

Exhibit A

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December 4, 2024

VIA PRIORITY MAIL

Merrick Garland
Attorney General of the United States
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Merrick Garland:

Faegre Drinker Biddle & Reath LLP represents Nissan North America, Inc. in a putative class action lawsuit entitled *Travis Beaver, Luz Pineda, Susanne Hanes and Carl Kirksey, individually and on behalf of all others similarly situated v. Nissan North America, Inc.*, Case No. 3:22-cv-00785. The lawsuit is pending before the Honorable Eli J. Richardson in the United States District Court for the Middle District of Tennessee, Nashville Division.

Pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1715 *et seq.* (“CAFA”), this letter and the documents listed below (CD-ROM enclosed) constitute Notice of a Proposed Class Action Settlement by Defendant Nissan North America, Inc. (“Nissan”), through Nissan’s undersigned counsel in the above-referenced action. Nissan denies the allegations and claims asserted against it in the above-referenced action and denies any wrongdoing or liability whatsoever with regard to the lawsuit, but it has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation.

Case Name: *Travis Beaver, et al. v. Nissan North America, Inc.*

Case Number: 3:22-cv-00785

Jurisdiction: United States District Court
Middle District of Tennessee, Nashville Division

Date Settlement
Filed with Court: November 25, 2024

In compliance with 28 U.S.C. § 1715(b), the following documents referenced below are included on the CD that is enclosed with this letter:

1. Class Action Complaint;
2. First Amended Class Action Complaint;
3. Second Amended Class Action Complaint;
4. Plaintiffs' Notice of Motion and Motion for Preliminary Approval of the Class Action Settlement with Defendant Nissan North America, Inc. (the "Motion");
5. Plaintiffs' Memorandum of Law in Support of the Motion;
6. The Declarations filed in Support of the Motion, specifically:
 - a. Declaration of Melissa S. Weiner and the following Exhibits:
 - i. Settlement Agreement filed in the Action;
 1. Exhibit A to Settlement Agreement – Expedited Resolution Process;
 2. Exhibit B to Settlement Agreement – Claim Form;
 3. Exhibit C to Settlement Agreement – Long Form Notice;
 4. Exhibit D to Settlement Agreement – Summary Notice;
 5. Exhibit E to Settlement Agreement – Proposed Preliminary Approval Order;
 6. Exhibit F to Settlement Agreement – Proposed Final Approval Order and Judgment;
 7. Exhibit G to Settlement Agreement – Supplemental Distribution of Summary Notice by Email.
 - b. Declaration of Norberto J. Cisneros;
 - c. Declaration of Cody R. Padgett;
 - d. Declaration of Natalie Finkelman Bennett;
 - e. Declaration of Lawrence Deutsch;
 - f. Declaration of Mark S. Greenstone;
 - g. Declaration of J. Gerard Stranch;
 - h. Declaration of Carla Peak of Verita Global, LLC f/k/a KCC Class Action Services, LLC, the proposed settlement administrator.

December 4, 2024

Please take note that the parties have filed the Settlement Agreement and exhibits thereto in the above-referenced action with the United States District Court for the Middle District of Tennessee (the "Court"). The Court has not issued any written orders regarding the proposed settlement as of the date of this letter, and there are no hearings scheduled at this time.

At this time, it is not feasible to provide the names of each class member who resides in each jurisdiction. Nissan and Verita Global are in the process of gathering information to provide a reasonable estimate of the number of class members residing in each State but will not have the information until the Settlement is preliminarily approved and they are able to obtain vehicle registration data from the various State motor vehicle departments. Accordingly, pursuant to 28 U.S.C. § 1715(b)(7)(B), Nissan estimates that there are perhaps one million individuals who are members of the proposed class, based on the fact that the proposed settlement concerns past and present owners and lessees of some five hundred twenty thousand Class Vehicles, and believes that a significant number of proposed class members may reside in all 50 States, the District of Columbia, and territories and possessions of the United States. Accordingly, we are providing notice to the responsible officials of every State, territory, and possession.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Nissan can address any concerns or questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Paul Cauley, Jr.", with a stylized flourish at the end.

E. Paul Cauley, Jr.

Enclosure – CD ROM