

EXHIBIT A

| PLAINTIFF | COUNT | STATUS OF CLAIM AFTER RULING ON MOTION TO DISMISS FAC (ECF No. 97) | RULING REQUESTED IN MOTION TO DISMISS SAC | REAFFIRMATION OF PRIOR DISMISSAL REQUESTED | NO ACTION REQUESTED |
|---|---|---|---|--|---------------------|
| NATIONWIDE | | | | | |
| All Plaintiffs | Count I - Magnuson-Moss Warranty Act | Dismissed without prejudice (Order at 61); Plaintiffs included in SAC only to "preserve the claim for appeal" (SAC ¶ 301) | | √ | |
| CALIFORNIA | | | | | |
| Jennifer Whalen, The Center for Defensive Driving, Richard Decker, Watson, Darcy Thomas Maskrey | Count I - Unfair Competition Law | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count II - Consumers Legal Remedies Act | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count III - False Advertising Law | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count IV - Implied Warranty of Merchantability | Pending claim | | | √ |
| | Count V - Breach of Contract | New claim | √ | | |
| | Count VI - Fraud by Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count VII - Song-Beverly Consumer Warranty Act for Breach of Express Warranties | Pending claim | | | √ |
| | Count VIII - Song-Beverly Consumer Warranty Act for Breach of Implied Warranty of Merchantability | Pending claim | | | √ |
| | Count IX - California Civil Code § 1795.92 | Dismissed except as to Campaign 12M01 (Order at 63) | | √ | |

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| ARIZONA | | | | | |
| Joseph D'Aguanno | Count I - Consumer Fraud Act | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count II - Express Warranty | Dismissed with prejudice (Order at 66) | | √ | |
| | Count III - Implied Warranty of Merchantability | Dismissed with prejudice (Order at 66) | | √ | |
| | Count IV - Breach of Contract | New claim | √ | | |
| | Count V - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| COLORADO | | | | | |
| James Sheerin | Count I - Consumer Protection Act | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count II - Strict Product Liability | Pending claim | | | √ |
| | Count III - Breach of Express Warranty | Dismissed with prejudice (Order at 66) | | √ | |
| | Count IV - Breach of Implied Warranty of Merchantability | Dismissed with prejudice (Order at 66) | | √ | |
| | Count V - Breach of Contract | New claim | √ | | |
| | Count VI - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |

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| CONNECTICUT | | | | | |
| Deb Makowski | Count I - Unfair Trade Practices Act | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count II - Express Warranty | Dismissed with prejudice (Order at 67) | | √ | |
| | Count III - Implied Warranty of Merchantability | Dismissed with prejudice (Order at 67) | | √ | |
| | Count IV - Breach of Contract | New claim | √ | | |
| | Count V - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| FLORIDA | | | | | |
| George Oremland | Count I - Deceptive & Unfair Trade Practices Act | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count II - Express Warranty | Pending claim | | | √ |
| | Count III - Implied Warranty of Merchantability | Dismissed with prejudice (Order at 67) | | √ | |
| | Count IV - Breach of Contract | New claim | √ | | |
| | Count V - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |

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| IOWA | | | | | |
| Thomas Mitchell | Count I - Consumer Frauds Act | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | √ | | |
| | Count II - Express Warranty | Pending claim as to 2011 MKZ; new claim as to 2014 MKX ¹ | √ | | |
| | Count III - Implied Warranty of Merchantability | Dismissed with prejudice (Order at 68) | | √ | |
| | Count IV - Breach of Contract | New claim | √ | | |
| | Count V - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | √ | | |
| MASSACHUSETTS | | | | | |
| William Creed | Count I - Consumer Protection Act | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count II - Express Warranty | Pending claim | | | √ |
| | Count III - Implied Warranty of Merchantability | Pending claim | | | √ |
| | Count IV - Breach of Contract | New claim | √ | | |
| | Count V - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |

¹ Ford is challenging Iowa Count II at this time only as to Plaintiff Mitchell's newly-acquired vehicle, a 2014 Lincoln MKZ (*see* SAC ¶ 101), and is not presently challenging this Count with respect to Plaintiff Mitchell's 2011 Lincoln MKX (*see id.* at ¶ 94).

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| NEW JERSEY | | | | | |
| Joshua Matlin Russ Rizzo | Count I - Consumer Fraud Act | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count II - Express Warranty | Pending claim | | | √ |
| | Count III - Implied Warranty of Merchantability | Pending claim | | | √ |
| | Count IV - Breach of Contract | New claim | √ | | |
| | Count V - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| NEW YORK | | | | | |
| Nuala Purcell | Count I - New York Gen. Bus. Law § 349 | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count II - New York Gen. Bus. Law § 350 | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count III - Express Warranty | Pending claim | | | √ |
| | Count IV - Implied Warranty of Merchantability | Dismissed with prejudice (Order at 69) | | √ | |
| | Count V - Breach of Contract | New claim | √ | | |
| | Count VI - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |

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| NEW YORK | | | | | |
| Jeffrey Miller | Count I - New York Gen. Bus. Law § 349 | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | | √ |
| | Count II - New York Gen. Bus. Law § 350 | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | | √ |
| | Count III - Express Warranty | Dismissed without prejudice (Order at 69) | | √ | |
| | Count IV - Implied Warranty of Merchantability | Dismissed with prejudice (Order at 69) | | √ | |
| | Count V - Breach of Contract | New claim | √ | | |
| | Count VI - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | | √ |
| NORTH CAROLINA | | | | | |
| Daniel Fink | Count I - Unfair and Deceptive Trade Practices Act | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count II - Express Warranty | Pending claim | | | √ |
| | Count III - Implied Warranty of Merchantability | Pending claim | | | √ |
| | Count IV - Breach of Contract | New claim | √ | | |
| | Count V - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | | √ |

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| OHIO | | | | | |
| Jerome Miskell | Count I - Consumer Sales Practices Act | New claim ² | √ | | |
| | Count II - Express Warranty | New claim | √ | | |
| | Count III - Implied Warranty In Tort | New claim | √ | | |
| | Count IV - Negligence | New claim | √ | | |
| | Count V - Breach of Contract | New claim | √ | | |
| | Count VI - Fraudulent Concealment | New claim | √ | | |
| TEXAS | | | | | |
| Jose Randy Rodriguez | Count I - Deceptive Trade Practices Act | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | √ | | |
| | Count II - Express Warranty | Dismissed with prejudice (Order at 70) | | √ | |
| | Count III - Implied Warranty of Merchantability | Dismissed with prejudice (Order at 70) | | √ | |
| | Count IV - Breach of Contract | New claim | √ | | |
| | Count V - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | √ | | |
| Michael Ervin | Count I - Deceptive Trade Practices Act | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count II - Express Warranty | Dismissed with prejudice (Order at 71) | | √ | |
| | Count III - Implied Warranty of Merchantability | Dismissed with prejudice (Order at 71) | | √ | |
| | Count IV - Breach of Contract | New claim | √ | | |
| | Count V - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |

² Although Ohio Counts I-IV and VI were asserted by former named Plaintiff Zuchowski (who was dismissed from this case, *see* ECF No. 134), such claims are being brought by new named Plaintiff Miskell for the first time in the SAC.

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| VIRGINIA | | | | | |
| Jason Connell, Henry Miller-Jones | Count I - Consumer Protection Act | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| | Count II - Express Warranty | Pending claim | | | √ |
| | Count III - Implied Warranty of Merchantability | Pending claim | | | √ |
| | Count IV - Breach of Contract | New claim | √ | | |
| | Count V - Fraudulent Concealment | Dismissed without prejudice as to affirmative misrepresentation; pending claim as to fraudulent omission (Order at 31) | | √ | |
| WASHINGTON | | | | | |
| Leif Kirchoff | Count I - Consumer Protection Act | New claim | √ | | |
| | Count II - Express Warranty | New claim | √ | | |
| | Count III - Implied Warranty of Merchantability | New claim | √ | | |
| | Count IV - Breach of Contract | New claim | √ | | |