

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

JAMES SAMPSON, ELIZABETH  
WHEATLEY, SHIRLEY REINHARD ON  
HER OWN BEHALF AND ON BEHALF OF  
THE ESTATE OF KENNETH REINHARD,  
LISA HARDING, JANET BAUER,  
BARBARA MILLER, CELESTE AND  
XAVIER SANDOVAL, and DANIELLE  
LOVELADY RYAN, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

SUBARU OF AMERICA, INC.,

Defendant.

Case No.: 1:21-cv-10284-ESK-SAK

SUPPLEMENTAL DECLARATION OF  
LARA JARJOURA RE: ADDITIONAL  
EXCLUSION REQUESTS

**I, Lara Jarjoura, declare and state as follows:**

1. I am a Vice President at JND Legal Administration (“JND”). This Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees, and if called upon to do so, I could and would testify competently thereto.

2. JND is a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience in all aspects of legal administration and has administered settlements in hundreds of cases.

1           3.       JND is serving as the Claim Administrator in the above-captioned matter,  
2 pursuant to the Court's Order Granting Preliminary Approval of Class Action Settlement  
3 ("Preliminary Approval Order"), filed March 31, 2025.

4  
5           4.       I submit this Declaration as additional information to my previous Supplemental  
6 Declaration regarding Settlement Notice Plan Progress ("Supplemental Notice Declaration"),  
7 filed with the Court on September 17, 2025. ECF No. 154-3.

8                               **REQUESTS FOR EXCLUSION**

9           5.       The Class Notices informed Settlement Class Members that anyone who wanted  
10 to be excluded from the Settlement could do so by submitting a written request for exclusion  
11 ("opt-out") to the Settlement Claim Administrator, with instructions regarding the necessary  
12 information, postmarked on or before August 28, 2025.

13  
14           6.       JND has been made aware of five (5) additional exclusion requests since the  
15 previous Supplemental Notice Declaration was filed with the Court. They are attached as  
16 **Exhibit A.**

17  
18           7.       Each of these five (5) additional exclusion requests have been determined to be  
19 invalid as they failed to comply with one or more of the basic requirements enumerated in the  
20 Preliminary Approval Order for a valid request for exclusion, and/or are untimely.

21           8.       Three (3) of these five (5) exclusion requests fail to include a VIN as required,  
22 and also have additional deficiencies, as follows (Exhibits A-1 and A-2):

- 23  
24                   • Two (2) requests fail to include a VIN, a statement of current or former  
25 ownership of lease, the model year of the vehicle, and a phone number as  
26 required (Exhibit A-1).

- One (1) request fails to include a VIN, the model year of the vehicle, and a phone number as required (Exhibit A-2).

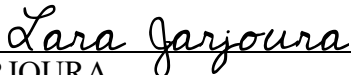
9. Two (2) of these five (5) exclusion requests are untimely because they were postmarked after the August 28, 2025 deadline. One of these requests also has additional deficiencies, as follows (Exhibits A-3 and A-4):

- One (1) request is untimely because it is postmarked after the August 28, 2025 deadline (Exhibit A-3).
- One (1) request is untimely because it is postmarked after the August 28, 2025 deadline, and it also fails to include a statement of current or former ownership or lease, the model year of the vehicle, and a phone number, as required (Exhibit A-4).

10. Class Counsel and Defense Counsel are in agreement with JND that all of these five (5) exclusion requests are invalid. Accordingly, they will be included in the list of invalid exclusion requests that is attached as Exhibit B to the proposed Final Approval Order and Judgment.

I declare under penalty of perjury pursuant to the laws of the United States of America that the forgoing is true and correct.

Executed on October 29, 2025 at Seattle, Washington.

  
LARA JARJOURA

# **EXHIBIT A-1**

From: shibuivisions@icloud.com  
Subject: Subaru Eyesight Settlement - EXCLUSION  
Date: August 22, 2025 at 3:19 PM  
To:

S

August, 22, 2025, 1:15 pm

Received  
AUG 29 2025  
by JNDLA

To: ✓ \*Claims Administrator, Subaru Eyesight Settlement C./jnd.legal  
administrator

P.O. Box 91063  
Seattle, WA 98111

\*Class Counsel, Russell D. Paul, Esq.  
Berger Montague  
1818 Market Street 3600  
Philadelphia, PA 19103

\*Defense Counsel, Homer B. Ramsey, Esq.  
1 Rockefeller Plaza - Suite 2801  
New York, New York 10020

To Those This May Concern:

Regarding my notification of your Subaru Eyesight Settlement, I wish to be excluded from the settlement. This notification is sent per your request to receive my exclusion request in writing and sent to you by August 28, 2025, postmarked. I understand I will not be eligible to receive any benefits of the settlement since I will be excluded.

Thank you,

*S. L. Koegl*

Susan (Sue) Koegl

*cc: PERSONAL FILES*



Sue Koegl  
5 Quedo Rd  
Santa Fe, NM 87508-1919

AUG 29 2025

ALBUQUERQUE NM 870  
26 AUG 2025  
AUG 26 2025 1775  
USPS



*gmg*

CLAIMS ADMINISTRATOR  
SUBADVISORY JEREMY C. JIND. LEAR  
ADMINISTRATOR  
P.O. Box 91063  
SEATTLE, WA 98111-91063



Yoko Kantor

Apt. 109

131 Black Rock Rd.

Mooresville, NC 28117

CHARLOTTE NC LPC 281

9 AUG 2025 PM 8 L

2285

1175★



To make sure your information remains up-to-date in our records, please confirm your address by filling in the above information and depositing this postcard in the U.S. Mail.

RECEIVED

AUG 13 2025

by JNDLA

Subaru EyeSight Settlement  
c/o JND Legal Administration  
P.O. Box 91063  
Seattle, WA 98111

JND 08/13/25

44-916663





PLEASE RETAIN THIS POSTCARD FOR YOUR RECORDS

Do not contact the Court for information about the settlement.

A Settlement has been reached in a class action lawsuit regarding the Pre-Collision Braking, Rear Automatic Braking, and Lane Keep Assist driver assistance features of EyeSight in certain Subaru vehicles.

**Am I a Class Member?**

You are a Settlement Class Member if you are a current or former owner or lessee of certain 2013-2024 Subaru vehicles equipped with EyeSight functionality ("Settlement Class Vehicles"), subject to certain exclusions. You can confirm whether your vehicle is included in the settlement, and that you are therefore a class member, by searching the VIN Lookup Tool on the Settlement Website: [www.EyeSightSettlement.com](http://www.EyeSightSettlement.com).

**What benefits can I get from the settlement?**

If the Court grants final approval, the Settlement will provide the following benefits: 1) a Warranty Extension, and 2) Reimbursement of 75% of certain past paid out-of-pocket repair expenses. A claim for reimbursement must be submitted to the Claim Administrator **no later than September 27, 2025** either by mail (postmarked) at the above address or online through the Settlement website. For further details regarding the class action, the Settlement terms and benefits, what is covered, and the requirements, deadline, and procedures for submitting a claim for reimbursement, please refer to the Long Form Class Notice on the Settlement Website: [www.EyeSightSettlement.com](http://www.EyeSightSettlement.com). You can also contact the Claim Administrator toll free at 1-866-287-0742 or [info@EyeSightSettlement.com](mailto:info@EyeSightSettlement.com) to obtain a Claim Form and for any questions you may have.

**How can I exclude myself from the class?**

If you want to exclude yourself from the settlement, you must mail a request for exclusion with the required information postmarked **no later than August 28, 2025**. The requirements for a request for exclusion, and the addresses to whom it must be mailed, are set forth in the Long Form Class Notice on the Settlement Website at [www.EyeSightSettlement.com](http://www.EyeSightSettlement.com). If you timely and properly exclude yourself, you will not be eligible to receive any benefits of the settlement. If you do not timely and properly exclude yourself, you will remain part of the Settlement Class and will be bound by its terms and provisions including the Release and Waiver.



# **EXHIBIT A-2**

Received  
SEP 02 2025  
by JNDLA

August 26, 2025

Reference: Subaru Eye Sight Settlement  
Class Action Suit

I would like to be excluded from the  
above referenced class action suit.

I currently own a Subaru Forester and  
I previously owned a Subaru Legacy.

my Unique ID's are: N5926R34WL and  
N68TMJ34CP

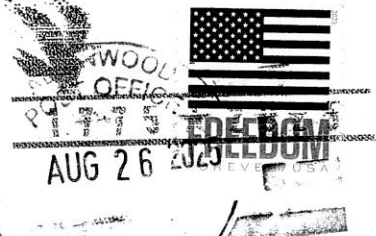
Angele Coyle  
714 Millbrook Rd  
Brick, N.J. 08724



Angela M. Coyle  
714 Millbrook Rd  
Brick, NJ 08724-1025

TRENTON NJ 085

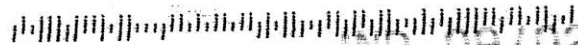
27 AUG 2025 PM 6 L



SEP 02 2025

Subaru Eye Sight Settlement  
% JND Legal Administration  
P.O. Box 91063  
Seattle, WA 98111

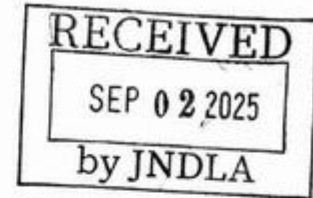
98111-916963



JND 09/02/25

# **EXHIBIT A-3**

Sarah M. Molleck  
2870 Britannia Court  
Reno, NV 89523  
(775) 287-3211  
[Booher.sarah@gmail.com](mailto:Booher.sarah@gmail.com)



**VIA U.S. Mail, postmarked 8/28/2025:**

**Claims Administrator**

Subaru EyeSight Settlement  
c/o JND Legal Administration  
P.O. Box 91063  
Seattle, WA 98111

**Class Counsel**

Russell D. Paul, Esq.  
Berger Montague, PC  
1818 Market Street, Ste. 3600  
Philadelphia, PA 19103

**Defense Counsel**

Homer B. Ramsey, Esq.  
Shook, Hardy & Bacon, LLP  
1 Rockefeller Plaza, Ste. 2801  
New York, NY 10020

**REQUEST FOR EXCLUSION**  
**SUBARU EYESIGHT SETTLEMENT**  
***Sampson, et al. v. Subaru of America, Inc.***  
**Case No.: 1:21-cv-10284-ESK-SAK**

Dear Counsel:

Please consider this letter my official Notice of Request for Exclusion from the above-referenced class action settlement, identified above and commonly referred to as the "Subaru EyeSight Settlement." Pursuant to the instructions under Section 11 of the FAQs on the class settlement notice, I am providing the following information:

1. I want to be excluded from the settlement.
2. My full name, address, and telephone number as follows:  
Sarah M. Molleck  
2870 Britannia Court  
Reno, Nevada 89523

Subaru Eyesight Settlement  
August 28, 2025  
Page 2

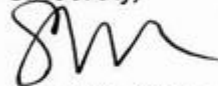
3. The model, model year, and VIN of my settlement class vehicle is:

Subaru Forester Limited, Year 2021, VIN: JF2SKAUC1MH510475

4. I am the current owner of the Subaru Forester vehicle identified above.

Please exclude me from the class and any settlement in the above-referenced matter. I wish to reserve the right to pursue any and all claims and remedies outside of this class, and do not wish to be bound by the settlement.

Sincerely,

A handwritten signature in black ink, appearing to be 'SM' with a stylized flourish.

Sarah M. Molleck



*the mollecks*  
2870 BRITTANIA COURT  
RENO, NV  
89523

RENO NV 894

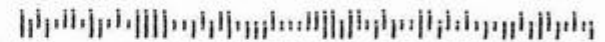
30 AUG 2025 AM 1 L



Subaru EyeSight Settlement  
c/o JND Legal Administration  
P.O. Box 91063  
Seattle, WA 98111

JND 09/02/25

98111\$9163 B000



# **EXHIBIT A-4**

**Notice of Proposed Class Action Settlement**

If you currently or previously own(ed) or lease(d) certain 2013-2024 Subaru vehicles equipped with Pre-Collision Braking, Rear Automatic Braking, and/or Lane Keep Assist driver assistance features of EyeSight, you may be entitled to benefits under a class action settlement. This notice is being mailed to you because you have been identified as owning or leasing such a vehicle.

For information on the proposed settlement, and how and when to file a claim for reimbursement or object to or exclude yourself from the settlement, call toll-free 1-866-287-0742 or you may visit [www.EyeSightSettlement.com](http://www.EyeSightSettlement.com).

*Si desea recibir esta notificación en español, llámenos o visite nuestra página web.*

Subaru EyeSight Settlement  
c/o JND Legal Administration  
PO Box 91063  
Seattle, WA 98111



Received

OCT 10 2025

by JNDLA

Postal Service: Please do not mark barcode

PRESORTED  
FIRST CLASS MAIL  
U.S. POSTAGE  
**PAID**  
SANTA ANA, CA  
PERMIT NO. 949

Electronic Service Requested

SMP N6ZHEFN3TB

103756622\*\*P0076-S5307-B0003\*\*\*\*\*AUTO\*\*5-DIGIT 59937

CHRISTINE RUSSELL

PO BOX 260304

MARTIN CITY, MT 59926-0304



I Opt out. 8/6/25  
Christine Russell

**How can I object?**

If you want to stay in the Settlement Class but object to any aspect of the settlement, you must file an objection with the Court with the required information **no later than August 28, 2025**. For further information and instructions on the requirements for an objection, and when and how to file one, refer to the settlement website and the Long Form Class Notice at [www.EyeSightSettlement.com](http://www.EyeSightSettlement.com).

**Do I have a lawyer in this case?**

Yes. The Court has appointed the law firms of Berger Montague, PC, Capstone Law APC, and Barrack, Rodos & Bacine to represent you and the Class. These attorneys are called Class Counsel. You will not be charged for their services. If you would like to retain your own counsel you may do so at your own expense.

**The Court's Final Fairness Hearing.**

The Court will hold a Final Fairness Hearing on **November 3, 2025 at 11:00 AM**, at the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Courtroom 4D, Camden, NJ 08101 to consider whether to approve (1) the settlement; (2) Class Counsel's request for Attorneys' fees and costs of up to \$2.5 million; and (3) Named Plaintiffs' Service Awards of up to \$5,000. The date of the hearing may change without further notice so please visit [www.EyeSightSettlement.com](http://www.EyeSightSettlement.com) for updated information.

**Where can I get more information?**

Please visit the Settlement Website at [www.EyeSightSettlement.com](http://www.EyeSightSettlement.com), call toll free 1-866-287-0742, or email [info@EyeSightSettlement.com](mailto:info@EyeSightSettlement.com) to obtain more complete information about the proposed settlement and your rights.

**Please do not contact the Court regarding this Notice.**

<b>YOUR VIN:</b>	JF2GTAPC4MH358884
<b>YOUR UNIQUE ID:</b>	N6ZHEFN3TB
<b>YOUR PIN:</b>	91954253
<b>PLEASE REFER TO YOUR UNIQUE ID AND PIN TO FILE A CLAIM</b>	



C. Russell

Case 1:21-cv-10284-ESK-SAK

Document 157  
2297

Filed 10/29/25

Page 19 of 19 PageID:

PO Box 260304

Martin City, MT 59926

PORTLAND OR RPDC 972

8 OCT 2025 PM 6 L



OCT 1 0 2025

Subaru EyeSight Settlement  
c/o JND Legal Administration  
PO Box 91063  
Seattle, WA 98111

98111-916363

