

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA

3
4 GLENN KESSELMAN, an individual, on
5 behalf of himself and all others similarly
6 situated in the State of California; KAREN
7 AMBROSE, an individual, on behalf of
8 herself and all others similarly situated in
9 the State of Arizona; PAUL ARELLANO,
10 an individual, on behalf of himself and all
11 others similarly situated in the State of
12 Colorado; CRAIG GRANGER, an
13 individual, on behalf of himself and all
14 others similarly situated in the State of New
15 York; DAVID DOUGLAS, an individual,
16 on behalf of himself and all others similarly
17 situated in the State of Washington; JOSH
18 DOWNS, an individual, on behalf of
19 himself and all others similarly situated in
20 the State of Illinois; JUAN GIRALDO, an
21 individual, on behalf of himself and all
22 others similarly situated in the State of
23 Georgia; MATTHEW SHAFFER, an
24 individual, on behalf of himself and all
25 others similarly situated in the State of
26 Ohio; WAYNE SLATES, an individual, on
27 behalf of himself and all others similarly
28 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-JC

HON. TERRY J. HATTER JR.

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

27 _____

1 **NOTICE PROGRAM METHODOLOGY**

2 6. There is no update to this section since I executed my Implementation
3 Declaration.

4 **CAFA NOTICE**

5 7. There is no update to this section since I executed my Implementation
6 Declaration.

7 **NOTICE PROGRAM DETAIL**

8 8. There is no update to this section since I executed my Implementation
9 Declaration.

10 **NOTICE PLAN**

11 ***Individual Notice***

12 9. ***Data Acquisition.*** There is no update to this section since I executed my
13 Implementation Declaration.

14 ***Individual Notice – Email***

15 10. There is no update to this section since I executed my Implementation
16 Declaration.

17 ***Individual Notice – Direct Mail***

18 11. As detailed on my Implementation Declaration, on October 16, 2025, Epiq
19 commenced sending 418,051 Postcard Notices to 418,051 identified Direct Notice
20 Recipients with an associated physical address for whom a valid email address was not
21 available. Subsequently, on November 14, 2025, Epiq commenced sending 290,709
22 Postcard Notices to all identified Direct Notice Recipients with an associated physical
23 address for whom the Email Notice was undeliverable after multiple attempts.

24 12. As of January 30, 2026, Epiq has remailed 7,862 Postcard Notices of the
25 17,480 Postcard Notices that were returned as undeliverable.

26 13. Additionally, a Long Form Notice was mailed to all persons who requested
27 one via the toll-free telephone number or by other means. As of January 30, 2026, Epiq
28 mailed 138 Long Form Notices as a result of such requests.

1 **Media Plan**

2 14. There is no update to this section since I executed my Implementation
3 Declaration.

4 ***Sponsored Search Listings***

5 15. There is no update to this section since I executed my Implementation
6 Declaration.

7 ***Informational Release***

8 16. As detailed in my Implementation Declaration, on August 18, 2025, a party-neutral
9 Informational Release was issued broadly over *PR Newswire's U.S.1 newswire* in English and
10 Spanish. As of January 30, 2026, the Informational Release was picked up 412 times.

11 ***Settlement Website***

12 17. The Settlement Website (www.ToyotaEchoSettlement.com) continues to be
13 available 24 hours per day, 7 days per week. As of January 30, 2026, there have been
14 243,130 unique visitor sessions to the settlement website, and 289,818 web pages have
15 been presented. The following documents were promptly posted to the Settlement
16 Website within the timeframe described in the Settlement Agreement and/or promptly
17 after their filing with the Court: Long Form Notice (English and Spanish); Press Release;
18 Fifth Amended Complaint; Settlement Agreement; Notice of Motion and Motion for
19 Preliminary Approval of Class Action Settlement; Plaintiffs' Memorandum of Law in
20 Support of Preliminary Approval; Plaintiffs' Joint Declaration in Support of Preliminary
21 Approval; Arias Sanguinetti Resume; Goldenberg Heller & Antognoli Resume; Toyota's
22 Memorandum of Law in Support of Preliminary Approval; Declaration of Settlement
23 Outreach Administrator; Preliminary Approval Order; Order Granting Joint Stipulation
24 on Deadlines; Plaintiffs' Amended Notice Of Motion And Motion For Attorney's Fees,
25 Expenses, And Service Award (replaced Plaintiffs' Notice Of Motion And Motion For
26 Attorney's Fees, Expenses, And Service Award); Plaintiffs' Amended Application For In
27 Camera Review (replaced Plaintiffs' Application For In Camera Review).

Toll-free Telephone Number and Postal Mailing Address

18. The toll-free telephone number (1-888-835-5756) established for the Settlement continues to allow Settlement Class Members to call for additional information. As of January 30, 2026, there have been 1,537 calls to the toll-free telephone number representing 3,141 minutes of use.

19. A postal mailing address was established and continues to be available, providing Class Members with the opportunity to request additional information or ask questions.

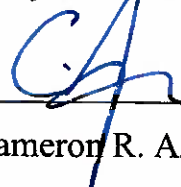
Objections

20. The deadline to object to the Settlement was January 14, 2026. As of January 30, 2026, Epiq is aware of eight objections to the Settlement which are unrelated to notice or settlement administration. Two of these objections were previously reported in my Implementation Declaration and included as Attachment 11. The additional six objections subsequently filed with the Court, are redacted and included as **Attachment 1** (of these, the Weise Objection was postmarked January 20, 2026, and is considered untimely). Epiq is not aware of any additional objections besides those filed with the Court.

CONCLUSION

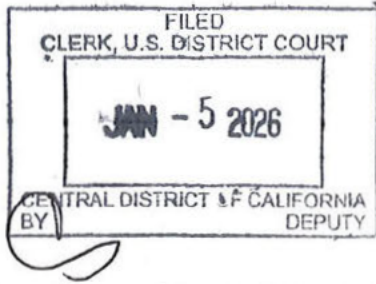
21. The Notice Program schedule afforded sufficient time to provide full and proper notice to Class Members before the objection deadline.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed January 30, 2026.



Cameron R. Azari, Esq.

Attachment 1



Emma Petersen



RE: *Kesselman v. Toyota Motor Sales, U.S.A., Inc., et al.* Action No. 2:21-cv-06010-TJH-JC; Objection to Class Action Settlement

To Whom it May Concern,

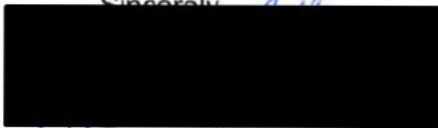
I purchased, and currently own, a 2017 Toyota 4Runner, on November 5th, 2023 in [REDACTED]. The VIN is [REDACTED].

I have never objected to a class action prior to this submission. The reason I am speaking up now is due to the nature of this lawsuit. Toyota provided an item of convenience in their hands-free option offered in the vehicles they manufactured. In a Free Enterprise nation such as is our Republic, no company can or should be required by a court of law to provide an amenity that is completely free of defects. If the nature of the concern was one of safety, ie, the brakes fail or air bags are defective, there would be grounds for legal action. An item of convenience should not be seen as an entitlement, but as a luxury. If we bring this back to choice, the public has the right to choose to purchase or not to purchase any product, good or service. No individual is being forced to purchase these vehicles, and if an individual desires a different service than is offered in a vehicle, they have the freedom to purchase a different option.

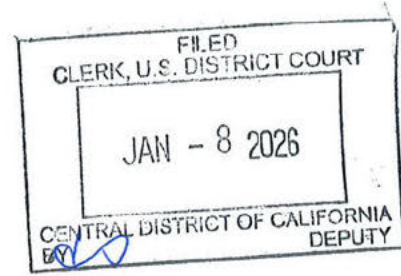
Per the settlement website, I am to provide a list of persons who will testify at the hearing, but I do not have access to that information to my knowledge. I do not intend on appearing for the hearing, I merely wanted to voice my concerns with the precedent that this class action suit seems to be setting for our nation.

Thank you for your time.

Sincerely,



Emma Petersen



December 21, 2025

RE:

Kesselman v. Toyota Motor Sales, U.S.A., Inc., et al.
Action No. 2:21-cv-06010-TJH-JC

From: James T. Miller

Residence: [REDACTED]

Mailing Address: [REDACTED]

I am a member of the Class in this Action per your notification via US Mail. I purchased a 2015 Toyota Tundra Limited in [REDACTED] around June, 2018. VIN: [REDACTED]

My objection applies only to myself. I have never objected to any other class action settlement. I do not intend to appear or testify at the Fairness Hearing or have others appear on my behalf.

The essence of my objection is that this Class Action is nothing more than a nuisance lawsuit that has been allowed to progress far more than the defect warrants. There has been no indication of personal injury stemming from the "defect" in the hands-free phone system. At most the echo is a harmless inconvenience with clear and simple remedies as outlined in the Volume Adjustment Protocol. The entire venture reeks of a "get rich" scheme for attorneys especially since the Settlement includes: up to \$2,850,000 in attorneys' fees; up to \$300,000.00 for their costs and expenses in litigating this case and securing this nationwide Settlement for the Class; and service awards totaling no more than \$95,000.00 to Settlement Class Representatives.

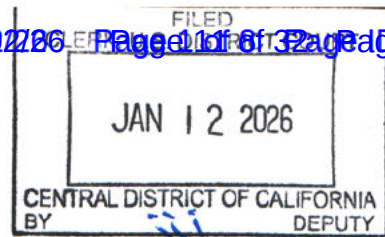
The lawyers get rich while members of the Class who invested in their vehicles get a web site? Seriously? This entire matter should have been thrown out of the courts at the outset.

Thank you for considering my objections.

[REDACTED]

James T. Miller

12/31/25
Date



CLASS MEMBER'S OBJECTION TO PROPOSED SETTLEMENT AGREEMENT

Kesselman v. Toyota Motor Sales, U.S.A., Inc., et al.
No. 2:21-cv-06010-TJH-JC

- **Your full name, current residential address, mailing address (if different), telephone number, and e-mail address¹**

Ian Rexroad, [REDACTED]

- **An explanation of the basis upon which you claim to be a Class Member, including the make, model year, and VIN(s) of the Subject Vehicle(s), the State in which you purchased or leased the Subject Vehicle, and the date of purchase/lease**

I am a class member by virtue of purchasing a 2017 Toyota Sienna in Ohio in September 2017 [REDACTED], which I still own in Ohio.

- **Whether the objection applies only to you, to a specific subset of the Class or to the entire Class, and all grounds for the objection, accompanied by any legal support for the objection, and any documents or other evidence you believe supports the objection**

I speak only for myself. This objection is to the proposed attorneys' fees award and service awards for class representatives and, therefore, relates to the entire class. The objection and its grounds are stated below beginning on page 3.

- **The number of times you have objected to a class action settlement within the five years preceding the date that you file the objection to this Settlement, the caption and case number of each case in which you have made such objection and the caption and case number of any related appeal, and a copy of any orders related to or ruling upon your prior such objections that were issued by the trial and appellate courts in each listed case**
- **If you have not made any such prior objection, you shall affirmatively so state in the written materials provided with the objection**

These two prompts (particularly the word "shall") signal that this information disclosure is a mandatory prerequisite to class members commenting on or objecting to the proposed settlement in this case. Yet no such disclosure requirement can be found in F.R.Civ.P. 23, C.D.Cal. Local Rule 23, the U.S. Code, Judge Hatter's standing orders, or the order in this case preliminarily approving the settlement (Dkt. 153). It appears that class counsel have added this requirement on their own initiative.

Class members in federal cases are entitled to raise objections to proposed settlements prior to court approval, *see* Rule 23(e)(5)(A). While it is reasonable to require that an objector submits information necessary to determine that they belong to the class, no further inquiry into their

¹ Information prompts are copied from the settlement website's instructions for objecting. <https://toyotaechosettlement.com/Home/FAQ#faq12> as accessed Jan. 7, 2026.

identity or prior interaction with the judicial system is relevant or appropriate merely to be heard in the first instance. Nor does such disclosure make the objector's arguments more or less relevant or persuasive.²

Class counsel's demand that class members recite a complete list of unrelated filings in unrelated causes, and their resolution, in order to exercise our right under Rule 23(e)(5)(A) is clearly "designed to discourage objections, in order to enhance the likelihood of final approval of the settlement..." Lackawanna Chiropractic P.C. v. Tivity Health Support, LLC, 18-CV-00649, 2019 U.S. Dist. LEXIS 148756, p.11 (W.D.N.Y. Aug. 29, 2019) (rejecting similar requirements including previous-objection disclosure).

This language also strongly implies (especially to laypersons) that the right to object in federal class actions can somehow be diluted or exhausted if exercised more than once in a five-year period, irrespective of the merits of the objection(s). A competent and zealous advocate would not mislead their clients into believing that procedural rights could disappear merely because they were exercised.

Submitting information or papers from unrelated cases (or stating that none exist) in order to exercise the right to object in this case is not required by law, would add irrelevant materials to the record of this case, and is not an appropriate method of screening out frivolous objections. The assertion that such information is required creates a significant risk that class members' right to object has already been chilled in this case and that laypersons who encounter the language will not "fully understand" their rights in the class action context, a risk that Congress identified as a significant problem more than 20 years ago. (Class Action Fairness Act of 2005, Pub. L. 109-2, Sec. 2(a)(3)(C); 28 U.S.C. 1711 note.)

I am disappointed that class counsel have demanded this irrelevant information and decline to provide it.

- **A list of all persons who will be called to testify at the Fairness Hearing in support of the objection**

I do not intend to call any witnesses at the hearing.

- **A statement confirming whether you intend to personally appear and/or testify at the Fairness Hearing**

I do not intend to appear or testify at the hearing.

² In the event that an objector's arguments are confusing, meritless, or irrelevant, the judge is competent to ignore them or request clarification. If an objector vexatiously multiplies the proceedings or files an appeal for an improper purpose, courts already have adequate tools to respond to and deter such misconduct, *e.g.*, requiring a bond under F.R.App.P. 7 or ordering sanctions under various authorities.

GROUNDS FOR OBJECTION

As an initial matter, I agree with the arguments of Objector Hribernick (Dkt. 160) and urge the court to not reward class counsel for creating “the perfect litigation nothing-burger.” I write separately to identify additional reasons why the proposed attorneys’ fees and representative awards are inappropriate.

CLASS COUNSEL HAVE FAILED TO FAIRLY AND ADEQUATELY REPRESENT THE CLASS BY DELIBERATELY CHILLING MEMBERS’ RIGHT TO OBJECT TO THE PROPOSED SETTLEMENT

As explained more fully above, class counsel’s primary focus in the settlement process has been to secure payouts for the attorneys and named plaintiffs. To advance those goals, class counsel added disclosure requirements beyond what is necessary or appropriate, likely in order to discourage would-be objectors from exercising their rights under F.R.Civ.P. 23(e)(5)(A). If the proposed settlement truly were fair and reasonable, then class counsel would have no reason to fear objections as they would be easily rebutted (if they came at all).

It is telling that class counsel instead hoped to silence class members in this case and also imply to non-lawyers that it would be inappropriate to file Rule 23(e)(5)(A) objections in more than one case within a five-year-period or else their right to object would be diminished. This court should reject class counsel’s attempt to chill objections which demonstrates that counsel is primarily interested in representing the named plaintiffs and their own business, not zealously representing the interests of the entire class that they chose to define and sought out.

The prescribed method of objecting also requires that objectors place their personal information on the court’s public docket merely to be heard, which is an additional deterrent to objecting.³ Class counsel have not treated the unnamed members fairly nor adequately represented us.

CLASS COUNSEL HAVE FAILED TO FAIRLY AND ADEQUATELY REPRESENT THE CLASS BY ADVISING MEMBERS TO VIOLATE THIS COURT’S RULES

At least two objectors before me mailed their objections through this court’s clerk’s office. The clerk docketed the objections at Dkts. 156, 157, 158, and 160, however, they noted that these filings violated Local Rule 83-2.5 and warned that some objections could be stricken because of the violation (*See*, Dkts. 159 & 161).

³ According to class counsel, “the reputational risks of being named in public litigation” are significant, justifying hefty service awards for the representatives. (Dkt. 162-1 at Page ID 3804.) Yet counsel apparently gave no thought to requiring that *objectors* shoulder the same risks and without any compensation. Although I have not reviewed every docket item, as best I can tell, the class representatives have not disclosed their own home addresses, mailing addresses, phone numbers, email addresses, or relevant VINs on the public docket, nor personally signed any publicly filed papers, despite requiring that objectors do all of those things, *even if* represented by independent counsel.

The clerk’s actions make sense. Non-parties mailing letters to the judge regarding a specific case is usually frowned upon, and rightly so. However, in this case, that is exactly what class counsel instructed objectors to do. The public settlement website says that objections are to be filed “electronically with the Court” (presumably this would require hiring local counsel with CM/ECF access in this district) or mailed “to the Clerk of the Court, Class Counsel and Toyota’s counsel” with addresses provided for all three.

You must file your objection electronically with the Court, or mail your objection to the Clerk of the Court, Class Counsel and Toyota’s counsel with a postmark of, on or before January 14, 2026

Clerk of Court	Class Counsel	Toyota’s Counsel
United States District Court Central District of California First Street Courthouse 350 W. 1st Street, Courtroom #9C, 9th Floor (or as assigned) Los Angeles, California 90012	Mickel M. Arias Arias Sanguinetti Wang and Team LLP 6701 Center Drive West, 14th Floor Los Angeles, CA 90045 Toyotasettlement@aswlawyers.com	John P. Hooper King & Spalding LLP 1185 Avenue of the Americas, 34th Floor New York, New York 10036 jhooper@kslaw.com
	Kevin P. Green Goldenberg Heller & Antognoli, P.C. 2227 South State Route 157 Edwardsville, Illinois 62025 Toyotasettlement@ghalaw.com	

If you intend to appear at the Fairness Hearing, either in person or through personal counsel hired at your expense, you or your attorney(s) who intend to appear must also deliver a notice of intention to appear to Class Counsel and to Toyota’s Counsel at the addresses listed above, and file that notice with the Court, by January 14, 2026.

(<https://toyotaechosettlement.com/Home/FAQ#faq12> Accessed Jan. 7, 2026.) This mirrors the Settlement Agreement which references mailing objections directly to the clerk in at least four places, *see* Dkt. 145-3 at Page IDs 3452, 3503-3504, 3508-3509, and 3532.

Since it’s possible that the earlier deficiency notices were in error, I called the clerk’s office to ask.⁴ I was advised that the local rule was correctly applied and that mailing class settlement objections to the clerk’s office for filing contravenes the rule. Unfortunately, because the clerk’s office was unable to give advice on an alternative method of transmitting objections, and because class counsel have made no representations that they will fairly present objections which are sent only to the attorneys, nor arranged for an independent settlement administrator to collect objections, I must also follow the instructions given and ask the court’s forgiveness for this additional violation of L.R. 83-2.5.

Whatever penalties might be appropriate for the violations of L.R. 83-2.5 in this case should be applied to the class counsel who provided inadequate legal advice, not to the objectors who were given no alternative pathway for exercising our rights under Rule 23(e)(5)(A) without hiring external counsel. Had class counsel done an adequate job in representing the non-named class members, they would have provided an affordable manner to object to the settlement that does not violate this court’s rules.

⁴ The individual I spoke to was polite and helpful. I’m certain that similar courtesy would have been given to class counsel had they asked for the clerk’s preferred way to handle objections.

CLASS COUNSEL AND THE CLASS REPRESENTATIVES HAVE NOT BENEFITTED THE CLASS

For their efforts in this case, class counsel and the representatives have achieved no meaningful benefit to the class. This is not a case where many consumers have suffered small harms which, when aggregated in a class, are cumulatively large and for which diligent efforts of class counsel can secure adequate relief for all. Instead, class counsel in this case found a minor annoyance with a popular carmaker's accessory feature and, after six years of motions practice and discovery across multiple cases, ended up with an underwhelming prize: a promise from the manufacturer that it will inform hands-free callers to turn up the volume on their phones and turn down the volume on their car radios.

That's it.

This "promise to inform" has negligible value to the class both in the abstract and specifically here, because the defendant automaker is only agreeing to do what it was already doing.⁵ Things might be different if this lawsuit had pressured Toyota to do something *more*, like perform physical repairs or replacements, update software, or otherwise fix the underlying echo issue. Instead, the concession that class counsel and the representative plaintiffs secured is that Toyota will repeat the same troubleshooting advice it's been giving for nearly two decades, but now also through a dedicated website, mailers, and internet ads. (Never mind that this information was already available in owners' manuals and online forums, as cited in the original complaint, and that there's no firm evidence as to how many of the class members have experienced the echo issue at all.)⁶ It is difficult to see that any serious benefit will accrue to the class because of class counsel's work in this case.

An obvious response would be that the benefit to the class is small because the class's claims themselves have little or no value, even in the aggregate. (I agree.) However, that makes the requested attorneys' fees and representative awards more suspicious, not less. Minor technical annoyances with car accessory functions where there are no injuries, safety risks, impact to driving functions, or monetary damages do not typically result in multi-million-dollar federal cases and especially not when the unnamed class members get zero monetary relief, not even a coupon.

⁵ According to the original complaint, this volume up/down advice was already being delivered to customers who sought Toyota's assistance with the echo issue at least by March 9, 2018, prior to this litigation being filed, and likely before then. (See Dkt. 1 p.35, discussing the advice published in "Tech Tips" by Toyota in 2018 and 2020. See also Dkt. 1 pp.15-30, discussing the same advice published in owners' manuals as early as 2007, and Dkt. 1 p.32, noting that Toyota's technical support personnel were giving the same advice directly in response to owner requests for help as early as 2017.)

⁶ Class counsel could have defined the class more narrowly, for example, sweeping in only owners who have experienced the echo issue that is the basis of this litigation.

This is the kind of litigation that Congress had in mind (and which we should not incentivize) when it warned of abuses in the class action context back in 2005:

- “(3) Class members often receive little or no benefit from class actions, and are sometimes harmed, such as where—
 - (A) counsel are awarded large fees, while leaving class members with coupons or other awards of little or no value;
 - (B) unjustified awards are made to certain plaintiffs at the expense of other class members; and
 - (C) confusing notices are published that prevent class members from being able to fully understand and effectively exercise their rights.”

Class Action Fairness Act of 2005, Pub. L. 109-2, Sec. 2(a); 28 U.S.C. 1711 note.

CONCLUSION

I fully understand defendants’ motivation to make this case go away, even at the cost of several million dollars, and I have no problem with a large corporation volunteering to part with that money. But class counsel and the class representatives have not demonstrated that they are entitled to all of these funds, or even any of them.

Class counsel have elevated the interests of themselves and the class representatives over those of the rest of the class, made misleading statements and imposed onerous filing requirements intended to deter objections, and instructed class members to violate this court’s rules in order to object. Further, whatever the work put in by class counsel and the class representatives, the settled outcome is hardly indistinguishable from the status quo before this suit was filed.

Since the unnamed class members will not benefit from this settlement, it’s not clear why nearly one hundred thousand dollars of the proceeds should be awarded to the class representatives and the remainder, more than three million dollars, should be awarded to their attorneys. If this court believes that defendants should pay what they’ve agreed, then I suggest the funds be distributed on a *cy-près* basis to a worthy charitable cause. At *most*, class counsel should be awarded the “percentage of remedy” calculation suggested by Objector Hribernick (Dkt. 160, p.3).

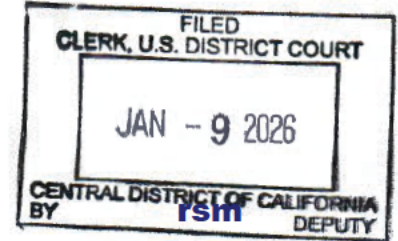
- **Your original signature and date of signature (an electronic signature or attorney’s signature is not sufficient).**

[Redacted Signature Area]

B. June 26

Mailed simultaneously via first class US mail to the Clerk of the Court, Class Counsel, and Toyota’s counsel as instructed by the settlement website’s “How do I tell the Court if I do not like the Settlement?” section. <https://toyotaechosettlement.com/Home/FAQ#faq12>.

United States District Court
Central District of California
First Street Courthouse
350 W. 1st Street
Courtroom #9C, 9th Floor (or as assigned)
Los Angeles, California 90012



January 5, 2026

Re: Kesselman v. Toyota Motor Sales, U.S.A., Inc., et al.
No. 2:21-cv-06010-TJH-JC;

Your Honor:

In 2017, in Colorado, I purchased a 2015 Toyota 4 Runner ([REDACTED]). Accordingly, I am a class member by the court's definition. The specific date in 2017 has not been retained in my records, but since I received the class action mailer, I will suggest that class counsel has the specific date should you need it.

I am not a legal expert and I will not be retaining representation in this matter. While I declare that my objection applies to the entire Class, I defer to the judgement of the court to restate my status should I be in error as necessary.

I object to the intentions of my assigned Class counsel in requesting fees amounting to \$2,850,000.00.

Having secured agreement from Toyota to notify owners to turn the volume down to avoid audio interference is not worth the \$2,850,000.00 that they will request of the court. Accordingly, I ask that the court deny their requested compensation because my class members and I are being used for personal enrichment exceeding the value brought by the efforts of class counsel.

I request the court consider my proposal instead. My counsel should be awarded \$1.00 for every hour they and their teams can account for in pursuing this case. This will fully compensate my counsel for the value of their time to the class membership.

If the court disagrees with my above proposal, I will ask the court consider a second proposal: I request that my class counsel receive compensation capped at the minimum rates paid by this court to external counsel when required to substitute for the federal public defenders due to a conflict. Surely the hourly rate that we provide to criminal defense counsel would be suitable and fair for all their hard work.

I understand that these proposals substantially differ from what my class counsel has proposed, but I believe firmly that compensation provided to class counsel should not exceed the value it has returned to its class members – the class it sought and established.

As sources, I cite the 1) Class Settlement Notice approved by this court and provided to me by the Administrator via US Mail and 2) the FAQ posted to the court approved settlement website (www.ToyotaEchoSettlement.com). Therein, plaintiff counsel indicates they intend to request an award of \$2,850,000.00 for fees, plus costs, plus service awards (1) for 11 class participants (2) and the agreed upon remediation of notifying owners to turn down the volume in our vehicles to avoid interference.

I have submitted no prior objection to preceding class actions, however, I object to the demand that these details be provided. If the court relies on previous objection history, it will prejudice the member's rights to object reasonably in this case without due consideration. It also implies to class members that if they've had an objection in the past, that their objection will be judged differently. This is inherently unfair.

My written objection will stand on its own. None will be called to testify. I will not testify in person. I do not have counsel beyond the appointed class counsel who pursued my inclusion in this class.

Thank you for considering my objection.


Jeffrey Alan Efrós

Residential & Mailing: 

Phone: 

Email: 

cc: Mickel M. Arias
Kevin P. Green
John P. Hooper

J. EFROS



SACRAMENTO CA 957
5 JAN 2026 PM 4 L



U.S. DISTRICT COURT
CENTRAL DISTRICT OF CA
350 W. 1st Street
Courtroom #9C, 9th Floor
Los Angeles, CA 90012

[Handwritten signature]

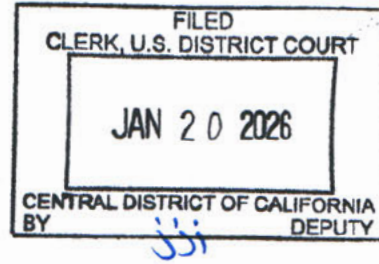
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CLERK U.S. DISTRICT COURT
JAN - 9 2025
BY CENTRAL DISTRICT OF CALIF.

90012-420950



January 14, 2026

United States District Court
Central District of California
First Street Courthouse
350 W. 1st Street, Courtroom #9C, 9th Floor (or as assigned)
Los Angeles, CA 90012



RE: Kesselman v. Toyota Motor Sales, U.S.A., Inc. et. Al. / No. 2:21-cv-06010-TJH-JC – OBJECTION TO PROPOSED SETTLEMENT

Dear Clerk of the Court:

I am writing to formally object to the proposed class action settlement in the above-referenced case. I received notice stating I am a class member because I own a 2019 Toyota 4-Runner that contains an alleged defective hands-free phone system. I purchased a 2019 Toyota 4-Runner on June 10, 2025, from Reliable Toyota Service, an authorized Toyota dealer in Springfield, Missouri [Redacted]. At the time of purchase, I specifically asked the salesman, who confirmed with his manager, whether all recalls, known defects, and issues with the vehicle had been addressed by the dealership before placing the vehicle up for sale. I was informed that they had addressed all issues except for a leak in the suspension system, but that was the only issue that kept this vehicle from being Certified. The dealer did not disclose any known issues with the Bluetooth or hands-free calling system.

While I tested the radio audio quality before purchasing the vehicle, I did not independently test the hands-free Bluetooth calling feature. I reasonably relied on Toyota’s representations and the expectation that a standard hands-free safety feature would function as intended. Since the date of purchase, I have never been able to use the hands-free Bluetooth calling capability, as calls are consistently distorted and difficult or impossible to hear.

I have followed Toyota’s troubleshooting instructions multiple times, including a factory reset and following the instructions again to adjust the system. These steps have not resolved the issue and, at best, make calls only marginally audible. As a result, the hands-free feature is not usable and no longer serves its intended safety purpose.

This defect substantially diminishes both the safety and value of the vehicle and renders a standard feature inoperable. The ongoing issue has effectively outdated the vehicle beyond the value represented at the time of purchase. I am very dissatisfied that this issue was not disclosed and has not been corrected.

Because this defect has existed since purchase and cannot be resolved through software updates or troubleshooting, Toyota should be responsible for replacing the radio/head unit at no cost to affected owners so that the hands-free Bluetooth functionality operates as originally represented.

Further, Toyota should be required to replace the radio/head unit for all consumers who purchased a Toyota vehicle covered by this class action lawsuit from an authorized Toyota dealer on or after April 2021, when the lawsuit was filed, as Toyota had written notice of the defect at that time and continued to sell affected vehicles without disclosure.

I ask the Court and Counsel to forgive any informalities in this letter, but to consider this my official objection to the settlement, as this is my first ever objection to any class action settlement. I am willing to testify electronically but cannot take time off to attend the court hearings. I am willing to be deposed. I appreciate the court’s understanding.

Sincerely,

[Redacted Signature]

Jennifer A. Allen, Class Member 1/14/2026
2019 Toyota 4-Runner Limited owner as of June 10, 2025

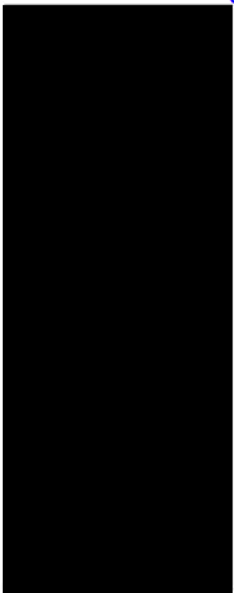
[Redacted Address]

Cc:

Mickel M. Arias
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SPRINGFIELD MO 658
15 JAN 2026 AM 3 L

FIRST CLASS



US POSTAGE
MILITNEY BOWES

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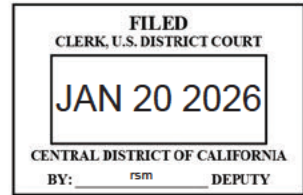


REC'D
CLERK U.S. DIST. COURT
JAN 20 2026
CENTRAL DISTRICT OF CALIFORNIA

United States District Court
Attn: Clerk of Court
350 W. 1st Street
Los Angeles, CA 90012

90012-456586





1/13/2026

TO - Clerk of Court

United States District Court
Central District of California
First Street Courthouse
350 W. 1st Street, Courtroom #9C, 9th Floor
Los Angeles, CA 90012

Re: Objection to Settlement in Kesselman v. Toyota Motor Sales, U.S.A., Inc., et al., Case No. 2:21-cv-06010-TJH-JC

To the Court, Class Counsel, and Toyota’s Counsel:

I am writing to object to the proposed settlement in the above-referenced case.

1. Case Information:

- Case Name: Kesselman v. Toyota Motor Sales, U.S.A., Inc., et al.
- Case Number: 2:21-cv-06010-TJH-JC

2. My Information:

- Full Name: Stanley Weise
- Current Residential Address: [Redacted]
- Telephone Number: [Redacted]
- Email Address: [Redacted]

3. Basis for Class Membership:

I am a member of the class because I purchased a 2015 Toyota Highlander VIN 5TDDKRFH0FS146661 vehicle in Washington State on 4/8/2015.

4. Scope of Objection:

This objection applies to me and a subset of the class - vehicles with high count of drivers.

5. Grounds for Objection:

I object to the settlement because:

- The settlement provides only injunctive relief and does not compensate class members for actual damages suffered as a result of the defect.
- The outreach program does not adequately address the loss in value or inconvenience caused by the defect.
- The settlement treats all class members the same, regardless of the extent of harm suffered.
- In vehicles where multiple drivers are regularly using the vehicle the proposed volume adjustment protocol clearly states that a phone update may undo the protocol work-around and necessitate a repeat of the procedure.

*.... These volume settings will remain in place for future hands-free phone calls but may be undone if your phone is paired to a new head unit, **a phone update occurs...***

Source [Toyota Bluetooth Echo Class Action Settlement - Home](#)

My vehicle regularly is driven by up to 5 drivers, all in possession of Apple iPhones.

As shown in the table below there have been **84** version and minor updates, some or all of which would have necessitated the repeat protocol. Multiplied by the number of drivers involved might have lead to 420 instances of the process. Given the process requires making/receiving a call, prior to driving, with some time involved in finding an acceptable volume level it can clearly be seen as a significant time investment and far below the threshold for a viable/acceptable alternative. This proposal is I would venture unworkable, and certainly unfair.

While every minor update may not have triggered a repeat, it would not be possible to know without testing.

It may not even be possible to know if an update had taken place if auto-update is enabled on the phone leading potentially to frustrating/dangerous situations if an incoming call was received where the echo had returned and made the call impossible to receive.

Table of iOS Major Versions and Minor Updates (2015–2025)

Major Version	Release Date	Last Minor Version	Number of Minor Updates
iOS 9	Sep 16, 2015	9.3.6	7
iOS 10	Sep 13, 2016	10.3.4	5
iOS 11	Sep 19, 2017	11.4.1	5
iOS 12	Sep 17, 2018	12.5.7	8
iOS 13	Sep 19, 2019	13.7	8
iOS 14	Sep 16, 2020	14.8.1	9
iOS 15	Sep 20, 2021	15.8.2	10
iOS 16	Sep 12, 2022	16.7.12	13
iOS 17	Sep 18, 2023	17.7.2	9
iOS 18	Sep 16, 2024	18.7.3 (as of Jan 2026)	7+ (ongoing)
iOS 26	Sep 15, 2025	26.3 beta (as of Jan 2026)	3+ (ongoing)

Sources

- <https://support.apple.com/en-us/HT201222>
- https://en.wikipedia.org/wiki/IOS_version_history

- [endoflife.date iOS](#)
- [Macworld iOS Versions List](#)

6. Prior Objections:

I have not objected to a class action settlement before.

8. Counsel Information:

I am not represented by an attorney.

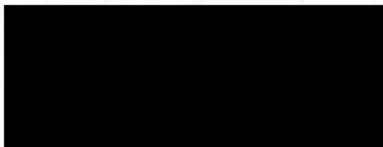
9. Intent to Appear:

I would like to request that I may appear at the Fairness Hearing, in person.

10. Witnesses:

I do not intend to call any witnesses.

11. Signature:



STANLEY WEISE

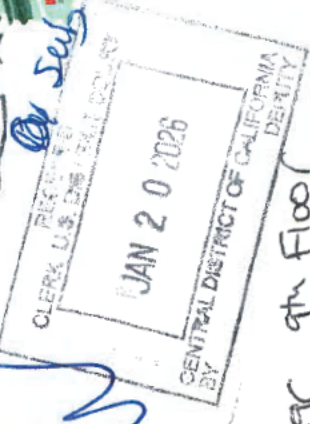
Dated 1/23/2026

Attachments:

None

SEATTLE WA 980

14 JAN 2026 PM 5 L



Clerk of Court,
United States District of California
First Street Courthouse,
350 W. 1st Street, Conference #9C, 9th Floor
Los Angeles, CA 90012

90012-456424



