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ADDENDUM TO SETTLEMENT AGREEMENT AND RELEASE

This ADDENDUM (“Addendum”) to the SETTLEMENT AGREEMENT AND RELEASE (“Agreement” or “Settlement Agreement”) is entered into this 25th day of August 2020, by and between Janet Case and Courtney Shararian (“Plaintiffs”), acting on behalf of the Settlement Class (as defined below), and Defendant American Honda Motor Co., Inc. (“Honda”) (collectively, the “Parties”), through their respective counsel of record pursuant to Paragraph 9.8 of the Settlement Agreement.

This Addendum incorporates by reference all terms and conditions of the Settlement Agreement. But for those specific terms and conditions that this Addendum modifies, all Settlement terms and conditions will remain effective and enforceable. Any inconsistencies or differences between this Addendum and the Settlement will be interpreted and construed in favor of this Addendum.

Delete Paragraph 3.3.d

The Parties hereby agree to delete Paragraph 3.3.d of the Settlement Agreement in its entirety. The Parties further agree that failure to comply with all Objection requirements set forth in Paragraph 3.3 shall not preclude Settlement Class Members from appearing at the final approval hearing.

Added Paragraph 5.3.f:

5.3.f. Uncashed Settlement Checks: Any checks issued by Honda to Settlement Class Members shall be negotiable for 180 calendar days. The funds represented by uncashed settlement checks and settlement checks returned as undeliverable shall be distributed by Honda to the State Controller’s Office under the Unclaimed Property Statutes.

Updated Exhibit A to the Settlement Agreement

The long-form notice attached hereto as **Exhibit A** shall replace the long-form notice attached as Exhibit A to the Settlement Agreement.

IT IS SO STIPULATED

SIGNATURES

Dated: August 25, 2020

ESENSTEN LAW

By: Jordan Esensten

Jordan S. Esensten

Robert L. Esensten

Attorneys for Plaintiffs

Dated: August 25, 2020

SHOOK, HARDY & BACON L.L.P.

By: Rachel Straus

Michael L. Mallow

Rachel A. Straus

*Attorneys for Defendant American Honda
Motor Co., Inc.*

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