

**ATTENTION: Individuals Who Suffered Personal Injury or Wrongful Death
Caused by a Defective or Malfunctioning Airbag Inflator
Manufactured by Takata Corporation or Any of Its Affiliates (“Takata”)**

***How to make a claim to the Takata Airbag Tort Compensation Trust Fund or
Individual Restitution Fund for compensation for personal injury or wrongful
death caused by the malfunction of a Takata Airbag Inflator***

**PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.
THIS NOTICE CONTAINS IMPORTANT INFORMATION REGARDING YOUR RIGHTS.**

This Notice contains information regarding the claims process established for individuals who suffered personal injury or wrongful death caused by the rupture or aggressive deployment of a Takata phase-stabilized ammonium nitrate (“PSAN”) airbag inflator (a “Takata Airbag Inflator Defect”).

A. TAKATA AIRBAG INFLATOR DEFECT CLAIMS

There are three types of claims that can be brought by individuals who suffered injury or wrongful death caused by a Takata Airbag Inflator Defect: (i) an “**IRF Claim**” for compensation from the Takata Individual Restitution Fund (“**IRF**”), the personal injury and wrongful death restitution fund overseen by the Special Master and established under the Restitution Order entered by the United States District Court for the Eastern District of Michigan (the “**District Court**”) on February 27, 2017 in *U.S. v. Takata Corporation*, Case No. 16-cr-20810 (E.D. Mich.); (ii) a “**Trust Claim**” against Takata, which must be resolved through the Takata Airbag Tort Compensation Trust Fund (the “**TATCTF**”) overseen by the Trustee and established in connection with Takata’s Chapter 11 Plan of Reorganization in the Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”), and (iii) a “**POEM Claim**” against a Participating Original Equipment Manufacturer (a “**POEM**,” **presently the only POEM is Honda/Acura**), which must be resolved through the TATCTF overseen by the Trustee.

Each of these three types of claims has its own eligibility requirements. If a Takata Airbag Inflator Defect caused personal injury or death, you may be eligible to file all three types of claims or you may be eligible for only one or two types of claims. **These claim types cover only physical injuries and wrongful death resulting from the rupture or aggressive deployment of a Takata PSAN Airbag Inflator.** Injuries or death caused by other airbag components, a failure to deploy, spontaneous deployment, crash injuries unrelated to the inflator, or economic losses unrelated to physical injuries or death are not covered.

1. IRF CLAIMS

Eligibility Criteria: An individual is eligible to file a claim for compensation from the IRF if the individual: (1) has suffered personal injury or wrongful death caused by a Takata Airbag Inflator Defect; (2) was at the time the Takata Airbag Inflator Defect accident occurred: (a) in a vehicle located or registered in the United States, its territories, or its possessions; or (b) a United States citizen or permanent resident (wherever the Takata Airbag Inflator Defect accident occurred); and (3) has not already resolved his or her claim against Takata.

An IRF Claim is available only to individuals who were either the driver of, or a passenger in, a vehicle with a Takata Airbag Inflator Defect. The IRF will not compensate non-U.S. citizens or non-permanent residents who were injured or suffered wrongful death outside of the United States, its territories, or its possessions in a vehicle that is not registered in the United States. If you do not meet the eligibility requirements for IRF Claims, you may still qualify for one of the other types of claims based on a Takata Airbag Inflator Defect; please read the eligibility information below with respect to Trust Claims and POEM Claims.

2. TRUST CLAIMS

Eligibility Criteria: An individual is eligible to file a Trust Claim for compensation from the TATCTF if the individual has suffered personal injury or wrongful death caused by the Takata Airbag Inflator Defect, provided that the Claimant has not already resolved his or her claim against Takata, and the Claimant: (1) is a United States citizen or permanent resident of the United States or any of its territories or possessions, wherever the injury or death occurred; (2) was injured or suffered wrongful death in an accident that occurred within the United States or any of its territories or possessions; or (3) was injured or suffered wrongful death in a vehicle registered in the United States or any of its territories or possessions.

If the Claimant does not satisfy any of the criteria set out in (1), (2), or (3) above, the Claimant still may be eligible if the Claimant's claim: (a) could have been asserted in a complaint filed in any court in the United States or any of its territories or possessions against one or more of the Takata debtors in the Chapter 11 Bankruptcy Cases in the Bankruptcy Court¹ (for purposes of this analysis, as if the Takata Chapter 11 Bankruptcy Cases had not been filed); and (b) such complaint, if filed, would have withstood challenge on a motion to dismiss (or other dispositive motion) upon the grounds of lack of jurisdiction (e.g., lack of subject matter jurisdiction) and/or on forum selection grounds (e.g., under the *forum non conveniens* doctrine).

3. POEM CLAIMS (presently, Honda or Acura vehicles only)

Eligibility Criteria: Honda/Acura is currently the only POEM. Thus, at the present time, only individuals who were injured or suffered wrongful death as a result of a Takata Airbag Inflator Defect in a vehicle sold or manufactured by Honda/Acura are eligible to file a POEM Claim. POEM claims are claims that: (1) are brought by a citizen of the United States or permanent resident, wherever the injury or death occurred; (2) arise from an accident that occurred in the United States or any of its territories or possessions, whether or not such claim is brought by a citizen or permanent resident of the United States; or (3) involve a vehicle registered in the United States or any of its territories or possessions. A POEM Claim may not be brought by an individual who has already resolved his or her claim against the POEM.

B. DEADLINES FOR FILING CLAIMS

A Claim Form asserting an IRF, Trust, and/or POEM Claim must be postmarked or submitted electronically through the Special Master/Trustee's claim filing website, **www.TakataInjuryClaimSubmission.com** (along with all required supporting documentation), by the following deadlines:

- For a Claim arising out of an accident that occurred prior to April 10, 2018, a "Notice of Claim" or the completed Claim Form must be postmarked or submitted electronically through the Special Master/Trustee's website no later than April 10, 2021.
- For a Claim arising out of an accident occurring on or after April 10, 2018, a "Notice of Claim" or the completed Claim Form must be postmarked or submitted electronically through the Special Master/Trustee's website by the later of three years from the date of the accident, or the time allowed under the state law applicable to the claim.

For all three types of claims, Claimants may elect to initially file a simple "Notice of Claim" rather than a completed Claim Form. Filing a Notice of Claim satisfies compliance with the claims filing deadlines. Claimants who are not ready to file a complete Claim Form, or who are planning to defer consideration of their claim until later, may prefer to file the Notice of Claim instead of the complete Claim Form. To have your claim processed and considered for compensation, a completed Claim Form must be submitted.

C. OVERSIGHT OF THE CLAIMS PROCESS

Professor Eric D. Green, who was appointed by the District Court and is serving as the Special Master of the IRF, was also appointed by the Bankruptcy Court to serve as the Trustee overseeing Trust Claims and POEM Claims.

D. INFORMATION AND QUESTIONS

For more information about eligibility and how to file a claim, please visit www.TakataAirbagInjuryTrust.com, email Questions@TakataAirbagInjuryTrust.com, or call us toll-free at (888) 215-9544.

¹ The debtors in the Takata Chapter 11 Bankruptcy Case include: TK Holdings Inc.; Takata Americas; TK Finance, LLC; TK China, LLC; Takata Protection Systems Inc.; Interiors in Flight Inc.; TK Mexico Inc.; TK Mexico LLC; TK Holdings de Mexico, S. de R.L. de C.V.; Industrias Irvin de Mexico, S.A. de C.V.; Takata de Mexico, S.A. de C.V.; and Stroshe-Mex, S. de R.L. de C.V.