

November 11, 2015

IMPORTANT NOTICE

Re: *Reese v. CNH Global and CNH America LLC*; Retiree Health Care Litigation

Dear Post-IPO Class Member:

By now you will have received our letter sent November 4, 2015. In that letter we advised that we had filed a Motion for Reconsideration, but warned you to prepare for the changes CNH planned to make to your retiree healthcare benefits. We advised Medicare-eligible class members to research and enroll in a “Medicare Part D” prescription drug insurance program and we advised you to do so before December 7, 2015. Things have changed. **DO NOT MAKE ANY CHANGES TO YOUR HEALTHCARE BENEFITS BASED ON THAT LETTER OR THE RECENT NOTICES FROM CNH.**

We have very good news: **THE COURT GRANTED OUR MOTION FOR RECONSIDERATION** and determined that the retiree healthcare benefits are vested. The Court also decided that the changes CNH recently proposed are not reasonable under the previous Sixth Circuit decision in *Reese II*. This means that **CNH WILL NOT BE ALLOWED TO IMPLEMENT THE CHANGES.**

We apologize for the confusion. However, we did not receive the order until late in the day November 9, 2015. You can find the Court’s Order on our Firm’s website, www.michworklaw.com. CNH has already filed a notice of appeal to the Sixth Circuit. However, they will not be implementing any changes without further order of the Court.

If you have already made a change to your benefits based upon the notice of the modification of your benefits, please contact us to discuss.

We still intend to hold the informational meetings in order to answer your questions:

MEETING LOCATIONS

Quad Cities	Date:	Monday, November 16, 2015 at 1:30 P.M.
	Location:	i Wireless Center 1201 River Drive Moline, IL 61265
Burlington	Date	Tuesday, November 17, 2015 at 9:30 A.M.
	Location:	Comfort Suites Burlington 1780 Stonegate Center Drive Burlington, IA. 52601
Wausau	Date:	Monday, November 23, 2015 at 9:30 A.M.

Location: Quality Inn
2910 Hummingbird Road
Wausau, WI 55401

Racine

Date: Tuesday, November 24, 2015 at 9:30 A.M.
Location: UAW Local 72
3615 Washington Road
Kenosha, WI 53144

It is particularly important for you to attend these meetings if you have already enrolled in a Medicare Part D program after receiving our letter last week, or have made changes in your benefits after CNH's recent notices.

Thank you for your patience.