The total reimbursement claims received is 8960.

5 6. The total reimbursement claims processed is 8960.

6 7. The total number of reimbursement claims approved is 7886.

7 8. The total number of reimbursement claims that were deemed deficient and cure letters
8 sent to consumers to allow them to resubmit the claims is 729.


9 9. A total of 345 reimbursement claims are in review status.

10 10. As of August 31, 2011 no reimbursement claims have been rejected.

11 11. The total monetary amount of reimbursement claims paid, or in which payment is
12 being processed, is \$521,721.00.

13 12. The Adjustment Program includes a warranty extension for visors for 7 years or
14 100,000 miles, whichever first occurs. In respect to the extended warranty, the total of warranty
15 claims that have been processed for vehicles beyond 36 months or 36,000 miles (the original standard
16 warranty) is 60,210. All such warranty claims were paid by Honda to dealers and were free of charge
17 to the consumer. Assuming an average of \$50 per visor replacement paid by Honda to authorized
18 dealers, the estimated cost through August 31, 2011 for warranty claims is \$3,010,500.00.

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

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24 Julie Li Fo Sioe

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SERVICE LIST

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