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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

GLENN KESSELMAN, an individual, on behalf of himself and all others similarly situated in the State of California; KAREN AMBROSE, an individual, on behalf of herself and all others similarly situated in the State of Arizona; PAUL ARELLANO, an individual, on behalf of himself and all others similarly situated in the State of Colorado; CRAIG GRANGER, an individual, on behalf of himself and all others similarly situated in the State of New York; DAVID DOUGLAS, an individual, on behalf of himself and all others similarly situated in the State of Washington; JOSH DOWNS, an individual, on behalf of himself and all others similarly situated in the State of Illinois; JUAN GIRALDO, an individual, on behalf of himself and all others similarly situated in the State of Georgia; MATTHEW SHAFFER, an individual, on behalf of himself and all others similarly situated in the State of Ohio; WAYNE SLATES, an individual, on behalf of himself and all others similarly situated in the State of Oregon; MITCHELL TROCKMAN, an individual, on behalf of himself and all others similarly situated in the State of Minnesota; and JAMIE BROWN, an individual, on behalf of herself and all others similarly situated in the State of Missouri,

Plaintiffs,

v.

TOYOTA MOTOR SALES, U.S.A.,  
INC., a California Corporation,

Defendant.

Case No.: 2:21-cv-06010-TJH-AYPx  
HON. TERRY J. HATTER JR.

**SECOND SUPPLEMENTAL  
DECLARATION OF CAMERON R.  
AZARI, ESQ. REGARDING  
IMPLEMENTATION AND  
ADEQUACY OF NOTICE  
PROGRAM**

1 I, Cameron R. Azari, Esq., hereby declare and state as follows:

2 1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters  
3 set forth herein, and I believe them to be true and correct.

4 2. I am a nationally recognized expert in the field of legal notice, and I have served  
5 as an expert in hundreds of federal and state cases involving class action notice plans.

6 3. I am a Senior Vice President of Epiq Class Action & Claims Solutions, Inc.  
7 (“Epiq”) and the Managing Director of Epiq Legal Noticing (aka Hilsoft Notifications), a  
8 business unit of Epiq that specializes in designing, developing, analyzing, and  
9 implementing large-scale, un-biased, legal notification plans.

10 4. The facts in this declaration are based on my personal knowledge, as well as  
11 information provided to me by my colleagues in the ordinary course of my business at Epiq  
12 and Epiq Legal Noticing (hereinafter “Epiq”).

13 **OVERVIEW**

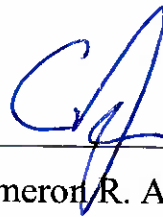
14 5. This declaration provides updated settlement administration statistics for the  
15 Settlement Website following the successful implementation of the Settlement Notice  
16 Program (“Notice Program”) for *Kesselman, et al. v. Toyota Motor Sales U.S.A. Inc.*, Case  
17 No. 2:21-cv-06010-TJH-JC pending in the United States District Court for the Central  
18 District of California. I previously executed my *Declaration of Cameron R. Azari, Esq.*  
19 *Regarding Notice Plan* (“Notice Plan Declaration”) on January 29, 2025, which described  
20 the Notice Plan, detailed Hilsoft’s class action notice experience, and attached Epiq’s  
21 *curriculum vitae* and Epiq’s Notice Plan. ECF No. 145. In the Notice Plan Declaration, I  
22 also provided my educational and professional experience relating to class actions and my  
23 ability to render opinions on overall adequacy of notice plans. Subsequently, I executed  
24 my *Declaration of Cameron R. Azari, Esq. Regarding Implementation and Adequacy of*  
25 *Notice Program* (“Implementation Declaration”) on January 5, 2026, which described the  
26 successful implementation of the Notice Program and provided settlement administration  
27 statistics. Most recently, I executed my *Supplemental Declaration of Cameron R. Azari,*  
28 *Esq. Regarding Implementation and Adequacy of Notice Program* (“Supplemental

1 Implementation Declaration”) on January 30, 2026, which provided updated settlement  
2 administration statistics.

3 *Settlement Website*

4 6. The Settlement Website (www.ToyotaEchoSettlement.com) continues to be  
5 available 24 hours per day, 7 days per week. In my Supplemental Implementation  
6 Declaration, I reported that as of January 30, 2026, there have been 243,130 unique visitor  
7 sessions to the settlement website, and 289,818 web pages have been presented. These  
8 statistics inadvertently included a scrivener’s error. As of March 19, 2026, the correct  
9 Settlement Website statistics are 89,644 unique visitor sessions to the Settlement Website,  
10 and 107,235 web pages have been presented.

11 I declare under penalty of perjury under the laws of the State of California that the  
12 foregoing is true and correct. Executed March 19, 2026.

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16 Cameron R. Azari, Esq.