

**IN THE COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION**

IRENE A. PARKER and
DENA M. SHIPPEN,

Plaintiffs,

v.

AMERICAN ISUZU MOTORS, INC., and
ISUZU MOTORS LIMITED,

Defendants.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

SEPTEMBER TERM, 2003
NO: 003476

CLASS ACTION

NOTICE OF PENDENCY OF CLASS ACTION, PROPOSED SETTLEMENT, AND SETTLEMENT HEARING

TO: PEOPLE WHO PURCHASED OR LEASED 1998 AND/OR 1999 ISUZU AMIGOS OR RODEOS, AND WHO SUFFERED UNREIMBURSED DAMAGES BECAUSE OF ACCIDENTS THEY BELIEVE WERE CAUSED BY A MALFUNCTION OF THE VEHICLES' ANTI-LOCK BRAKE SYSTEM.

Some people experienced accidents they believe resulted from a malfunction in the anti-lock brake system of their 1998 or 1999 Isuzu Amigo or Rodeo. There is a proposed settlement to a class action lawsuit that may allow you to receive money if you suffered unreimbursed out-of-pocket expenses. This mailing describes the settlement, who is eligible to receive payment, and what you need to do to receive a payment.

If you were in an accident which you believe was caused by an anti-lock brake system malfunction, and you return the Proof of Claim Form accompanying this notice, you may be eligible to receive a payment up to \$500.00 for some or all of your out-of-pocket losses, depending on the number of qualifying claims submitted.

To submit a claim, you must fill out and return the Proof of Claim Form postmarked on or before May 15, 2007.

I. What the Lawsuit is About

Plaintiffs Irene A. Parker and Dena M. Shippen ("Plaintiffs") filed a class action lawsuit on behalf of everyone who purchased or leased a 1998 or 1999 Isuzu Amigo or Rodeo (a "Qualifying Vehicle") and who suffered economic damages in connection with accidents caused by a malfunction of the vehicle's anti-lock brake system ("ABS"). Plaintiffs claim that the anti-lock brake system in these vehicles was faulty, and caused accidents. Plaintiffs seek to recover money damages from the Defendants. Defendants deny the allegations. The Court has not ruled on any of Plaintiffs' claims.

II. The Proposed Settlement and Payments to Class Members

Defendants have agreed to pay up to \$500.00 to anyone who submits a declaration that establishes they are a Class member because they were involved in an accident in a 1998 or 1999 Isuzu Amigo or Rodeo caused by an anti-lock brake system malfunction. To recover money, the Class member should describe the accident and identify the amount of unreimbursed out-of-pocket losses suffered. Class members should also provide the name of the insurance company and policy number at the time of the accident, if known.

Defendants have agreed to pay no less than a total of \$450,000.00 but no more than \$1,000,000.00, including administrative costs of up to \$100,000, regardless of the number of persons who submit valid Claim Forms.

The actual amount which will be paid to qualifying claimants may depend upon the number of valid claims submitted by the claims deadline. It is likely that the full amount of each claim will be paid.

Class members should submit a separate claim for every accident they experienced due to an anti-lock brake system malfunction. Both original and subsequent owners of the same vehicle may submit separate claims for each accident caused by an anti-lock brake system malfunction.

This settlement does not involve payment for any damages related to a personal injury.

The defendants AMERICAN ISUZU MOTORS, INC. and ISUZU MOTORS LIMITED have reserved the right to investigate all claims and contest any claims they think should not be paid.

If the Court approves, Plaintiffs Irene A. Parker and Dena M. Shippen will each receive up to \$3,000 because they have brought this lawsuit on behalf of the class.

III. Plaintiffs' Attorneys' Fees and Expenses

If the Court approves, Plaintiffs' lawyers will receive fees and expenses up to \$150,000.00. The payment to the lawyers will have no effect on payments made to Class members. Defendants have agreed not to contest any fee up to the amount of \$150,000.00. Class members will not have to pay any lawyers' fees or expenses.

IV. Participation in the Class

If you wish to participate in the Settlement, you must fill in and return a Proof of Claim Form postmarked by May 15, 2007, to:

Re: Isuzu Motors America, Inc.
c/o Heffler, Radetich & Saitta L.L.P.
P.O. Box 80
Philadelphia, PA 19105-0080

All Class members are represented by Plaintiffs' attorneys. If you want to, you may represent yourself or have your own attorney represent you, at your own expense.

If you do not want to be a Class member, you must tell us in writing. If you ask to be excluded from the class, you cannot receive any money under the Settlement. Your letter must ask to be excluded from the class and must include your name, address and telephone number. If you know it, you should also tell us the Vehicle Identification Number of the 1998 or 1999 Isuzu Amigo or Rodeo that you own or lease. Your request to be excluded must be sent by first class mail, postmarked no later than December 31, 2006, to any one of the following lawyers:

Sherrie R. Savett, Esquire
Michael T. Fantini, Esquire
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, PA 19103

Counsel for Plaintiffs and the Class

Joseph Kernen, Esquire
Keith E. Smith, Esquire
DLA Piper US LLP
1650 Market Street - Suite 4900
Philadelphia, PA 19103

Counsel for Defendants

V. Final Approval Hearing

A "Final Approval Hearing" will be held before the Honorable Mark I. Bernstein of the Court of Common Pleas of Philadelphia County on January 24, 2007, at 9:30 a.m. in Courtroom 246, City Hall, Philadelphia, Pennsylvania, to determine: (i) whether the proposed Settlement of the lawsuit should be finally approved; (ii) whether the additional payment to the class representatives should be approved; and (iii) whether the Plaintiffs' attorneys fees and expenses should be approved.

Class members do not need to appear at the hearing or take any other action if they approve.

Any Class member may object to the Settlement by stating in writing his or her objection, by filing the objection with the Court by December 31, 2006 and by sending it to one of the following lawyers:

Sherrie R. Savett, Esquire
Michael T. Fantini, Esquire
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, PA 19103

Counsel for Plaintiffs and the Class

Joseph Kernen, Esquire
Keith E. Smith, Esquire
DLA Piper US LLP
1650 Market Street - Suite 4900
Philadelphia, PA 19103

Counsel for Defendants

Any Class member may appear at the Final Approval Hearing to argue why the Settlement or the additional payment to the class representatives or the Plaintiffs' attorney's fees and expenses should not be approved.

VI. Releases

If the Settlement Agreement is approved, the Court will enter a judgment which will end the lawsuit and will preclude every Class member from suing the defendants for economic damages suffered as a result of an accident caused by an anti-lock brake system. Claims for losses or damages due to personal injuries are not affected by this case. You can avoid this preclusion by opting out of the agreement as described above.

VII. How to Get More Information

To learn more about this lawsuit, including the Settlement Agreement and the Complaint, you may inspect the documents on file in the Office of the Prothonotary, City Hall, Room 284, Philadelphia, Pennsylvania, 19107. Other inquiries may be sent to:

Re: Isuzu Motors America, Inc.
c/o Heffler, Radetich & Saitta L.L.P.
P.O. Box 80
Philadelphia, PA 19105-0080

Please do not contact the Court directly.

Dated: November 15, 2006

BY ORDER OF THE COURT

Mark I. Bernstein, J.

Check here if address differs from address on mailing panel:

Check here if filing in a representative capacity:

Address 1

Name of Representative

Address 2

Representative Capacity (e.g., executor, administrator, etc.)

City

State

Zip

If acting in representative capacity, attach documentary evidence of authority to act on behalf of Claimant.

ISUZU MOTORS AMERICA, INC. PROOF OF CLAIM FORM

Please complete this form and mail, **postmarked by May 15, 2007**, to:

Re: Isuzu Motors America, Inc.
c/o Heffler, Radetich & Saitta L.L.P.
P.O. Box 80
Philadelphia, PA 19105-0080

To apply for payment pursuant to the Settlement, you must answer the questions below to the best of your recollection, and sign and date this Proof of Claim Form:

I purchased or leased a 1998 or 1999 Isuzu Amigo or Rodeo. Yes No

I was involved in an accident with my Isuzu Amigo or Rodeo. Yes No

I believe that the accident with my Isuzu Amigo or Rodeo was caused by brake malfunction in the anti-lock brake system. Yes No

I lost money as a result of damage to my Isuzu Amigo or Rodeo caused by the accident. This loss was not wholly reimbursed. Yes No

Please provide whatever information you can about the accident (such as the date, time and location of the accident)

Please describe the physical damage to your vehicle and the amount of money lost

Is there anyone who knows about the accident? Please provide the following information if known:

Name: _____

Address: _____

Telephone number: _____

Please identify the insurance company that insured your vehicle on the date of the accident if known:

Name of Insurance company: _____ Policy number: _____

If possible please send any documents you have about the accident and your losses. These papers may include a police report, invoices for repair work, insurance payment or deductible receipts, invoice from car rental companies or any other documentation concerning the accident and your losses. You may submit a claim even if you do not have any documents to support the accident or the damage to your car. **DO NOT SEND ORIGINAL DOCUMENTS, KEEP ALL ORIGINAL DOCUMENTS FOR YOUR RECORDS.**

Please return this form **postmarked not later than May 15, 2007**. If you have any questions, you may call, toll free, 1-877-451-2124, between the hours of 9:00 a.m. and 5:00 p.m. Eastern Time, Monday through Friday.

Under the penalties relating to unsworn falsification, I certify that the above answers are true to the best of my knowledge and belief.

Signature

Date

Printed Name

Telephone Number

Address

City

State

Zip

Re: Isuzu Motors America, Inc.
c/o Heffler, Radetich & Saitta L.L.P.
P.O. Box 80
Philadelphia, PA 19105-0080
Forwarding Service Requested

FIRST-CLASS MAIL

IMPORTANT LEGAL NOTICE