

For current trial and exclusion dates, refer to Updated Notice

Legal Notice to California Residents

If you bought, owned or leased a Ford Explorer before August 9, 2000, a class action lawsuit may affect your rights.

PARA UNA NOTIFICACIÓN EN ESPAÑOL, LLAMAR O VISITAR NUESTRO WEBSITE

You may be affected by a class action lawsuit about whether Ford Motor Company concealed from California consumers what it knew about a tendency to roll over among its 1991-2001 model year Explorers. The lawsuit is called *Ford Explorer Cases*, JCCP Nos. 4266 and 4270, and is in the Superior Court of California, Sacramento County.

The Court decided this lawsuit should be a class action on behalf of a "Class," or group of people, that could include you. This notice summarizes your rights and options before a trial takes place. More information is in a detailed notice available at the website below. If you're included, you have to decide whether to stay in the Class and be bound by whatever results, or ask to be excluded and keep your right to sue Ford. There is no money available for you from this suit now and no guarantee that there will be. **This is not a recall.**

ARE YOU AFFECTED?

Class members are: All people and entities residing in California who bought, owned or leased, a new or used 1991-2001 model year Ford Explorer in California between 1990 and August 9, 2000, and who either still own their Explorer or who sold, ended their lease, or otherwise disposed of it after August 9, 2000.

WHAT IS THIS CASE ABOUT?

The lawsuit claims that Ford concealed what it knew about a dangerous design flaw that made the Explorer too likely to roll over, thereby misleading California consumers to buy or lease Explorers and to pay more than they should have. **This is not about personal injuries or wrongful deaths.** The lawsuit seeks money or benefits for the Class. Ford denies all the claims and allegations in the lawsuit. Ford notes that Plaintiffs are not claiming that the Explorer is more prone to roll over than other comparable sport utility vehicles. The Court has not decided whether the Class or Ford is right. The lawyers for the Class will have to prove their claims at a trial scheduled to begin September 25, 2006.

WHO REPRESENTS YOU?

The Court appointed Elizabeth J. Cabraser of Liefke Cabraser Heimann and Bernstein LLP, of San Francisco, CA, and Kevin P. Roddy of Wilentz, Goldman & Spitzer P.A., of Woodbridge, NJ, to represent you as co-lead "Class Counsel." If Class Counsel obtains money or benefits for the Class, they may ask the Court for fees and expenses. You don't have to pay any of these fees and expenses. If the Court grants their request, the fees and expenses would be deducted from any money obtained for the Class, or paid separately by Ford. You may hire your own lawyer to appear in Court for you, but if you do, you have to pay that lawyer.

WHAT ARE YOUR OPTIONS?

You have a choice of whether to stay in the Class or not, and you must decide this now. To stay in the Class, you do not have to do anything. If money or benefits are obtained, you will be notified about how to ask for a share. You will be legally bound by all orders and judgments of the Court, and you won't be able to sue, or continue to sue, Ford—as part of any other lawsuit—the legal claims in this case.

If you exclude yourself, you cannot get any money or benefits from this lawsuit if any are awarded, but you will keep any rights to sue Ford for the same claims, now or in the future, and will not be bound by any orders or judgments in this case. To ask to be excluded, fill out and send in the attached exclusion request postmarked by **March 14, 2006**.

HOW CAN I GET MORE INFORMATION?

If you have questions, visit the website at www.ExplorerCASuit.com, call toll-free 1-866-833-7918 or write to Class Counsel at P.O. Box 4850, Portland, OR 97208-4850.

1-866-833-7918

www.ExplorerCASuit.com

EXCLUSION REQUEST

I want to be excluded from the *Ford Explorer Cases* class action. I understand that if I exclude myself, I will not be able to get any money or benefits if any become available from this case, however I will not be bound by any Court orders, and I will keep any rights I have to sue Ford about the claims in this case, as part of any other lawsuit.

Name

Address

City

State

Zip

Telephone

Signed

Date

If you want to be excluded, mail this form, postmarked by **March 14, 2006** to: Ford Explorer Exclusions, P.O. Box 4850, Portland, OR 97208-4850.

DON'T MAIL THIS FORM IF YOU WANT TO STAY IN THE CLASS.