

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

IN THE MARION SUPERIOR COURT
CIVIL DIVISION, ROOM NO. 11
CAUSE NO. 49D11-1310-PL-038001

TAMMY RAAB,)
on behalf of herself and all others similarly)
situated,)

Plaintiff,)

vs.)

KENT W. ABERNATHY, in his official capacity)
as Commissioner of The Indiana Bureau of Motor)
Vehicles, and the INDIANA BUREAU OF)
MOTOR VEHICLES,)

Defendants.)

FILED

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APR 07 2016

Mylan A. Eldredge
CLERK OF THE MARION CIRCUIT COURT

**AMENDED REPORT OF AGREEMENT CONCERNING
FORM AND MANNER OF NOTICE TO PLAINTIFF CLASS**

Plaintiff Class Counsel reports to the Court pursuant to the Court's Order of November 16, 2015, that the Parties have agreed upon the form and manner of notice of class certification to the Plaintiff Class, and states:

1. The parties agree that notice should be issued to the Class substantially in the forms attached hereto as Exhibit A ("Long Form Notice"), Exhibit B ("Email Notice"), Exhibit C ("Postcard Notice"), and Exhibit D ("Published Notice"), as described more fully below. The parties agree that Class Counsel will employ an experienced notice vendor to assist in issuing notice.

2. The parties agree that Class Counsel will establish a stand-alone website providing information about the litigation, including downloadable versions of the Court's Order certifying the Plaintiff Class and the Long Form Notice, in English and Spanish. All forms of notice will advise Class members of the address for the website.

3. The parties agree that Class Counsel will establish a toll-free number that will allow potential Class members to obtain, in English or Spanish, the same information included in the Long Form Notice, and to request a mailed copy of the Long Form Notice. All forms of notice will advise Class members of the toll-free number.

4. The parties agree that the BMV and Class Counsel will each include, on the opening page of their respective websites, a prominent link to the stand-alone website established by Class Counsel and notice of the toll-free number established by Class Counsel.

5. The parties agree that, within 30 days of this Report, subject to agreement providing adequate safeguarding of the personal identifying information of Class members, the BMV will deliver to Class Counsel or a notice vendor designated by Class Counsel a database containing those names, email addresses, and mailing addresses of Class members that can be located in the BMV's own records through diligent effort.

6. The parties agree that Class Counsel will use the database provided by the BMV and the services of a notice vendor to direct an Email Notice to those Class members for whom an email address can be located and to direct a Postcard Notice to those Class members for whom only a mailing address can be located.

7. The parties agree that Class Counsel will arrange for the placement of the Published Notice in each of the following newspapers covering the major markets in the State of Indiana:

- Indianapolis Star;
- South Bend Tribune;
- Bloomington Herald;
- Gary Post Tribune;

- News and Tribune (New Albany and Jeffersonville);
- Evansville Courier Press;
- Richmond Palladium-Item; and
- Fort Wayne Journal Gazette.

8. The parties agree that Class Counsel will advance the cost of issuing notice as set forth above but does not waive the right to seek reimbursement from the amount of any judgment or settlement in this case.

WHEREFORE, Class Counsel respectfully requests the Court's entry of an Order approving the form and manner of notice to members of the Plaintiff Class attached hereto and described herein, and directing the parties to undertake the manner of notice described herein.

Respectfully submitted,



Irwin B. Levin, #8786-49
Richard E. Shevitz, #12007-49
Scott D. Gilchrist, #16720-53
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COHEN & MALAD, LLP
One Indiana Square, Suite 1400
Indianapolis, IN 46204
Tel: (317) 636-6481
Fax: (317) 636-2593

Date: April 7, 2016

*Counsel for Plaintiff and
the Plaintiff Class*

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of April, 2016, the foregoing document was served upon the following counsel of record by electronic mail and First Class U.S. Mail:

Carl A. Hayes
Alex E. Gude
Karl L. Mulvaney
Meaghan Klem Haller
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Exhibit A

Tammy Raab v. Kent W. Abernathy and The Indiana Bureau of Motor Vehicles
The Marion County, Indiana Superior Court, Room No. 11
Cause No. 49D11-1310-PL-038001

NOTICE OF CLASS CERTIFICATION

If you paid one or more fees to the Indiana Bureau of Motor Vehicles for certain transactions since January 1, 2002, your rights may be affected by a lawsuit pending in this Court.

This is not a solicitation from a lawyer.
This is not a lawsuit against you and you are not being sued.

- In the case of *Tammy Raab v. Kent W. Abernathy and The Indiana Bureau of Motor Vehicles* (the “Lawsuit”), filed in the Marion County, Indiana, Superior Court (the “Court”), the Plaintiff has alleged that since January 1, 2002, the Indiana Bureau of Motor Vehicles (the “BMV”) has charged Indiana residents more than is allowed by law for certain transactions.
- On September 18, 2015, the Court certified a Plaintiff Class in the Lawsuit that includes the following: All persons and entities that paid to the Indiana Bureau of Motor Vehicles one or more of the Overcharged Fees during the corresponding Overcharge Period identified on the table attached hereto as Exhibit A.
- If you paid one or more of the Overcharged Fees during the corresponding Overcharge Period identified on the table attached hereto as Exhibit A, please read this Notice carefully to learn the legal rights and options available to you.

YOUR LEGAL RIGHTS AND OPTIONS:		DEADLINE
DO NOTHING	Stay in this lawsuit. Await the outcome. Give up certain rights. By doing nothing, you keep the possibility of getting money that may come from the BMV through a trial or a settlement. Any judgment entered in the Lawsuit, whether favorable or not, will include all members of the Plaintiff Class who do not request exclusion. If you do nothing, you give up any rights to sue the BMV on your own about the same legal claims in the Lawsuit, and you are bound by all judicial decisions and orders issued in the Lawsuit.	M/D/Y
ASK TO BE EXCLUDED	Get out of this lawsuit. Get no benefits from this lawsuit. Keep rights. If you ask to be excluded and money from the BMV is later awarded, you won’t share in that money. But, you will keep any rights to sue the BMV separately about the same legal claims in the Lawsuit.	M/D/Y

WHAT THIS NOTICE CONTAINS

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BASIC INFORMATION

1. What is this lawsuit about?

The Lawsuit says that since 2002 the BMV has overcharged Indiana residents who have paid one or more fees for certain transactions, and that these overcharges should be returned to the people and entities who paid them.

2. What is the purpose of this notice?

This notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you. If you are a member of the Class, you have legal rights and options that you may exercise before the Court holds a trial. The trial is to decide whether the claims being made against the BMV, on your behalf, are correct. Judge John F. Hanley of the Marion County, Indiana, Superior Court is overseeing this class action. The lawsuit is known as *Raab v. Abernathy and The Indiana Bureau of Motor Vehicles, Cause No. 49D11-1310-PL-038001*.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives” sue on behalf of other people who have similar claims. The people together are a “Class” or “Class Members.” The Class Representative who sued—and all the Class Members like her—are called the Plaintiffs. The companies, state agencies or individuals sued by the Class Members are called the Defendants. One court resolves the issues for everyone in the Class—except for those people who choose to exclude themselves from the Class.

The Court decided that this lawsuit can be a class action and move towards a trial because it meets the requirements of Indiana Trial Rule 23, which governs class actions in Indiana courts. Specifically, the Court found that:

- There are millions of persons who may fall within the defined Class;
- There are legal questions and facts that are common to each of them;
- The Class Representative’s claims are typical of the claims of the rest of the Class;
- The Class Representative and the lawyers representing the Class will fairly and adequately represent the Class’ interests;
- The common legal questions and facts are more important than questions that affect only individuals; and
- This class action will be more efficient than having many individual lawsuits.

More information about why the Court is allowing this lawsuit to be a class action is in the Court’s order certifying the Class, which is available at www.XXXXXXXXXXXXXX.com.

THE CLAIMS IN THE LAWSUIT

5. What does the lawsuit complain about?

In the lawsuit, the Plaintiff says that all of the charges that may be imposed by the BMV for various services are set forth in statutes and Public Laws adopted by the Indiana General Assembly, and administrative rules promulgated by the BMV, but that since at least 2002 the fees imposed on Indiana drivers by the BMV for certain transactions have exceeded the charges that are authorized by these laws. You can read the Plaintiff's Amended Class Action Complaint at www.XXXXXXXXXXXXXX.com.

6. How do the Defendants answer?

The BMV admits overcharging for certain fees since 2002. However, the BMV denies many of the allegations in the Complaint and has asserted legal defenses. You can read the Defendants' Answer to the Class Action Complaint at www.XXXXXXXXXXXXXX.com.

7. Has the Court decided who is right?

The Court hasn't decided whether the Defendants or the Plaintiff is correct. By establishing the Class and issuing this Notice, the Court is not suggesting that the Plaintiff will win or lose this case. The Plaintiff must prove her claims and the claims of the Plaintiff Class against the Defendants at a trial. (See "The Trial" below on page .)

8. What is the Plaintiff asking for?

The Plaintiff is asking for a judgment requiring the BMV to refund to the Plaintiff Class the amount by which it overcharged for the fees on Exhibit A, plus interest.

9. Is there any money available now?

No. There will be no money available for distribution unless the Class wins the case or the case is settled.

WHO IS IN THE CLASS?

You need to decide whether you are affected by this lawsuit.

10. Am I part of the Class?

You are a member of the Class if you fall within the following definition set forth in Judge Hanley's order certifying the Class:

All persons and entities that paid to the Indiana Bureau of Motor Vehicles one or more of the Overcharged Fees during the corresponding Overcharge Period identified on the table attached hereto as Exhibit A.

11. I'm still not sure if I am included.

If you are still not sure whether you are included, you can get free help at www.XXXXXXXXXXXXXXXXXX.com, or by calling 1-XXX-XXX-XXXX.

YOUR RIGHTS AND OPTIONS

You have to decide whether to stay in the Class or ask to be excluded before the trial, and you have to decide this now.

12. What happens if I do nothing at all?

You don't have to do anything now if you want to keep the possibility of getting money awarded in this Lawsuit. By doing nothing you are staying in the Class. If you are a member of the Plaintiff Class and stay in the Class, and if the Plaintiff obtains money from the BMV, either as a result of the trial or a settlement, you will be eligible to participate in the distribution of that money. Keep in mind that if you do nothing now, regardless of whether the Plaintiffs win or lose the trial, you will not be able to sue, or continue to sue, the BMV on your own about the same legal claims that are the subject of this Lawsuit. You will also be legally bound by all of the Orders the Court issues and judgments the Court makes in this class action.

13. Why would I ask to be excluded?

If you would prefer to pursue your own lawsuit against the BMV you should ask to be excluded from the Class. If you exclude yourself from the Class—which also means to remove yourself from the Class, and is sometimes called “opting-out” of the Class—you won't get any money from this Lawsuit either through the Plaintiff winning the case or from any settlement. If you exclude yourself, you will not be legally bound by the Court's judgments in this class action. If you pursue your own lawsuit against the BMV after you exclude yourself, you'll have to hire and pay your own lawyer for that lawsuit, and you'll have to prove your claims. If you do exclude yourself so you can start or continue your own lawsuit against the BMV, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations.

14. How do I ask the Court to exclude me from the Class?

To ask to be excluded, you must send an “Exclusion Request” in the form of a letter sent by mail, stating that you want to be excluded from the certified class in *Raab v. Abernathy and BMV*. Be sure to include your name, address and phone number, and sign the letter. You must mail your Exclusion Request postmarked by **[30 DAYS FROM ISSUANCE OF NOTICE]** to:

BMV Overcharge Case
One Indiana Square, Suite 1400
Indianapolis, IN 46260

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

The Court decided that the law firm of Cohen & Malad, LLP, of Indianapolis, IN, is qualified to represent you and all Plaintiff Class members in this Lawsuit. In this role, Cohen & Malad, LLP is called “Class Counsel.” More information about Class Counsel is available at www.cohenandmalad.com.

16. Should I get my own lawyer?

You are not required to hire your own lawyer in the Lawsuit because Class Counsel is working on your behalf. However, if you have not excluded yourself from the Plaintiff Class you may enter an appearance in the Lawsuit through counsel of your own choosing. If you want your own lawyer, you will have to pay that lawyer.

17. How will the lawyers be paid?

If Class Counsel obtain money or benefits for the Class from the BMV, they may ask the Court for fees and expenses. If the Court grants Class Counsel’s request, the Court will determine how they are paid, such as from the money or benefits obtained, but you will not have to pay these fees and expenses out of your pocket. If the case is not successful, you do not owe any attorney fees and are not responsible for expenses.

THE TRIAL

The Court has scheduled a trial to decide who is right in this case.

18. How and when will the Court decide who is right?

As long as the case against the Defendants isn’t resolved by a settlement or otherwise, Class Counsel will have to prove the Plaintiff’s claims at a trial. The trial is currently set to start on , in Marion County, Indiana, Superior Court No. 11, Indianapolis/Marion County City-County Building, 14th Floor, Indianapolis, Indiana. During the trial, the Judge will hear all of the evidence about whether the Plaintiff or Defendants are right about the claims in the Lawsuit. There is no guarantee that the Plaintiff will win, or that the Lawsuit will result in any money for the Class.

19. Do I have to come to the trial?

No, you do not need to attend the trial. Class Counsel will present the case for the Plaintiff Class, and counsel for the Defendants will present the defenses. You and/or your own lawyer are welcome to come at your own expense.

20. Will I get money after the trial?

If the Plaintiff Class obtains money from the BMV as a result of the trial or a settlement, you will be notified about how to participate. We do not know how long this will take.

GETTING MORE INFORMATION

21. Are more details available?

Visit the website, www.XXXXXXXXXXXXXXXXXX.com, where you will find the Court's order certifying the class, the Complaint that the Plaintiff submitted, and other information about this case. You may also request additional information by calling 1-XXX-XXX-XXXX, or writing to:

BMV Overcharge Litigation
One Indiana Square, Suite 1400
Indianapolis, IN 46260

DO NOT CALL THE COURT WITH QUESTIONS.

ALL QUESTIONS SHOULD BE DIRECTED AS SET FORTH ABOVE.

Exhibit A: Table of Alleged Overcharged Fees

Overcharged Fee	Overcharge Period
REGISTRATIONS	
New Passenger Vehicle Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through December 31, 2014
Renewed Passenger Vehicle Registration	January 1, 2002 through November 5, 2008
New Motorcycle Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through December 31, 2014
Renewed Motorcycle Registrations	January 1, 2002 through November 5, 2008
New Truck Registrations (Under 11,000 lbs.)	January 1, 2002 through November 5, 2008; July 1, 2012 through December 31, 2014
Renewed Truck Registrations (Under 11,000 lbs.)	January 1, 2002 through November 5, 2008
New Truck Registrations (11,000 lbs. and Over)	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Truck Registrations (11,000 lbs. and Over)	January 1, 2002 through November 5, 2008
New Farm Truck Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Farm Truck Registrations	January 1, 2002 through November 5, 2008
New Tractor Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Tractor Registrations	January 1, 2002 through November 5, 2008
New Farm Tractor Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Farm Tractor Registrations	January 1, 2002 through November 5, 2008
New Trailer Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Trailer Registrations	January 1, 2002 through November 5, 2008
New Farm Trailer Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Farm Trailer Registrations	January 1, 2002 through November 5, 2008
New Semi Trailer Registrations (1 Year)	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Semi Trailer Registrations (1 Year)	January 1, 2002 through November 5, 2008
New Farm Semi Trailer Registrations (1 Year)	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Farm Semi Trailer Registrations (1 Year)	January 1, 2002 through November 5, 2008
New Semi Trailer Registrations (5 Year)	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Semi Trailer Registrations (5 Year)	January 1, 2002 through November 5, 2008
New Farm Semi Trailer Registrations (5 Year)	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Farm Semi Trailer Registrations (5 Year)	January 1, 2002 through November 5, 2008
New Semi Trailer Registrations (Permanent)	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Semi Trailer Registrations (Permanent)	January 1, 2002 through December 31, 2014
New Farm Semi Trailer Registrations (Permanent)	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013

Overcharged Fee	Overcharge Period
Renewed Farm Semi Trailer Registrations (Permanent)	January 1, 2002 through December 31, 2014
New Intercity Bus Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Intercity Bus Registrations	January 1, 2002 through November 5, 2008
New Intracity Bus Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Intracity Bus Registrations	January 1, 2002 through November 5, 2008
New Buses Not for Hire Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Buses Not for Hire Registrations	January 1, 2002 through November 5, 2008
New Church Bus Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Church Bus Registrations	January 1, 2002 through November 5, 2008
New School Bus Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed School Bus Registrations	January 1, 2002 through November 5, 2008
New Recovery Vehicle Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Recovery Vehicle Registrations	January 1, 2002 through November 5, 2008
New Recreational Vehicle Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Recreational Vehicle Registrations	January 1, 2002 through November 5, 2008
Special Machinery Registrations	January 1, 2002 through September 29, 2013
New Antique Passenger Vehicle Registrations	January 1, 2002 through December 31, 2014
Renewed Antique Passenger Vehicle Registration	January 1, 2002 through December 31, 2014
New Antique Motorcycle Registrations	January 1, 2002 through December 31, 2014
Renewed Antique Motorcycle Registrations	January 1, 2002 through December 31, 2014
New Antique Truck Registrations	January 1, 2002 through December 31, 2014
Renewed Antique Truck Registrations	January 1, 2002 through December 31, 2014
CREDENTIALS	
Operator's License (3 Year)	January 1, 2002 through December 31, 2005
Operator's License (4 Year)	January 1, 2002 through December 31, 2006
Operator's License (6 Year)	January 1, 2006 through March 6, 2007
Motorcycle Operator's License (3 Year)	January 1, 2002 through December 31, 2005
Motorcycle Operator's License (4 Year)	January 1, 2002 through December 31, 2005
Motorcycle Operator's License (6 Year)	January 1, 2006 through December 31, 2008
Chauffeur's License (6 Year)	January 1, 2002 through September 29, 2013
Public Passenger Chauffeur's License	January 1, 2002 through December 31, 2007
Motorcycle Endorsement on Operator's License (4 Year)	January 1, 2002 through December 31, 2005
Motorcycle Endorsement on Operator's License (5 Year)	March 26, 2012 through September 29, 2013
Motorcycle Endorsement on Operator's License (6 Year)	January 1, 2006 through September 29, 2013
Motorcycle Endorsement on Chauffeur's License	January 1, 2002 through September 29, 2013
Motorcycle Endorsement on Public Passenger Chauffeur's License	January 1, 2002 through September 29, 2013
Commercial Driver's License	January 1, 2002 through November 5, 2008

Overcharged Fee	Overcharge Period
Upgrade Commercial Driver's License	July 1, 2012 through September 29, 2013
Amend / Replace Commercial Driver's License	January 1, 2002 through September 29, 2013
Learner's Permit	January 1, 2002 through November 5, 2008
Motorcycle Learner's Permit	January 1, 2002 through November 5, 2008
CDL Learner's Permit	January 1, 2002 through December 31, 2014
I.D.	January 1, 2002 through September 29, 2013
Duplicate / Amended I.D.	January 1, 2002 through September 29, 2013
Special I.D	January 1, 2002 through September 29, 2013
Duplicate / Amended Special I.D.	January 1, 2002 through September 29, 2013
TITLES	
Titles	January 1, 2002 through December 31, 2014
Body Change	January 1, 2002 through December 31, 2014
Repossessions	January 1, 2002 through December 31, 2014
Corrections	January 1, 2002 through December 31, 2014
Mechanic's Lien	January 1, 2002 through December 31, 2014
Duplicate	January 1, 2002 through September 29, 2013
Salvage	January 1, 2002 through September 29, 2013
MVIN (Special ID)	January 1, 2002 through September 29, 2013
Delinquent Fee	January 1, 2002 through December 31, 2014
Administrative Fee	January 1, 2002 through September 29, 2013
PLATE FEES	
96-Hour Temporary Permit	January 1, 2002 through November 5, 2008
30-Day Temporary Permit	January 1, 2002 through November 5, 2008
Antique Year of Manufacture	January 1, 2008 through September 29, 2013
Plate Transfer	January 1, 2002 through September 29, 2013
Personalize Plate	January 1, 2002 through September 29, 2013
Amateur Radio Plate	January 1, 2002 through December 31, 2005
WATERCRAFT TITLES	
Titles	January 1, 2002 through November 5, 2008
Repossessions	January 1, 2002 through November 5, 2008
Corrections	January 1, 2002 through November 5, 2008
Duplicates	January 1, 2002 through November 5, 2008

Exhibit B

From: Notice Administrator @XXXXXX.com
To: ClassMember@XXXXXX.com
Subject: NOTICE OF CLASS ACTION CERTIFICATION

This is a Legal Notice authorized by the Marion County, Indiana, Superior Court.

This is not a lawsuit against you and you are not being sued.

In the case of *Tammy Raab v. Kent W. Abernathy and The Indiana Bureau of Motor Vehicles* (the “Lawsuit”), filed in the Marion County, Indiana, Superior Court (the “Court”), the Plaintiff has alleged that since January 1, 2002, the Indiana Bureau of Motor Vehicles (the “BMV”) has charged Indiana residents more than is allowed by law for certain transactions.

On September 18, 2015, the Court certified a Plaintiff Class in the Lawsuit. You are a member of the Plaintiff Class certified by the Court if you paid one or more of the Overcharged Fees to the Indiana Bureau of Motor Vehicles during the corresponding Overcharge Period identified on the table at the end of this email.

The judgment in the lawsuit, whether favorable or unfavorable, will include all members of the Plaintiff Class who do not exclude themselves.

Any member of the Plaintiff Class who does not request exclusion may appear in the lawsuit through their own attorney at their own cost.

YOUR LEGAL RIGHTS AND OPTIONS:		DEADLINE
DO NOTHING	Stay in this lawsuit. Await the outcome. Give up certain rights. By doing nothing, you keep the possibility of getting money that may come from the BMV through a trial or a settlement. Any judgment entered in the Lawsuit, whether favorable or not, will include all members of the Plaintiff Class who do not request exclusion. If you do nothing, you give up any rights to sue the BMV on your own about the same legal claims in the Lawsuit, and you are bound by all judicial decisions and orders issued in the Lawsuit.	M/D/Y

ASK TO BE EXCLUDED	Get out of this lawsuit. Get no benefits from this lawsuit. Keep rights. If you ask to be excluded and money from the BMV is later awarded, you won't share in that money. But, you will keep any rights to sue the BMV separately about the same legal claims in the Lawsuit.	M/D/Y
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If you have not excluded yourself from the Plaintiff Class you may enter an appearance in the Lawsuit through counsel of your own choosing. If you want your own lawyer, you will have to pay that lawyer.

To obtain more information about the Lawsuit and your rights, including a detailed notice, a complete list of allegedly overcharged fees, and instructions on how to request exclusion, visit www.XXXXXXX.com or call 1-XXX-XXX-XXXX.

[Spanish language instruction]

**DO NOT CALL THE COURT WITH QUESTIONS.
ALL QUESTIONS SHOULD BE DIRECTED AS SET FORTH ABOVE.**

Table of Alleged Overcharged Fees	
Overcharged Fee	Overcharge Period
REGISTRATIONS	
New Passenger Vehicle Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through December 31, 2014
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Renewed Farm Truck Registrations	January 1, 2002 through November 5, 2008
New Tractor Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013

Overcharged Fee	Overcharge Period
Renewed Tractor Registrations	January 1, 2002 through November 5, 2008
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Renewed Intercity Bus Registrations	January 1, 2002 through November 5, 2008
New Intracity Bus Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Intracity Bus Registrations	January 1, 2002 through November 5, 2008
New Buses Not for Hire Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Buses Not for Hire Registrations	January 1, 2002 through November 5, 2008
New Church Bus Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Church Bus Registrations	January 1, 2002 through November 5, 2008
New School Bus Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed School Bus Registrations	January 1, 2002 through November 5, 2008
New Recovery Vehicle Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013

Overcharged Fee	Overcharge Period
Renewed Recovery Vehicle Registrations	January 1, 2002 through November 5, 2008
New Recreational Vehicle Registrations	January 1, 2002 through November 5, 2008; July 1, 2012 through September 29, 2013
Renewed Recreational Vehicle Registrations	January 1, 2002 through November 5, 2008
Special Machinery Registrations	January 1, 2002 through September 29, 2013
New Antique Passenger Vehicle Registrations	January 1, 2002 through December 31, 2014
Renewed Antique Passenger Vehicle Registration	January 1, 2002 through December 31, 2014
New Antique Motorcycle Registrations	January 1, 2002 through December 31, 2014
Renewed Antique Motorcycle Registrations	January 1, 2002 through December 31, 2014
New Antique Truck Registrations	January 1, 2002 through December 31, 2014
Renewed Antique Truck Registrations	January 1, 2002 through December 31, 2014
CREDENTIALS	
Operator's License (3 Year)	January 1, 2002 through December 31, 2005
Operator's License (4 Year)	January 1, 2002 through December 31, 2006
Operator's License (6 Year)	January 1, 2006 through March 6, 2007
Motorcycle Operator's License (3 Year)	January 1, 2002 through December 31, 2005
Motorcycle Operator's License (4 Year)	January 1, 2002 through December 31, 2005
Motorcycle Operator's License (6 Year)	January 1, 2006 through December 31, 2008
Chauffeur's License (6 Year)	January 1, 2002 through September 29, 2013
Public Passenger Chauffeur's License	January 1, 2002 through December 31, 2007
Motorcycle Endorsement on Operator's License (4 Year)	January 1, 2002 through December 31, 2005
Motorcycle Endorsement on Operator's License (5 Year)	March 26, 2012 through September 29, 2013
Motorcycle Endorsement on Operator's License (6 Year)	January 1, 2006 through September 29, 2013
Motorcycle Endorsement on Chauffeur's License	January 1, 2002 through September 29, 2013
Motorcycle Endorsement on Public Passenger Chauffeur's License	January 1, 2002 through September 29, 2013
Commercial Driver's License	January 1, 2002 through November 5, 2008
Upgrade Commercial Driver's License	July 1, 2012 through September 29, 2013
Amend / Replace Commercial Driver's License	January 1, 2002 through September 29, 2013
Learner's Permit	January 1, 2002 through November 5, 2008
Motorcycle Learner's Permit	January 1, 2002 through November 5, 2008
CDL Learner's Permit	January 1, 2002 through December 31, 2014
I.D.	January 1, 2002 through September 29, 2013
Duplicate / Amended I.D.	January 1, 2002 through September 29, 2013
Special I.D.	January 1, 2002 through September 29, 2013
Duplicate / Amended Special I.D.	January 1, 2002 through September 29, 2013
TITLES	
Titles	January 1, 2002 through December 31, 2014
Body Change	January 1, 2002 through December 31, 2014
Repossessions	January 1, 2002 through December 31, 2014
Corrections	January 1, 2002 through December 31, 2014

Overcharged Fee	Overcharge Period
Mechanic's Lien	January 1, 2002 through December 31, 2014
Duplicate	January 1, 2002 through September 29, 2013
Salvage	January 1, 2002 through September 29, 2013
MVIN (Special ID)	January 1, 2002 through September 29, 2013
Delinquent Fee	January 1, 2002 through December 31, 2014
Administrative Fee	January 1, 2002 through September 29, 2013
PLATE FEES	
96-Hour Temporary Permit	January 1, 2002 through November 5, 2008
30-Day Temporary Permit	January 1, 2002 through November 5, 2008
Antique Year of Manufacture	January 1, 2008 through September 29, 2013
Plate Transfer	January 1, 2002 through September 29, 2013
Personalize Plate	January 1, 2002 through September 29, 2013
Amateur Radio Plate	January 1, 2002 through December 31, 2005
WATERCRAFT TITLES	
Titles	January 1, 2002 through November 5, 2008
Repossessions	January 1, 2002 through November 5, 2008
Corrections	January 1, 2002 through November 5, 2008
Duplicates	January 1, 2002 through November 5, 2008

Exhibit C

*Tammy Raab v. Kent W. Abernathy and
The Indiana Bureau of Motor Vehicles (“BMV”)*

NOTICE OF CLASS CERTIFICATION

This is a Legal Notice authorized by the Marion County, Indiana, Superior Court.
This is not a lawsuit against you and you are not being sued.

If you paid one or more fees to the Indiana Bureau of Motor Vehicles for certain transactions since January 1, 2002, you are a member of the Plaintiff Class certified by the Court in this lawsuit.

The Plaintiff in this case has alleged that since January 1, 2002, the Indiana Bureau of Motor Vehicles (the “BMV”) has charged Indiana residents more than is allowed by law for certain transactions.

The judgment in the lawsuit, whether favorable or unfavorable, will include all members of the Class who do not exclude themselves by _____.

To obtain more information about the Lawsuit and your rights, including a detailed notice, a complete list of allegedly overcharged fees, and instructions on how to request exclusion, visit www.XXXXXXX.com or call 1-XXX-XXX-XXXX.

[Spanish language instruction]

Notice Administrator
Street Address
City, State, Zip

Class Member
Street Address
City, State, Zip

Exhibit D

LEGAL NOTICE

If you paid one or more fees to the Indiana Bureau of Motor Vehicles for certain transactions since January 1, 2002, your rights may be affected by a lawsuit.

You may be affected by a class action lawsuit about whether the Indiana Bureau of Motor Vehicles (the “BMV”) has charged more than is allowed by law for certain transactions since January 1, 2002.

The lawsuit is called *Tammy Raab v. Kent Abernathy and The Indiana Bureau of Motor Vehicles* (the “Lawsuit”), and is filed in the Marion County, Indiana, Superior Court (the “Court”). On September 18, 2015, the Court decided the Lawsuit should be a class action on behalf of a “Class,” or group of people, that could include you. This notice summarizes your rights and options before an upcoming trial against the BMV. More information is in a detailed notice available at the website below. If you’re included, you have to decide whether to stay in the Class and be bound by whatever results against the BMV, or ask to be excluded and keep your right to sue the BMV on your own.

WHAT IS THIS CASE ABOUT?

The Lawsuit says that since 2002 the BMV has overcharged Indiana residents who have paid one or more fees. The lawsuit seeks a judgment for the amount the overcharged collected from the Class, with interest.

The BMV admits overcharging for certain fees since 2002. However, the BMV denies many of the allegations in the Lawsuit and has asserted legal defenses.

ARE YOU AFFECTED?

The Plaintiff Class is composed of all persons who paid one or more of the fees on the list attached to the Court’s order certifying the Plaintiff Class. The list can be obtained or viewed at the website identified below.

WHO REPRESENTS YOU?

The Court appointed the law firm of Cohen & Malad, LLP of Indianapolis, Indiana, to represent you as “Class Counsel.” You don’t have to pay Class Counsel, or anyone else, to participate. Instead, if Class Counsel obtain money or benefits for the Class from the BMV, they may ask the Court for fees and expenses. If the Court grants Class Counsel’s request, the Court will determine how they are paid, but you will not have to pay these fees and costs out of your pocket. You may hire your

own lawyer to appear in Court for you; if you do, you have to pay that lawyer.

WHAT ARE YOUR OPTIONS?

You have a choice of whether to stay in the Class, and **you must decide this now**. If you stay in the Class, you will be bound by all orders and judgments of the Court, and you won’t be able to sue, or continue to sue, the BMV—as part of any other lawsuit—for the same claims made in the Lawsuit. To stay in the Class, you do not have to do anything. If you ask to be excluded from the Class, you cannot get any money from this Lawsuit if any is awarded, but you will keep any rights to sue the BMV separately for these claims. Requests for exclusion must be written and signed, must state you want to be excluded from the certified class in *BMV Overcharge Case*, must include your name, address, and telephone number, must be mailed to *BMV Overcharge Litigation*, One Indiana Square, Suite 1400, Indianapolis, IN 46260, and be postmarked no later than_____.

HOW CAN YOU GET MORE INFORMATION?

To obtain more information about the Lawsuit and your rights, including a detailed notice, a complete list of allegedly overcharged fees, and instructions on how to request exclusion, visit www.XXXXXXXX.com or call 1-XXX-XXX-XXXX.

DO NOT CALL THE COURT WITH QUESTIONS.