

NAVISTAR MAXXFORCE ENGINE SETTLEMENT

If you owned or leased a 2011-2014 model year vehicle equipped with a MaxxForce 11- or 13-liter engine, you could get a payment from a class action settlement.

Depending on your months of ownership or lease, you may be entitled to up to \$2,500 cash per class vehicle, up to a \$10,000 rebate for a new heavy-duty truck, or up to \$15,000 as reimbursement for certain proven costs.

Para ver este aviso en español, visite www.MaxxForce11and13.com

A proposed settlement has been reached in a lawsuit against Navistar, Inc. and Navistar International Corporation (the "Defendants"). The lawsuit claimed that Defendants sold or leased vehicles equipped with a defective EGR emissions system and that if Named Plaintiffs had known of the defect, they would not have purchased or leased their vehicles or would have paid less for them. Defendants deny these allegations. The Settlement resolves the case and provides benefits to Class Members who do not exclude themselves, including payments to Class Members who submit valid claims. This notice is only a summary. For more information, visit www.MaxxForce11and13.com or call 1-833-222-1176.

Who is included? You may be a Class Member if you owned or leased a 2011-2014 model year vehicle equipped with a MaxxForce 11- or 13-liter engine certified to meet EPA 2010 emissions standards without selective catalytic reduction technology, provided the vehicle was purchased or leased in any of the fifty States, the District of Columbia, Puerto Rico, or any other United States territory or possession.

What can I get? The proposed Settlement creates a common fund of \$135 million to pay approved claims from Class Members. For each Class Vehicle, you may elect only one option. The Cash Option provides a payment based on months of ownership/lease up to \$2,500 per Class Vehicle. The Rebate Option provides a rebate based on months of ownership/lease up to \$10,000 per Class Vehicle toward a new Navistar Class 8 heavy-duty truck (maximum of 10 rebates). The Individual Prove-Up Option will reimburse a Class Member for up to \$15,000 of proven Covered Costs. **You must submit a Claim Form by May 11, 2020, to qualify for a payment.** A Claim Form is attached to this Notice, but you may also file a claim online at www.MaxxForce11and13.com. If you have any questions about the Claim Form or how to file a claim, call 1-833-222-1176 or email info@MaxxForce11and13.com.

What are my options? You can file a claim by May 11, 2020, exclude yourself by October 10, 2019, or object to the Settlement by October 10, 2019. If you do not exclude yourself, and the Court approves the Settlement, you will be bound by the Court's orders and judgments and will release your claims against Defendants, even if you do not file a claim. For information on how to exclude yourself, object, or file a claim, visit www.MaxxForce11and13.com or call 1-833-222-1176. The Court will hold a Final Approval Hearing on November 13, 2019 to decide whether to approve the Settlement. You may attend this hearing, but you don't have to. The time and date of this hearing may change without further notice to the Class, so please check the website for updates.

What happens next? The Court, located in Chicago, IL, will hold a hearing on **November 13, 2019 at 10:00 a.m.** to decide whether to approve the Settlement, including how much to pay Co-Lead Class Counsel for their work in representing the Class (up to \$40 million to be paid out of the Cash Fund) and what Service Award, if any, should be given to the Named Plaintiffs. Named Plaintiffs will ask the Court to award \$25,000 for each of the Named Plaintiffs remaining in the lawsuit. You or your attorney may ask permission to speak at the hearing at your own cost. The date and time of this hearing may change without further notice to the Class. Please check www.MaxxForce11and13.com for updates.

Who represents me? The Court has appointed Jonathan D. Selbin of Lief Cabraser Heimann & Bernstein, LLP, Adam J. Levitt of DiCello Levitt Gutzler LLC, and William M. Audet of Audet & Partners LLP to represent you and other Class Members. Together, the lawyers are called Co-Lead Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense. Lief Cabraser Heimann & Bernstein may be contacted at 250 Hudson St, 8th Floor, New York, NY 10013 or (212) 355-9500. Contact information for the other Co-Lead Class Counsel is provided in the Long Form Notice and at www.MaxxForce11and13.com.

How do I get more information? For more information, including the Long Form Notice, Claim Form, Motions for Approval and Attorneys' Fees, and Settlement Agreement, call 1-833-222-1176 or visit www.MaxxForce11and13.com.

QUESTIONS? Call toll-free 1-833-222-1176 or visit www.MaxxForce11and13.com.