

# If You Bought Firestone Tires or Owned or Leased a Vehicle Equipped with Firestone Tires Between 1991 and 2002,

## A Proposed Class Action Settlement May Affect Your Rights.

A proposed nationwide settlement of a class action lawsuit involving purchasers of certain brands of tires made by Firestone has been reached in *Shields v. Bridgestone/Firestone, Inc. and Bridgestone Corp.*, Cause No. B-170,462, a case pending in the Jefferson County, Texas District Court (“the Court”). The Court has ordered that notice be sent to the proposed class members. Personal injury or property damage claims are not involved.

### What is this case about?

Plaintiff originally filed this lawsuit seeking to represent a nationwide class of persons who owned Firestone ATX, ATX II, Wilderness AT, and other tires made by Firestone that were investigated by the National Highway Traffic Safety Administration between May 2000 and October 2001. This case, along with other similar lawsuits in state and federal courts around the country, arises out of NHTSA’s investigation of those tires and Firestone’s recall and replacement of certain ATX, ATX II, and Wilderness AT tires in August 2000 and in October 2001.

Plaintiff claims that Firestone sold the tires without telling people that the tires have defects in them that make the tires susceptible to tread separation. Plaintiff further claims that, had she and others who bought the tires known of the alleged defects, they would have paid less. Firestone denies all allegations and has asserted numerous defenses. The Settlement is not an admission of wrongdoing and does not indicate a violation of any law.

### Who is affected?

The Firestone tires subject to this Settlement include certain sizes of the following tire brands: **ATX, ATX II, ATX Radial 23 Degree, Wilderness, American Prospector, Champion All Terrain, Dayton Timberline, Daytona, Firehawk, Force 4 All Terrain, Gillette, Lemans, Peerless, Platinum, Polaris Pathmaker, Radial ATX, Seiberling, Steeltex Radial 23 Degree, Trans Trac, Triumph Terrain, Wheel Trac, and Widetrack Radial Baja.**

To see if your particular tires are affected, you should check the Settlement Website, <http://www.firestonesettlement.com>, or call the number below to receive a detailed Notice that describes the Settlement and lists the brands and sizes of tires included in the Tire Settlement Class.

### What does the Settlement provide?

Under the Settlement, for a period of at least seven years, Firestone will make certain types and sizes of its tires with

designs that include cap strips, nylon strips, or other comparable technology intended to provide high-speed capability for the tires.

Firestone also will conduct a three-year long consumer education program — using national media, a web site, point-of-sale materials, direct mail, and other efforts — with an annual budget of \$5,150,000. The consumer education program will be focused on improving consumer awareness about tire and vehicle safety issues.

The Settlement releases all claims for all members of the Class against Defendants except personal injury or property damage claims. Although Firestone’s recall and replacement programs were completed prior to the Settlement, if a member of the Class has not replaced recalled or replacement tires that are still in use on his or her vehicle, Firestone will replace those tires without charge if the vehicle is brought to a Firestone Tire Service Center.

For more detailed information about the Settlement, visit the Settlement Website or call the toll-free number below to receive a copy of the Notice.

### What are your rights and options?

- You may choose to participate in the Settlement and be bound by the terms of the Stipulation of Settlement, the Final Judgment, and the Releases described in the Notice.
- If you stay in the class, you may object to the terms of the Settlement by December 22, 2003. The Notice describes how to submit objections.
- If you do not wish to participate in, or be legally bound by, the Settlement, you must exclude yourself, as described in the Notice, by December 22, 2003 or you will be barred from pursuing any legal action against the Defendants related to your purchase and ownership of the tires or any vehicles on which they were installed.

The Court will hold a Fairness Hearing on January 7, 2004 to consider whether to finally approve the Settlement. At that hearing the Court will also consider the request by the lawyers representing Plaintiff and the Class for an award of no more than \$19 million for attorneys’ fees, costs and expenses. You may — but need not — appear personally at the Fairness Hearing.

**To receive a copy of the Notice or for more information,  
call toll-free 1-866-345-0360  
or visit the Website, <http://www.firestonesettlement.com>**