

FIAT 500 DOOR HANDLES – QUEBEC CLASS ACTION

**NOTICE OF AUTHORIZATION OF A CLASS ACTION AND
PRE-APPROVAL NOTICE OF A PROPOSED SETTLEMENT**

You do not have to do anything and you do not have to pay anything in order to participate in the class action or the proposed settlement

This notice concerns all persons in Quebec who have purchased or leased a Fiat 500 vehicle, model years 2012 to 2019

**PLEASE READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR RIGHTS.
THIS CLASS ACTION HAS BEEN SETTLED, SUBJECT TO COURT APPROVAL.**

WHAT IS THIS CLASS ACTION ABOUT?

By way of judgment dated April 29, 2024 (as rectified on May 7, 2024), the Superior Court of Quebec authorized the institution of a class action against FCA Canada Inc. (“FCA”) in the matter of *Paciucci et al. v. FCA Canada Inc.* (Court File No.: 500-06-000905-188).

The lawsuit alleges that the door handle and/or door locking mechanisms of Fiat 500 vehicles (model years 2012 to 2019) are affected by defects which cause the door handles to jam and, in some cases, break or detach from the vehicle (the “**Door Handle Issue**”). The lawsuit claims, on behalf of class members, compensatory damages including the reimbursement or reduction of the purchase or lease price, repair costs and other disbursements incurred by class members, compensation for loss of time, inconvenience and class members’ loss of use of their vehicles. The lawsuit also claims punitive damages.

FCA denies any wrongdoing, and no court has concluded that there has been any wrongdoing by FCA. The parties have instead decided to settle the lawsuit.

AM I A CLASS MEMBER?

You are a class member and purchased or leased a Fiat 500 vehicle (model years 2012 to 2019) with any trim line.

PROPOSED SETTLEMENT AGREEMENT

You have nothing to pay in order to participate in the settlement.

Without any admission of liability, the parties have reached a proposed agreement to settle the class action (the “**Settlement Agreement**”), subject to its approval by the Superior Court of Quebec.

A copy of the Settlement Agreement and other related documentation are available online at fiat500doorhandlesettlement.ca.

If the Settlement Agreement is approved, FCA will provide an extended warranty program, which will cover issues originating with the door handle and/or door locking mechanism of covered Fiat 500 vehicles that causes the door handles to jam and, in some cases, break or detach from the vehicle. The extended warranty program will include:

1) **Door Handle Repair Program**

- FCA will provide coverage to repair or replace free of charge the door handles of any vehicles affected by the Door Handle Issue at the time of their inspection.
- The door handle repair program will not cover preventative inspections or repairs.
- This coverage will be available for ten (10) years from the in-service date of the vehicle or, for a vehicle whose in-service date is already more than ten (10) years old when the notices are disseminated advising class members that the settlement has been approved have been sent out, an extra one (1) year of coverage following this date.
- There will be no per member limit on the number of claims that can be submitted during the warranty period.

2) **Reimbursement Payments**

- FCA will reimburse the costs previous incurred by class members to repair or replace the door handles of their vehicles as a result of the Door Handle Issue, irrespective of the repair facility where these repairs were conducted.
- Claims for reimbursement must be submitted within one (1) year of the first date on which the notices advising class members that the settlement has been approved have been sent out.
- There will be no limit on the amounts the class members may claim for reimbursement of any door handle repair costs already incurred.

In addition to the Extended Warranty Program, FCA will also pay the administration expenses, notice costs, and class counsel's fees in the amount of \$425,000, plus GST and PST, as well as disbursements of \$3,500. **You therefore have nothing to pay in order to participate in the class action and proposed settlement.**

DO I HAVE A LAWYER IN THIS CASE?

Yes. The lawyers representing the class members are the law firm Lex Group Inc. You will **not** be charged by this law firm for its work on the case. If you want to be represented by your own lawyer, you can hire one at your own expense.

SETTLEMENT APPROVAL HEARING

The Superior Court of Quebec must approve the Settlement Agreement in order to become effective. The approval hearing will be held on **[date]**, at **[time]**, at the Montreal Courthouse located at 1 Notre-Dame Street East, Montreal, Quebec, in **room [#]**, or via a Microsoft Teams link. This date may be changed by the Court without further notice to the class members. Any updates will be provided through a notice posted on the settlement website fiat500doorhandlesettlement.ca.

CAN I EXCLUDE MYSELF FROM THE CLASS ACTION?

If you wish to be included in the class action, you have no action to take at this stage (and nothing to pay).

If you wish to exclude yourself (opt out) from the class action, you will have no further right to participate in the class action, or to benefit from the Settlement Agreement.

To exclude yourself, you must send a notice no later than **[30 days from the date that the Pre-Approval Notice is first published]**, by mail to the following address:

Clerk of the Superior Court of Quebec
File: 500-06-000905-188
Paciucci et al. v. FCA Canada Inc.
Montreal Courthouse
1 Notre-Dame Street East, Suite 1.120, Montreal (Quebec) H2Y 1B6

With copy to the claims administrator by email or mail at the following address:

Concilia Services Inc.
5900 Andover Ave. Suite 1, Montreal, Quebec H4T 1H5
Email: fiat@conciliainc.com

You must state that you wish to exclude yourself from the class action *Paciucci et al. v. FCA Canada Inc.* (case n° 500-06-000905-188). This notice must include your full name, current address, email address and telephone number.

WHAT IF I DISAGREE WITH THE PROPOSED SETTLEMENT?

If you disagree with the proposed Settlement Agreement, but you do not wish to exclude yourself from the class action, you can object to or comment on it by submitting a written objection form no later than **[20 days prior to approval hearing]** or by presenting such objection(s) or comment(s) at the settlement approval hearing

Your written objection form must include: (a) a heading that refers to the class action, including the relevant Court file number; (b) your full name, address, telephone number and email address

and, if you are represented by counsel, their name, address, telephone number, fax number, and email address; (c) a statement as to whether you intend to appear at the approval hearing on your own behalf or through counsel; (d) a declaration that you consider yourself to be included in the class, as applicable, including the make, model, year and VIN(s) of the vehicles owned and/or leased; (e) a statement of the objection and the grounds supporting the objection; (f) copies of any papers, briefs or other documents upon which the objection is based; and (g) your dated signature. If any testimony is proposed to be given, the name(s) of all person(s) who will testify must be set forth in written submission.

You must send your letter to the Court by mail at the address mentioned above with copy to the claims administrator at:

Concilia Services Inc.
5900 Andover Ave. Suite 1, Montreal, Quebec H4T 1H5
Email: fiat@conciliainc.com

If you do not oppose the proposed Settlement Agreement, you do not need to appear at any hearing and you do not need to take any other action to indicate your desire to support the proposed Settlement Agreement. You may make a claim at a later date, if the settlement is approved by the Court.

If the Settlement Agreement is approved, another notice to class members will be sent explaining the procedure to benefit from the Extended Warranty Program, including the Door Handle Repair Program and the Reimbursement Payments.

HOW DO I OBTAIN MORE INFORMATION?

For further information or details about the proposed Settlement Agreement, you can contact the claims administrator (contact information above) or class counsel:

Mtre David Assor
Lex Group Inc.
4101 Sherbrooke Street West
Westmount, Quebec, H3Z 1A7
Tel: (514) 451-5500 #101
E-mail: davidassor@lexgroup.ca

You can also visit the settlement website at fiat500doorhandlesettlement.ca for copies of all relevant documents, agreements, notices and Judgments.

Please do not contact FCA or the Judges of the Superior Court of Quebec.

THE PUBLICATION OF THIS NOTICE TO CLASS MEMBERS HAS BEEN APPROVED AND ORDERED BY THE SUPERIOR COURT OF QUEBEC.