

## **If You Bought or Leased a New Vehicle, or Bought Certain Replacement Parts for a Vehicle in the U.S. Since 1996**

### **You Could Get Money from Settlements Totaling Approximately \$604 Million**

*A Federal Court authorized this Notice. This is not a solicitation from a lawyer.*

- Please read this Notice and the Settlement Agreements available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com) carefully. Your legal rights may be affected whether you act or don't act. This Notice is a summary, and it is not intended to, and does not, include all of the specific details of each Settlement Agreement. To obtain more specific details concerning the Settlements, please read the Settlement Agreements.
- Separate lawsuits claiming that Defendants in each lawsuit entered into unlawful agreements that artificially raised the prices of certain component parts of qualifying new vehicles (described in Question 8 below) have been settled with 23 Defendants and their affiliates ("Settling Defendants"). In May 2016, settlements with 11 of the Settling Defendants ("Round 1 Settlements"), totaling approximately \$225 million, received final Court approval. Additional settlements totaling \$379,401,268 have now been reached with 12 additional Settling Defendants. Those 12 additional Settling Defendants are called the "Round 2 Settling Defendants," and the settlements with them are called the "Round 2 Settlements." This Notice will give you details of those proposed Round 2 Settlements and your rights in these lawsuits.
- Generally, you are included in the Settlement Classes for the Round 2 Settlements if, at any time between 1996 and 2016, depending upon the component part, you: (1) bought or leased a qualifying new vehicle in the U.S. (not for resale) or (2) indirectly purchased a qualifying vehicle replacement part (not for resale). Indirectly means you bought the vehicle replacement part from someone other than the manufacturer of the part.
- As more fully described in Question 8 below, the Round 2 Settling Defendants have agreed to pay approximately \$379 million to be made available to Settlement Class members who purchased or leased a qualifying new vehicle or purchased a qualifying vehicle replacement part in the District of Columbia or one or more of the following States: Arizona, Arkansas, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, West Virginia, and Wisconsin.
- The Round 2 Settlements also include provisions requiring the Round 2 Settling Defendants' cooperation in the ongoing litigations. With the exception of Leoni (defined in Question 3), Round 2 Settling Defendants have also agreed not to engage in the specified conduct that is the subject of the lawsuits for a period of two years from the date of entry of the final judgment.

<b>Your Legal Rights And Options</b>		
<b>SUBMIT A CLAIM</b>	The only way to get a payment. You will be able to submit a claim for payment from both of the Round 1 and Round 2 Settlements.	Beginning November 29, 2016
<b>EXCLUDE YOURSELF</b>	You will not be included in the Settlement Classes for the Round 2 Settlement(s) from which you exclude yourself. You will receive no benefits from the Round 2 Settlement(s), but you will keep any rights you currently have to sue these Settling Defendants about the claims in the Settlement Classes from which you exclude yourself.	March 16, 2017
<b>DO NOTHING NOW</b>	You will be included in the Settlement Classes for the Round 2 Settlements and are eligible to file a claim for a payment (if you qualify). You will give up your rights to sue the Round 2 Settling Defendants about the claims in these cases.	
<b>OBJECT TO THE</b>	If you do not exclude yourself, you can write to the Court explaining why you	March 16,

<b>SETTLEMENTS AND PLAN OF ALLOCATION</b>	disagree with the Round 2 Settlement(s) or the Plan of Allocation to distribute the Settlement Funds minus expenses and any court-approved attorneys' fees ("Net Settlement Funds") to Round 1 and Round 2 Settlement Class members.	2017
<b>GO TO THE HEARING</b>	Ask to speak in Court about your opinion of the Round 2 Settlements and/or the Plan of Allocation as it applies to members of the Round 1 and Round 2 Settlement Classes.	April 19, 2017

- These rights and options – and the deadlines to exercise them – are explained in this Notice.
- The Court in charge of these cases still has to decide whether to finally approve the Round 2 Settlements. Payments will only be made (1) if the Court approves the Round 2 Settlements and after any appeals are resolved, and (2) after the Court approves a Plan of Allocation to distribute the Net Settlement Funds to Round 1 and Round 2 Settlement Class members.

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## BASIC INFORMATION

### 1. WHY IS THERE A NOTICE?

This Notice is to inform you about the Round 2 Settlements reached in 26 of the pending cases that are included in this litigation, before the Court decides whether to finally approve these Settlements.

The Court in charge is the United States District Court for the Eastern District of Michigan. This litigation is known as *In re Automotive Parts Antitrust Litigation*, MDL No. 12-2311. The people who sued are called the “Plaintiffs.” The companies they sued are called the “Defendants.”

Previously, you may have received notice about the Round 1 Settlements that were reached with 11 Defendants. Those Round 1 Settlements received final approval from the Court on May 11, 2016.

The Round 2 Settlements have been reached with an additional 12 Defendants, so that is why there is another Notice. This Notice explains the lawsuits, the proposed Round 2 Settlements, and your legal rights, including the ability to file a claim to receive a payment (if eligible).

This Notice is also to inform you that Class Counsel have proposed a Plan of Allocation to distribute the Net Settlement Funds from the Round 1 and Round 2 Settlements to the members of the Settlement Classes. The Plan of Allocation is described generally in Question 13 and is available on the website [www.AutoPartsClass.com](http://www.AutoPartsClass.com) along with Class Counsel’s motion filed with the Court seeking its approval.

### 2. WHAT ARE THESE LAWSUITS ABOUT?

The lawsuits claim that the Defendants in each lawsuit agreed to unlawfully raise the price of certain vehicle component parts. As a result, consumers and businesses who purchased or leased qualifying new vehicles (not for resale) containing those parts or who indirectly purchased qualifying replacement parts (not for resale) from the Defendants may have paid more than they should have. Although the Round 2 Settling Defendants have agreed to settle, they do not agree that they engaged in any wrongdoing or are liable or owe any money or benefits to Plaintiffs. The Court has not yet decided who is right.

### 3. WHO ARE THE ROUND 2 SETTLING DEFENDANTS?

The Round 2 Settling Defendants are:

- Aisin Seiki Co., Ltd. and Aisin Automotive Casting, LLC (together, “Aisin Seiki”),
- DENSO Corporation; DENSO International America, Inc.; DENSO International Korea Corporation, DENSO Korea Automotive Corporation; DENSO Automotive Deutschland GmbH; ASMO Co., Ltd.; ASMO North America, LLC; ASMO Greenville of North Carolina, Inc.; and ASMO Manufacturing, Inc. (collectively, “DENSO”),
- Furukawa Electric Co., Ltd. and American Furukawa, Inc. (together, “Furukawa”),
- G.S. Electech, Inc.; G.S. Wiring Systems Inc.; and G.S.W. Manufacturing, Inc. (collectively, “G.S. Electech”),
- LEONI Wiring Systems, Inc. and Leonische Holding Inc. (together, “LEONI”),

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- Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; and Mitsubishi Electric Automotive America, Inc. (collectively, “MELCO”),
- NSK Ltd.; NSK Americas, Inc.; NSK Steering Systems Co., Ltd.; and NSK Steering Systems America, Inc. (collectively, “NSK”),
- Omron Automotive Electronics Co. Ltd. (“Omron”),
- Schaeffler Group USA Inc. (“Schaeffler”),
- Sumitomo Riko Co. Ltd. and DTR Industries, Inc. (together, “Sumitomo Riko”),
- Tokai Rika Co., Ltd. and TRAM, Inc. d/b/a Tokai Rika U.S.A. Inc. (together, “Tokai Rika”), and
- Valeo Japan Co., Ltd. on behalf of itself and Valeo Inc.; Valeo Electrical Systems, Inc.; and Valeo Climate Control Corp. (collectively, “VALEO”).

#### **4. HAVE THERE BEEN ANY OTHER SETTLEMENTS RELATED TO THIS LAWSUIT?**

Yes. The following companies previously agreed to the Round 1 Settlements in the lawsuits, and the Court has given final approval to these Settlements:

- Autoliv, Inc.; Autoliv ASP, Inc.; Autoliv B.V. & Co. KG; Autoliv Safety Technology, Inc.; and Autoliv Japan Ltd.,
- Fujikura, Ltd. and Fujikura Automotive America LLC,
- Hitachi Automotive Systems, Ltd.,
- Kyungshin-Lear Sales and Engineering, LLC,
- Lear Corporation,
- Nippon Seiki Co., Ltd.; N.S. International, Ltd.; and New Sabina Industries, Inc.,
- Panasonic Corporation and Panasonic Corporation of North America,
- Sumitomo Electric Industries, Ltd.; Sumitomo Wiring Systems, Ltd.; Sumitomo Electric Wiring Systems, Inc. (incorporating K&S Wiring Systems, Inc.); and Sumitomo Wiring Systems (U.S.A.) Inc.,
- T.RAD Co., Ltd. and T.RAD North America, Inc.,
- TRW Deutschland Holding GmbH and TRW Automotive Holdings Corporation (now known as “ZF TRW Automotive Holdings Corp.”), and
- Yazaki Corporation and Yazaki North America, Incorporated.

Fourteen persons claiming to be Settlement Class members objected to the Round 1 Settlements, four of whom ultimately withdrew their objections. The Court overruled the remaining objections. Because certain objectors have appealed the Court’s decision, the Round 1 Settlements are not yet final. More information about these Settlements is available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

#### **5. WHO ARE THE NON-SETTLING DEFENDANTS?**

A list of all of the Defendants and the vehicle component parts they manufactured and sold is available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

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## 6. WHAT VEHICLE PARTS ARE INCLUDED?

The Round 2 Settlements generally include the vehicle component parts listed below. The specific definitions of the vehicle component parts are set forth in each Settlement Agreement. Each of those Settlement Agreements, and the related Complaints, are accessible on the website [www.AutoPartsClass.com](http://www.AutoPartsClass.com) or can be obtained by calling 1-877-940-5043.

- **Air Conditioning Systems** are systems that cool the interior environment of a vehicle and are part of a vehicle's thermal system. Air Conditioning Systems, whether sold together or separately, include one or more of the following: automotive compressors, condensers, HVAC units (typically consisting of a blower motor, actuators, flaps, evaporator, heater core, and filter embedded in a plastic housing), control panels, sensors, and associated hoses and pipes.
- **Air Fuel Ratio Sensors** are "wideband" oxygen sensors that enable more precise control of the air-to-fuel ratio injected into the engine. Air Fuel Ratio Sensors are a type of Oxygen Sensor.
- **Alternators** are electromechanical devices that generate an electric current while vehicle engines are in operation.
- **Anti-Vibration Rubber Parts** are comprised primarily of rubber and metal and are installed in suspension systems and engine mounts, as well as other parts of a vehicle, to reduce engine and road vibration.
- **Automatic Transmission Fluid Warmers** are automatic transmission fluid warmer or cooler devices located in the engine compartment of a vehicle that moderate the temperature of the automatic transmission fluid.
- **Automotive Bearings** are devices in a vehicle used to position, hold, and guide moving parts, as well as to reduce friction between moving and fixed parts. Automotive Bearings are located throughout a vehicle. Automotive Bearings include the following devices used in vehicles: ball bearings, tapered roller bearings, roller bearings, mounted bearings, and parts and components for ball and roller bearings.
- **Automotive Hoses** are flexible tubes used to convey liquid and air in vehicles. Automotive Hoses include low-pressure rubber hoses used in automobile engine compartments and plastic and resin tubes used in vehicle engine compartments and fuel tank modules.
- **Automotive Wire Harness Systems** are the electrical distribution systems used to direct and control electronic components, wiring, and circuit boards in vehicles. Automotive Wire Harness Systems include the following parts: automotive wire harnesses, automotive electrical wiring, lead wire assemblies, cable bond, automotive wiring connectors, automotive wiring terminals, electronic control units, fuse boxes, relay boxes, junction blocks, power distributors, high voltage wiring, and speed sensor wire assemblies.
- **Ceramic Substrates** are uncoated ceramic monoliths with fine honeycomb structures that, after coating with a mix of metal and other chemicals, are incorporated into automotive catalytic converters.

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- **Electric Powered Steering Assemblies** provide electronic power to assist the driver to more easily steer the vehicle. Electric Powered Steering Assemblies link the steering wheel to the tires. Electric Powered Steering Assemblies include Pinion-Assist Type Electric Powered Steering Assemblies as well as all component parts of the assemblies, including the steering column, intermediate shaft, electronic control unit, and electric power steering motors (but not the steering wheel or tires).
- **Fan Motors** are small electric motors used to turn radiator cooling fans.
- **Fuel Injection Systems** admit fuel or a fuel/air mixture into vehicle engine cylinders. Fuel Injection Systems can also be sold as part of a broader system, such as an engine management system, or as separate components. Fuel Injection Systems include one or more of the following parts: injectors; high pressure pumps; rail assemblies; feed lines; engine electronic control units; fuel pumps and fuel pump modules; manifold absolute pressure sensors; pressure regulators; pulsation dampers; purge control valves; air flow meters; and electronic throttle bodies.
- **Fuel Senders** are devices located inside the fuel tank of vehicles that measure the amount of fuel in the tank.
- **Heater Control Panels** are either mechanical or electrical devices that control the temperature of the interior environment of a vehicle. Heater Control Panels can be either manual (referred to as low-grade) or automatic (referred to as high-grade) and are located in the center console, back seat, or rear cabin of an automobile.
- **High Intensity Discharge Ballasts** are electrical devices that limit the amount of electrical current flowing to a High Intensity Discharge Ballast headlamp.
- **Ignition Coils** release electric energy to ignite the fuel/air mixture in cylinders.
- **Instrument Panel Clusters** are the mounted instruments and gauges housed in front of the driver of a vehicle. Instrument Panel Clusters are also known as meters.
- **Inverters** convert direct current electricity to alternating current electricity.
- **Motor Generators** are electric motors used to power electric drive systems that can also capture and regenerate energy.
- **Oil Coolers** are devices located in the engine compartment of a vehicle that remove surplus heat from the engine oil.
- **Power Window Motors** are small electric motors used to raise and lower vehicle windows.
- **Power Window Switches** are automobile switches that raise or lower a vehicle's electric windows.
- **Radiators** are heat exchangers or other devices that help prevent vehicle engines from overheating or otherwise regulate the temperature of the engine compartment of a vehicle and the

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fluids passing through it, including all devices physically attached to and sold as part of a radiator.

- **Spark Plugs** are located in the engine and deliver high electric voltage from the ignition system to the combustion chamber of an internal combustion engine.
- **Standard Oxygen Sensors** are located in the exhaust system and measure the amount of oxygen in the exhaust.
- **Starters** are small electronic motors used in starting internal combustion engines.
- **Valve Timing Control Devices** (also called Variable Timing Devices and/or Variable Timing Control Devices), control the timing of engine valve operation and include the Variable Timing Control actuator or solenoid valve. Some valve timing control devices may also contain an oil control valve.
- **Windshield Washer Systems** include one or more of the following: pump, hoses, nozzle, and tank necessary to deliver washer fluid to vehicle windows.
- **Windshield Wiper Systems** include one or more of the following: motor, linkage, arm, and blade necessary to clear water or snow from vehicle windows.

#### **7. WHY ARE THESE CLASS ACTIONS?**

In class actions, one or more individuals or companies called the “class representatives” sue on behalf of themselves and other people with similar claims in the specific class action. All of these individuals or companies together are the “Class” or “Class members.” In these Class actions, there are a total of fifty-five Class representatives. In a class action, one court may resolve the issues for all Class members, except for those who exclude themselves from the Class.

#### **WHO IS INCLUDED IN THE CLASSES**

#### **8. HOW DO I KNOW IF I MAY BE INCLUDED IN THE ROUND 2 SETTLEMENT CLASSES?**

Generally, you may be included in one or more of the Round 2 Settlement Classes if, at any time from 1996 to 2016, you: (1) bought or leased a qualifying new vehicle in the U.S. (not for resale), or (2) paid to replace one or more of the qualifying vehicle parts listed in Question 6 above (not for resale). In general, qualifying vehicles include four-wheeled passenger automobiles, cars, light trucks, pickup trucks, crossovers, vans, mini-vans, and sport utility vehicles.

The specific definition of the vehicles, as well as the definition of who is included in the Round 2 Settlement Classes, is set forth in each Settlement Agreement. Each of those Settlement Agreements, and the related Complaints, are accessible on the website [www.AutoPartsClass.com](http://www.AutoPartsClass.com) or can be obtained by calling 1-877-940-5043.

You will also be able to obtain additional information to learn whether you are a member of one or more of the Round 1 and Round 2 Settlement Classes by visiting the website [www.AutoPartsClass.com](http://www.AutoPartsClass.com) and

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providing details regarding your purchase or lease of a new vehicle or your purchase of a replacement part or by calling 1-877-940-5043.

A separate Settlement Class has been preliminarily approved by the Court in each of the following cases settled by the Round 2 Settling Defendants and their affiliates. The time period covered by the Round 2 Settlements for each of the Settlement Classes is provided below:

<b>Defendant</b>	<b>Time Period Starts</b>	<b>Time Period Ends</b>	<b>Auto Part(s) Cases</b>
Aisin Seiki	January 1, 2000	August 25, 2016	Valve Timing Control Devices
DENSO	January 1, 1998	July 14, 2016	<ul style="list-style-type: none"> <li>• Wire Harness</li> <li>• Instrument Panel Clusters</li> <li>• Fuel Senders</li> <li>• Heater Control Panels</li> <li>• Alternators</li> <li>• Windshield Wipers</li> <li>• Radiators</li> <li>• Starters</li> <li>• Ignition Coils</li> <li>• Motor Generator</li> <li>• HID Ballasts</li> <li>• Inverters</li> <li>• Fan Motors</li> <li>• Fuel Injection Systems</li> <li>• Power Window Motors</li> <li>• Automatic Transmission Fluid Warmers</li> <li>• Valve Timing Control Devices</li> <li>• Air Conditioning Systems</li> <li>• Windshield Washer Systems</li> <li>• Spark Plugs</li> <li>• Ceramic Substrates</li> </ul>
Furukawa	January 1, 1998	August 5, 2016	Wire Harness
G.S. Electech	January 1, 1999	August 29, 2016	Wire Harness
LEONI	January 1, 1999	June 28, 2016	Wire Harness
MELCO	July 1, 1998	March 30, 2016	<ul style="list-style-type: none"> <li>• Wire Harness</li> <li>• Alternators</li> <li>• Starters</li> <li>• Ignition Coils</li> <li>• Fuel Injection Systems</li> <li>• Valve Timing Control Devices</li> </ul>

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Defendant	Time Period Starts	Time Period Ends	Auto Part(s) Cases
			<ul style="list-style-type: none"> <li>• HID Ballasts</li> <li>• Electronic Powered Steering Assemblies</li> </ul>
NSK	January 1, 2000	July 21, 2016	Bearings
	January 1, 2005	July 21, 2016	Electronic Powered Steering Assemblies
Omron	January 1, 2003	August 10, 2016	Power Window Switches
Schaeffler	January 1, 2000	August 10, 2016	Bearings
Sumitomo Riko	March 1, 1996	July 30, 2016	Anti-Vibration Rubber Parts
	May 1, 2003	July 30, 2016	Automotive Hoses
Tokai Rika	January 1, 1999	August 2, 2016	Wire Harness
Valeo	May 1, 1999	July 26, 2016	Air Conditioning Systems

Payments to Settlement Class members will only be made: (1) if the Court approves the Round 2 Settlements and after any appeals from such approval are resolved; and (2) in accordance with the Plan of Allocation to distribute the Net Settlement Funds (*see* Question 14).

These cases are proceeding as class actions seeking monetary recovery for consumers and businesses in 30 states and the District of Columbia, and for nationwide injunctive relief to stop the Defendants' alleged illegal behavior and prevent this behavior from happening in the future (*see* Question 15).

Purchasers or lessees of qualifying new vehicles or indirect purchasers of any of the replacement parts listed in Question 6 may be members of the Settlement Classes entitled to monetary recovery. Only those Settlement Class Members who, during the relevant time periods listed above, purchased or leased a vehicle or purchased a replacement part while (1) residing or (2) as to businesses, having the principal place of business located, in the District of Columbia or the states listed below will be entitled to share in the monetary recovery. Those states are: Arizona, Arkansas, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, West Virginia, and Wisconsin. You may have seen a prior notice that indicated that members of the Settlement Classes may be entitled to monetary recovery if the purchase or lease transaction occurred in the District of Columbia or one of the listed states. Please note that the prior information as to the place of the purchase or lease transaction is replaced by this notice.

#### **9. WHO IS NOT INCLUDED IN THE SETTLEMENT CLASSES?**

The Settlement Classes do not include:

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- Any of the Defendants, their parent companies, subsidiaries, and affiliates;
- Any co-conspirators;
- Federal government entities and instrumentalities;
- States and their political subdivisions, agencies, and instrumentalities; and
- All persons who purchased their vehicle parts directly from the Defendants or for resale.

**10. WHY ARE THE LAWSUITS CONTINUING IF THERE ARE SETTLEMENTS?**

The Round 2 Settlements have been reached with the Round 2 Settling Defendants (listed in Question 3) as specified in the individual Settlement Agreements. The lawsuits will continue against all of the remaining Defendants who have not settled (“Non-Settling Defendants”).

Additional money may become available in the future as a result of a trial or future Settlements. Alternatively, the litigation may be resolved in favor of the Non-Settling Defendants, and no additional money may become available. There is no guarantee as to what will happen.

Please visit the website, [www.AutoPartsClass.com](http://www.AutoPartsClass.com), and register to be notified about any future Settlements or to file a claim.

**THE ROUND 2 SETTLEMENTS’ BENEFITS**

**11. WHAT DO THE ROUND 2 SETTLEMENTS PROVIDE?**

The Round 2 Settlements totaling \$379,401,268 are now being presented to the Court for approval. The Court has already approved the Round 1 Settlements, totaling \$224,668,350 in 19 cases. Together, the Round 1 and Round 2 Settlement Funds total approximately \$604 million. After deduction of attorneys’ fees, notice and claims administration costs, and litigation expenses, as approved by the Court, the Net Settlement Funds will be available for distribution to Class members who timely file valid claims.

The Round 2 Settlements also include non-monetary relief (*see* Question 15), including cooperation, as well as, with the exception of Leoni, agreements by these Settling Defendants not to engage in the conduct that is the subject of the lawsuits, as more fully described in the proposed Final Judgments located on the Settlement website [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

The Settlement Funds are allocated to the relevant vehicle component cases as follows:

<b>Auto Parts Round 2 Settlements and Settlement Funds</b>		
<b>Automotive Parts Case</b>	<b>Round 2 Settling Defendant</b>	<b>Settlement Fund</b>
Air Conditioning Systems	DENSO	\$21,836,133
	Valeo	\$6,650,000
Alternators	DENSO	\$50,449,261
	MELCO	\$17,129,946.08

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### Auto Parts Round 2 Settlements and Settlement Funds

Automotive Parts Case	Round 2 Settling Defendant	Settlement Fund
Anti-Vibrational Rubber Parts	Sumitomo Riko	\$10,283,916.10
Automatic Transmission Fluid Warmers	DENSO	\$1,662,943
Automotive Hoses	Sumitomo Riko	\$1,116,083.90
Bearings	NSK	\$22,420,000
	Schaeffler	\$7,600,000
Ceramic Substrates	DENSO	\$1,531,138
Electronic Powered Steering Assemblies	MELCO	\$3,211,463.34
	NSK	\$3,800,000
Fan Motors	DENSO	\$142,120
Fuel Injection Systems	DENSO	\$19,392,650
	MELCO	\$3,211,463.34
Fuel Senders	DENSO	\$187,823
Heater Control Panels	DENSO	\$14,676,679
HID Ballasts	DENSO	\$1,424,803
	MELCO	\$3,211,463.34
Ignition Coils	DENSO	\$16,746,824
	MELCO	\$14,567,197.98
Instrument Panel Clusters	DENSO	\$7,525,762
Inverters	DENSO	\$142,120
Motor Generator	DENSO	\$142,120
Power Window Motors	DENSO	\$142,120
Power Window Switches	Omron	\$3,040,000
Radiators	DENSO	\$15,760,989
Spark Plugs	DENSO	\$9,760,366
Starters	DENSO	\$9,709,228
	MELCO	\$16,474,807.24
Valve Timing Control Devices	DENSO	\$4,362,039

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<b>Auto Parts Round 2 Settlements and Settlement Funds</b>		
<b>Automotive Parts Case</b>	<b>Round 2 Settling Defendant</b>	<b>Settlement Fund</b>
	Aisin Seiki	\$18,620,000
	MELCO	\$3,211,463.34
Windshield Washer Systems	DENSO	\$362,978
Windshield Wipers	DENSO	\$3,310,103
Wire Harness	DENSO	\$14,531,801
	LEONI	\$1,482,000
	Tokai Rika	\$760,000
	G.S. Electech	\$3,040,000
	Furukawa	\$42,560,000
Wire Harness (Continued)	MELCO	\$3,211,463.34
<b>Total</b>		<b>\$379,401,268</b>

Any interest earned will be added to each of the Settlement Funds. More details about the Round 2 Settlements are provided in the Round 2 Settlement Agreements, available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

### **HOW TO GET BENEFITS**

#### **12. HOW DO I SUBMIT A CLAIM?**

You may be entitled to a portion of the Settlement Funds when a distribution is made to Class members of the Settlement Classes. If you excluded or exclude yourself from any of the Settlement Classes in the Round 1 or Round 2 Settlements, you will not receive a payment from those funds.

However, you will be required to submit a Claim Form to be eligible to receive a payment from any of the Settlement Funds. No deadline has yet been set by the Court for the submission of the Claim Form, but you can file your claim now. Claims may be submitted online at [www.AutoPartsClass.com](http://www.AutoPartsClass.com) or by printing and mailing your completed form to:

Auto Parts Claims Administrator  
P.O. Box 10163  
Dublin, OH 43017-3163

You may also call 1-877-940-5043, write the Claims Administrator at the address above, or visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com) to obtain a Claim Form.

If you submit a Claim Form or register at the Settlement website, you will receive future notifications containing additional important information, including information about any future Settlements.

**Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)**

### **13. HOW MUCH MONEY CAN I GET?**

The amount of your recovery will be determined by the Plan of Allocation, the terms of which are posted on the website [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

Class Counsel has proposed a Plan of Allocation to distribute the Net Settlement Funds from the Round 1 and Round 2 Settlements to the members of the Settlement Classes. If the Court approves the Plan of Allocation, payment will be made on a *pro rata* basis to Settlement Class members who submit claims that are allowed by the Court, which will be based on a ratio consisting of the claimant's total number of vehicles purchased or leased or replacement parts purchased, and the total number of vehicles purchased or leased and replacement parts purchased by other claimants. Claims based on vehicles containing automotive parts that were specifically targeted by Defendants' alleged collusive conduct receive more money. The amount of money Class members are eligible to receive is based on information obtained by Class Counsel during discovery as well as the cooperation provided by the Round 1 and 2 Settling Defendants.

At this time, it is unknown how much each Settlement Class member who submits a valid claim will receive. Payments will be based on a number of factors, including at least the number of valid claims filed by all Settlement Class members and the number of (1) qualifying new vehicles purchased or leased or (2) qualifying replacement parts purchased. It is possible that any money remaining after claims are paid will be distributed to charities, governmental entities, or other beneficiaries approved by the Court. No matter how many claims are filed, no money will be returned to the Settling Defendants after the Court finally approves the Round 2 Settlements.

In order to receive a payment from any of the Settlements (Round 1 and Round 2), you will need to file a valid Claim Form. If you want to be kept updated about any future settlements, you should register at [www.AutoPartsClass.com](http://www.AutoPartsClass.com) or file a Claim Form.

### **14. WHEN WILL I GET A PAYMENT?**

Payments may be distributed to Settlement Class members after the Court grants final approval to the Round 2 Settlements and any appeals from such approvals are resolved. Appeals can take several years to conclude.

### **15. WHAT IS THE NON-MONETARY RELIEF?**

With the exception of Leoni, the Round 2 Settling Defendants have agreed not to engage in certain specified conduct that would violate the antitrust laws that are at issue in these lawsuits for a period of two years. Additionally, all of these Settling Defendants will cooperate with the Plaintiffs in their ongoing litigation against the Non-Settling Defendants.

## **REMAINING IN THE CLASSES**

### **16. WHAT HAPPENS IF I REMAIN IN THE SETTLEMENT CLASSES?**

If the Round 2 Settlements become final, you will give up your right to sue these Settling Defendants on your own for the claims described in the Settlement Agreements unless you exclude yourself from one or

**Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)**

more of the Settlement Classes. You also will be bound by any decisions by the Court relating to any Round 2 Settlements from which you do not exclude yourself.

In return for paying the Settlement amounts and providing the non-monetary benefits, the Round 2 Settling Defendants (and certain related entities defined in the Settlement Agreements) will be released from claims relating to the alleged conduct involving the vehicle parts identified in the Settlement Agreements. The Round 2 Settlement Agreements describe the released claims in detail, so read them carefully since those releases will be binding on you if the Court approves these Settlements. If you have any questions, you can talk to Class Counsel listed in Question 20 for free, or you can, of course, talk to your own lawyer (at your own expense) if you have questions about what this means. The Round 2 Settlement Agreements and the specific releases are available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

## EXCLUDING YOURSELF FROM THE SETTLEMENT CLASSES

### 17. HOW DO I GET OUT OF THE SETTLEMENT CLASSES?

To exclude yourself from one or more of the Settlement Classes, you must send a letter by mail stating that you want to be excluded from *In re Automotive Parts Antitrust Litigation*, MDL No. 12-2311, and specifying which Settlement Class or Classes (including the specific automotive part case) you wish to be excluded from. If you did not timely request to be excluded from the Round 1 Settlements, you may not do so at this time. You may only request to be excluded from the Settlement Classes for the Round 2 Settlements.

Your letter must also include:

- Your name, address, and telephone number;
- Documents reflecting your purchase or lease of a new eligible vehicle and/or purchase of the applicable replacement part. Purchase or lease documentation should include: (a) the date of purchase or lease, (b) the make and model year of the new vehicle, and (c) the state where the new vehicle was purchased or leased. Replacement part documentation should include: (a) the date of purchase, (b) type of replacement part purchased, and (c) the state where the replacement part was purchased; and
- Your signature.

If you are seeking to exclude yourself from one or more of the Round 2 Settlement Classes, you are also requested (but not required) to state in your letter the number of new vehicles you purchased from March 1, 1996 to August 29, 2016.

Any request for exclusion must be received no later than **March 16, 2017**, and mailed to:

Automotive Parts Indirect Exclusions  
P.O. Box 10163  
Dublin, OH 43017-3163

### 18. IF I DON'T EXCLUDE MYSELF, CAN I SUE FOR THE SAME THING LATER?

No. Unless you exclude yourself, you give up any right to sue the Round 2 Settling Defendants for the claims being released in this litigation.

Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)

**19. IF I EXCLUDE MYSELF, CAN I STILL GET MONEY BENEFITS?**

No. If you exclude yourself from the Settlement Class(es) in any of the Round 2 Settlements, you will not get any money as a result of the Settlement in that case. However, you may exclude yourself from one or more of the Settlement Classes for any of the Round 2 Settlements, but remain in the Settlement Classes for other Round 2 Settlements. In that case, you may receive money from the Round 2 Settlements for the Settlement Classes in which you remain a Class member.

**THE LAWYERS REPRESENTING YOU**

**20. DO I HAVE A LAWYER REPRESENTING ME?**

The Court has appointed the following law firms as Settlement Class Counsel to represent you and all other members of the Classes:

Steven Williams Cotchett, Pitre, & McCarthy LLP San Francisco Airport Office Center 840 Malcolm Road, Suite 200 Burlingame, CA 94010	Hollis Salzman Robins Kaplan LLP 601 Lexington Avenue Suite 3400 New York, NY 10022	Marc M. Seltzer Susman Godfrey L.L.P. 1901 Avenue of the Stars Suite 950 Los Angeles, CA 90067
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You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

**21. HOW WILL THE LAWYERS BE PAID?**

At the upcoming final fairness hearing, Class Counsel may ask the Court (a) to reimburse them for certain costs and expenses, and (b) for attorneys’ fees based on their services in this litigation, not to exceed 27.5% of the approximately \$379 million in additional Settlement Funds resulting from the Round 2 Settlements after deducting reimbursable costs and expenses. Any payment to the attorneys will be subject to Court approval, and the Court may award less than the requested amount. The attorneys’ fees, costs, and expenses that the Court orders, plus the costs to administer the Round 2 Settlements, will come out of the Settlement Funds. Class Counsel may seek additional attorneys’ fees, costs, and expenses from any additional Settlements or recoveries obtained in the future.

When Class Counsel’s motion for fees, costs and expenses is filed, it will be available at [www.AutoPartsClass.com](http://www.AutoPartsClass.com). The motion will be posted on the website at least 45 days before the Court holds a hearing to consider the request, and you will have an opportunity to comment on the motion (*see* Question 22).

Register at the website or call 1-877-940-5043 to receive notice when the motion is filed.

**Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)**

## OBJECTING TO THE ROUND 2 SETTLEMENTS

### 22. HOW DO I OBJECT TO OR COMMENT ON THE ROUND 2 SETTLEMENTS AND/OR THE PLAN OF ALLOCATION?

If you have objections to or comments about any aspect of one or more of the Round 2 Settlements or the Plan of Allocation as it applies to members of the Round 1 and Round 2 Settlement Classes, you may express your views to the Court. You can only object to or comment on one or more of the Round 2 Settlements or the Plan of Allocation if you do not exclude yourself from the applicable Settlement Class or Classes.

To object to or comment on a Round 2 Settlement, you must specify which Settlement (including the specific vehicle part) you are objecting to and include the following in your objection letter:

- Your name, address, and telephone number;
- Documents reflecting your purchase or lease of a new eligible vehicle and/or purchase of the applicable replacement part. Purchase or lease documentation should include: (a) the date of purchase or lease, (b) the make and model year of the new vehicle, and (c) the state where the new vehicle was purchased or leased. Replacement part documentation should include: (a) the date of purchase, (b) type of replacement part purchased, and (c) the state where the replacement part was purchased;
- The name of the Settling Defendant whose Settlement you are objecting to or commenting on;
- The vehicle part case that is the subject of your objection(s) or comments;
- The reasons you object to the Settlement or the Plan of Allocation, along with any supporting materials; and
- Your signature.

Any comment or objection must be received no later than **March 16, 2017**, and mailed to:

<b>Court</b>	<b>Notice Administrator</b>
U.S. District Court for the Eastern District of Michigan Clerk's Office Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd., Room 564 Detroit, MI 48226	Auto Parts Settlements Objections P.O. Box 10163 Dublin, OH 43017-3163

### 23. WHAT IS THE DIFFERENCE BETWEEN EXCLUDING MYSELF FROM THE SETTLEMENT CLASSES AND OBJECTING TO THE ROUND 2 SETTLEMENTS?

If you exclude yourself from one or more of the Round 2 Settlement Classes, you are telling the Court that you do not want to participate in the Round 2 Settlement(s) from which you exclude yourself. Therefore, you will not be eligible to receive any benefits from those Round 2 Settlement(s), and you will not be able to object to them. Objecting to a Round 2 Settlement simply means telling the Court that you do not like something about the Settlement. Objecting does not make you ineligible to receive a payment.

Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)

## THE FINAL FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Round 2 Settlements and any requests by Settlement Class Counsel for fees, costs, expenses, and class representative awards. The Court may also decide whether to approve the Plan of Allocation for the distribution of the Net Settlement Funds in the Round 1 and Round 2 Settlements. You may attend and you may ask to speak, but you do not have to do so.

### 24. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE ROUND 2 SETTLEMENTS?

The Court will hold a Final Fairness Hearing at X:XX p.m. on **April 19, 2017**, at the United States Courthouse, 231 W. Lafayette Blvd, Detroit, MI 48226, Room 272. The hearing may be moved to a different date or time without additional notice, so check [www.AutoPartsClass.com](http://www.AutoPartsClass.com) or call 1-877-940-5043 for current information. At this hearing, the Court will consider whether the Round 2 Settlements are fair, reasonable, and adequate. If there are objections or comments, the Court will consider them at that time and may listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Settlement Class Counsel. At or after the hearing, the Court will decide whether to approve the Round 2 Settlements.

The Plan of Allocation may also be considered at the Final Approval Hearing, along with the fairness of the Round 2 Settlements, and any application for attorneys' fees, and reimbursement of expenses. The Plan of Allocation may also be considered at later hearings before the Court, and notice of such hearings will be provided on the website [www.AutoPartsClass.com](http://www.AutoPartsClass.com).

### 25. DO I HAVE TO ATTEND THE HEARING?

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend at your expense. If you send an objection or comment, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also hire your own lawyer at your own expense to attend on your behalf, but you are not required to do so.

### 26. MAY I SPEAK AT THE HEARING?

If you send an objection or comment on the Round 2 Settlements as described in Question 22, you may have the right to speak at the Final Fairness Hearing as determined by the Court. You cannot speak at the hearing about a Round 2 Settlement if you exclude yourself from that specific Settlement Class.

## THE TRIALS

### 27. WHEN AND WHERE WILL THE TRIALS AGAINST THE NON-SETTLING DEFENDANTS TAKE PLACE?

If the cases are not dismissed or settled, the Plaintiffs will have to prove their claims against the Non-Settling Defendants at trial. Trial dates have not yet been set.

Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)

At the trial, a decision will be reached about whether the Plaintiffs or the Non-Settling Defendants are right about the claims in the lawsuits. There is no guarantee that the Plaintiffs will win any money or other benefits for Class members at trial.

**28. WHAT ARE THE PLAINTIFFS ASKING FOR FROM THE NON-SETTLING DEFENDANTS?**

The Class representatives are asking for money for Settlement Class members in the District of Columbia and 30 states listed in Question 8 above. The Class representatives are also seeking a nationwide court order to prohibit the Non-Settling Defendants from engaging in the alleged behavior that is the subject of the lawsuits.

**29. WILL I GET MONEY AFTER THE TRIALS?**

If the Plaintiffs obtain money or benefits as a result of a trial or Settlement with any of the Non-Settling Defendants, Settlement Class members will be notified about how to ask for a share or what their other options are at that time. These things are not known right now.

**GET MORE INFORMATION**

**30. HOW DO I GET MORE INFORMATION?**

This Notice summarizes the Round 2 Settlements. More details are in the Round 2 Settlement Agreements. You can get copies of the Settlement Agreements and more information about all of the Settlements at [www.AutoPartsClass.com](http://www.AutoPartsClass.com). In addition, the full Plan of Allocation is available on the website, [www.AutoPartsClass.com](http://www.AutoPartsClass.com). You also may write with questions to Auto Parts Settlements, P.O. Box 10163, Dublin, OH 43017-3163 or call the toll-free number, 1-877-940-5043. You should also register at the website to be directly notified of any future settlements, the terms of the Plan of Allocation, how to file a Claim Form, and other information concerning these cases.

Questions? Call 1-877-940-5043 or Visit [www.AutoPartsClass.com](http://www.AutoPartsClass.com)