

EXHIBIT 1

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June 27, 2019

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***Via United Parcel Service for the U.S. Attorney General
and USPS Certified Mail for Those on Exhibit A***

Mr. William Barr, Esq.
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Washington, D.C. 20530

CALIFORNIA
CONNECTICUT
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WASHINGTON D.C.

The Attorneys General Identified
in the Attached Exhibit A

Re: *Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715*

Dear Mr. Barr and Attorneys General:

Our firm represents Nissan North America, Inc., (“NNA”) in a class action entitled *Weckwerth, et. al. (f/k/a Norman, et al.) v. Nissan North America, Inc.*, Case No. 3:18-cv-00588. The lawsuit is pending before the Honorable Eli Richardson in the United States District Court for the Middle District of Tennessee, Nashville Division.

Pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1715 *et seq.* (“CAFA”), this letter and the documents listed below (CD-ROM enclosed) shall constitute Notice of a Proposed Class Action Settlement by Defendant Nissan North America, Inc. (“Defendant” or “Nissan”), through Defendant’s undersigned counsel for Nissan, in the above-referenced action. Nissan denies the allegations and claims asserted against it in the above-referenced action, but it has decided to settle this action in order to eliminate the burden, expense, and uncertainties of further litigation.

In conjunction with this notice, please find copies of the following documents on the enclosed CD-ROM:

1. Unopposed Motion for Preliminary Approval [71];
2. [Proposed] Preliminary Approval Order [71-1];
3. Memorandum in Support of Preliminary Approval [72];
4. Declaration of Cody Padgett [74];
 - a. Settlement Agreement filed in the Action [74-2];

Established 1849

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- b. Exhibit A – Expedited Resolution Notice [74-3];
 - c. Exhibit B – Claim Form [74-4];
 - d. Exhibit C – Long Form Notice [74-5];
 - e. Exhibit D – Summary Notice [74-6];
 - f. Exhibit E – Proposed Preliminary Approval Order [74-7];
 - g. Exhibit F – Proposed Final Approval Order and Judgment [74-8];
- 5. Declaration of KCC’s Carla Peak [80];
 - 6. Class Action Complaint [1];
 - 7. First Amended Class Action Complaint [68];
 - 8. Second Amended Class Action Complaint [83];

Please take note that the parties have filed the operative Settlement Agreement and exhibits thereto in the Action with the United States District Court for the Middle District of Tennessee (the “Court”). The Court has not issued a written preliminary approval order as of the date of this letter, but recently asked the Parties for additional information and joint briefing by July 8, 2019. There are no hearings scheduled at this time.

At this time, it is not feasible to provide the names of each class member who resides in each jurisdiction. Accordingly, pursuant to 28 U.S.C. § 1715(b)(7)(B), Defendant estimates that there are more than 1.6 million individuals who are members of the proposed class and believes that a significant number of proposed class members reside in all 50 States, the District of Columbia, and territories and possessions of the United States. Defendant may have additional information on the number of class members after the Settlement Administrator obtains vehicle registration data.

If for any reason you believe the enclosed information does not fully comply with CAFA, please notify the undersigned immediately so that Defendant can address any concerns you may have.

DrinkerBiddle&Reath

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Very truly yours,

A handwritten signature in black ink, appearing to read "E.P. Cauley, Jr.", with a long horizontal flourish extending to the right.

E. Paul Cauley, Jr.

EPC
Enclosures
119566578.2

Weckwerth, et al. (f/k/a Norman, et al.) v. Nissan North America, Inc.
3:18-cv-00588 (M.D. TN)

EXHIBIT A - CAFA RECIPIENT SERVICE DISTRIBUTION LIST

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