

ADDENDUM TO THE STIPULATION AND CLASS ACTION SETTLEMENT

AGREEMENT

Plaintiff Wyatt Coppernoll, as an individual and on behalf of persons who do not opt out of the Settlement (“Participating Class Members”), as provided for in the Parties’ Stipulation and Class Action Settlement Agreement (“Agreement”), and Defendants Hamcor, Inc. d/b/a Dublin Toyota, 6450 Motors LLC d/b/a Dublin Hyundai, Nisdat, LLC d/b/a Dublin Nissan, Cornelius Bros., LLC d/b/a Dublin Volkswagen, and Turin Dublin, LLC d/b/a Dublin Fiat (collectively “Defendants”) (collectively, the “Parties) hereby enter into the following Addendum To The Stipulation And Class Action Settlement Agreement (“Addendum”) that they previously executed in the civil action pending in the Superior Court of California, County of Alameda Case No. RG16843171. This Addendum, as with the Agreement is subject to the approval of the Superior Court.

WHEREAS, on May 23, 2018, the Parties entered into a Stipulation and Class Action Settlement Agreement;

WHEREAS, the original Agreement was executed without a definition for the “Opt-Out Period”, and the Parties agree and acknowledge that the Agreement must be amended to include this definition;

THEREFORE, the Parties hereby add to the Settlement Agreement as follows, in the form of a binding Addendum:

PROVISIONS

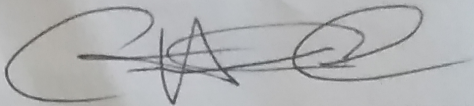
1. Terms used in this Addendum are as defined in the Agreement.
2. The Parties agree to add the following Paragraph as Paragraph B(43) to the Agreement:

43. “Opt-Out Period” means a period of sixty (60) calendar days from the Mailing Date. If the 60th day falls on a Sunday or holiday, the Opt-Out Period shall end on the next business day that is not a Sunday or holiday. At no point will a Class Member’s Opt-Out Period end more than 90 days after the Mailing Date per Paragraph E(1)(c) of the Agreement.

3. All other provisions contained in the Agreement shall remain “as is,” and continue in full force and effect.

IT IS SO AGREED:

Dated: July 10, 2018

By: 

Wyatt Coppernoll
Plaintiff/Class Representative

HAMCOR, INC. D/B/A DUBLIN TOYOTA

Dated: _____, 2018

By: _____

M. Gregg McKerroll
Chief Financial Officer and Secretary

6450 MOTORS LLC D/B/A DUBLIN
HYUNDAI

Dated: _____, 2018

By: _____

M. Gregg McKerroll
Chief Financial Officer and Secretary

NISDAT, LLC D/B/A DUBLIN NISSAN

Dated: _____, 2018

By: _____

M. Gregg McKerroll
Chief Financial Officer and Secretary

CORNELIUS BROS., LLC D/B/A DUBLIN
VOLKSWAGEN

Dated: _____, 2018

By: _____

M. Gregg McKerroll
Chief Financial Officer and Secretary

TURIN DUBLIN, LLC D/B/A DUBLIN FIAT

Dated: _____, 2018

By: _____

M. Gregg McKerroll
Chief Financial Officer and Secretary

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IT IS SO AGREED:

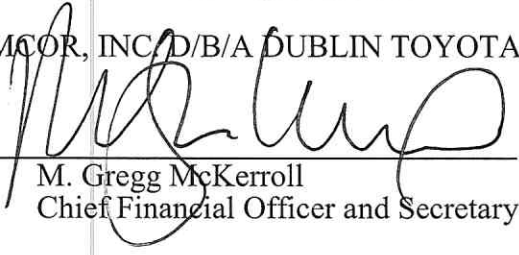
Dated: _____, 2018

By: _____

Wyatt Coppernoll
Plaintiff/Class Representative

HAMCOR, INC D/B/A DUBLIN TOYOTA

Dated: July 10, 2018

By: 

M. Gregg McKerroll
Chief Financial Officer and Secretary

6450 MOTORS LLC D/B/A DUBLIN
HYUNDAI

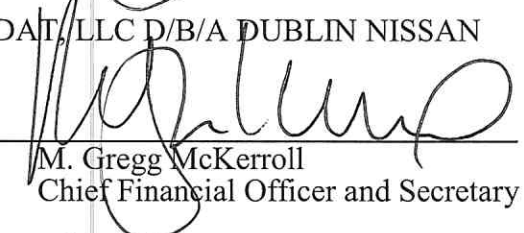
Dated: July 10, 2018

By: 

M. Gregg McKerroll
Chief Financial Officer and Secretary

NISDAT, LLC D/B/A DUBLIN NISSAN

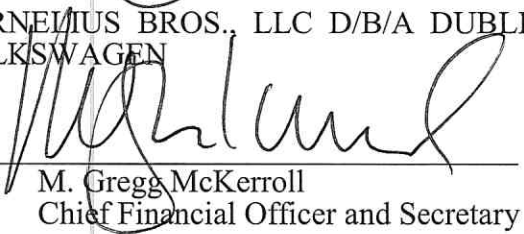
Dated: July 10, 2018

By: 

M. Gregg McKerroll
Chief Financial Officer and Secretary

CORNELIUS BROS., LLC D/B/A DUBLIN
VOLKSWAGEN

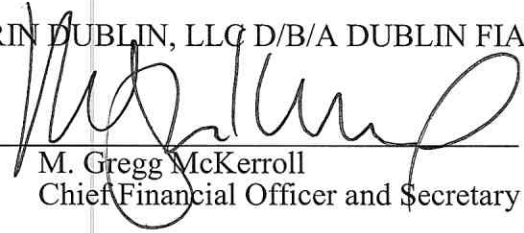
Dated: July 10, 2018

By: 

M. Gregg McKerroll
Chief Financial Officer and Secretary

TURIN DUBLIN, LLC D/B/A DUBLIN FIAT

Dated: July 10, 2018

By: 

M. Gregg McKerroll
Chief Financial Officer and Secretary

1 APPROVED AS TO FORM:

2 HOYER & HICKS

3
4 Dated: July 10, 2018

By: 

Richard Hoyer
Ryan Hicks
Counsel for Plaintiff and the Class

7 LITTLER MENDELSON, P.C.

8 Dated: July 11,, 2018

By: 

Joshua Cliffe
Perry Miska
Counsel for Defendants

13 Firmwide: 155737473.1 093138.1008