SUMMARY OF ELIGIBILITY AND REMEDIES
SUBARU STARLINK CLASS ACTION SETTLEMENT

Chad Udeen et al. v. Subaru of America, Inc. et al.,
Civil Action No. 1:18-cv-17334-RBK-JS (D. N.J)

[Note: This is a summary of who may arbitrate and the remedies that may be sought under the
terms of the class action settlement. This not intended to be a complete list of all requirements
-- please see the terms of the class action settlement for additional requirements]

1. ELIGIBLE VEHICLES
The following Subaru vehicles are eligible if equipped with a Generation 3.0 Starlink
Infotainment System with head unit manufactured by Harmon International Industries, Inc.:

- 2017-2018 Impreza
- 2018 Forester
- 2018 Outback
- 2018 Legacy
- 2018 Crosstrek
- 2018 BRZ

2. ELIGIBLE CLAIMANTS
An eligible claimant must satisfy all of the following criteria:

- The claimant must be a resident of the continental United States or Hawaii or Alaska
  who currently owns or leases, or previously owned or leased, an eligible vehicle;
- The claimant must have purchased or leased the eligible vehicle in the continental
  United States, including Alaska or Hawaii;
- The claimant did not validly and timely opt out of the settlement class; and
• The claimant filed a claim with the Settlement Administrator no later than April 1, 2020.

In addition, at least one of the following must apply:

• The claimant purchased a Subaru Added Security plan with a duration equal to or greater than five years or 100,000 miles: and/or
• The claimant presented an eligible vehicle two or more times to an authorized Subaru dealer for a ”Qualifying Repair” of a ”Qualifying Starlink Malfunction” not including visits related to the March 2017 WTN-74 recall or January 2019 WTZ-85 recall; and/or
• Eligible vehicle’s Starlink head unit became inoperable between July 1, 2018 and January 31, 2019 and claimant waited for more than one day for a replacement head unit to be installed; and/or
• Claimant incurred out-of-pocket expenses relating to a “Qualifying Repair” addressing a Qualifying Starlink Malfunction.

3. ELIGIBILITY FOR ARBITRATION

Claimants may seek to arbitrate claim only after claim has been denied by the Settlement Administrator after a second review

4. REMEDIES THAT MAY BE SOUGHT IN ARBITRATION

   A. Reimbursement for proportionate value of Subaru Added Security Plan

   Claims must include an invoice or other document(s) that shows:

   • The purchase of a Subaru Added Security Plan, and
   • The time and mileage duration of the Subaru Added Security Plan.

   B. Compensation for multiple “Qualifying Repairs” of “Qualifying Starlink Malfunctions”

1 “Qualifying Repair” means any type of repair, replacement, diagnosis or inspection performed by an authorized Subaru dealer to address a “Qualifying Starlink Malfunction” excluding repairs performed subject to Subaru recalls and repair work performed to address a condition unrelated to a Qualifying Starlink Malfunction. Please see terms of the class action settlement for full definition.

2 “Qualifying Starlink Malfunction” means the failure of the Starlink System or failure of a vehicle function caused by a Starlink System error. Please see terms of the class action settlement for a full definition.
Claims must include repair invoices or other document(s) that show:

- VIN, make and model of eligible vehicle;
- That a Starlink-related replacement, diagnosis, repair, update or inspection was performed;
- Repair dates;
- Vehicle mileage at time of repairs;
- Proof that vehicle was presented to authorized Subaru dealer for repairs; and
- Name, address and phone number of facility that performed the repair.

C. **Compensation for delay in repair caused by backorder**

Claims must include repair invoices or any other document(s) that show:

- VIN, make and model of eligible vehicle;
- Repair dates;
- Vehicle mileage at time of repairs;
- Proof vehicle was presented to authorized retailer for repair between July 1, 2018 and January 31, 2019;
- That a Starlink-related repair was performed after July 1, 2018; and
- Name, address and phone number of facility that performed the repair.

D. **Reimbursement for out-of-pocket repair expenses**

Claims must include a repair invoice or any other document(s) that shows:

- VIN, make and model of eligible vehicle;
- Repair date(s);
- Vehicle mileage at time of repair(s);
- Performance of a Starlink-related replacement, diagnosis or inspection;
- Proof of payment;
- Proof that vehicle was presented to authorized Subaru dealer for repairs; and
- Name, address and phone number of facility that performed the repair.

E. **Reimbursement for rental vehicle/ride-hailing service expenses**

Claims must include a receipt or other document(s) that shows:
- VIN, make and model of eligible vehicle;
- Repair date(s);
- What was purchased (e.g., rental car or ride-hailing service);
- Name, address and phone number of facility;
- Amount paid;
- Date purchased;
- The date and type of “Qualifying Repair”