

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,
Plaintiff

v.

TAKATA CORPORATION,
Defendant.

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) Case No. 16-CR-20810-04
)

) Honorable Nancy G. Edmunds
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)

FORTY-FIFTH STATUS REPORT OF THE SPECIAL MASTER

1. Eric D. Green, the court-appointed Special Master for the custody, administration, and distribution of the Takata Airbag Restitution Funds, hereby respectfully submits his Forty-Fourth Status Report pursuant to paragraph 4 of this Court’s Appointment Order (the “Status Report”).¹ The Status Report provides an overview of the Special Master’s work from January 18, 2024 through March 21, 2025 (the “Reporting Period”) and anticipated future efforts. The Special Master is presently on schedule regarding the processing of Claims and distribution of the restitution funds available to eligible Claimants who have filed Claims with the Individual Restitution Fund (the “IRF”).

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Forty-Fourth Status Report of the Special Master*, dated January 22, 2025 [Docket No. 216].

I. ACTIVITIES IN THE REPORTING PERIOD.

A. APPROVAL OF THIRTIETH IRF DISTRIBUTION REQUEST.

1. On January 22, 2025, the Special Master filed the *Special Master's Request for Approval of Thirtieth Distribution of Individual Restitution Fund* [Docket No. 215] (the "Thirtieth IRF Distribution Request"), seeking Court-approval for: (i) a thirtieth distribution from the IRF to compensate two (2) eligible Claims; and denial of four (4) ineligible Claims.

2. Consistent with the procedures set forth in the Minutes of July 25, 2019 Conference with Special Master (the "July 2019 Minutes Order") [Docket No. 110], the Special Master notified the affected Claimants: (i) of their point award and the monetary value of the award (if any); (ii) of the filing of the Thirtieth IRF Distribution Request; and (iii) that such Claimants may object to the Thirtieth IRF Distribution Request by submitting a written response to the Special Master on or before February 17, 2025 (the "Objection Deadline").

3. As the Court is aware, there are two conditions that must be met for Claimants with compensable Claims to receive payment from the IRF. First, all Claimants must execute and submit to the Special Master the Court-approved release agreement (a "Release"). Additionally, if any Claimant was represented by counsel, such counsel must execute and submit to the Special Master a fee rider (a "Fee

Rider”) acknowledging and agreeing to abide by the restriction on attorney’s fees set forth in the IRF Methodology Order. [Docket No. 78, Page ID 2219].

4. On March 10, 2025, the Court entered an order granting the Special Master’s Request. *See Order Granting Special Master’s Request For Approval Of Thirtieth Distribution Of Individual Restitution Fund* [Docket No. 218]. Accordingly, the Special Master will begin processing and making these payments, subject to the Modified Points Schedule and 2024 Point Value, on a rolling basis following receipt of the necessary documentation.

5. Since the Thirtieth Distribution Request, the Special Master has administered, reviewed, analyzed, and evaluated five (5) additional Claims. As outlined in the Special Master’s Thirty-First Claim Approval Request filed contemporaneously herewith, the Special Master recommends disallowing two (2) of those claims as ineligible and allow three (3) of those claims for a combined amount of 1,200 points, amounting to a total distribution of \$268,800.00.

II. GOING FORWARD EFFORTS.

A. CLAIM EVALUATION AND PROCESSING EFFORTS.

6. The Special Master and his team continue to receive claims for compensation from the IRF and TATCTF (in his capacity as Trustee of that Trust) and will continue the process of reviewing, evaluating, and distributing funds on account of claims. The Special Master and his team will also continue to evaluate

the claims data and recall completion rate data in connection with any future point-value evaluations. The Special Master and his claims evaluation team remain committed to completing its initial evaluation of Claims within thirty (30) days of the Special Master's receipt thereof.

CONCLUSION

7. The Special Master will continue to perform his responsibilities and duties consistent with the Appointment Order and all other directives of this Court.

Dated: March 25, 2025

Respectfully submitted,



Eric D. Green, Special Master