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1	Joseph J. Tabacco, Jr. (Bar No. 75484) Todd A. Seaver (Bar No. 271067)	FILED
2	Matthew D. Pearson (Bar No. 235339) BERMAN TABACCO	San Francisco County Superior Court MAY 12 2025
3	425 California Street, Suite 2300 San Francisco, CA 94104	
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7	Attorneys for Plaintiffs	
8		
9		THE STATE OF CALIFORNIA
10		FY OF SAN FRANCISCO D JURISDICTION
	01,222,122	
11	COORDINATION PROCEEDING SPECIAL) Judicial Council Coordination
12	TITLE (Cal. R. Ct. 1550(b))	Proceeding Nos. 4298 and 4303
13	AUTOMOBILE ANTITRUST CASES I, II) CJC-03-004298 and CJC-03-004303
14	THE TOTAL BILL THE THIRD IS A STATE OF THE S	CLASS ACTION
15		PROPOSED ORDER APPROVING CY
16	This document relates to: All Actions) PRES DISTRIBUTION OF RESIDUAL) SETTLEMENT FUNDS AND PAYMENT
	1 22 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2) OF CLAIMS ADMINISTRATION
17) EXPENSES
18) Date: May 15, 2025) Time: 2:30 p.m.
19) Dept: 304
20) Judge: Honorable Ethan P. Schulman
21		Hearing Date and Time Has Been Approvedby Department 304
		_) by Department 304
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[PROPOSED] ORDER APPROVING CY PRES DISTRIBUTION

Before this Court is Plaintiffs' motion for an order approving *cy pres* distribution of residual settlement funds and payment of claims administration expenses, concerning the ongoing administration of the Settlement reached with defendant Ford Motor Company of Canada, Ltd. Plaintiffs' motion came before the Court at a hearing on May 15, 2025. Upon consideration of Plaintiffs' motion and supporting declarations, and oral argument in support thereof,

IT IS HEREBY ORDERED AS FOLLOWS:

- 1. The Court authorizes payment of \$194,714.59 from the residual Net Settlement Fund to A.B. Data, Ltd. ("A.B. Data") for claims administration expenses that were reasonably incurred in distributing the Net Settlement Fund to Authorized Claimants.
- 2. The Court authorizes A.B. Data to reserve \$12,179 (the "Reserve") for anticipated future tax-related expenses and claims administration expenses associated with preparing tax returns for the Settlement Fund, covering estimated tax liabilities, carrying out the *cy pres* distribution, and closing out the administration of the Settlement. Class Counsel are authorized to review and, if deemed by Class Counsel to be reasonable, approve payment of tax liabilities and claims administration expenses incurred by A.B. Data from the Reserve without further approval by the Court.
- 3. The Court authorizes Class Counsel to direct Western Alliance Bank to transfer the full amount of the funds held in the Escrow Account to A.B. Data's distribution account prior to the *cy pres* distribution.
- 4. The Court authorizes the residual remaining in the Net Settlement Fund, after payment of unreimbursed claims administration expenses ($see \ 1$ above) and holding back the Reserve ($see \ 2$ above), to be paid to the following nonprofit organizations as a cy pres distribution allocated according to the percentages listed next to each organization:
 - a. American Antitrust Institute (10%);
 - b. Bay Area Legal Aid (20%);
 - c. California Rural Legal Assistance (5%);
 - d. Central California Legal Services (5%);
 - e. Community Legal Aid of SoCal (5%);

1	f. Consumer Federation of California (5%);	
2	g. Greater Bakersfield Legal Assistance (5%);	
3	h. Legal Aid Foundation of Los Angeles (20%);	
4	i. Legal Services of Northern California (10%);	
5	j. Legal Aid Society of San Bernardino (5%); and	
6	k. Legal Aid Society of San Diego (10%).	
7	5. After completion of the <i>cy pres</i> distribution, and after payment of any remaining claims	
8	administration expenses, tax liabilities, and/or tax return preparation expenses are made from the	
9	Reserve, should any funds remain in the Reserve, the residual Reserve funds shall be distributed 50% to	
10	Bay Area Legal Aid and 50% to the Legal Aid Foundation of Los Angeles.	
11	6. This Court retains continuing jurisdiction over the administration and distribution of the	
12	Ford Canada Settlement Fund. The Mas 15, 2025 Learny is off calendar.	
13	TILL DALL	
14	Dated: May 12, 2025 Honorable Ethan P. Schulman	
15	Honorable Ethan F. Schuman	
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CERTIFICATE OF ELECTRONIC SERVICE

(CCP 1010.6(6) & CRC 2.260(g))

I, Felicia Green, a Deputy Clerk of the Superior Court of the County of San Francisco, certify that I am not a party to the within action.

On May 12, 2025, I electronically served ORDER APPOINTING CY PRES DISTRIBUTION OF RESIDUAL SETTLEMENT FUNDS AND PAYMENT OF CLAIMS ADMINISTRATION EXPENSES via File & ServeXpress on the recipients designated on the Transaction Receipt located on the File & ServeXpress website.

Dated: MAY 1 2 2025

Brandon E. Riley, Court Executive Officer

By:

Felicia Green, Deputy Clerk