

Class action settlement notice: Bosch solar panels model c-Si M NA30119 were recalled due to fire risk. Act now to have your panels replaced for free.

A court authorized this notice. This is not a solicitation from a lawyer. Read this carefully.

- A proposed settlement has been reached in a class-action lawsuit about an alleged defect in Bosch Solar Energy Corporation (“Bosch Solar”) solar panels model c-Si M NA30119 (“NA30119”) claiming the solder joints pose a fire safety risk. Other Bosch Solar panels are not affected. Bosch Solar started a voluntary recall of NA30119 units and under the settlement will replace roof and ground mounted NA30119 units at no cost to current owners who submit claims.
- Act now to submit a claim form and a photo of your panels, or to exercise other rights.
- If you are included, your legal rights are affected whether you act or not.

CLASS MEMBER RIGHTS AND OPTIONS:	
SUBMIT A CLAIM FORM	Request free replacement panels, as described in this notice.
ASK TO BE EXCLUDED	Also called “opting out.” The only option that allows you to sue Bosch Solar over the claims resolved by this settlement.
OBJECT	Write to the Court about why it should reject the settlement.
GO TO A HEARING	Ask to speak in Court about an objection.
DO NOTHING	Get no replacement panels. Give up rights to sue.

- If you own these panels—OR own a property on which they are installed (for example you might be leasing them from a solar company) you have **25 years** from when they were purchased OR until **December 31, 2038** (whichever is earlier) to submit a claim. But act soon to make sure the panels are replaced as quickly as possible.
- If you want to be Excluded (opt out) or Object you must do so by **February 3, 2023**.
- The Court in charge of this case will listen to any objections and decide whether to approve the settlement, and it will hold a hearing on **April 6, 2023**.

WHAT THIS NOTICE CONTAINS

	<u>Page</u>
BASIC INFORMATION	3
1. Why was this notice issued?	3
2. What is this lawsuit about?	3
3. Is there something wrong with the NA30119 Panels?	3
4. What is a class action?	3
5. Why is there a settlement?	3
WHO IS IN THE SETTLEMENT	3
6. How do I know if I am part of the settlement?.....	3
7. Which solar panels are included?.....	3
8. What do the solar panels look like?	4
9. If I own a property where they are installed, but lease the panels, am I included?.....	4
10. Are there exceptions to being included?	4
11. I'm still not sure I'm included.....	4
THE SETTLEMENT BENEFITS—WHAT YOU GET	4
12. What benefits does the settlement provide?	4
13. How much time do I have to request replacement?	5
14. Will the replacement panels work the same way?	5
15. Can I get money instead of replacement?	5
HOW TO GET YOUR PANELS REPLACED—SUBMITTING A CLAIM FORM	5
16. How can I request replacement of my panels?.....	5
17. How will my claim be evaluated?	5
18. When will my panels be replaced?.....	5
19. What am I giving up if I stay in the Class and/or request replacement?.....	5
EXCLUDING YOURSELF FROM THE SETTLEMENT	5
20. How do I get out of the settlement?	6
21. If I don't exclude myself, can I sue Bosch Solar for the same thing later?.....	6
22. If I exclude myself, can I get my NA30119 solar panels replaced?.....	6
THE LAWYERS REPRESENTING YOU	6
23. Do I have a lawyer in this case?	6
24. How will the lawyers be paid?	6
25. Will the Class Representatives receive a cash payment?	6
OBJECTING TO THE SETTLEMENT	6
26. Why would I object to the settlement?.....	6
27. How do I object to the settlement?.....	7
28. What do I have to include in an objection?.....	7
29. What's the difference between objecting and asking to be excluded?	7
THE COURT'S FAIRNESS HEARING	7
30. When and where will the Court decide whether to approve the settlement?	7
31. How do I request to appear at the Fairness Hearing?.....	7
32. Do I have to come to the Fairness Hearing?	8
33. May I speak at the Fairness Hearing?	8
IF YOU DO NOTHING	8
34. What happens if I do nothing at all?	8
GETTING MORE INFORMATION	8
35. How do I get more information about the settlement?.....	8

BASIC INFORMATION

1. Why was this notice issued?

A Court authorized this notice because you have a right to know about a proposed settlement of this class action, including the right to request free replacement panels, and about all your other options, before the Court decides whether to give “final approval” to the settlement. This notice explains the lawsuit, the settlement, your legal rights, what benefits are available, who may be eligible for them, and how to get them.

Judge Beth Labson Freeman is overseeing this class action. The case is known as *Rojas v. Bosch Solar Energy Corp.*, Case No. 5:18-cv-5841BLF in the United States District Court for the Northern District of California, San Jose division. The people who sued are called the “Plaintiffs,” and the companies they sued, together referred to as “Bosch Solar,” are called the “Defendants.”

2. What is this lawsuit about?

The lawsuit claimed the NA30119 panels were defective and pose a fire risk. The suit said Bosch Solar breached its warranty, was unjustly enriched, and the suit sought replacement of all roof and ground mounted panels. Bosch Solar denies these claims, maintains that it acted lawfully, and voluntarily recalled all roof mounted panels.

3. Is there something wrong with the model NA30119 panels?

Bosch Solar determined that where electrical contacts to the solder had degraded, the resulting resistance could result in heat, and that it was theoretically possible for a fire to result. No fires have been reported. Bosch Solar voluntarily recalled roof mounted panels under the United States Consumer Product Safety Commission (“CPSC”) Fast Track Recall process. The CPSC says the solar panels can overheat, posing a risk of fire.

4. What is a class action?

In a class action, one or more people called “Class Representatives” (in this case, Steve R. Rojas and Andrea N. Rojas), sue on behalf of people who have similar claims. All these people are a “Class” or “Class members.” One court resolves the issues for everyone except those who exclude themselves from the Class.

5. Why is there a settlement?

The Court did not decide who is right. Instead, both sides agreed to settle. That way, they avoid a costly trial, and all the affected panels can be replaced for free. The Class Representatives and their attorneys think the settlement is best for all Class members. The settlement does not mean that Bosch Solar did anything wrong.

WHO IS IN THE SETTLEMENT

To see if you can get benefits from this settlement, you first must decide if you are a Class member.

6. How do I know if I am part of the settlement?

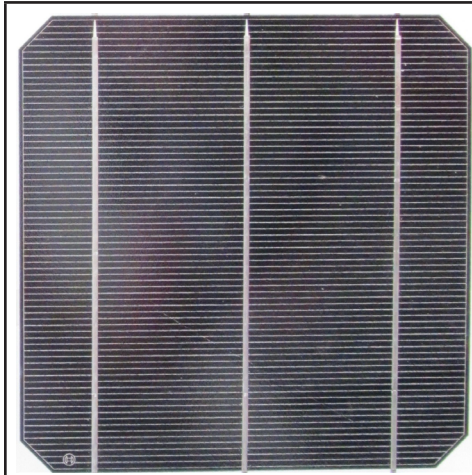
Judge Freeman decided that everyone who fits this description is a Class Member: *All persons or entities in the United States who are the current owners of Bosch c-Si M 60 NA30119 solar modules or the current owners of premises on which Bosch c-Si M 60 NA30119 solar modules are installed. Continue reading to learn more.*

7. Which solar panels are included?

The solar panels are Bosch model c-Si M 60 NA30119, which were sold through distributors and commercial installers nationwide from October 2011 through May 2013 for about \$300 per panel. At this time, Bosch Solar believes most of the remaining NA30119 solar panels are installed in southern California.

8. What do the solar panels look like?

Each panel measures approximately 65 inches by 39 inches by 1.65 inches. Each c-Si M 60 NA30119 panel contains 60 cells, arranged in 10 rows of 6 cells. Each cell is marked with the Bosch brand logo. The frame edge of the panel is smooth, with no grooves. These pictures may help you identify the panels:

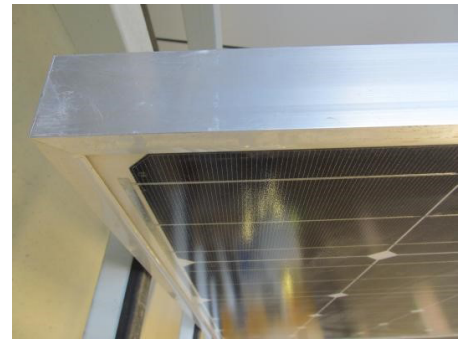


Closeup of one of the sixty (60) cells
(*above*).

Closeup of the Bosch logo that appears
in the corner of each cell (*below*).



The front of one entire NA30119
panel showing the sixty (60) cells.



The frame edge showing its smooth
flat surface, without grooves.

9. If I own a property where they are installed, but lease the panels, am I included?

Yes. You are a class member and may file a claim for replacement if you own the property where the NA30119 panels are installed even if you lease the panels from a solar company. You are also a class member if you own the panels but not the property on which they are installed.

10. Are there exceptions to being included?

You are not a class member if you already had your NA30119 panels replaced under the recall or warranty. Also, you are not a class member if you own an array of one hundred (100) or more ground mounted NA30119 panels. There are other exclusions listed in the Settlement Agreement to be found at the website listed below.

11. I'm still not sure I'm included.

If you are not sure whether you are included, call the toll-free number: 1-877-441-2792.

THE SETTLEMENT BENEFITS—WHAT YOU GET

12. What benefits does the settlement provide?

The settlement provides full replacement of NA30119 panels that are still installed on the roofs of structures or that are

mounted on the ground. A Settlement Agreement, available at www.RojasSolarSettlement.com, describes all of the details about the proposed settlement.

13. How much time do I have to request replacement?

If you have the NA30119 panels, you have 25 years from the date they were originally purchased, or until December 31, 2038, whichever is earlier. The panels were sold between 2011 and 2013. If you don't know when they were purchased, you should submit your claim anyway, as soon as possible.

14. Will the replacement panels work the same way?

The new panels may differ in size, color, shape, model number, or manufacturer, but the output of your replacement panels will provide the same or greater power than your Bosch Solar NA30119 solar array.

15. Can I get money instead of replacement?

No. The settlement provides for replacement panels to remedy the claims made in the lawsuit.

HOW TO GET YOUR PANELS REPLACED—SUBMITTING A CLAIM FORM

16. How can I request replacement of my panels?

Complete and submit a claim form to request replacement. The claim form is attached to this notice if you received it in the mail. You may also find one at www.RojasSolarSettlement.com. Be sure to include pictures of your solar panels and other helpful information requested in the claim form. Send your submission to:

Rojas v. Bosch Solar Energy
c/o Analytics Consulting LLC
P.O. Box 2004
Chanhassen, MN 55317-2004

17. How will my claims for replacement be evaluated?

The Claims Administrator will review your claim form and then possibly inspect your array to confirm you have NA30119 panels. If so, they will be replaced. Otherwise, they will not be.

18. When will my panels be replaced?

If your panels are NA30119 panels, Bosch Solar will replace them as soon as practicable after receipt of your claim form. Bosch Solar will not delay the replacement of the panels based on any objections to the settlement.

19. What am I giving up if I stay in the Class or request replacement?

Unless you exclude yourself, you are staying in the Class, and that means that you can't sue Bosch Solar over the claims in this case. It also means that all the Court's orders will apply to you and legally bind you. Whether you submit a claim form or not, if you do not opt out of the Class (see below), you will agree to "release and discharge" Bosch Solar as described in the Settlement Agreement. The Settlement Agreement can be obtained at www.RojasSolarSettlement.com, and it specifically describes the released claims in necessarily accurate legal terminology. Talk to Class Counsel (*see* below), or your own lawyer, if you have questions about the released claims.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you want to keep the right to sue Bosch Solar about the issues in this case, then you must take steps to get out, called "excluding yourself" from—sometimes referred to as "opting out" of—the Settlement Class.

20. How do I get out of the settlement?

To exclude yourself from the settlement, you must send a letter by mail saying that you want to be excluded from *Rojas v. Bosch Solar Energy*. Be sure to include your full name, address, telephone number, and your signature. Include the address where your NA30119 panels are installed and how many you own. You must mail your exclusion request postmarked by **February 3, 2023** to:

Rojas Exclusions
c/o Analytics Consulting LLC
P.O. Box 2004
Chanhassen, MN 55317-2004

You can't exclude yourself on the phone, by email, or at the website.

21. If I don't exclude myself, can I sue Bosch Solar for the same thing later?

No. If you do not exclude yourself, you may never sue (or be part of any other class action against) Bosch Solar over the claims resolved by this settlement. Remember, the exclusion deadline is **February 3, 2023**.

22. If I exclude myself, can I get my NA30119 solar panels replaced?

Yes. If you exclude yourself, you may still ask for replacement panels under the recall process.

THE LAWYERS REPRESENTING YOU

23. Do I have a lawyer in this case?

The Court has appointed Birka-White Law Offices, 178 E. Prospect Ave, Danville, CA 94526; Levin Sedran & Berman LLP, 510 Walnut Street, Suite 500, Philadelphia, PA 19106; and Farella Braun + Martel, 235 Montgomery Street, San Francisco, CA 94104 to represent you and other Class members. Together they are called "Settlement Class Counsel". You do not have to pay them. If you want to be represented by your own lawyer (perhaps to have that lawyer appear in Court for you), you may hire one at your own expense.

24. How will the lawyers be paid?

If the Court approves the settlement, Bosch Solar will pay Settlement Class Counsel \$1,400,000 to cover their fees and expenses. Class members will not be charged for this payment, and it will not affect panel replacements. Bosch Solar will also separately pay the costs to identify and notify Class members, and to administer the settlement.

25. Will the Class Representatives receive a cash payment?

If the Court approves the settlement, Settlement Class Counsel will ask the Court to approve an incentive award of up to \$10,000 total to be paid by Bosch Solar to Steve and Andrea Rojas, in recognition of the time and effort they spent helping counsel pursue the class action and settlement on behalf of all other Class members. The Rojas' are also entitled to claim replacement panels like other Class members. There is no other agreement to provide payments to Plaintiffs or other parties.

OBJECTING TO THE SETTLEMENT

Class members may object to the settlement and ask the Court to reject it. The Court will consider your views.

26. Why would I object to the settlement?

If you are opposed to the settlement, you can object to its approval. You can't ask the Court to order a different settlement; the Court can only approve or reject this settlement. If the Court denies approval, you will not be bound by it, and the lawsuit will continue. If that is what you want to happen, you should object.

27. How do I object to the settlement?

To object, you must write a letter to the Court **and include the information in Question 28**. The Court will enter it into the electronic filing system for the public record. If you want to object, be sure to send your objection by **February 3, 2023** to:

Clerk of Court
San Jose Courthouse
Courtroom 3, 5th Floor
280 South 1st Street
San Jose, CA 95113

28. What do I have to include in an objection?

You must indicate the case name: *Rojas v. Bosch Solar Energy*, and the case number: 5:18-cv-5841BLF. State your full name, address, telephone number, and signature. You must provide the address where your NA30119 panels are installed, and how many you own. You must state the specific grounds for your objection, whether it affects only you, a specific subset of Class members, or the whole Class. You must also indicate whether you intend to appear at the Fairness Hearing (*See below*).

29. What's the difference between objecting and asking to be excluded?

Objecting is telling the Court that you oppose approval of the settlement. You can object only if you stay in the Class. This means that you may not exclude yourself and also object.

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement. You may attend and you may ask to speak, but you don't have to.

30. When and where will the Court decide whether to approve the settlement?

The Court has scheduled a Fairness Hearing at **9:00 a.m. on April 6, 2023**, at the San Jose Courthouse, Courtroom 3, 5th Floor, 280 South 1st St., San Jose, CA 95113. You may also attend by zoom using the instructions at www.RojasSolarSettlement.com. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Judge will listen to people who have asked to speak about an objection. At or after the hearing, the Court will decide whether to approve the settlement. We do not know how long this decision will take. The hearing may be moved to another day, time, or location, so check www.RojasSolarSettlement.com for updates.

31. How do I request to appear at the Fairness Hearing?

If you or your separate attorney (if you have one) wish to appear at the Fairness Hearing, send a signed letter with your name/address/phone number, and your attorney's name/address/phone number/bar number. Include a list of any witnesses you intend to call at the Fairness Hearing, the address of each witness, a summary of his or her proposed testimony, and copies of all exhibits you intend to introduce at the Fairness Hearing. Note: you do not need a lawyer to ask to appear at the Fairness Hearing. Send your request by **February 3, 2023** to:

Clerk of Court
San Jose Courthouse
Courtroom 3, 5th Floor
280 South 1st Street
San Jose, CA 95113

32. Do I have to come to the Fairness Hearing?

No. Settlement Class Counsel and the lawyers for Bosch will answer questions that the Judge may have. But you are

welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. If you filed and mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

33. May I speak at the Fairness Hearing?

If you submitted an objection to the settlement and you asked to appear at the Fairness Hearing (be sure you provide all the information identified in this notice), you may ask the Court for permission to speak at the Fairness Hearing. You cannot speak at the hearing if you exclude yourself.

IF YOU DO NOTHING

34. What happens if I do nothing at all?

If you do nothing, you will not have the solar panels replaced, leaving a potential fire risk in place. But you'll release Bosch Solar and never be able to sue Bosch Solar for the claims in this case.

GETTING MORE INFORMATION

35. How do I get more information about the settlement?

This notice summarizes the proposed settlement. For the precise terms of the settlement, please see the Settlement Agreement at www.RojasSolarSettlement.com, by contacting class counsel through that website, by accessing the Court docket in this case for a fee through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 280 South 1st Street, San Jose, CA 95113, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays. Please do not telephone the Court or the Court Clerk's office to inquire about this settlement or the claim process.