

15 March 2016

Volkswagen AG  
Board of Management  
Berliner Ring 2  
38440 Wolfsburg  
Germany

Re: Resolution of European Claims Regarding the Use of "Defeat Devices"

Dear Mr Müller,  
Dear Madam and Sirs,

Our German firm has been retained by consumers and businesses in Germany, and we are working with a coalition of law firms that have been retained by consumers and businesses throughout the EU, to represent them concerning their rights in connection with their purchase of VW, Audi, Seat and Skoda vehicles containing what has been described in the press as a "defeat device." As owners of these vehicles marketed as "clean diesel,"<sup>1</sup> our clients are aware of the company's responses to the Kraftfahrt-Bundesamt and other government regulators and to consumers in the United States. They read with interest your expressions of contrition, transparency and sincerity, but remain unconvinced.

At a press conference on December 10<sup>th</sup>, you acknowledged that the company is in the "midst of one of the greatest trials" in its history. You stated that you discovered procedural problems within the company that encouraged misconduct resulting in "faults in reporting and monitoring systems as well as a failure to comply with existing regulations." You claimed that you were engaged in a "comprehensive and relentless investigation," leaving no stone unturned, to find the truth about the origins of the "manipulation."

You repeatedly committed to putting all facts surrounding this matter on the table. As a result of what you have learned, you stated that the company is dedicated to "profoundly changing the way" it does business. You concluded by emphasizing that the company will not rest before it resolves this issue once and for all to the satisfaction of all your customers. While our clients applaud the wisdom of your declarations, the explanations and projections from VW are inconsistent and unclear.

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<sup>1</sup> The word clean is universally defined as "pure" and "free from pollution." There does not appear to be any interpretation of "clean" which would legitimately encompass the real-world emissions of these vehicles.

As you pledged, VW must put all facts that you have learned on the customers' table. To date VW has not done so. Accordingly, we respectfully request the opportunity to meet with you, subject to availability, within the next two weeks, to begin a process between the company and its customers in Germany and throughout the EU, which could ultimately and naturally bring this issue to an early joint satisfactory closure.

We are enclosing reports prepared for the European market which, based on presently available public information, identify the engineering issues and economic consequences of this deceit to European customers and other stakeholders.

Regards,



Michael D. Hausfeld  
Chairman



Christopher Rother  
Partner

P.S. Resolution of this matter is material not only to consumers but also to prevent the further degradation of air quality and the threat to human life in the areas where these vehicles are operated.

A copy of this letter will be sent to the chairman of the Supervisory Board, Mr Hans Dieter Pötsch.