

HUSCH BLACKWELL

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Via email

Bridgette Smith-Lawson
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401 Jackson Street, 3rd Floor
Richmond, Texas 77469

Re: Mediation in Cause No. D-1-GN-16-00370, *In re Volkswagen Clean Diesel Litigation*, in the 353rd District Court of Travis County, Texas

Dear Ms. Smith-Lawson:

As you know, we represent Fort Bend County, Texas in the above-referenced litigation. In this suit, Fort Bend County seeks civil penalties for Volkswagen's alleged violations of Texas Clean Air Act. The matter is consolidated for pretrial purposes before a multi-district litigation court in Travis County, Texas.

The parties to the multi-district litigation—the State of Texas, Harris County, Fort Bend County (“Plaintiffs”), and Volkswagen Group of America (“Defendant”)—have agreed to mediation with the objective of resolving the dispute through settlement.

The mediation is scheduled to take place **9:00 a.m. local time, on Tuesday, September 13, 2022**, at Sullivan & Cromwell's Midtown Conference Center, 535 Madison Avenue, New York, NY 10022. The parties' agreed mediator is former federal district judge Layn Phillips. We anticipate that the mediation will last at least a full day.

Sincerely,

/s/ Ben Stephens

Ben Stephens