

If you purchased or leased a new Ford Transit Trail vehicle before June 1, 2024, you may be entitled to benefits from a Class Action Settlement.

Court-Approved Notice of Settlement. A Settlement has been reached in a class action lawsuit against Ford Motor Company ("lawsuit") asserting legal claims regarding model year 2023 and 2024 Ford Transit Trail Vehicles ("Class Vehicles"). The lawsuit alleges defects relating to the "Transit Trail" package, including that Class Vehicles fail to provide sufficient clearance for the tires within the wheel wells under certain driving conditions, and seeks economic damages associated with purchasing or leasing them. Ford denies any wrongdoing.

- **Settlement Class:** All persons who, as the Original Owner or Lessee, purchased or leased a Class Vehicle before June 1, 2024, for personal, family, or household use and who have not already received any compensation from Ford, including any settlement payment or repurchase, relating to the Class Vehicle or to any alleged defect of, or economic loss relating to, the Class Vehicle.
- **Submit a Claim:** If you are a member of the Settlement Class, you can submit a Claim online or by mail postmarked by **January 15, 2027**, to receive:

\$6,000 Payment per Class Vehicle

You must provide a completed IRS Form W-9 or other documentation, in order to show that your vehicle qualifies as a Class Vehicle and that you qualify as an Original Owner or Lessee.

Class Vehicles include Model Year 2023 and 2024 Ford Transit Trails originally sold or leased by an Authorized Ford Dealer, and that were purchased or leased as new before June 1, 2024 by an Original Owner or Lessee. Visit www.FordTransitTrailSettlement.com to determine if your vehicle is a Class Vehicle.

The Settlement does not alter or modify your rights of repair under the Class Vehicles' New Vehicle Limited Warranty to the extent it remains in effect as to any given Class Vehicle. The Settlement does not affect or limit your right to any recall remedies already provided at no charge to all owners and lessees of Class Vehicles.

Your Legal Rights & Options	Important Dates
Submit a Claim: You must submit a Claim to receive a payment from the Settlement.	Submitted or postmarked by: January 15, 2027
Opt-Out: Get no payment. Keep your right to file your own lawsuit against Ford about the Released Claims that are released by the Settlement.	Postmarked by: January 13, 2027
Object: Stay in the Settlement. Tell the Court why you do not like the Settlement. You will still be bound by the Settlement if the Court approves it.	Filed with the Court by: January 13, 2027
Do Nothing: You will not get a payment, and you will give up your legal rights.	



LEARN MORE

Scan this QR code, call toll-free 1-877-525-1779
or visit www.FordTransitTrailSettlement.com

NOTICE OF CLASS ACTION SETTLEMENT

1. Why is this notice being provided?

A Court authorized this Notice because you have a right to know about the Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval to the Settlement. This notice informs you of the lawsuit and the proposed Settlement and describes your rights and options.

Judge Richard G. Andrews of the United States District Court for the District of Delaware is overseeing this class action. The lawsuit is known as *Provo v. Ford Motor Company*, and the case number is 1:25-cv-00569-RGA. The individuals who filed this lawsuit are called the "Plaintiffs" and/or "Class Representatives" and the company sued, Ford Motor Company, is called the "Defendant."

2. What is the lawsuit about?

Plaintiffs allege defects relating to the "Transit Trail" package in certain Ford vehicles, including that they fail to provide sufficient clearance for the tires within the wheel wells under certain driving conditions, and that Ford is liable to the Settlement Class for various legal claims.

You can read Plaintiffs' Complaint by visiting www.FordTransitTrailSettlement.com. More information can be found at www.ford.com/support/recalls-details under Ford recall number 24S21 (National Highway Traffic and Safety Administration recall number 24V226) (referred to as the "Recall" in this notice).

Ford denies that it did anything wrong and denies liability. The Court has not decided whether Ford did anything wrong. Instead, Plaintiffs and Ford have agreed to a settlement to avoid the risk, cost, and time of continuing the lawsuit.

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

In a class action lawsuit, people called the "Class Representatives" sue on behalf of themselves and other people who have similar legal claims. All of the people together are called a "Settlement Class" or the "Settlement Class Members." The company sued (in this lawsuit, Ford Motor Company) is called the Defendant. One court resolves the issues for everyone in the Settlement Class, except for those people who choose to exclude themselves from the Settlement Class.

4. Has the Court decided who is right?

The Court has not decided whether Plaintiffs or Ford is correct, and no trial has happened. By reaching a settlement, the Plaintiffs and Ford have agreed to the Settlement benefits described in this Notice.

Settlement Class

5. Am I in the Settlement Class?

The Settlement Class includes:

All persons who, as the Original Owner or Lessee, purchased or leased a Class Vehicle before June 1, 2024, for personal, family, or household use, and who have not already received any compensation from Ford, including any settlement payment or repurchase, relating to the Class Vehicle or to any alleged defect of, or economic loss relating to, the Class Vehicle.

To qualify as the Original Owner or Lessee, you must be the first person (or persons, if acquired jointly) who purchased or leased a new Class Vehicle for personal, family, or household use, whether the vehicle was acquired directly from an Authorized Ford Dealer or indirectly through an outfitter/upfitter or other

intermediate that acquired the vehicle new for resale and/or vehicle conversion. If you fall within that description, you may be a member of the Settlement Class. There can be only one Original Owner or Lessee per Class Vehicle.

Class Vehicles include Model Year 2023 and 2024 Ford Transit Trails originally sold or leased by an Authorized Ford Dealer, and that were purchased or leased as new before June 1, 2024 by an Original Owner or Lessee. Visit www.FordTransitTrailSettlement.com to determine if your vehicle is a Class Vehicle.

Excluded from the Settlement Class are: (1) all purchasers of Class Vehicles for business, commercial, or other non-personal uses; (2) all federal court judges who have presided over this lawsuit, their chamber staff, and any members of their immediate families; (3) all persons who have litigated to final judgment claims against Ford involving the Recall or alleged economic loss relating to a Class Vehicle; (4) all persons who, via a settlement or otherwise, delivered to Ford releases of claims involving the Recall or alleged economic loss relating to a Class Vehicle; (5) Ford's employees, officers, directors, agents, and representatives, and their family members; (6) all persons who submitted a valid request for exclusion.

6. I purchased or leased a Class Vehicle before June 1, 2024, but no longer own it. Am I included?

Yes, if you purchased or leased a Ford Transit Trail before June 1, 2024, as an Original Owner or Lessee, but no longer own it (e.g., because you sold the vehicle), you may still be included in the Settlement Class.

7. I received repairs or compensation from Ford relating to my Class Vehicle. Am I included?

If you have previously litigated legal claims to judgment against Ford relating to your Class Vehicle, or have delivered to Ford a release of legal claims relating to your Class Vehicle, you may not be included in the Settlement Class. For example, if Ford repurchased your Transit Trail, you likely are not included in the Settlement Class. You should consult a lawyer to determine what rights you may have.

8. Am I a Settlement Class Member if I purchased my Class Vehicle from a private owner?

No, you are not a Settlement Class Member if you purchased your Class Vehicle from a private owner. Only Class Vehicles purchased new from an Authorized Ford Dealer or from an outfitter/upfitter or other intermediary that acquired the vehicle new for resale and/or vehicle conversion are included in the Settlement Class.

9. What vehicles are included in the Settlement?

This Settlement includes model year 2023 and 2024 Ford Transit Trail vehicles, purchased or leased new before June 1, 2024, from an Authorized Ford Dealer, or from an outfitter/upfitter or other intermediary that acquired the vehicle new for resale and/or vehicle conversion, for family, household, or personal use.

Visit www.FordTransitTrailSettlement.com to determine if your vehicle is a Class Vehicle.

10. What if I am still not sure if I am member of the Settlement Class?

If you are still not sure whether you are a member of the Settlement Class, you can review documents at www.FordTransitTrailSettlement.com, or call or write to Class Counsel at the telephone numbers and addresses listed below. Do not call the Court.

Settlement Benefits

11. What can I get from the Settlement?

If you are a member of the Settlement Class, you may submit a Claim to receive:

\$6,000 Payment per Class Vehicle

You must provide a completed IRS Form W-9 along with documentation qualifying as Proof of Membership in the Settlement Class, in order to show that your vehicle qualifies as a Class Vehicle and that you qualify as an Original Owner or Lessee.

Proof of Membership means information sufficient to establish you are a Settlement Class Member. Proof of Membership includes:

1. The VIN of your Class Vehicle;
2. Your signature on the Claim Form under penalty of perjury (a legal term meaning you certify the information is true) confirming that you are the Original Owner or Lessee and that you purchased or leased the Class Vehicle for which a claim is being made for personal, family, or household use;
3. Providing a copy of the original purchase or lease agreement reflecting the name of the seller/lessor, the purchaser/lessee, the VIN, and the date of purchase/lease; or, if that document is unavailable, other reliable documentary proof sufficient to show your identity, the VIN, and the date of the first retail purchase or lease, including but not limited to a buyer's order, retail installment sale contract, lease summary, bill of sale, certificate of title, initial vehicle registration, temporary registration, DMV record, financing or leasing record, dealer or intermediary invoice, or other comparable documentation; and
4. Your signature on the Claim Form under penalty of perjury (a legal term meaning you certify the information is true) confirming that you have not already received compensation from Ford, including any settlement payment or repurchase, relating to the Class Vehicle or to any alleged defect of, or economic loss relating to, the Class Vehicle for which a claim is being made, and you have not transferred or assigned any legal claim relating to the Class Vehicle.

12. Do the Named Plaintiffs receive any additional Settlement benefits?

As part of the Settlement, Class Counsel will ask the Court to approve a \$3,500 service award to each of the Named Plaintiffs for their efforts. The Court may award less than this amount. If awarded by the Court, Ford will pay any money to the Named Plaintiffs directly.

13. What am I giving up to receive a payment or stay in the Settlement Class?

Unless you exclude yourself (opt-out), you will remain in the Settlement Class. If the Settlement is approved and becomes final, all Court orders and any judgments will apply to you and legally bind you. You will be not be able to sue Ford relating to the legal claims in the lawsuit or legal claims for economic losses based on or relating to alleged defects in the Transit Trail package. If you want to bring or continue your own lawsuit against Ford, you must exclude yourself from this Settlement. If you exclude yourself from this Settlement, you will not receive a payment under this Settlement. The specific rights you are giving up are called "Released Claims."

You will continue to be entitled to any recall remedies already provided at no charge. The Settlement does not release legal claims for personal injury, wrongful death, or damage to property other than Class Vehicles, and does not affect your rights under Ford's New Vehicle Limited Warranty.

14. What are the Released Claims?

Section I of the Settlement Agreement describes the Releases, Released Claims, and Released Parties, in necessary legal terminology, so please read this section carefully. The Settlement Agreement is available at www.FordTransitTrailSettlement.com. For questions regarding the Releases, Released Claims, or Released Parties and what the language in the Settlement Agreement means, you can also contact Class Counsel listed below for free, or you can talk to your own lawyer at your own expense.

15. When will I receive my payment?

All timely and valid Claim Forms will be paid after the Court approves the Settlement at the Fairness Hearing and becomes final.

It may take time for the Settlement to be approved and become final. Please be patient and check www.FordTransitTrailSettlement.com for updates.

[Submit a Claim](#)

16. How do I submit a Claim?

You can submit a Claim online or by mail. A Claim Form is also available at www.FordTransitTrailSettlement.com or by calling 1-877-525-1779 or by writing to the address for mailing your Claim:

Option 1 – Submit Online



Complete and submit your Claim by **January 15, 2027**.

Scan the QR code or go to: www.FordTransitTrailSettlement.com.



Option 2 – Submit by Mail



Complete and submit your Claim by mail, **postmarked** by **January 15, 2027**, and mailed to:

Ford Transit Trail Settlement

Settlement Administrator
PO Box 5470
Portland, OR 97228-5470

Please note per the United States Postal Service, mail may *not* be postmarked the day it is deposited in a mailbox or at a local post office. Postmarks occur when mail reaches a processing facility. To meet a postmark deadline, **mail at least a week prior to a postmark deadline**, get a manual postmark in-person at any post office, or send via Certified Mail.

17. What happens if my contact information changes?

If your mailing address or email address changes, please send your new contact information in writing to:

Ford Transit Trail Settlement

Settlement Administrator
PO Box 5470
Portland, OR 97228-5470

18. Am I required to submit a Claim Form?

No; however, the only way to receive a payment is to submit a Claim Form. If you do not submit a Claim Form, you will not receive a payment and you will give up the right to sue Ford relating to the legal claims in the lawsuit or legal claims for economic losses based on or relating to the alleged defects in the Transit Trail package. You will continue to be entitled to any recall remedies already provided at no charge to all owners and lessees of Class Vehicles.

19. What if my Claim Form is rejected?

The Settlement Administrator will review each Claim Form to ensure that it is valid. That determination will include, without limitation, that the Claim Form is timely, complete (including all required information necessary to prove your membership in the Settlement Class), and non-duplicative. If the Settlement Administrator rejects your Claim Form, it will notify you of the reason(s) for rejection. If a Claim Form is rejected due to missing information or documentation but was originally submitted by the deadline, you will have thirty days to resubmit your Claim Form along with the requested information. The Settlement Administrator and the lawyers will review the Claim Form and attempt to resolve the dispute. If the Settlement Administrator makes a final determination that your Claim Form is not valid, you may appeal to the Court within forty-five days of the date the Settlement Administrator mailed the final determination to you. If no appeal is filed, the determination will be final.

Opt-Out of the Settlement Class

20. Why would I ask to be excluded?

You may choose to exclude yourself if you want to sue Ford on your own regarding the same legal claims in this lawsuit, or if you already have your own lawsuit against Ford for similar legal claims and want to continue with it. If you exclude yourself—which means to remove yourself from the Settlement Class and is sometimes called “opting out”—you will not receive a payment from this Settlement.

If you submit a valid exclusion request as described below, you will not be legally bound by the terms of the Settlement, and you will be free, if you choose, to pursue your own lawsuit against Ford. If you start or continue your own lawsuit against Ford after you exclude yourself, you will have to prove your legal claims in court, and you will have to hire and pay your own lawyer and expenses for that lawsuit. If you do exclude yourself, you should talk to your own lawyer soon, because your legal claims may be subject to a statute of limitations, meaning that you may face a deadline after which you cannot sue.

You will continue to be entitled to any recall remedies already provided at no charge to all owners and lessees of Class Vehicles.

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

If you wish to be excluded from the Settlement Class, receive no payment from the Settlement, and keep your legal rights, you must submit a request for exclusion. If you owned or leased more than one Class Vehicle, your request for exclusion will apply to all vehicles.

To exclude yourself from the Settlement, you must mail a written request for exclusion via first-class U.S. mail, which includes the following:

1. Your name, mailing address, and telephone number;
2. The model, model year, and purchase or lease date of your vehicle(s);
3. The Vehicle Identification Number (VIN);
4. A clear statement that you wish to be excluded from the Settlement Class, such as “I hereby request to be excluded from the Settlement Class in *Provo v. Ford Motor Company*,” and

Your personal physical signature (and your lawyer's signature, if you are represented by a lawyer).

Your opt-out must be **postmarked** by **January 13, 2027**, and **mailed** to:

Ford Transit Trail Settlement

Opt-Out

PO Box 5470

Portland, OR 97228-5470

You cannot opt-out of the Settlement Class by telephone or by email.

"Mass" opt-outs are opt-outs submitted for multiple Settlement Class Members by a third-party. Mass opt-outs will not be allowed, unless each opt-out is signed by the member of the Settlement Class.

Please note per the United States Postal Service, mail may *not* be postmarked the day it is deposited in a mailbox or at a local post office. Postmarks occur when mail reaches a processing facility. To meet a postmark deadline, **mail at least a week prior to a postmark deadline**, get a manual postmark in-person at any post office, or send via Certified Mail.

22. If I opt-out of the Settlement Class, will I get anything from the Settlement?

No. If you opt-out, you will not be able to receive a payment, and you will not be bound by the Settlement or any judgments in this lawsuit. You can only get a payment if you stay in the Settlement and submit a timely and valid Claim Form.

23. If I do not opt-out, can I sue Ford for the same thing later?

No. Unless you opt-out, you give up any right to sue any of the Released Parties for the legal claims this Settlement resolves and Releases, and you will be bound by all the terms of the Settlement, proceedings, orders, and judgments in the lawsuit. You must opt-out of this lawsuit to start or continue your own lawsuit or be part of any other lawsuit against the Released Parties about the Released Claims in this Settlement. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately.

Object to the Settlement

24. Why would I object?

If you are a member of the Settlement Class and believe the Settlement is not fair, reasonable, or adequate, you may object to the Settlement, Class Counsel's request for attorneys' fees and expenses, and/or the request for Named Plaintiffs' service awards. If you do not submit your objection before the deadline, you will waive all objections, your right to comment at the Fairness Hearing, and your right to appeal approval of the Settlement. The Court will consider properly filed objections but may or may not agree with them, in whole or in part.

25. How do I object?

To object, you must file your timely written objection with the Court by **January 13, 2027**, stating you object to the Settlement in *Provo v. Ford Motor Company*, Case No. 1:25-cv-00569-RGA.

To file an objection, you cannot exclude yourself from the Settlement Class. Your written objection must include:

1. The case name and number (*Provo v. Ford Motor Company*, 1:25-cv-00569-RGA);
2. Your full name, address, and telephone number;
3. The model, model year, VIN, and purchase or lease date of your Class Vehicle;

4. Proof that you are the Original Owner or Lessee of a new Class Vehicle that was purchased or leased from an Authorized Ford Dealer or an outfitter/upfitter or other intermediary that acquired the vehicle new for resale and/or vehicle conversion before June 1, 2024, for personal, family, or household use, and that you have not already received compensation from Ford, including any settlement payment or repurchase, relating to the Class Vehicle or any alleged defect of that Class Vehicle;
5. A written statement of all reasons for your objection accompanied by any legal support for the objection;
6. Identify whether your objection is to the Settlement in part or in whole;
7. State whether the objection applies only to you as the objector, a subset of the Settlement Class, or the entire Settlement Class;
8. Copies of any papers, briefs, or other documents on which your objection is based;
9. A list of other cases in which you and/or your lawyer have in any way participated in or filed—financially or otherwise—objections to a class settlement in the preceding five years;
10. The name, address, email address, and telephone number of all lawyers representing you;
11. A statement indicating whether you/your lawyer intend to appear at the Fairness Hearing, and if so, a list of any persons you will call to testify in support of the objection; and
12. Your signature (and your lawyer's signature, if you are represented by a lawyer).

If you file a timely written objection, you may, but are not required to, appear at the Fairness Hearing, either in person or through your own lawyer. If you appear through your own lawyer, you are responsible for hiring and paying that lawyer.

To object, you must file a written objection with the Court so it is **received** by **January 13, 2027**. You must also send your objection to Class Counsel, Defendant's Counsel, and the Settlement Administrator so it is **received** by **January 13, 2027**, via US Mail or shipped by private courier (such as Fed Ex or UPS) to:

Court
U.S. District Court Clerk J. Caleb Boggs Federal Building 844 N. King Street Wilmington, DE 19801

You can ask the Court to deny approval by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or deny the current Settlement. If the Court denies approval, no payments will be sent to any Settlement Class Members (including you) and the lawsuit will continue. If this is what you want to happen, you must object.

26. What is the difference between objecting and excluding?

Excluding yourself is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you cannot object to the Settlement because the Settlement no longer affects you.

Objecting is telling the Court that you do not like something about the Settlement. You may only object if you stay in the Settlement Class.

27. As a member of the Settlement Class, do I have a lawyer in the lawsuit?

Yes. The Court has appointed Russell D. Paul, Amey J. Park, Natalie Lesser, Cody R. Padgett, Abigail Gertner, Majdi Hijazin, and Shahin Rezvani; and the law firms Berger Montague PC and Capstone Law APC, to represent you and the Settlement Class as "Class Counsel." Their contact information is listed below. You may hire your own lawyer at your own cost if you want someone other than Class Counsel to represent you in this lawsuit.

You may contact Class Counsel using the information below:

Class Counsel
Russell D. Paul BERGER MONTAGUE PC 800 N. West Street, Suite 200 Wilmington, DE 19801 Phone: (302) 691-9545 rpau@bm.net
Amey J. Park Natalie Lesser BERGER MONTAGUE PC 1818 Market Street, Suite 3600 Philadelphia, PA 19103 Phone: (215) 875-3000
Cody R. Padgett Abigail Gertner Majdi Hijazin Shahin Rezvani CAPSTONE LAW APC 1875 Century Park East, Suite 1000 Los Angeles, CA 90067 Phone: (310) 556-4811 Cody.Padgett@capstonelawyers.com Abigail.Gertner@capstonelawyers.com Majdi.Hijazin@capstonelawyers.com Shahin.Rezvani@capstonelawyers.com

28. Should I get my own lawyer?

If you wish to remain a Settlement Class Member, you do not need to hire your own lawyer because Class Counsel is working on your behalf. You may hire your own lawyer at your own cost if you want someone other than Class Counsel to represent you in this lawsuit.

29. How will Class Counsel be paid?

Class Counsel will ask the Court to award up to \$625,000 in attorneys' fees and expenses. The Court may award less than this amount. If awarded by the Court, the attorneys' fees and expenses will be paid by Ford directly.

Fairness Hearing

30. When and where will the Court decide to approve the Settlement?

When: March 16, 2027 at 10:00 a.m. ET

Where: 844 North King St., Unit 18, Wilmington, Delaware 19801

At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate; whether it should be approved, and if so, what fees and expenses should be awarded to Class Counsel and what service award, if any, should be given to the Named Plaintiffs.

If there are objections that were filed by the deadline, the Court will consider them. If you file a timely objection, and you (or your lawyer) ask to speak at the hearing, the Court may hear objections at the hearing.

The time, date, and location of the Fairness Hearing may change without further notice to you. The Court may also decide to hold the hearing via video conference or by telephone. You should check the Settlement Website www.FordTransitTrailSettlement.com to confirm the date and time of the Fairness Hearing have not changed.

31. Do I have to attend the Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you file an objection, you do not have to attend the Fairness Hearing to speak about it. As long as you file your written objection by the deadline, the Court will consider it.

32. May I speak at the Final Approval Hearing?

If there are objections that were filed by the deadline, the Court will consider them. If you file a timely objection, and you (or your lawyer) ask to speak at the hearing, the Court may hear objections at the hearing.

Get More Information

33. How do I get more information?

Here are the ways to get more information.



Visit:

www.FordTransitTrailSettlement.com



Call:

1-877-525-1779



Scan:



Email:

info@FordTransitTrailSettlement.com



Write:

Ford Transit Trail Settlement
Settlement Administrator
PO Box 5470
Portland, OR 97228-5470

PLEASE DO NOT CALL THE COURT OR CLERK'S OFFICE ABOUT THIS NOTICE.