

# **EXHIBIT 1**

June 27, 2019

Law Offices

1717 Main Street  
Suite 5400  
Dallas, TX  
75201-7367

469-357-2500  
469-327-0860 fax  
www.drinkerbiddle.com

CALIFORNIA  
CONNECTICUT  
DELAWARE  
ILLINOIS  
LONDON  
NEW JERSEY  
NEW YORK  
PENNSYLVANIA  
TEXAS  
WASHINGTON D.C.

***Via United Parcel Service for the U.S. Attorney General  
and USPS Certified Mail for Those on Exhibit A***

Mr. William Barr, Esq.  
Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530

The Attorneys General Identified  
in the Attached Exhibit A

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

Dear Mr. Barr and Attorneys General:

Our firm represents Nissan North America, Inc., (“NNA”) in a class action entitled *Norman, et. al. (f/k/a Madrid, et al.) v. Nissan North America, Inc.*, Case No. 3:18-cv-00534. The lawsuit is pending before the Honorable Eli 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) shall constitute Notice of a Proposed Class Action Settlement by Defendant Nissan North America, Inc. (“Defendant” or “Nissan”), through Defendant’s undersigned counsel for Nissan, in the above-referenced action. Nissan denies the allegations and claims asserted against it in the above-referenced action, but it has decided to settle this action in order to eliminate the burden, expense, and uncertainties of further litigation.

In conjunction with this notice, please find copies of the following documents on the enclosed CD-ROM:

1. Unopposed Motion for Preliminary Approval [69];
2. [Proposed] Preliminary Approval Order [69-1];
3. Memorandum in Support of Preliminary Approval [70];
4. Declaration of Cody Padgett [71];
  - a. Settlement Agreement filed in the Action [71-2];

Established 1849

Mr. William Barr, Esq.  
June 27, 2019  
Page 2

- b. Exhibit A – Expedited Resolution Notice [71-3];
  - c. Exhibit B – Claim Form [71-4];
  - d. Exhibit C – Long Form Notice [71-5];
  - e. Exhibit D – Summary Notice [71-6];
  - f. Exhibit E - Proposed Preliminary Approval Order [71-7];
  - g. Exhibit F – Proposed Final Approval Order and Judgment [71-8];
- 5. Declaration of KCC’s Carla Peak [74];
  - 6. Class Action Complaint [1];
  - 7. First Amended Class Action Complaint [64];
  - 8. Second Amended Class Action Complaint [77];

Please take note that the parties have filed the operative Settlement Agreement and exhibits thereto in the Action with the United States District Court for the Middle District of Tennessee (the “Court”). The Court has not issued a written preliminary approval order as of the date of this letter, but recently asked the Parties for additional information and joint briefing by July 8, 2019. 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. Accordingly, pursuant to 28 U.S.C. § 1715(b)(7)(B), Defendant estimates that there are more than 140,000 individuals who are members of the proposed class and believes that proposed class members reside in all 50 States, the District of Columbia, and territories and possessions of the United States. Defendant may have additional information on the number of class members after the Settlement Administrator obtains vehicle registration data.

If for any reason you believe the enclosed information does not fully comply with CAFA, please notify the undersigned immediately so that Defendant can address any concerns you may have.

DrinkerBiddle&Reath

Mr. William Barr, Esq.  
June 27, 2019  
Page 3

Very truly yours,

A handwritten signature in black ink, appearing to read "E.P. Cauley, Jr.", with a long horizontal flourish extending to the right.

E. Paul Cauley, Jr.

EPC  
Enclosures  
119566898.2

**Norman, et al. (f/k/a Madrid, et al.) v. Nissan North America, Inc.**  
**3:18-cv-00534 (M.D. TN)**

**EXHIBIT A - CAFA RECIPIENT SERVICE DISTRIBUTION LIST**

FEDERAL

William Barr, Esq.  
Attorney General of the United States  
United States Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

ALASKA

Kevin Clarkson  
Office of the Alaska Attorney General  
P.O. Box 110300  
Jeaneau, AK 99811

ALABAMA

Steve Marshall  
Office of the Alabama Attorney General  
501 Washington Avenue  
PO Box 300152  
Montgomery, AL 36130-0152

ARKANSAS

Leslie Rutledge  
Arkansas Attorney General Office  
323 Center Street, Suite 200  
Little Rock, AR 72201-2610

ARIZONA

Mark Brnovich  
Office of the Arizona Attorney General  
2005 N. Central Avenue  
Phoenix, AZ 85004

CALIFORNIA

CAFA Coordinator  
Office of the Attorney General  
Consumer Law Section  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102

COLORADO

Phil Weiser  
Office of the Colorado Attorney General  
Ralph L. Carr Colorado Judicial Center  
1300 Broadway, 10th Floor  
Denver, CO 80203

CONNECTICUT

William Tong  
State of Connecticut Attorney General's Office  
55 Elm Street  
Hartford, CT 06106

DISTRICTOF COLUMBIA

Karl A. Racine  
District of Columbia Attorney General  
441 4th Street, NW, Suite 1100S  
Washington, DC 20001

DELAWARE

Kathy Jennings  
Delaware Attorney General  
Carvel State Office Building  
820 N. French Street  
Wilmington, DE 19801

FLORIDA

Ashley Moody  
Office of the Attorney General of Florida  
The Capitol, PL-01  
Tallahassee, FL 32399-1050

GEORGIA

Chris Carr  
Office of the Georgia Attorney General  
40 Capitol Square, SW  
Atlanta, GA 30334-1300

HAWAII

Clare Connors  
Office of the Hawaii Attorney General  
425 Queen Street  
Honolulu, HI 96813

IOWA

Tom Miller  
Iowa Attorney General  
Hoover State Office Building  
1305 E. Walnut Street  
Des Moines, IA 50319

IDAHO  
Lawrence Wasden  
State of Idaho Attorney General's Office  
700 W. Jefferson Street, Suite 210  
P.O. Box 83720  
Boise, ID 83720-0010

ILLINOIS  
Kwame Raoul  
Illinois Attorney General  
James R. Thompson Center  
100 W. Randolph Street  
Chicago, IL 60601

INDIANA  
Curtis T. Hill, Jr.  
Indiana Attorney General's Office  
Indiana Government Center South  
302 West Washington Street, 5th Floor  
Indianapolis, IN 46204

KANSAS  
Derek Schmidt  
Kansas Attorney General  
120 S.W. 10th Ave., 2nd Floor  
Topeka, KS 66612-1597

KENTUCKY  
Andy Beshear  
Office of the Kentucky Attorney General  
700 Capitol Ave  
Capitol Building, Suite 118  
Frankfort, KY 40601



LOUISIANA

Jeff Landry  
Office of the Louisiana Attorney General  
P.O. Box 94095  
Baton Rouge, LA 70804-4095

MASSACHUSETTS

Maura Healey  
Office of the Attorney General of Massachusetts  
1 Ashburton Place  
20th Floor  
Boston, MA 02108-1518

MARYLAND

Brian Frosh  
Office of the Maryland Attorney General  
200 St. Paul Place  
Baltimore, MD 21202-2202

MAINE

Aaron Frey  
Office of the Maine Attorney General  
State House Station 6  
Augusta, ME 04333

MICHIGAN

Dana Nessel  
Office of the Michigan Attorney General  
P.O. Box 30212  
525 W. Ottawa Street  
Lansing, MI 48909-0212

MINNESOTA

Attorney General Keith Ellison  
Attention: CAFA Coordinator  
445 Minnesota Street  
Suite 1400  
St. Paul, MN 55101-2131

MISSOURI

Eric Schmitt  
Missouri Attorney General's Office  
Supreme Court Building  
207 W. High Street  
Jefferson City, MO 65101

MISSISSIPPI

Jim Hood  
Mississippi Attorney General's Office  
Department of Justice  
P.O. Box 220  
Jackson, MS 39205

MONTANA

Tim Fox  
Office of the Montana Attorney General  
Justice Bldg., 3rd Floor  
215 N. Sanders Street  
Helena, MT 59620-1401

NORTH CAROLINA

Josh Stein  
Office of the North Carolina Attorney General  
Department of Justice  
9001 Mail Service Center  
Raleigh, NC 27602-0629

NORTH DAKOTA

Wayne Stenehjem  
North Dakota Office of the Attorney General  
State Capitol  
600 E. Boulevard Avenue  
Bismarck, ND 58505-0040

NEBRASKA

Doug Peterson  
Office of the Nebraska Attorney General  
2115 State Capitol  
P.O. Box 98920  
Lincoln, NE 68509-8920

NEW HAMPSHIRE

Gordon MacDonald  
New Hampshire Attorney General  
New Hampshire Department of Justice  
33 Capitol Street  
Concord, NH 03301-6397

NEW JERSEY

Gurbir S. Grewal  
Office of the New Jersey Attorney General  
Richard J. Hughes Justice Complex  
25 Market Street, P.O. Box 080  
Trenton, NJ 08625

NEW MEXICO

Hector Balderas  
Office of the New Mexico Attorney General  
P.O. Drawer 1508  
Santa Fe, NM 87504-1508

NEVADA

Aaron Ford  
Nevada Attorney General  
Old Supreme Ct. Bldg.  
100 North Carson Street  
Carson City, NV 89701

NEW YORK

Letitia James  
Office of the New York Attorney General  
Dept. of Law - The Capitol  
2nd Floor  
Albany, NY 12224

OHIO

Dave Yost  
Ohio Attorney General  
State Office Tower  
30 E. Broad Street  
Columbus, OH 43266-0410

OKLAHOMA

Mike Hunter  
Oklahoma Office of the Attorney General  
313 NE 21st Street  
Oklahoma City, OK 73105

OREGON

Ellen F. Rosenblum  
Office of the Oregon Attorney General  
Justice Building  
1162 Court Street, NE  
Salem, OR 97301

PENNSYLVANIA

Josh Shapiro  
Pennsylvania Office of the Attorney General  
1600 Strawberry Square  
Harrisburg, PA 17120

RHODE ISLAND

Peter Kilmartin  
Rhode Island Office of the Attorney General  
150 South Main Street  
Providence, RI 02903

SOUTH CAROLINA

Alan Wilson  
South Carolina Attorney General  
Rembert C. Dennis Office Bldg.  
P.O. Box 11549  
Columbia, SC 29211-1549

SOUTH DAKOTA

Jason Ravensborg  
South Dakota Office of the Attorney General  
1302 East Highway 14, Suite 1  
Pierre, SD 57501-8501

TENNESSEE

Herbert H. Slatery, III  
Tennessee Attorney General and Reporter  
P.O. Box 20207  
Nashville, TN 37202-0207

TEXAS

Ken Paxton  
Attorney General of Texas  
Capitol Station  
P.O. Box 12548  
Austin, TX 78711-2548

UTAH

Sean Reyes  
Utah Office of the Attorney General  
P.O. Box 142320  
Salt Lake City, UT 84114-2320

VIRGINIA

Mark Herring  
Office of the Virginia Attorney General  
202 North Ninth Street  
Richmond, VA 23219

VERMONT

TJ Donovan  
Office of the Attorney General of Vermont  
109 State Street  
Montpelier, VT 05609-1001

WASHINGTON

Bob Ferguson  
Washington State Office of the Attorney General  
1125 Washington St SE  
P.O. Box 40100  
Olympia, WA 98504-0100

WISCONSIN

Josh Kaul  
Office of the Wisconsin Attorney General  
Dept of Justice, State Capitol  
RM 114 East P.O. Box 7857  
Madison, WI 53707-7857

WEST VIRGINIA

Patrick Morrissey  
West Virginia Attorney General  
State Capitol Complex, Bldg 1  
Room E-26  
Charleston, WV 25305

WYOMING

Peter K. Michael  
Office of the Wyoming Attorney General  
2320 Capitol Avenue  
Cheyenne, WY 82002

AMERICAN SAMOA

Talauega Eleasalo V. Ale  
American Samoa Attorney General  
Exec. Ofc. Bldg, 3rd Floor  
P.O. Box 7  
Utulei, AS 96799

GUAM

Leevin Taitano Camacho  
Office of the Attorney General, ITC Building  
590 S. Marine Corps Drive  
Suite 901  
Tamuning, Guam 96913

NORTHERN MARIANA ISLANDS

Edward Manibusan  
Northern Mariana Islands Attorney General  
Administration Building  
PO Box 10007  
Saipan, MP 96950-8907

PUERTO RICO

Wanda Vazquez Garced  
Puerto Rico Attorney General  
P.O. Box 902192  
San Juan  
San Juan, PR 00902-0192

VIRGIN ISLANDS

Claude E. Walker  
Virgin Islands Attorney General, Department of Justice  
34-38 Kronprindsens Gade  
GERS Bldg, 2nd Floor  
St. Thomas, VI 00802