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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
FOR THE COUNTY OF SAN FRANCISCO
10 **UNLIMITED JURISDICTION**

11 COORDINATION PROCEEDING SPECIAL)
12 TITLE (Cal. R. Ct. 1550(b)))

Judicial Council Coordination
Proceeding Nos. 4298 and 4303

13)
14 AUTOMOBILE ANTITRUST CASES I, II)

CJC-03-004298 and CJC-03-004303

CLASS ACTION

15 _____)
16 This document relates to:)
17 All Actions)

[PROPOSED] JUDGMENT

Date: October 5, 2022
Time: 10:00 a.m.
Dept: 306
Judge: Honorable Anne-Christine Massullo

18)
19)
20)
Date Complaint Filed: October 6, 2003
(Consolidated Amended Class Action
Complaint)

1 This matter came before the Court on October 5, 2022, pursuant to the Court’s Order
2 Preliminarily Approving Settlement with Ford Canada dated June 23, 2022, for a Final Approval
3 Hearing on Plaintiffs’ motion, on behalf of the Class, for final approval of the Settlement Agreement
4 between Plaintiffs and Ford Motor Company of Canada, Limited (“Ford Canada”).

5 The Court, being otherwise fully informed, and having made certain findings and determinations,
6 and good cause appearing therefore, in its _____, _____, 2022 Order Granting Final Approval of
7 Settlement With Ford Canada found that the Settlement Agreement is in all respects fair, reasonable, and
8 adequate, and fully and finally approved the Settlement Agreement, including its payment and release
9 provisions, and directed consummation of the Settlement Agreement according to its terms.

10 Accordingly, in light of the Order Granting Final Approval of Settlement With Ford Canada, the
11 terms of which are hereby incorporated as if fully set forth herein, and good cause appearing, IT IS
12 HEREBY ADJUDGED that:

- 13 1. This Judgment incorporates by reference the definitions in the Settlement Agreement, and
14 all terms used herein shall have the same meanings set forth in the Settlement Agreement.
- 15 2. Judgment shall be entered that Plaintiffs and the Class Members take nothing from Ford
16 Canada other than as set forth in the Settlement Agreement and Order Granting Final
17 Approval of the Settlement with Ford Canada, and that Plaintiffs and Class Members
18 release all claims as set forth in paragraph 11 of the Settlement Agreement.
- 19 3. As to Ford Canada, the Action be dismissed with prejudice and, except as provided for in
20 this Agreement, without costs.
- 21 4. Without affecting the finality of this Judgment in any way, this Court hereby retains
22 continuing jurisdiction over the Settlement and the Parties, consistent with California
23 Code of Civil Procedure Section 664.6, and as provided in the Order Granting Final
24 Approval of the Settlement, including with respect to: (a) implementation and
25 consummation of the Settlement Agreement and any disputes relating to the Settlement
26 Agreement, and (b) construing, enforcing, and administering the Settlement Agreement
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5. The Court determines that there is no just reason for delay and directs that this Judgment shall be entered.

IT IS SO ORDERED

Dated: _____

Anne-Christine Massullo
Judge of the Superior Court