

# HAVE YOU EVER OWNED OR LEASED ONE OF THESE FORD VEHICLES?



2011-2015 FORD EXPLORER

2011-2013 FORD EDGE

2011-2013 LINCOLN MKX



## A CANADA-WIDE CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS

Class actions were initiated in Ontario and Québec against Ford Motor Company and Ford Motor Company of Canada alleging that exhaust odour may enter the passenger compartment of the **2011-2015 Model Year Ford Explorers** (the “**Class Vehicles**”) due to defects. The action in Ontario also alleged these defects exist in **2011-2013 Ford Edge** and **2011-2013 Lincoln MKX** vehicle models (the “**Excluded Vehicles**”). Ford denied all allegations in these proceedings. A Settlement has been reached by the parties and approved by the Courts in Ontario and Québec that resolves the case across Canada and will pay money to Settlement Class Members who submit valid claims as described below.

**Who is included?** You are a Settlement Class Member if you are a resident of Canada and a former or current owner or lessee of a Class Vehicle.

**Who is excluded?** The Settlement does not include current and former owners and lessees of the Excluded Vehicles whose claims have been discontinued without prejudice to their rights to commence new proceedings to advance claims in respect of the Excluded Vehicles. Because those claims have been discontinued, the applicable limitation periods are no longer suspended and have resumed running against current and former owners or lessees of the Excluded Vehicles.

**What do I get?** If you submit a valid Claim Form and the required supporting documentation, Ford will reimburse you for certain out-of-pocket expenses incurred for repairs to address exhaust odour in your Class Vehicle. These exhaust odour repairs are described in Technical Service Bulletin 16-0166 (the “2016 Exhaust Odour TSB”) which Ford has issued to its dealers. Some, but not all, the repair steps required under the 2016 Exhaust Odour TSB may be performed by your Ford dealer free of charge pursuant to Ford’s Customer Satisfaction Program 17N03. Out-of-pocket expenses eligible for reimbursement under the Settlement must have been incurred within the later of (1) 4 years / 85,000 kilometres after your Class Vehicle was placed in service (whichever comes first) and (2) April 30, 2018. The maximum available reimbursement amounts will be \$230 or \$655 per repair, depending on the nature of the repair. Ford will reimburse you for up to two such repairs.

**How do I claim?** Your claim for reimbursement for Out-of-Pocket Expenses must be submitted to the Settlement Administrator and postmarked within the later of (1) June 29, 2018 or (2) two months after the date that the Authorized Dealer completed the dealer service under the Exhaust Odour Repair for which you seek partial reimbursement.

The Claim Form is available on the settlement websites [www.FordExplorerSettlement.com](http://www.FordExplorerSettlement.com) (in English) and [www.ReglementFordExplorer.com](http://www.ReglementFordExplorer.com) (in French), or by contacting class counsel as indicated below.

**Can I exclude myself from the Settlement?** All persons residing anywhere in Canada who come within the class definition are automatically included in the Settlement Class unless they properly exclude themselves (“Opt Out”). All class members who do not Opt Out will be forever barred from instituting individual actions in respect of the damages alleged in the class action. **Opt-Out Forms must be completed by April 17, 2018.**

**How do I learn more?** You should immediately review the full legal notice in this matter to ensure you understand your legal rights including the benefits under the Settlement and the procedures for objecting to the Settlement. A copy of the full legal notice and the Settlement Agreement may be viewed at [www.FordExplorerSettlement.com](http://www.FordExplorerSettlement.com) (in English), [www.ReglementFordExplorer.com](http://www.ReglementFordExplorer.com) (in French), and at Class Counsel’s website [www.investigationcounsel.com](http://www.investigationcounsel.com) (in both English and French).

**TO SIGN UP FOR UPDATES AND TO OBTAIN MORE INFORMATION  
VISIT [www.FordExplorerSettlement.com](http://www.FordExplorerSettlement.com) or [www.ReglementFordExplorer.com](http://www.ReglementFordExplorer.com)**

**or CALL 1-855-862-9078**

**YOU MAY ALSO CONTACT CLASS COUNSEL:**

**OWNERS AND LESSEES IN CANADA EXCEPT  
QUÉBEC:**

John Archibald  
Investigation Counsel P.C.  
350 Bay Street, Suite 300  
Toronto ON M5H 2S6  
(416) 637-3150  
[fordexplorersettlement@investigationcounsel.com](mailto:fordexplorersettlement@investigationcounsel.com)

**QUÉBEC AND FRENCH INQUIRIES:**

Samy Elnemr  
Siskinds Desmeules  
Les Promenades du Vieux-Québec  
43, rue Buade, Suite 320  
Québec, QC G1R 4A2  
(418) 694-2009  
[siskindsmontreal@siskindsdesmeules.com](mailto:siskindsmontreal@siskindsdesmeules.com)

THIS NOTICE IS ONLY A SUMMARY OF SOME OF THE TERMS OF THE SETTLEMENT  
IF THERE IS A CONFLICT BETWEEN THIS NOTICE AND THE SETTLEMENT, THE SETTLEMENT APPLIES

Publication of this notice has been authorized by the Ontario Superior Court of Justice and the Superior Court of Québec.