

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION	No. 12-md-02311 Hon. Sean F. Cox
In Re: Wire Harness Systems	Case No. 2:12-cv-00103
In Re: Instrument Panel Clusters	Case No. 2:12-cv-00203
In Re: Fuel Senders	Case No. 2:12-cv-00303
In Re: Heater Control Panels	Case No. 2:12-cv-00403
In Re: Automotive Bearings	Case No. 2:12-cv-00503
In Re: Occupant Safety Systems	Case No. 2:12-cv-00603
In Re: Alternators	Case No. 2:13-cv-00703
In Re: Anti-Vibrational Rubber Parts	Case No. 2:13-cv-00803
In Re: Windshield Wiper Systems	Case No. 2:13-cv-00903
In Re: Radiators	Case No. 2:13-cv-01003
In Re: Starters	Case No. 2:13-cv-01103
In Re: Automotive Lamps	Case No. 2:13-cv-01203
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In Re: Power Window Motors	Case No. 2:13-cv-02303
In Re: Automatic Transmission Fluid Warmers	Case No. 2:13-cv-02403
In Re: Valve Timing Control Devices	Case No. 2:13-cv-02503
In Re: Electronic Throttle Bodies	Case No. 2:13-cv-02603
In Re: Air Conditioning Systems	Case No. 2:13-cv-02703
In Re: Windshield Washer Systems	Case No. 2:13-cv-02803
In Re: Automotive Constant Velocity Joint Boot Products	Case No. 2:14-cv-02903

In Re: Spark Plugs  
In Re: Automotive Hoses  
In Re: Shock Absorbers  
In Re: Body Sealing Products  
In Re: Interior Trim Products  
In Re: Automotive Brake Hoses  
In Re: Exhaust Systems  
In Re: Ceramic Substrates  
In Re: Power Window Switches  
In Re: Automotive Steel Tubes  
In Re: Access Mechanisms  
In Re: Side Door Latches  
In Re: Electronic Braking Systems  
In Re: Hydraulic Braking Systems

Case No. 2:15-cv-03003  
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Case No. 2:16-cv-03903  
Case No. 2:16-cv-04003  
Case No. 2:16-cv-04103  
Case No. 2:16-cv-04303  
Case No. 2:21-cv-04403  
Case No. 2:21-cv-04503

THIS DOCUMENT RELATES TO:  
End-Payor Actions

## **END-PAYOR PLAINTIFFS’ MOTION FOR *PRO RATA* DISTRIBUTIONS TO AUTHORIZED CLAIMANTS<sup>1</sup>**

End-Payor Plaintiffs (“EPPs”), by their Settlement Class Counsel, respectfully move the Court for an order authorizing *pro rata* distributions of payments from the Net Settlement Funds<sup>2</sup> (excluding the reserved amount described

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<sup>1</sup> Unless otherwise defined herein, all capitalized terms shall have the meaning set forth in EPPs’ Motion for Distribution of \$100 Minimum Payment to Authorized Claimants (*see, e.g.*, No 2:12-cv-00103 (Aug. 29, 2024), ECF No. 656-1) and the Settlement Agreements that are the subject of the Rounds 1 through 5 Settlements.

<sup>2</sup> The Net Settlement Funds consist of the Rounds 1-5 Settlement Amounts, plus interest earned thereon through November 30, 2024, less attorneys’ fees, litigation costs and expenses, class notice, and settlement administration expenses approved

below) to Authorized Claimants pursuant to the Court-approved Round 4 Plan of Allocation<sup>3</sup> and Round 5 Plan of Allocation.<sup>4</sup>

On October 21, 2024, the Court approved EPPs' Motion for Distribution of \$100 Minimum Payments to Authorized Claimants.<sup>5</sup> Settlement Class Counsel now seek approval to distribute payments from the Net Settlement Funds to Authorized Claimants on a *pro rata* basis based on their respective allowed claimed losses. In

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by the Court and paid to date, class representative service payments, and the \$100 minimum payments, plus a reserve established in connection with these payments totaling \$450,000. The Net Settlement Funds continue to accrue interest and may be subject to reductions in connection with future expenses, including but not limited to Settlement Class Counsel's forthcoming application for attorneys' fees and reimbursement of expenses.

<sup>3</sup> See, e.g., Order Granting EPPs' Unopposed Motion for an Order Approving the Proposed Further Revised Plan of Allocation and for Authorization to Disseminate Supplemental Notice to the Settlement Classes, Master File No. 2:12-md-02311 (Dec. 20, 2019), ECF No. 2032 (order granting EPPs' proposed Plan of Allocation in connection with the Rounds 1 through 4 Settlements); Proposed Further Revised Plan of Allocation and for Authorization to Disseminate Supplemental Notice to the Settlement Classes, Case No. 2:12-cv-00403 (Dec. 10, 2019), ECF No. 301-2 (EPPs' proposed Plan of Allocation in connection with the Rounds 1 through 4 Settlements).

<sup>4</sup> See, e.g., Order Granting EPPs' Motion for an Order Approving the Proposed Plan of Allocation in Connection with the Round 5 Settlements, Master File No. 2:21-cv04403 (Feb. 6, 2023), ECF No. 14 (Order Granting EPPs' Proposed Plan of Allocation in Connection with the Round 5 Settlements); Proposed Plan of Allocation and Distribution of the Automotive Parts Settlement Funds, Case No. 2:21-cv-04403 (Nov. 18, 2022), ECF No. 8-1 (EPPs' proposed Plan of Allocation in connection with the Round 5 Settlements).

<sup>5</sup> See Order Overruling FRS's Objections and Approving End-Payor Plaintiffs' Motion for Distribution of \$100 Minimum Payments to Authorized Claimants, Case No 2:12-cv-00103 (Oct. 21, 2024), ECF No. 663.

support of this motion, EPPs submit the accompanying Memorandum of Law, the Declaration of Michelle M. La Count, Esq. Regarding End-Payor Plaintiffs' Motion for *Pro Rata* Distribution to Authorized Claimants, and a proposed order.

EPPs have not sought consent from Settling Defendants pursuant to Local Rule 7.1 because Settling Defendants have long since been dismissed from this Litigation and Settling Defendants have no interest in the distribution of the Net Settlement Funds.

Dated: December 27, 2024

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**MEMORANDUM OF LAW IN SUPPORT OF END-PAYOR PLAINTIFFS'  
MOTION FOR *PRO RATA* DISTRIBUTIONS TO AUTHORIZED  
CLAIMANTS**

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**STATEMENT OF THE ISSUE PRESENTED**

Whether the Court should authorize *pro rata* distributions of payments from the Net Settlement Funds (excluding the reserved amount) to Authorized Claimants pursuant to the Round 4 and Round 5 Plans of Allocation.

## **CONTROLLING OR MOST APPROPRIATE AUTHORITIES FOR THE RELIEF SOUGHT**

Proposed Further Revised Plan of Allocation and for Authorization to Disseminate Supplemental Notice to the Settlement Classes, Case No. 2:12-cv-00403 (Dec. 10, 2019), ECF No. 301-2 (EPPs' proposed Plan of Allocation in connection with the Rounds 1 through 4 Settlements).

Order Granting EPPs' Unopposed Motion for an Order Approving the Proposed Further Revised Plan of Allocation and for Authorization to Disseminate Supplemental Notice to the Settlement Classes, Master File No. 2:12-md-02311 (Dec. 20, 2019), ECF No. 2032 (order granting EPPs' proposed Plan of Allocation in connection with the Rounds 1 through 4 Settlements).

Proposed Plan of Allocation and Distribution of the Automotive Parts Settlement Funds, Case No. 2:21-cv-04403 (Nov. 18, 2022), ECF No. 8-1 (EPPs' proposed Plan of Allocation in connection with the Round 5 Settlements).

Order Granting EPPs' Motion for an Order Approving the Proposed Plan of Allocation in Connection with the Round 5 Settlements, Master File No. 2:21-cv04403 (Feb. 6, 2023), ECF No. 14 (order granting EPPs' proposed Plan of Allocation in connection with the Round 5 Settlements).

Order Overruling FRS's Objections and Approving End-Payor Plaintiffs' Motion for Distribution of \$100 Minimum Payments to Authorized Claimants, Case No. 2:12-cv-00103 (Oct. 21, 2024), ECF No. 663 (authorizing the Settlement Administrator to distribute \$100 minimum payments to Authorized Claimants from the Net Settlement Funds from the Rounds 1 through 5 Settlements pursuant to the Round 4 and Round 5 Plans of Allocation).

## I. INTRODUCTION

The settlement administration process in this complex multidistrict litigation has been extraordinarily complicated and time-consuming. Tens of thousands of claims have been submitted covering millions of vehicles. Settlement Class Counsel<sup>1</sup> and the Settlement Administrator, Epiq Class Action & Claims Solutions, Inc. (“Epiq” or the “Settlement Administrator”), expended thousands of hours reviewing and processing claims and engaging in follow-up efforts regarding the documentation submitted in support of the claims. Declaration of Michelle M. La Count, Esq. Regarding End-Payor Plaintiffs’ Motion for *Pro Rata* Distributions to Authorized Claimants (“La Count Decl.”) ¶ 13. In addition, Epiq expended many hours in consultation with Settlement Class Counsel deduplicating over 3.4 million claimed vehicles, which resulted in the elimination of millions of non-qualifying claimed vehicles. ¶¶ 11, 18, 22.

On October 21, 2024, the Court granted EPPs’ Motion for Distribution of \$100 Minimum Payments to Authorized Claimants.<sup>2</sup> Minimum Distribution Order

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<sup>1</sup> Unless otherwise defined herein, all capitalized terms shall have the meaning set forth in in EPPs’ Motion for Distribution of \$100 Minimum Payment to Authorized Claimants (*see, e.g.*, No 2:12-cv-00103 (Aug. 29, 2024), ECF No. 656-1) and the Settlement Agreements that are the subject of the Rounds 1 through 5 Settlements.

<sup>2</sup> Order Overruling FRS’s Objections and Approving End-Payor Plaintiffs’ Motion for Distribution of \$100 Minimum Payments to Authorized Claimants, Case No. 2:12-cv-00103 (Oct. 21, 2024), ECF No. 663 (“Minimum Distribution Order”).

¶ 4. On December 24, 2024, Epiq commenced distribution of the \$100 minimum payments to Authorized Claimants. La Count Decl. ¶ 7.

Epiq reviewed each claimed vehicle and replacement part for eligibility for each of the 43 separate, but related EPP class action cases. La Count Decl. ¶¶ 9, 43, 56. Consistent with the Round 4 and Round 5 Plans of Allocation, Epiq performed calculations for the proposed *pro rata* distribution of payments from the Rounds 1-4 Net Settlement Funds to Authorized Claimants. *Id.* ¶ 51(h).<sup>3</sup>

Subject to approval by the Court, Epiq is now prepared to distribute *pro rata* payments from the Rounds 1-4 Net Settlement Funds to Authorized Claimants. Accordingly, EPPs respectfully move the Court for an order: (1) approving the Settlement Administrator's claim determinations made pursuant to the Round 4 and Round 5 Plans of Allocation as well as the methodology described herein and more fully described in the La Count Decl. at ¶ 51(a-h); (2) establishing a reserve of 15% of the Net Settlement Funds to be used for administrative costs, resolving any matters that might arise in connection with distribution of the proceeds of the

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<sup>3</sup> After distribution of the minimum \$100 payments in connection with the Round 5 Settlements, \$741,862.64 will remain in the Round 5 Net Settlement Funds. La Count Decl. ¶ 6. Upon the Court's Order granting this Motion, Epiq will make any Round 5 *pro rata* distributions following consultation and approval by Settlement Class Counsel utilizing the same validation approach applied in the Rounds 1 through 4 Settlements.

remaining Net Settlement Funds,<sup>4</sup> and Settlement Class Counsel’s application for attorneys’ fees and reimbursement of costs and expenses (“the “Reserve Fund”); (3) authorizing the *pro rata* distributions of payments from the Net Settlement Funds to Authorized Claimants subject to the Reserve Fund; (4) authorizing the Settlement Administrator, at the direction of Settlement Class Counsel, to make additional payments to Authorized Claimants from the Reserve Fund in connection with the *pro rata* distributions if circumstances warrant; and (5) authorizing the Settlement Administrator, at the direction of Settlement Class Counsel, to make a second *pro rata* distribution from any residual amount of the Net Settlement Funds within 15 months of Epiq issuing checks in connection with the first *pro rata* distribution, if economically feasible.

The Net Settlement Funds total approximately \$972 million. La Count Decl.

¶ 47. If the Court approves EPPs’ requested Reserve Fund of 15% of the Net Settlement Funds, approximately \$827 million will remain available to be distributed on a *pro rata* basis to Authorized Claimants at this time. *Id.* ¶ 49.

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<sup>4</sup> The Net Settlement Funds consist of the Rounds 1-5 Settlement Amounts, plus interest earned thereon through November 30, 2024, less attorneys’ fees, litigation costs and expenses, class notice and settlement administration expenses approved by the Court and paid to date, class representative service payments, and the \$100 minimum payments plus a reserve in connection with these payments totaling \$450,000.

## **II. BACKGROUND**

### **A. Implementation of the \$100 Minimum Distribution**

On October 21, 2024, the Court entered an Order approving EPPs' Motion for Distribution of \$100 Minimum Payments to Authorized Claimants. *See, generally*, Minimum Distribution Order. Pursuant to the Court's \$100 Minimum Distribution Order, the Settlement Administrator began distributing the \$100 minimum payments to Authorized Claimants on December 24, 2024. La Count Decl. ¶ 7. The \$100 minimum payment distribution included digital, wire, and physical check payments to Authorized Claimants. *Id.*

### **B. Epiq's Settlement Administration Work to Date**

Since the Court's entry of the Minimum Distribution Order, the Settlement Administrator has completed initial processing for all claims in connection with the Rounds 1 through 5 Settlements and reviewed claimants' eligibility to recover for all qualifying vehicles and purchases claimed in connection with the Rounds 1-4 Settlements. La Count Decl. ¶¶ 9, 56. Epiq categorized claims into Small Claim Submissions and Large Claim Submissions based on the number of vehicles claimed (La Count Decl. ¶ 10) and undertook a careful and rigorous verification processes based on the claims that were submitted. *Id.* ¶¶ 11-28.

To ensure eligibility of a claim, claimants were required to submit certain information about claimed vehicles. For those claimants submitting Large Claim Submissions, the requisite information included a list of Vehicle Identification

Numbers (“VINs”) for each vehicle claimed. *Id.* ¶¶ 14, 19. Based on this information, Epiq determined that claims covering 32,483,686 vehicles were valid. *Id.* ¶ 29. As set forth in greater detail in the La Count Decl., Epiq, along with Settlement Class Counsel, expended thousands of hours administering the claims that were submitted. *Id.* ¶¶ 13, 56.

For Large Claim Submissions, Epiq required that in addition to submitting a VIN for each vehicle claimed, each claimant was required to submit evidence of a representative sample of vehicles chosen by Epiq confirming the vehicles’ make, model, year, ownership/leaseholder status, date of purchase/lease, and location of purchase/lease in a qualifying damages state for a particular number of the claimed vehicles (“Sample Vehicle Documentation”).<sup>5</sup> *Id.* ¶ 19.

In consultation with Settlement Class Counsel, Epiq determined that a requirement that claimants provide documentation for all vehicles submitted as part of a Large Claim Submission might prove unduly burdensome for some claimants given the number of vehicles covered by each claim and the length of the Settlement Class Periods. *Id.* ¶ 23. Imposing such a requirement would also have been to the

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<sup>5</sup> The Settlement Administrator specified that the requisite proof included purchase orders, lease contracts, title documents and/or purchase or lease documents that provided sufficient information enabling the Settlement Administrator to identify the purchaser’s or lessee’s name and address, VIN, the date and place of purchase or lease, and either the purchaser/lessee’s place of residence, or for businesses, their principal place of business. La Count Decl. at ¶ 13 n. 8.

detriment of Settlement Class Members because it would have resulted in significant delay and increased costs. *Id.* Accordingly, Epiq requested Sample Vehicle Documentation from claimants with Large Claim Submissions for a subset of their claimed vehicles. *Id.* ¶ 24. As reflected in the La Count Decl., Epiq devised a matrix which established the number of vehicles for which a claimant was required to provide Sample Vehicle Documentation based on the number of vehicles claimed. *Id.* The more vehicles claimed, the greater number of vehicle claims a claimant was required to substantiate with Sample Vehicle Documentation. *Id.*

If a claimant was unable to provide Sample Vehicle Documents for vehicles model years 2011 and older, Epiq allowed the claimant to alternatively submit: (i) Sample Vehicle Documentation for three vehicles per claimed manufacturing year in 2011 or before; or (ii) a data export from the claimant's digital records detailing all claimed purchases/leases from 2011 and before, accompanied by a signed affidavit verifying the claim. *Id.* ¶ 25.

Epiq sent out two rounds of deficiency notices to those claimants who failed to adequately support their claimed vehicles with Sample Vehicle Documentation. *Id.* ¶ 36. The Settlement Administrator devoted substantial time and effort reviewing and reconciling claimants' documentation and conferring with claimants concerning their submissions of supporting evidence. *Id.* As part of this process, Epiq conducted an analysis of documents submitted by claimants to support claims for 22,946



vehicles. Based on its analysis of these documents, Epiq was able to validate claims for 25.69% of these vehicles. *Id.*

Employing the 25.69% validation rate, Settlement Class Counsel directed the Settlement Administrator to adjust the validation rate of Large Claim Submissions based on the total number of vehicles a claimant supported with Sample Vehicle Documentation divided by the total number of vehicles for which Epiq requested Sample Vehicle Documentation (“Adjusted Validation Rate”). *Id.* ¶ 37.

Pursuant to the Adjusted Validation Rate, a claimant’s calculated allowed points were adjusted (as necessary) by multiplying the total claimed vehicle points by an established adjustment percentage based on the proportion of sample vehicle claims that Epiq verified relative to the total number of vehicles for which Epiq requested Sample Vehicle Documentation. *Id.* ¶ 38. A chart reflecting the Adjusted Validation rates based on the percentage of sample vehicle claims that were validated is set forth in paragraph 38 of the La Count Decl.

For example, a claimant submitting a claim covering 100 vehicles with a total point value of 100 points (one point for each claimed vehicle) would have been requested by Epiq to submit Sample Vehicle Documentation for 20 vehicles. *Id.* ¶ 24. If the hypothetical claimant provided Sample Vehicle Documentation verifying its claims for five of the 20 vehicles for which Epiq requested Sample Vehicle

Documentation (25%), then the hypothetical claimant would have been awarded 50 total points (50% of its total eligible allowed loss points). *Id.* ¶ 38.

In consultation with Settlement Class Counsel, Epiq required that all claims for a replacement automotive part be accompanied by documentation.<sup>6</sup> *Id.* ¶ 43. Epiq imposed this requirement because many replacement automotive parts are manufactured and sold by third parties (“Aftermarket Parts”) rather than by Defendants (“OEM Parts”) and, absent documentation, it was in most instances impossible to determine the manufacturer of the replacement automotive part. *Id.* Epiq determined that all replacement automotive part claims unsupported by valid documentation of an OEM Part purchase would be ineligible for recovery in connection with the Rounds 1 through 5 Settlements. *Id.*

The La Count Decl. sets forth in detail how Epiq assessed the eligibility for *pro rata* distribution of claimed vehicles and automotive replacement parts. It also discusses how Epiq assessed eligibility for replacement automotive part claims. *Id.* ¶¶ 42-46.

No further review or validation is required for the Settlement Administrator to be able to effectuate a *pro rata* distribution of the Settlement Funds established by the Rounds 1-4 Settlements. *Id.* ¶ 56.

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<sup>6</sup> This required, for example, that if a claimant submitted a claim for 100 replacement parts, Epiq required documentation for each of the 100 claimed replacement parts.

**C. Proposed *Pro Rata* Distribution of Award Payments from the Net Settlement Funds Subject to the Reserve Fund**

Consistent with the Round 4 and Round 5 Plans of Allocation, Epiq allocated the Net Settlement Funds from the Rounds 1-5 Settlements into 43 Automotive Part Funds based on the applicable Automotive Part case (the “Settlement Part Fund”) (e.g., Instrument Panel Clusters Settlement Part Fund). *Id.* ¶ 50. Epiq then assigned each Authorized Claimant points based on all eligible vehicles purchased or leased or replacement parts purchased. *Id.* ¶ 32. Those vehicles that were specifically identified on the Settlement Website as “targeted” vehicles, meaning the vehicle was specifically targeted by the alleged conspiracies, were credited four points. *Id.* ¶ 30. All other eligible vehicles and all eligible replacement parts were credited one point. *Id.*<sup>7</sup>

Epiq calculated a *pro rata* percentage for each Authorized Claimant in a particular Settlement Part Fund by dividing the claimant’s eligible points in a given Settlement Part Fund by the total points eligible for payment within each specific Settlement Part Fund. *Id.* ¶ 51(b). Epiq multiplied each claimant’s *pro rata*

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<sup>7</sup> See, e.g., Order Granting EPPs’ Unopposed Motion for an Order Approving the Proposed Further Revised Plan of Allocation and for Authorization to Disseminate Supplemental Notice to the Settlement Classes ¶¶ 6-8, Master File No. 2:12-md-02311 (Dec. 20, 2019), ECF No. 2032 (order approving further revised plan of allocation in connection with Round 4 Settlements); Proposed Further Revised Plan of Allocation and for Authorization to Disseminate Supplemental Notice to the Settlement Classes, Case No. 2:12-cv-00403 (Dec. 10, 2019), ECF No. 301-2 (EPPs’ proposed Plan of Allocation in connection with the Rounds 1 through 4 Settlements).

percentage within each Settlement Part Fund by the available funding for the Settlement Part Fund after excluding the portion of the Reserve Fund applicable to each Settlement Part Fund, but before deducting funds attributable to the \$100 minimum payments. *Id.* ¶ 51(c). Epiq then summed the claimant's *pro rata* payments across all the eligible Settlement Part Funds to establish an aggregated original *pro rata* distribution payment for each Authorized Claimant. *Id.* ¶ 51(d).

Epiq excluded from the *pro rata* distribution for each Settlement Part Fund those Authorized Claimants whose aggregate original *pro rata* distribution payment was less than or equal to \$100. *Id.* ¶ 51(e). The Settlement Administrator included the remaining Authorized Claimants whose original *pro rata* calculation reached a combined value of more than \$100 across one or more Settlement Part Funds in an adjusted *pro rata* calculation. *Id.* ¶ 51(f).

Epiq reapplied the *pro rata* calculation methodology outlined above after adjusting the balances of each Settlement Part Fund for the portion of the \$100 minimum payment attributable to each Settlement Part Fund and the Reserve Fund. *Id.* Specifically, the Settlement Administrator (1) divided each claimant's points within a given Settlement Part Fund by the total combined point value of each Settlement Part Fund; (2) multiplied the resulting individualized *pro rata* percentage by the Settlement Part Fund's distributable funds; and (3) determined the individual

adjusted *pro rata* distribution payment for each Authorized Claimant in each Settlement Part Fund based on these calculations. *Id.*

Finally, Epiq combined the resulting individual adjusted *pro rata* distribution payments in each Settlement Part Fund to establish the total adjusted *pro rata* distribution payment for each Authorized Claimant. *Id.* ¶ 51(g).

For example, hypothetical Settlement Part Fund A has \$10 million in settlement funds following the minimum \$100 distribution payments and exclusion of the reserve fund. Hypothetical Settlement Part Fund A has 1 million eligible claimed vehicles, and 2,500,000 total eligible points (500,000 targeted vehicles, 500,000 vehicles not identified as targeted). Hypothetical Claimant Z submitted a claim that included 100 eligible vehicles within hypothetical Settlement Part Fund A. The hypothetical claim included 50 eligible targeted vehicles and 50 eligible vehicles that were not identified as targeted, providing a total of 250 eligible points (200 points targeted, 50 points not identified as targeted). *Id.* ¶ 52. Epiq requested five Sample Vehicle Documents from hypothetical Claimant Z. Hypothetical Claimant Z provided one valid Sample Vehicle Document that supported new vehicle purchases/leases (i.e., 20% of the requested Sample Vehicle Documents). *Id.* Epiq then applied an adjusted validation rate of 50% to Claimant Z's total vehicle points because Claimant Z's sample validation rate fell between >5%-25%. *Id.* Claimant Z's eligible base points resulted in an adjusted point value of 125 points.

*Id.* This means that Claimant Z would be entitled to receive a distribution payment of \$500 ( $125/2,500,000 * \$10,000,000$ ) from Part Fund A in the pro rata distribution.

*Id.* Epiq follows this same process for each eligible vehicle claimed in each applicable Part Fund and sums those amounts to create the aggregate distribution payment to Claimant Z. *Id.*

Based on the foregoing *pro rata* calculation methodology, the Settlement Administrator determined that 39,316 Authorized Claimants are eligible for a *pro rata* distribution payment from the Rounds 1 through 4 Settlements, for a combined total of \$826,320,591.11. La Count Decl. ¶ 51(h).

### **III. ARGUMENT**

EPPs respectfully submit that the Court should approve the Motion and permit EPPs to distribute payments from the Net Settlement Funds to Authorized Claimants subject to the Reserve Fund, consistent with the approved Round 4 and Round 5 Plans of Allocation. EPPs thereby are seeking the Court's approval to promptly distribute the lion's share of the proceeds from these historic settlements to the Settlement Class Members.

#### **A. The Court Should Approve the Settlement Administrator's Claim Determinations**

The Court should adopt the Settlement Administrator's recommendations regarding the acceptance or rejection of claims. As set forth above, Epiq conducted a thorough review of claims involving millions of vehicles and replacement parts.

La Count Decl. ¶¶ 3-46. Where it found claims that were incomplete or deficient, it provided claimants a full and fair opportunity to correct or supplement the submissions. *Id.* ¶¶ 15, 20, 23, 44. Epiq also conducted a quality control audit to confirm its administration and calculation of each of the claims. Declaration of Peter Sperry Regarding End-Payor Plaintiffs’ Motion for Distribution of \$100 Minimum Payments to Authorized Claimants, Case No. 2:12-cv-00103 (Aug. 29, 2024), ECF No. 656-1 ¶¶ 24-28.

The use of sampling to verify documentation for Large Claim Submissions was appropriate and necessary. It is well-recognized that “[t]he goal of any distribution method is to get as much of the available damages remedy to class members as possible and in as simple and expedient a manner as possible.” 4 William B. Rubenstein, *Newberg on Class Actions*, § 12:15 (5th ed.) (Westlaw 2018).

As a result of this necessarily complex process, Epiq determined that there are 39,316 Authorized Claimants from the Rounds 1-4 Settlements that merit *pro rata* distribution payments. La Count Decl. ¶ 51(h). Epiq conducted its claim review process in a fair and reasonable matter, consistent with the Rounds 4 and 5 Plans of Allocation, and its methodology and claim determinations should be afforded deference.

**B. The Court Should Authorize the Creation of a Reserve Fund Amounting to 15% of the Net Settlement Funds**

EPPs request that the Court authorize Epiq to create a reserve of 15% of the Net Settlement Funds. The requested reserve is necessary to account for (1) the payment of current and future administrative costs, including but not limited to, tax and claims administration costs; (2) any issues that may arise in connection with the distribution of the proceeds of the Net Settlement Funds; and (3) Settlement Class Counsel’s anticipated application for additional attorneys’ fees and reimbursement of costs and expenses.<sup>8</sup>

**C. The Court Should Approve the Proposed *Pro Rata* Distribution of the Net Settlement Fund Subject to the Reserve Fund**

The proposed *pro rata* distribution (as described herein and more fully in the La Count Decl.) is entirely consistent with the Court-approved Round 4 and Round

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<sup>8</sup> Reserving a portion of the Settlement Funds pending approval of Settlement Class Counsel’s motion for attorneys’ fees and reimbursement of expenses is consistent with the Court-approved notice sent out in connection with the Round 5 Settlements, which provides: “At a later date, Settlement Class Counsel will ask the Court for an award of attorneys’ fees and reimbursement of costs and expenses for all of their services to be paid from the total Settlement Amounts established by the Rounds 1 through 5 Settlements, including any interest earned. The total amount of fees requested, combined with all fees previously awarded by the Court, will not exceed 30 percent of the total Settlement Amounts of all of the Rounds 1 through 5 Settlements, including any interest earned.” Order Granting EPPs’ Motion for an Order Approving the Proposed Plan of Allocation in Connection with the Round 5 Settlements, Master File No. 2:21-cv04403 (Feb. 6, 2023), ECF No. 14 at ¶ 22.



5 Plans of Allocation. For instance, both the Round 4 and Round 5 Plans of Allocation and the proposed *pro rata* distribution provide that:

- Authorized Claimants who were not fully compensated in the \$100 Minimum Distribution round will share and share alike on a *pro rata* basis in the Net Settlement Funds established for each Settlement Class of which they are members based on their Allowed Claim Amounts, subject to the Minimum Payment Amount. *Compare* Round 4 Plan of Allocation at 7; Round 5 Plan of Allocation at 5 *with* La Count Decl. ¶ 51.
- Each Authorized Claimant shall be paid the percentage of the Net Settlement Fund established with respect to a particular Settlement Class that each Authorized Claimant's Allowed Claim Amount bears to the total of the Allowed Claim Amounts of all Authorized Claimants with respect to the same Settlement Class unless the Authorized Claimant's share was less than the \$100 Minimum, then no further payment will be made by the Settlement Administrator. *Compare* Round 4 Plan of Allocation at 8; Round 5 Plan of Allocation at 5 *with* La Count Decl. ¶ 51(b-e).
- The *pro rata* allocation will be modified by initially distributing a \$100 Minimum Payment Amount to all Authorized Claimants, and then

distributing the remaining funds to Authorized Claimants whose weighted *pro rata* allocation exceeds \$100 (subject to their being sufficient funds for each Authorized Claimant to receive at least \$100). *Compare* Round 4 Plan of Allocation at 8; Round 5 Plan of Allocation at 5 *with* La Count Decl. ¶ 7.

- Allowed Claim Amounts for each Authorized Claimant will be determined separately for each Automotive Part. With respect to the specific vehicles containing Automotive Parts which were allegedly targeted by the collusive conduct of Defendants, the per vehicle Allowed Claim Amounts for the purchase or lease of such Vehicle makes, models and years will be weighted at four times the Allowed Claim Amount for other vehicles. *Compare* Round 4 Plan of Allocation at 8; Round 5 Plan of Allocation at 6 *with* La Count Decl. ¶ 30.

Accordingly, the Court should approve the proposed *pro rata* distribution.

**D. At Settlement Class Counsel’s Direction, the Court Should Permit the Settlement Administrator to Make Additional Payments to Authorized Claimants if the Circumstances Warrant and Authorize an Additional *Pro Rata* Distribution if Economically Feasible**

Finally, EPPs seek approval from the Court to authorize Epiq, at Settlement Class Counsel’s direction, to make additional payments to Authorized Claimants,

from the Reserve Fund if the circumstances warrant<sup>9</sup> and a second *pro rata* distribution if economically feasible. In the event it is economically infeasible, EPPs will seek approval from the Court to donate the balance, after payment of any unpaid costs, fees and taxes, to a not-for-profit 501(c)(3) organization as may be approved by the Court.

#### **IV. CONCLUSION**

For the foregoing reasons, EPPs respectfully request that the Court enter an order: (1) approving the Settlement Administrator's claim determinations made pursuant to the methodology described herein and as set out more fully in the La Count Decl.; (2) establishing a reserve of 15% of the Net Settlement Funds to be used for future administrative costs, any issues that might arise in connection with the *pro rata* distribution of funds, and Settlement Class Counsel's application for attorneys' fees and reimbursement of costs and expenses; (3) authorizing *pro rata* distributions of the Net Settlement Funds to Authorized Claimants subject to the reserve; (4) authorizing the Settlement Administrator to make additional payments to Authorized Claimants from the Reserve Fund if circumstances warrant; and (5) authorizing the Settlement Administrator to make a second *pro rata* distribution

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<sup>9</sup> Any such additional payments would be consistent with the Rounds 4 and 5 Plans of Allocation and the Settlement Administrator's claims validation and acceptance process described herein and in the La Count Decl.

within 15 months of Epiq issuing checks in connection with the first *pro rata* distribution, if economically feasible.

Dated: December 27, 2024

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**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION	No. 12-md-02311 Hon. Sean F. Cox
In Re: Wire Harness Systems	Case No. 2:12-cv-00103
In Re: Instrument Panel Clusters	Case No. 2:12-cv-00203
In Re: Fuel Senders	Case No. 2:12-cv-00303
In Re: Heater Control Panels	Case No. 2:12-cv-00403
In Re: Automotive Bearings	Case No. 2:12-cv-00503
In Re: Occupant Safety Systems	Case No. 2:12-cv-00603
In Re: Alternators	Case No. 2:13-cv-00703
In Re: Anti-Vibrational Rubber Parts	Case No. 2:13-cv-00803
In Re: Windshield Wiper Systems	Case No. 2:13-cv-00903
In Re: Radiators	Case No. 2:13-cv-01003
In Re: Starters	Case No. 2:13-cv-01103
In Re: Automotive Lamps	Case No. 2:13-cv-01203
In Re: Switches	Case No. 2:13-cv-01303
In Re: Ignition Coils	Case No. 2:13-cv-01403
In Re: Motor Generator	Case No. 2:13-cv-01503
In Re: Steering Angle Sensors	Case No. 2:13-cv-01603
In Re: HID Ballasts	Case No. 2:13-cv-01703
In Re: Inverters	Case No. 2:13-cv-01803
In Re: Electric Powered Steering Assemblies	Case No. 2:13-cv-01903
In Re: Air Flow Meters	Case No. 2:13-cv-02003
In Re: Fan Motors	Case No. 2:13-cv-02103
In Re: Fuel Injection Systems	Case No. 2:13-cv-02203
In Re: Power Window Motors	Case No. 2:13-cv-02303
In Re: Automatic Transmission Fluid Warmers	Case No. 2:13-cv-02403
In Re: Valve Timing Control Devices	Case No. 2:13-cv-02503
In Re: Electronic Throttle Bodies	Case No. 2:13-cv-02603
In Re: Air Conditioning Systems	Case No. 2:13-cv-02703
In Re: Windshield Washer Systems	Case No. 2:13-cv-02803
In Re: Automotive Constant Velocity Joint Boot Products	Case No. 2:14-cv-02903

In Re: Spark Plugs  
In Re: Automotive Hoses  
In Re: Shock Absorbers  
In Re: Body Sealing Products  
In Re: Interior Trim Products  
In Re: Automotive Brake Hoses  
In Re: Exhaust Systems  
In Re: Ceramic Substrates  
In Re: Power Window Switches  
In Re: Automotive Steel Tubes  
In Re: Access Mechanisms  
In Re: Side Door Latches

Case No. 2:15-cv-03003  
Case No. 2:15-cv-03203  
Case No. 2:15-cv-03303  
Case No. 2:16-cv-03403  
Case No. 2:16-cv-03503  
Case No. 2:16-cv-03603  
Case No. 2:16-cv-03703  
Case No. 2:16-cv-03803  
Case No. 2:16-cv-03903  
Case No. 2:16-cv-04003  
Case No. 2:16-cv-04103  
Case No. 2:16-cv-04303

THIS DOCUMENT RELATES TO:  
End-Payor Actions

**DECLARATION OF MICHELLE M. LA COUNT, ESQ. REGARDING  
END-PAYOR PLAINTIFFS’ MOTION FOR *PRO RATA* DISTRIBUTIONS  
TO AUTHORIZED CLAIMANTS<sup>1</sup>**

I, MICHELLE M. LA COUNT, ESQ., hereby declare as follows pursuant to 28

U.S.C. § 1746:

1. I am an employee of Epiq Class Action & Claims Solutions, Inc. (“Epiq” or “Settlement Administrator”). I currently serve as one of the Project Directors for this matter on behalf of Epiq. I have more than 17 years of experience handling all aspects of settlement administration. The statements of fact in this

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<sup>1</sup> All capitalized terms not otherwise defined in this document shall have the same meanings ascribed to them in EPPs’ Motion for Distribution of \$100 Minimum Payment to Authorized Claimants (“Motion for Distribution of \$100 Minimum Payments”). *See, e.g.*, No 2:12-cv00103 (August 29, 2024), ECF No. 656-1.

Declaration are based on my personal knowledge and information provided to me by other experienced Epiq employees working with me and under my supervision in the ordinary course of business. If called on to do so, I could and would testify competently thereto.

2. The Court appointed Epiq as the Settlement Administrator on October 13, 2015. *See, e.g.*, Corrected Order Granting End-Payor Plaintiffs’ Motion for Authorization to Disseminate Notice to the End-Payor Plaintiff Settlement Classes, No. 2:13-md-02203 (Oct. 13, 2015), ECF No. 152).<sup>2</sup> I submit this Declaration to (a) provide an update to the parties and the Court regarding the approved \$100 minimum payment distribution, (b) advise the parties and the Court regarding the implementation of the various applicable End-Payor Plaintiff (“EPP”) Settlement Agreements, orders, and related documents, and (c) detail the process for allocating the *pro rata* proceeds of the Net Settlement Funds<sup>3</sup> to Authorized Claimants from the Rounds 1 through 5 Settlements.

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<sup>2</sup> In 2018, Epiq acquired Garden City Group, the original Court-appointed settlement administrator, and became its successor.

<sup>3</sup> The Net Settlement Funds consist of the Rounds 1-5 Settlement Amounts, plus interest earned thereon through November 30, 2024, less attorneys’ fees, litigation costs and expenses, class notice and settlement administration expenses that have been approved by the Court and paid to date, class representative service awards, the previously approved \$100 minimum payments, and a \$450,000 reserve fund in connection therewith.



### **ROUND 5 SUBMISSION VALIDATION PROCESS**

3. Epiq applied a similar validation process to the Round 5 Claim Form submissions. Specifically, Epiq audited Round 5 Claim Form submissions that appeared to have at least one facially valid transaction to ensure that Epiq identified and removed from consideration:

- a. Duplicate submissions previously made in the Rounds 1 through 4 Settlements;
- b. Duplicate submissions made within the Round 5 Settlements;
- c. Submissions that failed to include or omitted the required vehicle purchase, vehicle lease, and/or part purchase information; and
- d. Submissions that included an indicia of fraud (*e.g.*, where a single claimant submitted multiple claims for multiple vehicles using the same mailing or email address and/or where submissions facially appeared to contain fraudulent or fake information).

4. Following application of the validation criteria, the Settlement Administrator determined that a total of 24,854 submissions would be eligible for a \$100 minimum payment exclusively from the Round 5 Settlements, for a total of \$2,845,400.

5. The Settlement Administrator has not conducted any defect outreach or requested any sample record documents for those claimants that have submitted a claim for inclusion exclusively within the Round 5 Settlements.

6. Following discussions with Settlement Class Counsel, it has been determined that the \$100 minimum payments will draw exclusively from the Round 5 Settlement proceeds leaving a maximum of \$741,862.64 remaining funds from the Round 5 Settlements available for any future distribution or payment of outstanding costs and fees. Given the small amount of remaining funds available for *pro rata* distribution from the Round 5 Settlement Funds, the Settlement Administrator requests that the Court approve distributing those funds using the same methodology approved for the Rounds 1 through 4 *pro rata* distribution described below without further Order of the Court.

**ROUNDS 1 THROUGH 5 \$100 MINIMUM PAYMENT DISTRIBUTION**

7. Following this Court's Order Approving End-Payor Plaintiffs' Motion for Distribution of \$100 Minimum Payments to Authorized Claimants, Case No. 2:12-cv-00103 (Oct. 21, 2024), ECF No. 663, the Settlement Administrator began distributing the \$100 minimum payments to eligible claimants on December 24, 2024. The \$100 minimum payment distribution included digital, wire, and physical check payments to Authorized Claimants in the Rounds 1-4 Settlements as described in the Declaration of Peter Sperry Regarding End-Payor Plaintiffs' Motion for

Distribution of \$100 Minimum Payments as well as eligible Round 5 claimants described in paragraphs 3-6 above.<sup>4</sup>

### **PROCESSING CLAIMS**

8. Following application of the claims process detailed in the \$100 Minimum Payment Declaration, the Settlement Administrator completed the defect process, claimant outreach, and related audits in connection with the Rounds 1 through 4 Settlements and reviewed claimants' eligibility to recover for vehicles claimed in connection with the Rounds 1 through 4 Settlements.

9. During and following the completion of the claim submission process for the Rounds 1 through 4 Settlements, the Settlement Administrator received, processed, and/or updated Claim Form submissions from claimants.

10. Part of this process required the Settlement Administrator to de-duplicate claims made for the same vehicles. This process also required the Settlement Administrator to identify claims where five or fewer vehicles were included as part of the submission ("Small Claim Submission"), or six or more vehicles were included as part of the submission ("Large Claim Submission").

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<sup>4</sup> Those first payments issued as a check included language noting, "Cash promptly, void and subject to re-distribution if not cashed within 90 days after issue date."

**IDENTIFYING DUPLICATE CLAIMS BASED ON THE SAME VEHICLE**

11. Following its initial review of claim submissions, Epiq determined that certain claimants submitted duplicate claims for the same Vehicle Identification Number (“VIN”). Epiq programmatically reviewed these duplicate VIN submissions and designated, where appropriate, those transactions that contained duplicate VINs. Epiq determined that 3,425,690 duplicate vehicle submissions existed among 12,102 records submitted by claimants.

12. Following its identification and designation of duplicate transactions, the Settlement Administrator, after consulting with Settlement Class Counsel, established a procedure to determine which claimant would receive payment for the duplicate eligible vehicle. Epiq established the following order of priority:

- a. Epiq reviewed the purchase dates included with duplicate claimed vehicles and awarded priority to the claimed vehicle with the earliest purchase date.
  - i. The Settlement Administrator adopted an exception to this rule to account for transactions where it was apparent that the earlier purchasing/leasing claimant sold or leased the duplicate vehicle as a new vehicle. This was evidenced by the existence of a claim for a duplicate VIN with a purchase/lease date indicating that the vehicle was purchased or leased by another claimant within a

short time of the earlier purchase/lease. Specifically, Epiq determined that if a claimant submitted a claim for a vehicle that was purchased/leased by another claimant within 60 days of the claimed purchase/lease date, the claimant asserting the claim for the later-purchased duplicate vehicle would be permitted to recover and the earlier purchaser/lessor who was deemed to purchase/lease the vehicle for resale was excluded pursuant to the terms of the Settlement Agreements.

- b. Fleet Management Companies (“FMCs”)<sup>5</sup> that timely submitted valid claims were permitted to participate in the recovery under the terms set forth in the stipulations reached between Settlement Class Counsel and both: (i) Automotive Rentals, Inc., Element Fleet Corporation, Wheels, Inc., Donlen LLC, and Class Action Capital (“CAC Stipulation”) [ECF No. 2182]; and (ii) Enterprise Fleet Management, Inc. (“EFM Stipulation”) [ECF No. 40184] (together with the “CAC Stipulation, the “FMC Stipulations”). The Settlement Administrator received and processed Claim Forms it received from FMCs and companies that

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<sup>5</sup> FMCs are companies that provide fleet management services to businesses that operate fleets of vehicles. In certain, but not all instances, FMCs purchased new vehicles and then leased those vehicles to their customers.

leased vehicles directly from FMCs (“FMC Customer Claimants”) following the same process identified above, with two exceptions:

- i. Where both an FMC and an FMC Customer Claimant submitted claims based on the same vehicle with the same VIN, the Settlement Administrator resolved the competing claims in favor of the FMC Customer Claimant when the FMC Customer Claimant submitted a valid and qualifying claim.
  - ii. Where both an FMC and an FMC Customer Claimant submitted claims based on the same vehicle with the same VIN and the FMC Customer Claimant submitted an ineligible claim, then Epiq denied both the FMC Customer Claimant’s claim and the FMC’s claim for the duplicate vehicle.<sup>6</sup>
- c. If, after applying the priority rules set forth above, priority could still not be established for one of the duplicate claimants and the conflict accordingly remained unresolved, then Epiq applied the following priority allocation:
- i. If the unresolved conflict was between an individual person/ individual business and an FMC, then Epiq awarded payment to the individual person or individual business claimant.

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<sup>6</sup> CAC Stipulation at ¶ 3; EFM Stipulation at ¶ 2.

- ii. If the unresolved conflict existed between a rental car company and an FMC, then Epiq awarded payment to the rental car company. If two or more rental car companies submitted duplicate claims and insufficient documentation existed to determine the priority of either claimant, then Epiq denied payment to each of the rental car companies. Epiq adopted this approach because rental car companies frequently submitted duplicate claims for affiliated, merged, acquired, subsidiary, and related companies that generated thousands of duplicate and conflicting claims with insufficient documentation to determine which rental car company affiliate should prevail over another. Due to the high frequency of such unverified, duplicate, and conflicting claims, Epiq denied the claims.
- iii. If the unresolved conflict existed between an FMC and an FMC with a Managed-Only Claim<sup>7</sup>, then Epiq awarded the FMC the vehicle for payment. If two or more FMCs submitted duplicate claims for a vehicle and insufficient documentation existed to determine the priority of the claimants, then Epiq denied

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<sup>7</sup> A Managed-Only claim is a claim asserted by an FMC that provided fleet management services to an FMC Customer relating to new vehicles purchased or leased by the FMC Customer from an automobile dealer or other third party.

payment for the duplicate vehicle to all FMC claimants. Epiq adopted this approach because FMCs submitted thousands of duplicate and conflicting claims with insufficient documentation to determine which claim should prevail over another. Due to the high frequency of such unverified, duplicate, and conflicting claims, Epiq denied the claims.

13. Epiq's employees spent thousands of hours conducting a manual review and outreach in connection with the submission of duplicate claims. This process required Epiq to contact claimants and review thousands of pages of documents involving millions of claimed vehicles. After application of the duplicate vehicle priority rules, Epiq updated all vehicle transactions with duplicate VINs to either deny payment for unresolved duplicates or award payment to the appropriate priority holder eliminating millions of ineligible and/or duplicative VINs both within claims from a single claimant and across multiple claims from consideration.

## **IDENTIFYING, CATEGORIZING, AND VALIDATING CLAIMS**

### **SMALL CLAIM SUBMISSION**

14. For Small Claim Submissions, the claimant was required to submit transaction details identifying: (1) the make, model, and year of each claimed vehicle; (2) whether the claimed vehicle was purchased or leased new; (3) the



purchase or lease date of the vehicle; and (4) the state of purchase, state of residence, or, for businesses the principle place of business at the time of the purchase or lease.

15. Following receipt of the Claim Form and any corresponding defect response, the Settlement Administrator removed claims for ineligible vehicles where:

- a. The claim for one or more vehicle(s) did not include: (1) the make, model, and year of the claimed vehicle(s); (2) whether the claimed vehicle(s) was purchased or leased new; (3) the purchase or lease date of the claimed vehicle(s); and/or (4) the state of purchase, state of residence, or, for businesses, the principal place of business at the time of the purchase or lease of the claimed vehicle(s).
- b. The claim did not have a make, model, and year consistent with a vehicle present on the Settlement Rounds 1 through 5 eligible vehicle lists.<sup>8</sup>
- c. The purchase or lease date of the claimed vehicle(s) was 24 months or more after the model year or 12 months or more before the model year of the claimed vehicle(s). This rule was applied to ensure that a vehicle was purchased or leased new.

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<sup>8</sup> The eligible vehicle list identifies the eligible make, model, and model year vehicles included in each Settlement Class. The eligible vehicle list was and has been posted to the Settlements website, [AutoPartsClass.com](http://AutoPartsClass.com).

16. Although the Settlement Administrator did not require documentation for Small Claim Submissions unless the initial submission was defective, a claim for a vehicle was deemed ineligible if: (1) the Claim Form submission included documentation demonstrating the vehicle was ineligible for recovery; or (2) a defect response provided information that made it readily apparent that the vehicle was not eligible for recovery.

17. Following review and removal of ineligible vehicles (where necessary), Epiq determined the number of Small Claim Submission vehicles eligible for participation in the Rounds 1 through 4 Settlements.

18. For Small Claim Submissions, Epiq evaluated 314,058 vehicles for eligibility. Epiq determined that 267,230 of Small Claim Submission vehicles are eligible for participation in the Rounds 1 through 4 Settlements.

### **LARGE CLAIM SUBMISSIONS**

19. For Large Claim Submissions, Epiq implemented additional claim submission requirements due to the potential impact that accepting a Large Claim Submission could have on the recovery of other claimants. First, Epiq required claimants to submit the associated VIN for each claimed vehicle. Second, Epiq required the claimant to submit proof of an identified sample of vehicle purchases. Specifically, the Settlement Administrator required claimants to submit evidence for a randomly determined representative sample of vehicles (discussed in more detail

below) confirming the vehicles' make, model, year, ownership/leaseholder status, date of purchase/lease, and location of purchase/lease in an Indirect Purchaser State for a particular quantity of the claimed vehicles ("Sample Vehicle Documentation").<sup>9</sup>

20. After processing all defect responses, Epiq applied the following criteria to establish the eligibility of a Large Claim Submission:

- a. Epiq required that submissions for each claimed vehicle meet the same minimum criteria as set forth in paragraph 15. The Settlement Administrator removed all claimed vehicles as ineligible that were not in compliance with these minimum requirements.
- b. While VINs were requested but not required for claimants under the Small Claims Submission Process, Epiq required claimants within the Large Claim Submission process to include the associated VIN for each claimed vehicle. If a VIN was not provided for a particular claimed vehicle following the defect notice and opportunity to cure,

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<sup>9</sup> The Settlement Administrator specified that the requisite proof included purchase orders, lease contracts, title documents, and/or purchase or lease documents that provided sufficient information to enable the Settlement Administrator to identify the purchaser's or lessee's name and address, VIN, the date and place of purchase or lease, and either the purchaser/lessee's place of residence, or for businesses, principal place of business.

Epiq marked the claimed vehicle as ineligible and excluded it from the claimant's recovery.<sup>10</sup>

- c. If all the claimed vehicles in a submission conformed with the established eligibility requirements (*i.e.*, vehicles make, model, year, ownership/leaseholder status, date of purchase/lease, and location of purchase/lease in an Indirect Purchaser State), but the claimant failed to provide a VIN for any of the claimed vehicles, the Settlement Administrator permitted the claimant to obtain recovery for five vehicles, consistent with the allowances made for Small Claims Submissions. This exception was applied to maintain consistency among the Small Claim Form and Large Claim Form populations.

21. Following review and removal of ineligible transactions (if necessary), Epiq determined the number of Large Claim Submission vehicles eligible for participation in the Rounds 1 through 4 Settlements.

22. For Large Claim Submissions, Epiq evaluated 41,073,762 vehicles for eligibility. Epiq determined that 32,216,456 of Large Claim Submission vehicles are eligible for participation in the Rounds 1 through 4 Settlements.

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<sup>10</sup> A strict requirement for inclusion of VINs was applied to Large Claim Submissions due to the volume of vehicles claimed by these submissions compared to those under the Small Claim Submission process.

## **LARGE CLAIM SUBMISSION VEHICLE SAMPLE DOCUMENTATION REVIEW AND VALIDATION**

23. In June 2023, Epiq issued claim defect notices to claimants with Large Claim Submissions. The defect notices advised claimants with Large Claim Submissions that they would need to provide purchase or lease documentation for a representative sample of claimed vehicles. The Settlement Administrator selected a representative sample of vehicles from the population of facially valid vehicle transactions using a programmatic randomizer to establish the list of claimed vehicle transactions that would require documentation (the “Sample Vehicle List”). The Settlement Administrator did not require Sample Vehicle Documentation for all vehicles submitted as part of a Large Claim Submission because such a requirement may have been overly burdensome for some claimants given the quantity of vehicles involved and the length of the Class Periods. Imposing such a requirement would also have been to the detriment of Settlement Class Members because it would have resulted in significant delay and increased costs.

24. The Settlement Administrator requested Sample Vehicle Documentation from claimants based on the number of vehicles claimed. This process involved establishing a Sample Document matrix as follows:

<b>Vehicle Count</b>	<b>Sample Document Count</b>
6-99 claimed vehicles	5
100-999 claimed vehicles	20
1,000-9,999 claimed vehicles	50
10,000-99,999 claimed vehicles	100
100,000-999,999 claimed vehicles	200
One million or more claimed vehicles	400

25. If a claimant was unable to present Sample Vehicle Documents for model years 2011 and older, the Settlement Administrator allowed the claimants to alternatively submit: (i) Sample Vehicle Documentation for three (3) Vehicles per claimed model year in 2011 or before; or (ii) a data export from the company's digital records detailing all claimed purchases/leases in 2011 and before, accompanied by a signed affidavit.

26. Epiq has reviewed all Sample Vehicle Documentation in connection with the Rounds 1 through 4 Settlements to confirm that the submitted documentation validates the following information for each identified sample vehicle: (1) make, model, and year; (2) ownership/leaseholder status; (3) date of purchase/lease; (4) location of purchase/lease in an indirect purchaser state; and (5) the purchase/lease was a new vehicle.

27. During the documentation review process, a handful of claimants (either directly or through Third-Party Claims Filers<sup>11</sup>) contacted the Settlement Administrator to discuss questions and comments concerning available documentation. The Settlement Administrator considered these questions, comments, and any additional supporting documentation when determining an appropriate validation process.

28. The Settlement Administrator reviewed documentation for a total of 66,645 vehicles submitted as part of a Large Claim Submission in connection with the Rounds 1-4 Settlements. From these records, the Settlement Administrator determined:

- a. Randomly Selected Sample Vehicle Documentation: 9,646 vehicles were supported by documentation from a claimant's records indicating a qualifying purchase or lease. 23,609 vehicles were supported by indirect purchase evidence from a Recording Company<sup>12</sup>. 23,105 sample vehicles were accompanied by either invalid documentation or no documentation.<sup>13</sup>

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<sup>11</sup> A third-party filer is an entity that filed a claim on behalf of a claimant.

<sup>12</sup> Recording companies include companies such as Carfax, Inc., R.L. Polk & Company, TransUnion Automotive Solutions, and Accurint that collect vehicle data and records concerning the purchase or lease of a vehicle, including the vehicle make, model, year, VIN, title, and registered owner details.

b. For those claimants that could not support vehicle purchases or leases for model year vehicles 2011 and older with supporting Sample Vehicle Documentation, claimants were presented with an alternate option to document claimed vehicles for these years using an affidavit signed by the claimant that included a data export taken from the claimant's business records. 3,923 claimants supported these purchases using this alternative method.

### **CLAIM AND RELATED VEHICLE POINT VALUATION**

29. Following completion of the Settlement Administrator's review and analysis of Small and Large Claim Submissions, which included review of all submitted Sample Vehicle Documentation, application of the FMC submission rules, and award or removal of duplicate vehicle submissions, Epiq determined that 32,483,686 vehicles should be allocated payment from the Rounds 1 through 4 Settlement Funds, inclusive of both Small and Large Claim Submissions.

30. In accordance with the Rounds 4 and 5 Plans of Allocation, the Settlement Administrator established a "point" value for each included vehicle identified as eligible under the various Settlements. Per the approved Rounds 4 and 5 Plans of Allocation, certain vehicles were specifically identified as a "targeted" vehicle, meaning the vehicle was specifically targeted by the alleged collusive



conduct of the Defendants. Such targeted vehicles were “weighted at four times the Allowed Claim Amount for other vehicles.”<sup>14</sup>

31. Based on the required weighting, the Settlement Administrator established a point valuation system for each eligible vehicle within the various Rounds 1 through 4 Settlements – one point for each non-weighted eligible vehicle and four points for each targeted eligible vehicle as described above. Eligible vehicles were identified on the Settlement Website, [www.AutoPartClass.com](http://www.AutoPartClass.com), which listed the make, model, and year, of the vehicles, the automotive parts case(s) to which they applied, and whether the vehicles were targeted.

32. After determining the eligible vehicles for a given claim, the Settlement Administrator assessed the point value of each Authorized Claimant’s eligible vehicle claims. The assigned point value of an eligible vehicle for Small and Large Claim Submissions were determined as described below.

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<sup>14</sup> *See, e.g.*, Order Granting EPPs’ Unopposed Motion for an Order Approving the Proposed Further Revised Plan of Allocation and for Authorization to Disseminate Supplemental Notice to the Settlement Classes ¶¶ 6-8, Master File No. 2:12-md- 02311 (Dec. 20, 2019), ECF No. 2032 (order approving further revised plan of allocation in connection with Round 4 Settlements); Proposed Further Revised Plan of Allocation and for Authorization to Disseminate Supplemental Notice to the Settlement Classes, Case No. 2:12-cv-00403 (Dec. 10, 2019), ECF No. 301-2 (EPPs’ proposed Plan of Allocation in connection with the Rounds 1 through 4 Settlements).

### **SMALL CLAIM SUBMISSIONS**

33. Epiq recorded the eligible vehicle transactions of claimants utilizing the Small Claims Submissions and added together the point values for all potentially eligible vehicles in each Round 1 through 4 Settlement Fund. For each of the separate Round 1 through 4 Settlement Funds, a Small Claim Submission could only be eligible for between zero and 20 points (e.g., if all five eligible vehicles qualified as four-point targeted vehicles). Epiq treated Large Claim Submissions that identified eligible vehicles with no valid VIN information as Small Claim Submissions limited to a maximum of 20 points.

34. For those claimants utilizing or treated as Small Claim Submissions, the Settlement Administrator determined that 267,230 vehicles were eligible for payment across 152,815 claimant submissions. This totaled 4,177,081 points across the Rounds 1-4 Settlements.

### **LARGE CLAIM SUBMISSIONS**

35. For those claimants utilizing the Large Claim Submission process, the Settlement Administrator determined that 32,216,456 vehicles were eligible for payment across 3,851 claimant submissions. As set forth in detail in paragraph 24 above, those claimants that Epiq identified as part of the Large Claim Submission group were required to present Sample Vehicle Documentation to validate their claims.

36. In May 2023, Epiq sent defect letters to claimants that failed to adequately support the vehicles requested by Epiq with Sample Vehicle Documentation. Following issuance of the defect letters, Epiq spent six months reviewing claimants' responses, requesting additional details, and reconciling documentation. Epiq ultimately determined that a large portion of claimants submitting Large Claim Submissions failed to cure their defects necessitating Epiq to send a second round of defect letters to claimants on a rolling basis beginning in November 2023. All told, the Settlement Administrator spent hundreds of hours communicating with those claimants that failed to provide adequate support for each of the vehicles for which it requested Sample Vehicle Documentation. In June 2024, after reviewing documentation provided in response to both the initial and the follow-up defect letter campaign, Epiq conducted an analysis of documents submitted by claimants which purported to support claims for 22,946 vehicles. This analysis was conducted to determine the proportion of claimants that were able to provide sufficient Sample Vehicle Documents for all of the vehicles for which the Settlement Administrator requested such documentation. 5,895, or 25.69%, of the vehicle claims analyzed by Epiq were validated by the Sample Vehicle Documentation responses; documents submitted in connection with the remaining vehicle claims analyzed by Epiq were missing one or more of the criteria for "valid" Sample Vehicle Documentation.

37. As a result of the 25.69% validation rate following two rounds of defect notices and hundreds of hours of meetings with the filers in an effort to perfect the Sample Vehicle Documentation for their claims, Settlement Class Counsel directed the Settlement Administrator to adjust the validation rate of Large Claim Submissions based on the total number of vehicles Epiq validated with Sample Vehicle Documentation divided by the total number of vehicles for which Epiq requested Sample Vehicle Documentation (“Adjusted Validation Rate”).

38. After providing extensive statistical analysis to Settlement Class Counsel and at Settlement Class Counsel’s direction, Epiq established the following Adjusted Validation Rate based on the percentage of sample vehicle claims that were validated:

<b>Sample Vehicle Claims Verified</b>	<b>Percentage of Calculated, Unverified Vehicle Points Allowed</b>	<b>Capped Value</b>
0% Validated Sample Vehicles	25%	\$100,000
>0% - 5% Validated Sample Vehicles	25%	N/A
>5% - 25% Validated Sample Vehicles	50%	N/A
Recording Company Documentation Only	70%	N/A
>25% - 50% Validated Sample Vehicles or Recording Company Documentation with Additional Validated Sample Vehicle Documentation	75%	N/A
>50% - 75% Validated Sample Vehicles	90%	N/A
>75%+Validated Sample Vehicles or Recording Company Documentation with 50%+ Validated Sample Vehicles	100%	N/A

39. Epiq then summed the total points of vehicles claimed by a given claimant across the Rounds 1 through 4 Settlement Funds and multiplied that amount by the Adjusted Validation Rate. An example breakdown of a single vehicle’s points following application of the Adjusted Validation Rate (“Post Validation Rate Adjustment”) is set forth in the table below:

<b>Post Validation Rate Adjustment of all Vehicles Points Claimed</b>		
	Non-Targeted Vehicle	Targeted Vehicle
Base Point Value	1.0	4.0
25% Adjustment	0.25	1.0
50% Adjustment	0.5	2.0
70% Adjustment	0.7	2.8
75% Adjustment	0.75	3.0
90% Adjustment	0.9	3.6
100% Adjustment	1.0	4.0

Illustrative examples of the Adjusted Validation Rate applied to a vehicle claim submission are as follows:

- a. Claimant A submitted a claim that included 1,500 eligible vehicles. The base points for all eligible vehicles totaled 1,500 points. The Settlement Administrator requested 50 Sample Vehicle Documents from Claimant A. Claimant A provided 11 valid Sample Vehicle Documents that supported new vehicle purchases/leases (i.e., 22% of the Sample Vehicle Documents requested). The Settlement Administrator then applied an Adjusted Validation Rate of 50% to Claimant A’s base vehicle points

because Claimant A's sample validation rate fell between >5%-25%. Claimant A's eligible base points resulted in an Adjusted Point Value of 750 points.

- b. Claimant B submitted a claim that included 150,000 vehicles. The base points for all eligible vehicles totaled 300,000. The Settlement Administrator requested 200 Sample Vehicle Documents from Claimant B. Claimant B provided five (5) valid Sample Vehicle Documents that supported new vehicle purchases/leases (2.5% of the Sample Vehicle Documents Requested) and the 195 remaining sampled vehicles were supported by Recording Company documents. The Settlement Administrator then applied an Adjusted Validation Rate of 75% to Claimant B's base vehicle points because Claimant B validated the vehicles with Recording Company documentation and additional Sample Vehicle Documentation. The Settlement Administrator then applied the 75% Adjusted Validation Rate to Claimant B's eligible base points resulting in an Adjusted Point Value of 225,000 points.

40. Following application of the Adjusted Validation Rate to all vehicle points claimed, 366,893,461 points have been claimed collectively among the Rounds 1 through 4 Settlement Funds by 2,936 claimants submitting Large Claim Submissions.

41. Collectively, among both claimants submitting Small and Large Claim Submissions, 379,702,671 points have been calculated among Rounds 1 through 4 Settlements, with post-adjustment points total of 371,070,542 total points after applying the Adjusted Validation Rate for Large Claim Submissions.

**CLAIMED REPLACEMENT PART ELIGIBILITY**

42. In addition to submitting a Claim Form for a new vehicle lease or purchase, the Round 4 Plan of Allocation also contemplates a claimant submitting a claim for purchase of a qualifying replacement part manufactured by one of the Defendants.

43. In consultation with Settlement Class Counsel, the Settlement Administrator required that all claims for a replacement part be accompanied by documentation.<sup>15</sup> Epiq imposed this requirement because many replacement parts are manufactured and sold by third parties (“Aftermarket Parts”) rather than by Defendants (“OEM Parts”) and, absent documentation, it is in most instances impossible to determine the manufacturer of the replacement part. Epiq determined that all replacement part claims unsupported by valid documentation of an OEM Part purchase would be ineligible for recovery in connection with the Rounds 1 through 5 Settlements and reviewed all replacement parts claimed based on this standard.

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<sup>15</sup> This required, for example, that if a claim was submitted that included 100 replacement parts, each of the 100 replacement parts would require supporting documentation.

44. As part of the Settlement Administrator's May and June 2023 claim defect notice process, the Settlement Administrator issued notices to those claimants that claimed replacement parts that were not supported by documentation and required them to submit either: (1) a repair order for a repair performed on an Included Vehicle, as defined in the Settlement Website, by an authorized dealer repair shop that included an eligible replacement part as an invoiced item, or (2) a receipt or purchase order showing the part, the identity and the manufacturer of the part, the place of purchase, the date of purchase, and the amount paid. This process required a significant investment of time on the part of Epiq.

45. Epiq assigned all eligible qualifying replacement part purchases a value of one point. Replacement parts could only be claimed from the specific Settlement Fund for which it was eligible.

46. Following completion of all documentation review, the Settlement Administrator validated 8,266 qualifying replacement parts claimed across 2,261 claims, but as described more fully in paragraph 51 below, none of these claims exceeded the \$100 minimum payment threshold in the aggregate and thus do not qualify for payment in connection with the Rounds 1 through 4 Settlements *pro rata* distribution.



**PROPOSED PRO RATA DISTRIBUTION OF NET SETTLEMENT FUNDS**

47. As of November 30, 2024, the Net Settlement Funds total approximately \$972 million.

48. Following discussions with Settlement Class Counsel, Epiq recommends the establishment of a reserve amounting to 15% of the Net Settlement Funds. This will allow for the payment of administrative costs and fees, the resolution of any matters that might arise following distribution of the proceeds of the Net Settlement Funds, and Settlement Class Counsel's application for attorneys' fees and reimbursement of costs and expenses.

49. If reserve funding is approved by the Court, approximately \$827 million will remain available for distribution among the various Rounds 1-5 Settlement Funds. This figure does not include interest that is accruing on the Net Settlement Funds. A breakdown of each Settlement Fund's available funding through November 30, 2024, funds allocated to the \$100 minimum distribution, proposed reserves, and remaining distributable funds is shown in Exhibit A.<sup>16</sup>

50. To date, a separate Settlement Fund has been maintained for each Defendant across each Auto Parts case. For instance, Sumitomo settled with EPPs

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<sup>16</sup> The Exhibit is provided in two versions for the convenience of the Court. Version 1 includes the full list of each Settlement Fund organized by Settlement Round. Version 2 includes a full list of each Settlement Fund organized by automotive parts case.

across two Auto Parts cases and there are two separate Settlement Funds involving Sumitomo, one for each settlement with Sumitomo across each Auto Parts case. The Settlement Administrator intends to aggregate Settlement Funds within each Auto Parts case so there will be a single settlement fund for each Auto Parts case (“Settlement Part Fund”). For example, 12 Defendants settled with EPPs in the Wire Harness Systems case and there are presently 12 separate Wire Harnesses Systems Settlement Funds, one for each Defendant. Epiq intends to combine these Settlement Funds into one aggregate Settlement Part Fund involving Wire Harness.

51. Pursuant to the Round 4 and Round 5 Plans of Allocation, each of the eligible Rounds 1 through 5 Authorized Claimants are entitled to receive a Minimum Payment Amount of \$100 and an additional *pro rata* payment of any calculated amounts that exceed \$100.<sup>17</sup> If an Authorized Claimant’s payment is calculated at \$100 or less, the \$100 payment will be the total payment the Authorized Claimant will be eligible to receive (*i.e.*, the Authorized Claimant will not receive a further

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<sup>17</sup> See, e.g., Order Granting EPPs’ Unopposed Motion for an Order Approving the Proposed Further Revised Plan of Allocation and for Authorization to Disseminate Supplemental Notice to the Settlement Classes, Master File No. 2:12-md-02311 (Dec. 20, 2019), ECF No. 2032 (order granting EPPs’ proposed Plan of Allocation in connection with the Rounds 1 through 4 Settlements); Proposed Further Revised Plan of Allocation and for Authorization to Disseminate Supplemental Notice to the Settlement Classes, Case No. 2:12-cv-00403 (Dec. 10, 2019), ECF No. 301-2 (EPPs’ proposed Plan of Allocation in connection with the Rounds 1 through 4 Settlements).

*pro rata* distribution payment). To calculate Authorized Claimants' payments, the following methodology was applied:

- a. The Settlement Administrator combined all the vehicle and replacement part points from all Authorized Claimants' submissions eligible for *pro rata* distribution in all the Settlement Part Funds. As detailed in the sections above, 379,702,671 total points relate to claimed vehicles and 8,266 total points relate to claimed replacement parts, for a combined total of 379,710,937 payable points. These totals represent the combined point totals from the Round 1-4 Settlement Part Funds, and not the total from an individual Settlement Part Fund.
- b. Then, the Settlement Administrator calculated *pro rata* percentages for each Authorized Claimant. After applying the Adjusted Validation Rate to Large Claim Submissions, the Settlement Administrator determined the *pro rata* percentages by taking the total points eligible for payment within each specific Settlement Part Fund and dividing that total against the individual eligible points for each Authorized Claimant within a particular Settlement Part Fund.
- c. The Settlement Administrator then multiplied the resulting individualized *pro rata* percentage by the original available funding

amount within each Settlement Part Fund (*i.e.*, before removing funds related to the \$100 minimum payments, but after removing reserve funding).<sup>18</sup> This calculation determined the estimated *pro rata* award for Authorized Claimants in each Settlement Part Fund.

- d. The Settlement Administrator then combined each Authorized Claimant's estimated *pro rata* award among all the Settlement Part Funds to achieve a combined initial *pro rata* calculation ("Initial *Pro Rata* Calculation").
- e. If an Authorized Claimant's Initial *Pro Rata* Calculation was less than or equal to \$100, that Authorized Claimant was removed from the *pro rata* payment population within each Settlement Part Fund (in addition to their approved vehicle and replacement part points). It should be noted, no claims containing replacement parts exceeded the \$100 threshold, thus there is no allocation of additional Settlement Part Funds to replacement parts point values as part of the *pro rata* distribution.

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<sup>18</sup> The Settlement Administrator included the funding allocated from each Settlement Part Fund for the \$100 minimum payments to ensure that the *pro rata* calculations could not be reduced and inadvertently exclude an Authorized Claimant from an additional payment for which they were due.

- f. The Settlement Administrator included the remaining Authorized Claimants whose Initial *Pro Rata* Calculation reached a combined value of \$100.01 or greater in an adjusted *pro rata* calculation. The Settlement Administrator reapplied the *pro rata* calculation methodology outlined above after adjusting the balances of each Settlement Part Fund for the portion of the \$100 minimum payment attributable to each Settlement Part Fund and the reserved funds. Specifically, the Settlement Administrator (1) combined the total Post Valuation Rate Adjustment points of each Authorized Claimant in each Settlement Part Fund, (2) divided the total combined point value of each Settlement Part Fund against each Authorized Claimant's Settlement Part Fund points, (3) multiplied the resulting individualized *pro rata* percentage by the Settlement Part Fund's distributable funds, and (4) determined the individual adjusted *pro rata* award for each Authorized Claimant in each Settlement Part Fund based on these calculations.
- g. The resulting individual adjusted *pro rata* awards in each Settlement Part Fund were then combined to establish the total adjusted *pro rata* distribution payment ("*Pro Rata* Distribution Payment") for each Authorized Claimant.

h. Based on the foregoing *pro rata* calculation methodology, the Settlement Administrator determined that 39,316 Authorized Claimants from the Rounds 1-4 Settlements are eligible for a *Pro Rata* Distribution Payment, for a combined total of \$826,320,591.11, using the current value of the Net Settlement Funds.

52. For example, hypothetical Settlement Part Fund A has \$10 million in settlement funds following the \$100 distribution payments and exclusion of the reserve fund. Hypothetical Settlement Part Fund A has 1 million eligible claimed vehicles, and 2,500,000 total eligible points (500,000 targeted vehicles, 500,000 vehicles not identified as targeted). Hypothetical Claimant Z submitted a claim that included 100 eligible vehicles within hypothetical Settlement Part Fund A. The claim included 50 eligible targeted vehicles and 50 eligible vehicles not identified as targeted that provided a total of 250 eligible points (200 points targeted, 50 points not identified as targeted). Epiq requested five Sample Vehicle Documents from hypothetical Claimant Z. Hypothetical Claimant Z provided one valid Sample Vehicle Document that supported new vehicle purchases/leases (i.e., 20% of the requested Sample Vehicle Documents). Epiq then applied an adjusted validation rate of 50% to hypothetical Claimant Z's total vehicle points because hypothetical Claimant Z's sample validation rate fell between >5%-25%. Hypothetical Claimant

Z's eligible base points resulted in an adjusted point value of 125 points. This means that hypothetical Claimant Z would be entitled to receive a distribution payment of \$500 ( $125/2,500,000 * \$10,000,000$ ) from hypothetical Settlement Part Fund A in the *pro rata* distribution. Epiq follows this same process for each eligible vehicle claimed in each applicable Settlement Part Fund and sums those amounts to create the aggregate distribution payment to hypothetical Claimant

### **DISTRIBUTION PLAN FOR THE NET SETTLEMENT FUNDS**

53. If approved by the Court, Authorized Claimants' *Pro Rata* Distribution Payments will be paid from the Net Settlement Funds. Payments will be issued with a 90-day stale date and will become void following the expiration of that period. It may be expected that not all the payments to be distributed to Authorized Claimants will be cashed promptly. In order to encourage Authorized Claimants to promptly cash their distribution checks, and to avoid or reduce future expenses relating to unpaid distributions, Settlement Class Counsel propose that all the distribution checks bear a notation "CASH PROMPTLY, VOID AND SUBJECT TO RE-DISTRIBUTION IF NOT CASHED WITHIN 90 DAYS AFTER ISSUE DATE."<sup>19</sup>

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<sup>19</sup> This excludes those payments that are subject to the FMC Stipulations, which will become stale eight (8) months following the distribution of the \$100 minimum payments or 90 days after the *Pro Rata* Distribution Payments, whichever is later.

54. As part of the distribution, the Settlement Administrator will issue a check payment of the *Pro Rata* Distribution Payment to those Authorized Claimants that are not represented by a Third-Party Claims Filer. For those Authorized Claimants that are represented by a Third-Party Claims Filer, the Settlement Administrator will issue a check payment or payments if the representing Third-Party Claims Filer has not contacted the Settlement Administrator indicating a payment preference. If a Third-Party Claims Filer has contacted the Settlement Administrator and has provided a preference for a wire payment instead of a check, the Settlement Administrator will compile a list of individuals and/or companies represented by the Third-Party Claims Filer, their related *Pro Rata* Distribution Payment, and issue a single lump sum payment to the Third-Party Claims Filer.

- a. The Settlement Administrator may, at the direction of Settlement Class Counsel, require an accounting from the Third-Party Claims Filer providing detail on whether the Third-Party Claims Filer has distributed and confirmed receipt of the *Pro Rata* Distribution Payment to each Authorized Claimant the Third-Party Claims Filer represents and requiring any funds not so distributed to be returned to the Settlement Administrator.

55. Unless otherwise provided by the FMC Stipulations as described above in paragraph 12(b), 180 days after distributions are transmitted, any Third-Party

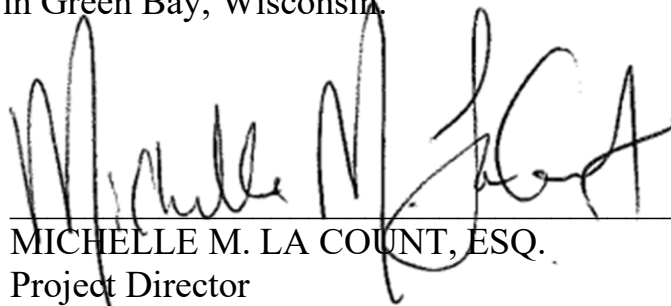


Claims Filer that has not distributed and confirmed the transfer of funds concerning a *Pro Rata* Distribution Payment to an Authorized Claimant (e.g., via wire transfer to or cashed check by an Authorized Claimant) must return the total undistributed *Pro Rata* Distribution Payment attributable to such uncompensated Settlement Class Member to the Settlement Administrator.

### **CONCLUSION**

56. Based on the initial claim examinations and extensive defect notice and cure process, which required thousands of hours of programmatic and manual review, the Settlement Administrator arrived at determinations for received claims in accordance with the terms of the Settlement Agreements, Court-approved Plans of Allocation, Orders of the Court, and the guidance of Settlement Class Counsel.

I declare under penalty of perjury under the laws of the United States and the State of Wisconsin that the foregoing is true and correct, and that this Declaration was executed on December 27, 2024, in Green Bay, Wisconsin.



MICHELLE M. LA COUNT, ESQ.  
Project Director  
Epiq Class Action & Claims Solutions, Inc.

# Exhibit A

Sorted by Settlement Round

Defendant	Part Settlement	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
<b>Round 1 Settlement Funds</b>							
Hitachi	Air Flow Meters 13-2003	\$ 3,729,467.96	\$ 59,120.91	\$ 1,322.50	\$ 3,669,024.55	\$ 546,758.82	\$ 3,122,265.73
Hitachi	Alternators 13-0703	\$ 4,598,634.21	\$ 72,839.28	\$ 1,629.37	\$ 4,524,165.56	\$ 674,195.82	\$ 3,849,969.74
T.RAD	ATF Warmers 13-2403	\$ 529,293.35	\$ 8,349.37	\$ 186.77	\$ 520,757.21	\$ 77,605.90	\$ 443,151.31
Hitachi	Electronic Throttle Bodies 13-2603	\$ 5,074,639.77	\$ 80,390.98	\$ 1,798.30	\$ 4,992,450.49	\$ 743,979.38	\$ 4,248,471.11
Hitachi	Fuel Injection Systems 13-2203	\$ 6,437,350.15	\$ 101,941.21	\$ 2,280.36	\$ 6,333,128.58	\$ 943,770.73	\$ 5,389,357.85
Yazaki	Fuel Senders 12-0303	\$ 31,009.70	\$ 489.70	\$ 10.95	\$ 30,509.05	\$ 4,546.58	\$ 25,962.47
Sumitomo	Heater Control Panels 12-0403	\$ 1,629,606.62	\$ 25,806.38	\$ 577.27	\$ 1,603,222.97	\$ 238,914.28	\$ 1,364,308.69
Panasonic	HID Ballasts 13-1703	\$ 4,166,425.56	\$ 65,994.07	\$ 1,476.25	\$ 4,098,955.24	\$ 610,830.50	\$ 3,488,124.74
Hitachi	Ignition Coils 13-1403	\$ 5,495,660.42	\$ 87,029.92	\$ 1,946.80	\$ 5,406,683.70	\$ 805,710.68	\$ 4,600,973.02
Nippon Seiki	Instrument Panel Clusters 12-0203	\$ 3,423,285.80	\$ 54,212.48	\$ 1,212.70	\$ 3,367,860.62	\$ 501,882.69	\$ 2,865,977.93
Yazaki	Instrument Panel Clusters 12-0203	\$ 2,002,337.59	\$ 31,731.06	\$ 709.80	\$ 1,969,896.73	\$ 293,555.10	\$ 1,676,341.63
Hitachi	Inverters 13-1803	\$ 1,744,415.71	\$ 27,564.26	\$ 616.59	\$ 1,716,234.86	\$ 255,759.18	\$ 1,460,475.68
Hitachi	Motor Generators 13-1503	\$ 1,743,252.04	\$ 27,547.20	\$ 616.21	\$ 1,715,088.63	\$ 255,588.28	\$ 1,459,500.35

Sorted by Settlement Round

Defendant	Part Settlement	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
Autoliv+2:16	Occupant Safety Restraint Systems 12-0603	\$ 14,513,002.57	\$ 229,806.92	\$ 5,140.63	\$ 14,278,055.02	\$ 2,127,734.79	\$ 12,150,320.23
TRW	Occupant Safety Restraint Systems 12-0603	\$ 4,032,417.10	\$ 63,887.96	\$ 1,429.13	\$ 3,967,100.01	\$ 591,180.28	\$ 3,375,919.73
T.RAD	Radiators 13-1003	\$ 4,991,180.03	\$ 79,051.42	\$ 1,768.33	\$ 4,910,360.28	\$ 731,747.30	\$ 4,178,612.98
Hitachi	Starters 13-1103	\$ 2,840,501.99	\$ 45,022.27	\$ 1,007.12	\$ 2,794,472.60	\$ 416,433.30	\$ 2,378,039.30
Panasonic	Steering Angle Sensors 13-1603	\$ 4,746,631.23	\$ 75,180.43	\$ 1,681.74	\$ 4,669,769.06	\$ 695,894.00	\$ 3,973,875.07
Panasonic	Switches 13-1303	\$ 3,990,119.49	\$ 63,214.47	\$ 1,414.07	\$ 3,925,490.95	\$ 584,979.87	\$ 3,340,511.08
Hitachi	Valve Timing Control Devices 13-2503	\$ 2,938,308.74	\$ 46,595.36	\$ 1,042.31	\$ 2,890,671.07	\$ 430,767.42	\$ 2,459,903.65
Fujikura	Wire Harness 12-0103	\$ 5,394,276.83	\$ 85,451.25	\$ 1,911.49	\$ 5,306,914.09	\$ 790,841.23	\$ 4,516,072.86
KL Sales	Wire Harness 12-0103	\$ 166,008.45	\$ 2,615.11	\$ 58.50	\$ 163,334.84	\$ 24,341.21	\$ 138,993.63
Lear	Wire Harness 12-0103	\$ 2,214,829.97	\$ 34,889.72	\$ 780.46	\$ 2,179,159.79	\$ 324,752.49	\$ 1,854,407.30
Sumitomo	Wire Harness 12-0103	\$ 27,155,965.10	\$ 429,981.54	\$ 9,618.41	\$ 26,716,365.15	\$ 3,981,309.64	\$ 22,735,055.51
Yazaki	Wire Harness 12-0103	\$ 55,693,435.36	\$ 880,769.37	\$ 19,702.25	\$ 54,792,963.74	\$ 8,165,389.17	\$ 46,627,574.57
<b>Round 1 Total Settlement Funds</b>							<b>\$ 141,724,166.16</b>

Sorted by Settlement Round

Defendant	Part Settlement	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
<b>Round 2 Settlement Funds</b>							
DENSO	Air Conditioning Systems 13-2703	\$ 18,753,254.64	\$ 296,973.56	\$ 6,643.11	\$ 18,449,637.97	\$ 2,749,388.15	\$ 15,700,249.82
Valeo	Air Conditioning Systems 13-2703	\$ 5,671,077.09	\$ 89,836.03	\$ 2,009.57	\$ 5,579,231.49	\$ 831,422.22	\$ 4,747,809.27
DENSO	Alternators 13-0703	\$ 43,229,489.89	\$ 684,074.39	\$ 15,302.31	\$ 42,530,113.19	\$ 6,337,921.67	\$ 36,192,191.52
MELCO	Alternators 13-0703	\$ 14,503,133.20	\$ 228,923.48	\$ 5,120.87	\$ 14,269,088.85	\$ 2,140,363.33	\$ 12,128,725.52
Sumitomo Riko	Anti-Vibrational Rubber Parts 13-0803	\$ 8,782,626.66	\$ 139,106.68	\$ 3,111.73	\$ 8,640,408.25	\$ 1,287,602.82	\$ 7,352,805.43
DENSO	ATF Warmers 13-2403	\$ 1,405,468.51	\$ 22,245.31	\$ 497.61	\$ 1,382,725.59	\$ 206,056.21	\$ 1,176,669.38
NSK	Automotive Bearings 12-0503	\$ 19,174,666.09	\$ 303,666.13	\$ 6,792.82	\$ 18,864,207.14	\$ 2,811,166.58	\$ 16,053,040.56
Schaeffler	Automotive Bearings 12-0503	\$ 6,484,143.77	\$ 102,714.84	\$ 2,297.67	\$ 6,379,131.26	\$ 950,624.09	\$ 5,428,507.17
Sumitomo Riko	Automotive Hoses 15-3203	\$ 933,118.62	\$ 14,763.98	\$ 330.26	\$ 918,024.38	\$ 136,805.93	\$ 781,218.45
DENSO	Ceramic Substrates 16-3803	\$ 1,291,961.30	\$ 20,447.97	\$ 457.41	\$ 1,271,055.92	\$ 189,415.04	\$ 1,081,640.88
MELCO	Electric Powered Steering Assemblies 13-1903	\$ 2,727,177.13	\$ 43,224.39	\$ 966.90	\$ 2,682,985.84	\$ 402,447.88	\$ 2,280,537.96
NSK	Electric Powered Steering Assemblies 13-1903	\$ 3,230,829.09	\$ 51,202.27	\$ 1,145.36	\$ 3,178,481.46	\$ 473,658.85	\$ 2,704,822.61

Sorted by Settlement Round

Defendant	Part Settlement	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
DENSO	Fan Motors 13-2103	\$ 106,899.88	\$ 1,688.14	\$ 37.76	\$ 105,173.98	\$ 15,673.45	\$ 89,500.53
DENSO	Fuel Injection Systems 13-2203	\$ 16,694,358.08	\$ 264,397.54	\$ 5,914.40	\$ 16,424,046.14	\$ 2,447,530.17	\$ 13,976,515.97
MELCO	Fuel Injection Systems 13-2203	\$ 2,721,385.75	\$ 43,164.49	\$ 965.56	\$ 2,677,255.70	\$ 401,588.36	\$ 2,275,667.35
DENSO	Fuel Senders 12-0303	\$ 142,564.02	\$ 2,251.34	\$ 50.36	\$ 140,262.32	\$ 20,902.46	\$ 119,359.87
DENSO	Heater Control Panels 12-0403	\$ 12,591,845.10	\$ 199,431.79	\$ 4,461.16	\$ 12,387,952.15	\$ 1,846,066.32	\$ 10,541,885.83
DENSO	HID Ballasts 13-1703	\$ 1,199,754.10	\$ 18,991.12	\$ 424.82	\$ 1,180,338.16	\$ 175,895.96	\$ 1,004,442.20
MELCO	HID Ballasts 13-1703	\$ 2,727,118.47	\$ 43,223.48	\$ 966.88	\$ 2,682,928.11	\$ 402,439.22	\$ 2,280,488.89
DENSO	Ignition Coils 13-1403	\$ 14,365,951.90	\$ 227,564.85	\$ 5,090.48	\$ 14,133,296.57	\$ 2,106,157.35	\$ 12,027,139.22
MELCO	Ignition Coils 13-1403	\$ 12,442,179.86	\$ 197,049.88	\$ 4,407.88	\$ 12,240,722.10	\$ 1,836,108.32	\$ 10,404,613.79
DENSO	Instrument Panel Clusters 12-0203	\$ 6,442,876.26	\$ 102,068.17	\$ 2,283.20	\$ 6,338,524.89	\$ 944,572.45	\$ 5,393,952.44
DENSO	Inverters 13-1803	\$ 107,300.35	\$ 1,694.46	\$ 37.90	\$ 105,567.99	\$ 15,732.17	\$ 89,835.82
DENSO	Motor Generators 13-1503	\$ 107,270.11	\$ 1,693.99	\$ 37.89	\$ 105,538.23	\$ 15,727.73	\$ 89,810.50
DENSO	Power Window Motors 13-2303	\$ 107,300.37	\$ 1,694.46	\$ 37.90	\$ 105,568.01	\$ 15,732.17	\$ 89,835.84
Omron	Power Window Switches 16-3903	\$ 2,579,777.99	\$ 40,911.43	\$ 915.16	\$ 2,537,951.40	\$ 378,205.08	\$ 2,159,746.32
DENSO	Radiators 13-1003	\$ 13,519,419.58	\$ 214,149.57	\$ 4,790.39	\$ 13,300,479.62	\$ 1,982,050.53	\$ 11,318,429.09

Sorted by Settlement Round

Defendant	Part Settlement	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
DENSO	Spark Plugs 15-3003	\$ 8,357,882.38	\$ 132,407.20	\$ 2,961.86	\$ 8,222,513.32	\$ 1,225,325.95	\$ 6,997,187.37
DENSO	Starters 13-1103	\$ 8,315,844.42	\$ 131,744.31	\$ 2,947.04	\$ 8,181,153.07	\$ 1,219,162.22	\$ 6,961,990.85
MELCO	Starters 13-1103	\$ 14,083,728.99	\$ 223,041.33	\$ 4,989.29	\$ 13,855,698.37	\$ 2,078,354.76	\$ 11,777,343.61
Aisan Seiki	Valve Timing Control Devices 13-2503	\$ 15,907,856.77	\$ 251,974.99	\$ 5,636.52	\$ 15,650,245.26	\$ 2,332,215.39	\$ 13,318,029.87
DENSO	Valve Timing Control Devices 13-2503	\$ 3,724,518.10	\$ 59,025.39	\$ 1,320.36	\$ 3,664,172.35	\$ 546,036.80	\$ 3,118,135.55
MELCO	Valve Timing Control Devices 13-2503	\$ 2,725,643.10	\$ 43,211.98	\$ 966.62	\$ 2,681,464.50	\$ 402,219.68	\$ 2,279,244.83
DENSO	Windshield Washer Systems 13-2803	\$ 289,901.35	\$ 4,576.14	\$ 102.37	\$ 285,222.84	\$ 42,505.17	\$ 242,717.67
DENSO	Windshield Wipers 13-0903	\$ 2,822,058.64	\$ 44,736.10	\$ 1,000.72	\$ 2,776,321.82	\$ 413,728.08	\$ 2,362,593.74
DENSO	Wire Harness 12-0103	\$ 12,458,703.97	\$ 197,310.34	\$ 4,413.71	\$ 12,256,979.92	\$ 1,826,549.49	\$ 10,430,430.43
Furukawa	Wire Harness 12-0103	\$ 36,361,634.66	\$ 575,276.51	\$ 12,868.57	\$ 35,773,489.58	\$ 5,331,043.61	\$ 30,442,445.97
G.S. ELECTECH	Wire Harness 12-0103	\$ 2,580,084.14	\$ 40,912.77	\$ 915.19	\$ 2,538,256.18	\$ 378,250.72	\$ 2,160,005.46
Leoni	Wire Harness 12-0103	\$ 1,245,866.52	\$ 19,713.84	\$ 440.99	\$ 1,225,711.69	\$ 182,658.05	\$ 1,043,053.64
MELCO	Wire Harness 12-0103	\$ 2,727,197.61	\$ 43,224.72	\$ 966.91	\$ 2,683,005.98	\$ 402,450.90	\$ 2,280,555.08
Tokai Rika	Wire Harness 12-0103	\$ 627,872.24	\$ 9,928.00	\$ 222.08	\$ 617,722.16	\$ 92,054.65	\$ 525,667.51
<b>Round 2 Total Settlement Funds</b>							<b>\$ 271,428,843.82</b>

Sorted by Settlement Round

Defendant	Part Settlement	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
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## Round 3 Settlement Funds

Alpha	Access Mechanisms 16-4103	\$ 2,136,685.23	\$ 33,962.29	\$ 759.71	\$ 2,101,963.23	\$ 313,229.40	\$ 1,788,733.83
Valeo	Access Mechanisms 16-4103	\$ 588,623.39	\$ 9,324.67	\$ 208.59	\$ 579,090.13	\$ 86,296.53	\$ 492,793.60
Calsonic	Air Conditioning Systems 13-2703	\$ 4,092,030.19	\$ 65,029.53	\$ 1,454.67	\$ 4,025,545.99	\$ 599,877.76	\$ 3,425,668.23
Mahle Behr	Air Conditioning Systems 13-2703	\$ 1,159,158.94	\$ 18,386.25	\$ 411.29	\$ 1,140,361.40	\$ 169,936.23	\$ 970,425.17
Sanden	Air Conditioning Systems 13-2703	\$ 6,041,679.54	\$ 95,984.60	\$ 2,147.11	\$ 5,943,547.83	\$ 885,695.81	\$ 5,057,852.02
Bridgestone	Anti-Vibrational Rubber Parts 13-0803	\$ 23,584,254.78	\$ 374,524.09	\$ 8,377.87	\$ 23,201,352.82	\$ 3,457,429.90	\$ 19,743,922.92
Toyo Tire	Anti-Vibrational Rubber Parts 13-0803	\$ 27,328,071.11	\$ 433,999.70	\$ 9,708.30	\$ 26,884,363.11	\$ 4,006,265.01	\$ 22,878,098.10
Yamashita Rubber	Anti-Vibrational Rubber Parts 13-0803	\$ 4,839,054.77	\$ 76,879.05	\$ 1,719.74	\$ 4,760,455.98	\$ 709,393.75	\$ 4,051,062.23
Calsonic	ATF Warmers 13-2403	\$ 285,606.28	\$ 4,511.28	\$ 100.91	\$ 280,994.09	\$ 41,874.80	\$ 239,119.29
JTEKT	Automotive Bearings 12-0503	\$ 34,530,208.82	\$ 548,028.38	\$ 12,259.05	\$ 33,969,921.39	\$ 5,062,165.21	\$ 28,907,756.18
Nachi Fujikoshi	Automotive Bearings 12-0503	\$ 2,555,236.36	\$ 40,609.74	\$ 908.41	\$ 2,513,718.21	\$ 374,588.45	\$ 2,139,129.76



Sorted by Settlement Round

Defendant	Part Settlement	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
NTN	Automotive Bearings 12-0503	\$ 5,233,405.56	\$ 83,154.62	\$ 1,860.12	\$ 5,148,390.82	\$ 767,202.39	\$ 4,381,188.43
SKF	Automotive Bearings 12-0503	\$ 6,040,167.07	\$ 95,953.15	\$ 2,146.41	\$ 5,942,067.51	\$ 885,475.67	\$ 5,056,591.84
Hitachi Metals	Automotive Brake Hoses 16-3603	\$ 890,613.26	\$ 14,118.66	\$ 315.83	\$ 876,178.77	\$ 130,568.33	\$ 745,610.44
Nishikawa	Body Sealing Products 16-3403	\$ 29,889,514.95	\$ 474,681.16	\$ 10,618.32	\$ 29,404,215.47	\$ 4,381,769.22	\$ 25,022,446.25
NGK Insulators	Ceramic Substrates 16-3803	\$ 9,666,046.81	\$ 153,530.96	\$ 3,434.39	\$ 9,509,081.46	\$ 1,417,026.73	\$ 8,092,054.73
Toyo Tire	CVJ Boot 14-2903	\$ 1,380,528.54	\$ 21,897.33	\$ 489.83	\$ 1,358,141.38	\$ 202,389.74	\$ 1,155,751.65
JTEKT	Electric Powered Steering Assemblies 13-1903	\$ 3,238,301.21	\$ 51,472.26	\$ 1,151.40	\$ 3,185,677.55	\$ 474,721.85	\$ 2,710,955.70
Mitsuba	Electric Powered Steering Assemblies 13-1903	\$ 119,851.78	\$ 1,892.69	\$ 42.34	\$ 117,916.75	\$ 17,572.43	\$ 100,344.32
Yamada	Electric Powered Steering Assemblies 13-1903	\$ 1,862,380.00	\$ 29,594.54	\$ 662.01	\$ 1,832,123.45	\$ 273,019.01	\$ 1,559,104.44
Eberspaecher	Exhaust Systems 16-3703	\$ 1,068,479.74	\$ 16,949.08	\$ 379.14	\$ 1,051,151.52	\$ 156,642.14	\$ 894,509.39
Faurecia	Exhaust Systems 16-3703	\$ 1,163,815.89	\$ 18,459.96	\$ 412.94	\$ 1,144,942.99	\$ 170,618.99	\$ 974,324.00
Tenneco	Exhaust Systems 16-3703	\$ 13,932,392.56	\$ 221,280.86	\$ 4,949.91	\$ 13,706,161.79	\$ 2,042,469.23	\$ 11,663,692.56
Mitsuba	Fan Motors 13-2103	\$ 2,899,931.88	\$ 46,120.60	\$ 1,031.69	\$ 2,852,779.59	\$ 425,112.56	\$ 2,427,667.03
Aisan	Fuel Injection Systems 13-2203	\$ 3,620,053.09	\$ 57,521.85	\$ 1,286.73	\$ 3,561,244.51	\$ 530,689.05	\$ 3,030,555.46

## Exhibit A - Version 1

Sorted by Settlement Round

Defendant	Part Settlement	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
Bosch	Fuel Injection Systems 13-2203	\$ 2,283,735.93	\$ 36,310.43	\$ 812.24	\$ 2,246,613.26	\$ 334,784.12	\$ 1,911,829.14
Mitsuba	Fuel Injection Systems 13-2203	\$ 1,077,184.72	\$ 17,086.68	\$ 382.22	\$ 1,059,715.82	\$ 157,918.41	\$ 901,797.41
Alps	Heater Control Panels 12-0403	\$ 2,552,836.20	\$ 40,571.78	\$ 907.56	\$ 2,511,356.86	\$ 374,236.55	\$ 2,137,120.31
Koito	HID Ballasts 13-1703	\$ 1,043,996.68	\$ 16,554.17	\$ 370.31	\$ 1,027,072.20	\$ 153,054.25	\$ 874,017.95
Stanley Electric	HID Ballasts 13-1703	\$ 2,283,016.89	\$ 36,286.44	\$ 811.70	\$ 2,245,918.75	\$ 334,681.41	\$ 1,911,237.34
Diamond Electric	Ignition Coils 13-1403	\$ 4,277,367.84	\$ 67,974.99	\$ 1,520.56	\$ 4,207,872.29	\$ 627,047.61	\$ 3,580,824.68
Continental	Instrument Panel Clusters 12-0203	\$ 3,012,093.21	\$ 47,893.32	\$ 1,071.34	\$ 2,963,128.55	\$ 441,557.12	\$ 2,521,571.43
INOAC	Interior Trim 16-3503	\$ 1,951,304.38	\$ 31,005.80	\$ 693.58	\$ 1,919,605.00	\$ 286,055.43	\$ 1,633,549.57
Koito	Lamps 13-1203	\$ 17,240,069.00	\$ 273,778.36	\$ 6,124.25	\$ 16,960,166.39	\$ 2,527,377.80	\$ 14,432,788.59
Mitsuba	Lamps 13-1203	\$ 173,733.25	\$ 2,743.58	\$ 61.37	\$ 170,928.30	\$ 25,472.42	\$ 145,455.88
Stanley Electric	Lamps 13-1203	\$ 9,804,178.30	\$ 155,715.82	\$ 3,483.26	\$ 9,644,979.22	\$ 1,437,278.54	\$ 8,207,700.68
Kiekert AG	Latches 17-4303	\$ 1,793,824.47	\$ 28,469.68	\$ 636.85	\$ 1,764,717.94	\$ 262,976.58	\$ 1,501,741.36
Mitsuba	Power Window Motors 13-2303	\$ 15,251,281.16	\$ 242,290.63	\$ 5,419.89	\$ 15,003,570.64	\$ 2,235,803.06	\$ 12,767,767.58
Calsonic	Radiators 13-1003	\$ 4,438,927.24	\$ 70,536.53	\$ 1,577.86	\$ 4,366,812.85	\$ 650,732.94	\$ 3,716,079.91
Mitsuba	Radiators 13-1003	\$ 2,901,129.63	\$ 46,131.52	\$ 1,031.93	\$ 2,853,966.18	\$ 425,289.89	\$ 2,428,676.29

## Sorted by Settlement Round

Defendant	Part Settlement	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
Hitachi	Shock Absorbers 15-3303	\$ 10,563,062.98	\$ 167,764.77	\$ 3,752.79	\$ 10,391,545.42	\$ 1,548,530.84	\$ 8,843,014.59
Bosch	Spark Plugs 15-3003	\$ 23,071,175.87	\$ 366,413.24	\$ 8,196.43	\$ 22,696,566.20	\$ 3,382,205.08	\$ 19,314,361.12
NGK Spark Plugs	Spark Plugs 15-3003	\$ 10,107,791.64	\$ 160,549.64	\$ 3,591.39	\$ 9,943,650.61	\$ 1,481,785.33	\$ 8,461,865.28
Bosch	Starters 13-1103	\$ 808,287.56	\$ 12,820.70	\$ 286.79	\$ 795,180.07	\$ 118,497.44	\$ 676,682.63
Mitsuba	Starters 13-1103	\$ 7,510,812.48	\$ 119,322.58	\$ 2,669.17	\$ 7,388,820.73	\$ 1,101,067.67	\$ 6,287,753.06
Usui Kokusai	Steel Tubes 16-4003	\$ 4,224,988.55	\$ 67,139.03	\$ 1,501.86	\$ 4,156,347.66	\$ 619,369.74	\$ 3,536,977.92
Mitsuba	Windshield Washer Systems 13-2803	\$ 1,214,578.98	\$ 19,266.77	\$ 430.99	\$ 1,194,881.22	\$ 178,060.66	\$ 1,016,820.56
Bosch	Windshield Wipers 13-0903	\$ 386,662.33	\$ 6,120.59	\$ 136.91	\$ 380,404.83	\$ 56,688.56	\$ 323,716.27
Mitsuba	Windshield Wipers 13-0903	\$ 26,177,050.75	\$ 415,669.79	\$ 9,298.27	\$ 25,752,082.69	\$ 3,837,537.50	\$ 21,914,545.19
Chiyoda	Wire Harness 12-0103	\$ 1,507,674.82	\$ 23,922.84	\$ 535.14	\$ 1,483,216.84	\$ 221,027.89	\$ 1,262,188.95
<b>Round 3 Total Settlement Funds</b>							<b>\$ 287,819,441.23</b>

## Round 4 Settlement Funds

Mitsubishi Heavy	Air Conditioning Systems 13-2703	\$ 5,579,442.53	\$ 88,464.35	\$ 1,978.89	\$ 5,488,999.29	\$ 817,970.80	\$ 4,671,028.49
Panasonic	Air Conditioning Systems 13-2703	\$ 602,377.44	\$ 9,524.67	\$ 213.06	\$ 592,639.71	\$ 88,316.81	\$ 504,322.90

## Exhibit A - Version 1

Sorted by Settlement Round

Defendant	Part Settlement	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
Toyoda Gosei	Automotive Brake Hoses 16-3603	\$ 667,890.96	\$ 10,574.21	\$ 236.54	\$ 657,080.21	\$ 97,919.06	\$ 559,161.15
Toyoda Gosei	Automotive Hoses 15-3203	\$ 4,417,805.75	\$ 70,063.36	\$ 1,567.27	\$ 4,346,175.12	\$ 647,666.05	\$ 3,698,509.07
Green Tokai	Body Sealing Products 16-3403	\$ 758,947.04	\$ 12,014.97	\$ 268.77	\$ 746,663.30	\$ 111,268.92	\$ 635,394.38
Toyoda Gosei	Body Sealing Products 16-3403	\$ 22,044,432.01	\$ 349,402.34	\$ 7,815.91	\$ 21,687,213.76	\$ 3,231,836.57	\$ 18,455,377.19
Corning	Ceramic Substrates 16-3803	\$ 21,600,805.16	\$ 342,395.34	\$ 7,659.17	\$ 21,250,750.65	\$ 3,166,793.17	\$ 18,083,957.48
Toyoda Gosei	CVJ Boot 14-2903	\$ 568,061.17	\$ 8,986.96	\$ 201.03	\$ 558,873.18	\$ 83,284.52	\$ 475,588.66
Showa	Electric Powered Steering Assemblies 13-1903	\$ 3,360,711.62	\$ 53,317.55	\$ 1,192.68	\$ 3,306,201.39	\$ 492,688.22	\$ 2,813,513.17
Meritor	Exhaust Systems 16-3703	\$ 604,670.05	\$ 9,565.58	\$ 213.98	\$ 594,890.49	\$ 88,651.94	\$ 506,238.55
Keihin	Fuel Injection Systems 13-2203	\$ 666,016.07	\$ 10,544.70	\$ 235.88	\$ 655,235.49	\$ 97,644.15	\$ 557,591.34
Maruyasu	Fuel Injection Systems 13-2203	\$ 78,284.57	\$ 1,236.25	\$ 27.65	\$ 77,020.67	\$ 11,477.93	\$ 65,542.74
Mikuni	Fuel Injection Systems 13-2203	\$ 2,171,603.06	\$ 34,443.95	\$ 770.49	\$ 2,136,388.62	\$ 318,363.92	\$ 1,818,024.70
Tokai Rika	Heater Control Panels 12-0403	\$ 1,104,447.74	\$ 17,486.05	\$ 391.15	\$ 1,086,570.54	\$ 161,922.34	\$ 924,648.20
Delphi	Ignition Coils 13-1403	\$ 558,906.35	\$ 8,830.21	\$ 197.53	\$ 549,878.61	\$ 81,944.87	\$ 467,933.74
Toyo DENSO	Ignition Coils 13-1403	\$ 604,862.09	\$ 9,568.61	\$ 214.04	\$ 595,079.44	\$ 88,680.09	\$ 506,399.35
Toyoda Gosei	Interior Trim 16-3503	\$ 4,140,118.71	\$ 65,665.15	\$ 1,468.89	\$ 4,072,984.67	\$ 606,954.92	\$ 3,466,029.76

Sorted by Settlement Round

Defendant	Part Settlement	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
Brose	Latches 17-4303	\$ 1,847,085.60	\$ 29,247.47	\$ 654.25	\$ 1,817,183.88	\$ 270,799.18	\$ 1,546,384.70
Tokai Rika	Occupant Safety Restraint Systems 12-0603	\$ 23,403,599.48	\$ 370,904.55	\$ 8,296.90	\$ 23,024,398.03	\$ 3,431,106.76	\$ 19,593,291.27
Toyoda Gosei	Occupant Safety Restraint Systems 12-0603	\$ 4,720,653.38	\$ 74,858.62	\$ 1,674.54	\$ 4,644,120.22	\$ 692,066.24	\$ 3,952,053.98
Toyo DENSO	Power Window Switches 16-3903	\$ 3,597,503.16	\$ 57,054.31	\$ 1,276.27	\$ 3,539,172.58	\$ 527,406.69	\$ 3,011,765.89
KYB	Shock Absorbers 15-3303	\$ 23,555,598.98	\$ 373,414.70	\$ 8,353.05	\$ 23,173,831.23	\$ 3,453,369.11	\$ 19,720,462.12
Showa	Shock Absorbers 15-3303	\$ 8,097,657.63	\$ 128,382.36	\$ 2,871.83	\$ 7,966,403.44	\$ 1,187,154.20	\$ 6,779,249.25
Maruyasu	Steel Tubes 16-4003	\$ 4,236,050.85	\$ 67,179.33	\$ 1,502.76	\$ 4,167,368.76	\$ 621,020.46	\$ 3,546,348.30
Sanoh	Steel Tubes 16-4003	\$ 6,821,652.60	\$ 108,170.75	\$ 2,419.71	\$ 6,711,062.14	\$ 1,000,081.97	\$ 5,710,980.17
Tokai Rika	Steering Angle Sensors 13-1603	\$ 539,151.14	\$ 8,529.86	\$ 190.81	\$ 530,430.47	\$ 79,045.91	\$ 451,384.56
Tokai Rika	Switches 13-1303	\$ 2,787,375.22	\$ 44,222.07	\$ 989.22	\$ 2,742,163.93	\$ 408,635.66	\$ 2,333,528.27
Mikuni	Valve Timing Control Devices 13-2503	\$ 532,490.49	\$ 8,424.75	\$ 188.46	\$ 523,877.28	\$ 78,069.32	\$ 445,807.96
<b>Round 4 Total Settlement Funds</b>							<b>\$ 125,300,517.33</b>

Sorted by Settlement Round

Defendant	Part Settlement	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
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## Round 5 Settlement Funds

Bosch	Electronic Braking Systems 21-11989	\$ 2,103,053.14	\$ 1,772,811.59	\$ 67,786.17	\$ 262,455.38	\$ 39,368.31	\$ 223,087.07
Bosal	Exhaust Systems 16-3703	\$ 136,835.90	\$ 116,542.23	\$ 4,456.17	\$ 15,837.50	\$ 2,375.63	\$ 13,461.88
Bosch	Hydraulic Braking Systems 21-11993	\$ 114,333.15	\$ 97,376.79	\$ 3,723.35	\$ 13,233.01	\$ 1,984.95	\$ 11,248.06
TRW	Hydraulic Braking Systems 21-11993	\$ 744,900.61	\$ 628,569.39	\$ 24,034.31	\$ 92,296.91	\$ 13,844.54	\$ 78,452.37
Takata Corporation	Occupant Safety Restraint Systems 12-0603	\$ 245,189.08	\$ - *	\$ - *	\$ 245,189.08	\$ 36,778.36	\$ 208,410.72
TK Holdings, Inc.	Occupant Safety Restraint Systems 12-0603	\$ 243,767.70	\$ - *	\$ - *	\$ 243,767.70	\$ 36,565.16	\$ 207,202.55
<b>Round 5 Total Settlement Funds</b>							<b>\$ 741,862.64</b>

Aggregate Totals

\$ 990,612,933.48

\$ 971,901,233.48

\$ 827,067,431.59

\*For purposes of the \$100 Minimum and Pro Rata Distributions, the Occupant Safety Restraint Systems - TK Holdings, Inc. and Occupant Safety Restraint Systems - Takata Corporation Settlement Funds have been grouped with the Round 5 Settlement Funds.

Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
<b>Access Mechanisms - 16-4103</b>						
Alpha	\$ 2,136,685.23	\$ 33,962.29	\$ 759.71	\$ 2,101,963.23	\$ 313,229.40	\$ 1,788,733.83
Valeo	\$ 588,623.39	\$ 9,324.67	\$ 208.59	\$ 579,090.13	\$ 86,296.53	\$ 492,793.60
<b>Access Mechanisms Settlement Fund</b>						<b>\$ 2,281,527.43</b>

<b>Air Conditioning Systems - 13-2703</b>						
DENSO	\$ 18,753,254.64	\$ 296,973.56	\$ 6,643.11	\$ 18,449,637.97	\$ 2,749,388.15	\$ 15,700,249.82
Valeo	\$ 5,671,077.09	\$ 89,836.03	\$ 2,009.57	\$ 5,579,231.49	\$ 831,422.22	\$ 4,747,809.27
Calsonic	\$ 4,092,030.19	\$ 65,029.53	\$ 1,454.67	\$ 4,025,545.99	\$ 599,877.76	\$ 3,425,668.23
Mahle Behr	\$ 1,159,158.94	\$ 18,386.25	\$ 411.29	\$ 1,140,361.40	\$ 169,936.23	\$ 970,425.17
Sanden	\$ 6,041,679.54	\$ 95,984.60	\$ 2,147.11	\$ 5,943,547.83	\$ 885,695.81	\$ 5,057,852.02
Mitsubishi Heavy	\$ 5,579,442.53	\$ 88,464.35	\$ 1,978.89	\$ 5,488,999.29	\$ 817,970.80	\$ 4,671,028.49
Panasonic	\$ 602,377.44	\$ 9,524.67	\$ 213.06	\$ 592,639.71	\$ 88,316.81	\$ 504,322.90
<b>Air Conditioning Systems Settlement Fund</b>						<b>\$ 35,077,355.91</b>

<b>Air Flow Meters - 13-2003</b>						
Hitachi	\$ 3,729,467.96	\$ 59,120.91	\$ 1,322.50	\$ 3,669,024.55	\$ 546,758.82	\$ 3,122,265.73
<b>Air Flow Meters Settlement Fund</b>						<b>\$ 3,122,265.73</b>

Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
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**Alternators - 13-0703**

Hitachi	\$ 4,598,634.21	\$ 72,839.28	\$ 1,629.37	\$ 4,524,165.56	\$ 674,195.82	\$ 3,849,969.74
DENSO	\$ 43,229,489.89	\$ 684,074.39	\$ 15,302.31	\$ 42,530,113.19	\$ 6,337,921.67	\$ 36,192,191.52
MELCO	\$ 14,503,133.20	\$ 228,923.48	\$ 5,120.87	\$ 14,269,088.85	\$ 2,140,363.33	\$ 12,128,725.52
<b>Alternators Settlement Fund</b>						<b>\$ 52,170,886.78</b>

**Anti-Vibrational Rubber Parts - 13-0803**

Sumitomo Riko	\$ 8,782,626.66	\$ 139,106.68	\$ 3,111.73	\$ 8,640,408.25	\$ 1,287,602.82	\$ 7,352,805.43
Bridgestone	\$ 23,584,254.78	\$ 374,524.09	\$ 8,377.87	\$ 23,201,352.82	\$ 3,457,429.90	\$ 19,743,922.92
Toyo Tire	\$ 27,328,071.11	\$ 433,999.70	\$ 9,708.30	\$ 26,884,363.11	\$ 4,006,265.01	\$ 22,878,098.10
Yamashita Rubber	\$ 4,839,054.77	\$ 76,879.05	\$ 1,719.74	\$ 4,760,455.98	\$ 709,393.75	\$ 4,051,062.23
<b>Anti-Vibrational Rubber Parts Settlement Fund</b>						<b>\$ 54,025,888.68</b>

**ATF Warmers - 13-2403**

T.RAD	\$ 529,293.35	\$ 8,349.37	\$ 186.77	\$ 520,757.21	\$ 77,605.90	\$ 443,151.31
DENSO	\$ 1,405,468.51	\$ 22,245.31	\$ 497.61	\$ 1,382,725.59	\$ 206,056.21	\$ 1,176,669.38
Calsonic	\$ 285,606.28	\$ 4,511.28	\$ 100.91	\$ 280,994.09	\$ 41,874.80	\$ 239,119.29
<b>ATF Warmers Settlement Fund</b>						<b>\$ 1,858,939.98</b>



Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
<b>Automotive Bearings - 12-0503</b>						
NSK	\$ 19,174,666.09	\$ 303,666.13	\$ 6,792.82	\$ 18,864,207.14	\$ 2,811,166.58	\$ 16,053,040.56
Schaeffler	\$ 6,484,143.77	\$ 102,714.84	\$ 2,297.67	\$ 6,379,131.26	\$ 950,624.09	\$ 5,428,507.17
JTEKT	\$ 34,530,208.82	\$ 548,028.38	\$ 12,259.05	\$ 33,969,921.39	\$ 5,062,165.21	\$ 28,907,756.18
Nachi Fujikoshi	\$ 2,555,236.36	\$ 40,609.74	\$ 908.41	\$ 2,513,718.21	\$ 374,588.45	\$ 2,139,129.76
NTN	\$ 5,233,405.56	\$ 83,154.62	\$ 1,860.12	\$ 5,148,390.82	\$ 767,202.39	\$ 4,381,188.43
SKF	\$ 6,040,167.07	\$ 95,953.15	\$ 2,146.41	\$ 5,942,067.51	\$ 885,475.67	\$ 5,056,591.84
<b>Automotive Bearings Settlement Fund</b>						<b>\$ 61,966,213.95</b>

<b>Automotive Brake Hoses - 16-3603</b>						
Hitachi Metals	\$ 890,613.26	\$ 14,118.66	\$ 315.83	\$ 876,178.77	\$ 130,568.33	\$ 745,610.44
Toyota Gosei	\$ 667,890.96	\$ 10,574.21	\$ 236.54	\$ 657,080.21	\$ 97,919.06	\$ 559,161.15
<b>Automotive Brake Hoses Settlement Fund</b>						<b>\$ 1,304,771.59</b>

<b>Automotive Hoses - 15-3203</b>						
Sumitomo Riko	\$ 933,118.62	\$ 14,763.98	\$ 330.26	\$ 918,024.38	\$ 136,805.93	\$ 781,218.45
Toyota Gosei	\$ 4,417,805.75	\$ 70,063.36	\$ 1,567.27	\$ 4,346,175.12	\$ 647,666.05	\$ 3,698,509.07
<b>Automotive Hoses Settlement Fund</b>						<b>\$ 4,479,727.52</b>

Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
<b>Body Sealing Products - 16-3403</b>						
Nishikawa	\$ 29,889,514.95	\$ 474,681.16	\$ 10,618.32	\$ 29,404,215.47	\$ 4,381,769.22	\$ 25,022,446.25
Green Tokai	\$ 758,947.04	\$ 12,014.97	\$ 268.77	\$ 746,663.30	\$ 111,268.92	\$ 635,394.38
Toyoda Gosei	\$ 22,044,432.01	\$ 349,402.34	\$ 7,815.91	\$ 21,687,213.76	\$ 3,231,836.57	\$ 18,455,377.19
<b>Body Sealing Products Settlement Fund</b>						<b>\$ 44,113,217.82</b>

<b>Ceramic Substrates - 16-3803</b>						
DENSO	\$ 1,291,961.30	\$ 20,447.97	\$ 457.41	\$ 1,271,055.92	\$ 189,415.04	\$ 1,081,640.88
NGK Insulators	\$ 9,666,046.81	\$ 153,530.96	\$ 3,434.39	\$ 9,509,081.46	\$ 1,417,026.73	\$ 8,092,054.73
Corning	\$ 21,600,805.16	\$ 342,395.34	\$ 7,659.17	\$ 21,250,750.65	\$ 3,166,793.17	\$ 18,083,957.48
<b>Ceramic Substrates Settlement Fund</b>						<b>\$ 27,257,653.09</b>

<b>CVJ Boot - 14-2903</b>						
Toyo Tire	\$ 1,380,528.54	\$ 21,897.33	\$ 489.83	\$ 1,358,141.38	\$ 202,389.74	\$ 1,155,751.65
Toyoda Gosei	\$ 568,061.17	\$ 8,986.96	\$ 201.03	\$ 558,873.18	\$ 83,284.52	\$ 475,588.66
<b>CVJ Boot Settlement Fund</b>						<b>\$ 1,631,340.30</b>

Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
<b>Electric Powered Steering Assemblies - 13-1903</b>						
MELCO	\$ 2,727,177.13	\$ 43,224.39	\$ 966.90	\$ 2,682,985.84	\$ 402,447.88	\$ 2,280,537.96
NSK	\$ 3,230,829.09	\$ 51,202.27	\$ 1,145.36	\$ 3,178,481.46	\$ 473,658.85	\$ 2,704,822.61
JTEKT	\$ 3,238,301.21	\$ 51,472.26	\$ 1,151.40	\$ 3,185,677.55	\$ 474,721.85	\$ 2,710,955.70
Mitsuba	\$ 119,851.78	\$ 1,892.69	\$ 42.34	\$ 117,916.75	\$ 17,572.43	\$ 100,344.32
Yamada	\$ 1,862,380.00	\$ 29,594.54	\$ 662.01	\$ 1,832,123.45	\$ 273,019.01	\$ 1,559,104.44
Showa	\$ 3,360,711.62	\$ 53,317.55	\$ 1,192.68	\$ 3,306,201.39	\$ 492,688.22	\$ 2,813,513.17
<b>Electric Powered Steering Assemblies Settlement Fund</b>						<b>\$ 12,169,278.20</b>
<b>Electronic Braking Systems - 21-11989</b>						
Bosch	\$ 2,103,053.14	\$ 1,772,811.59	\$ 67,786.17	\$ 262,455.38	\$ 39,368.31	\$ 223,087.07
<b>Electronic Braking Systems Settlement Fund</b>						<b>\$ 223,087.07</b>
<b>Electronic Throttle Bodies - 13-2603</b>						
Hitachi	\$ 5,074,639.77	\$ 80,390.98	\$ 1,798.30	\$ 4,992,450.49	\$ 743,979.38	\$ 4,248,471.11
<b>Electronic Throttle Bodies Settlement Fund</b>						<b>\$ 4,248,471.11</b>

Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
<b>Exhaust Systems - 16-3703</b>						
Eberspaecher	\$ 1,068,479.74	\$ 16,949.08	\$ 379.14	\$ 1,051,151.52	\$ 156,642.14	\$ 894,509.39
Faurecia	\$ 1,163,815.89	\$ 18,459.96	\$ 412.94	\$ 1,144,942.99	\$ 170,618.99	\$ 974,324.00
Tenneco	\$ 13,932,392.56	\$ 221,280.86	\$ 4,949.91	\$ 13,706,161.79	\$ 2,042,469.23	\$ 11,663,692.56
Meritor	\$ 604,670.05	\$ 9,565.58	\$ 213.98	\$ 594,890.49	\$ 88,651.94	\$ 506,238.55
Bosal	\$ 136,835.90	\$ 116,542.23	\$ 4,456.17	\$ 15,837.50	\$ 2,375.63	\$ 13,461.88
<b>Exhaust Systems Settlement Fund</b>						<b>\$ 14,052,226.37</b>

<b>Fan Motors - 13-2103</b>						
DENSO	\$ 106,899.88	\$ 1,688.14	\$ 37.76	\$ 105,173.98	\$ 15,673.45	\$ 89,500.53
Mitsuba	\$ 2,899,931.88	\$ 46,120.60	\$ 1,031.69	\$ 2,852,779.59	\$ 425,112.56	\$ 2,427,667.03
<b>Fan Motors Settlement Fund</b>						<b>\$ 2,517,167.56</b>

<b>Fuel Injection Systems - 13-2203</b>						
Hitachi	\$ 6,437,350.15	\$ 101,941.21	\$ 2,280.36	\$ 6,333,128.58	\$ 943,770.73	\$ 5,389,357.85
DENSO	\$ 16,694,358.08	\$ 264,397.54	\$ 5,914.40	\$ 16,424,046.14	\$ 2,447,530.17	\$ 13,976,515.97
MELCO	\$ 2,721,385.75	\$ 43,164.49	\$ 965.56	\$ 2,677,255.70	\$ 401,588.36	\$ 2,275,667.35
Aisan	\$ 3,620,053.09	\$ 57,521.85	\$ 1,286.73	\$ 3,561,244.51	\$ 530,689.05	\$ 3,030,555.46
Bosch	\$ 2,283,735.93	\$ 36,310.43	\$ 812.24	\$ 2,246,613.26	\$ 334,784.12	\$ 1,911,829.14
Mitsuba	\$ 1,077,184.72	\$ 17,086.68	\$ 382.22	\$ 1,059,715.82	\$ 157,918.41	\$ 901,797.41
Keihin	\$ 666,016.07	\$ 10,544.70	\$ 235.88	\$ 655,235.49	\$ 97,644.15	\$ 557,591.34
Maruyasu	\$ 78,284.57	\$ 1,236.25	\$ 27.65	\$ 77,020.67	\$ 11,477.93	\$ 65,542.74

Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
Mikuni	\$ 2,171,603.06	\$ 34,443.95	\$ 770.49	\$ 2,136,388.62	\$ 318,363.92	\$ 1,818,024.70
<b>Fuel Injection Systems Settlement Fund</b>						<b>\$ 29,926,881.96</b>

<b>Fuel Senders - 12-0303</b>						
Yazaki	\$ 31,009.70	\$ 489.70	\$ 10.95	\$ 30,509.05	\$ 4,546.58	\$ 25,962.47
DENSO	\$ 142,564.02	\$ 2,251.34	\$ 50.36	\$ 140,262.32	\$ 20,902.46	\$ 119,359.87
<b>Fuel Senders Settlement Fund</b>						<b>\$ 145,322.33</b>

<b>Heater Control Panels - 12-0403</b>						
Sumitomo	\$ 1,629,606.62	\$ 25,806.38	\$ 577.27	\$ 1,603,222.97	\$ 238,914.28	\$ 1,364,308.69
DENSO	\$ 12,591,845.10	\$ 199,431.79	\$ 4,461.16	\$ 12,387,952.15	\$ 1,846,066.32	\$ 10,541,885.83
Alps	\$ 2,552,836.20	\$ 40,571.78	\$ 907.56	\$ 2,511,356.86	\$ 374,236.55	\$ 2,137,120.31
Tokai Rika	\$ 1,104,447.74	\$ 17,486.05	\$ 391.15	\$ 1,086,570.54	\$ 161,922.34	\$ 924,648.20
<b>Heater Control Panels Settlement Fund</b>						<b>\$ 14,967,963.02</b>

<b>HID Ballasts - 13-1703</b>						
Panasonic	\$ 4,166,425.56	\$ 65,994.07	\$ 1,476.25	\$ 4,098,955.24	\$ 610,830.50	\$ 3,488,124.74
DENSO	\$ 1,199,754.10	\$ 18,991.12	\$ 424.82	\$ 1,180,338.16	\$ 175,895.96	\$ 1,004,442.20
MELCO	\$ 2,727,118.47	\$ 43,223.48	\$ 966.88	\$ 2,682,928.11	\$ 402,439.22	\$ 2,280,488.89
Koito	\$ 1,043,996.68	\$ 16,554.17	\$ 370.31	\$ 1,027,072.20	\$ 153,054.25	\$ 874,017.95

Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
Stanley Electric	\$ 2,283,016.89	\$ 36,286.44	\$ 811.70	\$ 2,245,918.75	\$ 334,681.41	\$ 1,911,237.34
<b>HID Ballasts Settlement Fund</b>						<b>\$ 9,558,311.12</b>

<b>Hydraulic Braking Systems - 21-11993</b>						
Bosch	\$ 114,333.15	\$ 97,376.79	\$ 3,723.35	\$ 13,233.01	\$ 1,984.95	\$ 11,248.06
TRW	\$ 744,900.61	\$ 628,569.39	\$ 24,034.31	\$ 92,296.91	\$ 13,844.54	\$ 78,452.37
<b>Hydraulic Braking Systems Settlement Fund</b>						<b>\$ 89,700.43</b>

<b>Ignition Coils - 13-1403</b>						
Hitachi	\$ 5,495,660.42	\$ 87,029.92	\$ 1,946.80	\$ 5,406,683.70	\$ 805,710.68	\$ 4,600,973.02
DENSO	\$ 14,365,951.90	\$ 227,564.85	\$ 5,090.48	\$ 14,133,296.57	\$ 2,106,157.35	\$ 12,027,139.22
MELCO	\$ 12,442,179.86	\$ 197,049.88	\$ 4,407.88	\$ 12,240,722.10	\$ 1,836,108.32	\$ 10,404,613.79
Diamond Electric		\$ 67,974.99	\$ 1,520.56	\$ 4,207,872.29	\$ 627,047.61	\$ 3,580,824.68
Delphi	\$ 558,906.35	\$ 8,830.21	\$ 197.53	\$ 549,878.61	\$ 81,944.87	\$ 467,933.74
Toyo DENSO	\$ 604,862.09	\$ 9,568.61	\$ 214.04	\$ 595,079.44	\$ 88,680.09	\$ 506,399.35
<b>Ignition Coils Settlement Fund</b>						<b>\$ 31,587,883.79</b>

<b>Instrument Panel Clusters - 12-0203</b>						
Nippon Seiki	\$ 3,423,285.80	\$ 54,212.48	\$ 1,212.70	\$ 3,367,860.62	\$ 501,882.69	\$ 2,865,977.93

Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
Yazaki	\$ 2,002,337.59	\$ 31,731.06	\$ 709.80	\$ 1,969,896.73	\$ 293,555.10	\$ 1,676,341.63
DENSO	\$ 6,442,876.26	\$ 102,068.17	\$ 2,283.20	\$ 6,338,524.89	\$ 944,572.45	\$ 5,393,952.44
Continental	\$ 3,012,093.21	\$ 47,893.32	\$ 1,071.34	\$ 2,963,128.55	\$ 441,557.12	\$ 2,521,571.43
<b>Instrument Panel Clusters Settlement Fund</b>						<b>\$ 12,457,843.43</b>

<b>Interior Trim - 16-3503</b>						
INOAC	\$ 1,951,304.38	\$ 31,005.80	\$ 693.58	\$ 1,919,605.00	\$ 286,055.43	\$ 1,633,549.57
Toyoda Gosei	\$ 4,140,118.71	\$ 65,665.15	\$ 1,468.89	\$ 4,072,984.67	\$ 606,954.92	\$ 3,466,029.76
<b>Interior Trim Settlement Fund</b>						<b>\$ 5,099,579.32</b>

<b>Inverters - 13-1803</b>						
Hitachi	\$ 1,744,415.71	\$ 27,564.26	\$ 616.59	\$ 1,716,234.86	\$ 255,759.18	\$ 1,460,475.68
DENSO	\$ 107,300.35	\$ 1,694.46	\$ 37.90	\$ 105,567.99	\$ 15,732.17	\$ 89,835.82
<b>Inverters Settlement Fund</b>						<b>\$ 1,550,311.51</b>

<b>Lamps - 13-1203</b>						
Koito	\$ 17,240,069.00	\$ 273,778.36	\$ 6,124.25	\$ 16,960,166.39	\$ 2,527,377.80	\$ 14,432,788.59
Mitsuba	\$ 173,733.25	\$ 2,743.58	\$ 61.37	\$ 170,928.30	\$ 25,472.42	\$ 145,455.88
Stanley Electric	\$ 9,804,178.30	\$ 155,715.82	\$ 3,483.26	\$ 9,644,979.22	\$ 1,437,278.54	\$ 8,207,700.68
<b>Lamps Settlement Fund</b>						<b>\$ 22,785,945.15</b>

Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
<b>Latches - 17-4303</b>						
Kiekert AG	\$ 1,793,824.47	\$ 28,469.68	\$ 636.85	\$ 1,764,717.94	\$ 262,976.58	\$ 1,501,741.36
Brose	\$ 1,847,085.60	\$ 29,247.47	\$ 654.25	\$ 1,817,183.88	\$ 270,799.18	\$ 1,546,384.70
<b>Latches Settlement Fund</b>						<b>\$ 3,048,126.05</b>

<b>Motor Generators - 13-1503</b>						
Hitachi	\$ 1,743,252.04	\$ 27,547.20	\$ 616.21	\$ 1,715,088.63	\$ 255,588.28	\$ 1,459,500.35
DENSO	\$ 107,270.11	\$ 1,693.99	\$ 37.89	\$ 105,538.23	\$ 15,727.73	\$ 89,810.50
<b>Motor Generators Settlement Fund</b>						<b>\$ 1,549,310.85</b>

<b>Occupant Safety Restraint Systems - 12-0603</b>						
Autoliv	\$ 14,513,002.57	\$ 229,806.92	\$ 5,140.63	\$ 14,278,055.02	\$ 2,127,734.79	\$ 12,150,320.23
TRW	\$ 4,032,417.10	\$ 63,887.96	\$ 1,429.13	\$ 3,967,100.01	\$ 591,180.28	\$ 3,375,919.73
Tokai Rika	\$ 23,403,599.48	\$ 370,904.55	\$ 8,296.90	\$ 23,024,398.03	\$ 3,431,106.76	\$ 19,593,291.27
Toyota Gosei	\$ 4,720,653.38	\$ 74,858.62	\$ 1,674.54	\$ 4,644,120.22	\$ 692,066.24	\$ 3,952,053.98
Takata Corpora	\$ 245,189.08	\$ - *	\$ - *	\$ 245,189.08	\$ 36,778.36	\$ 208,410.72
TK Holdings, Inc	\$ 243,767.70	\$ - *	\$ - *	\$ 243,767.70	\$ 36,565.16	\$ 207,202.55
<b>Occupant Safety Restraint Systems Settlement Fund</b>						<b>\$ 39,487,198.48</b>



Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
<b>Power Window Motors - 13-2303</b>						
DENSO	\$ 107,300.37	\$ 1,694.46	\$ 37.90	\$ 105,568.01	\$ 15,732.17	\$ 89,835.84
Mitsuba	\$ 15,251,281.16	\$ 242,290.63	\$ 5,419.89	\$ 15,003,570.64	\$ 2,235,803.06	\$ 12,767,767.58
<b>Power Window Motors Settlement Fund</b>						<b>\$ 12,857,603.42</b>

<b>Power Window Switches - 16-3903</b>						
Omron	\$ 2,579,777.99	\$ 40,911.43	\$ 915.16	\$ 2,537,951.40	\$ 378,205.08	\$ 2,159,746.32
Toyo DENSO	\$ 3,597,503.16	\$ 57,054.31	\$ 1,276.27	\$ 3,539,172.58	\$ 527,406.69	\$ 3,011,765.89
<b>Power Window Switches Settlement Fund</b>						<b>\$ 5,171,512.21</b>

<b>Radiators - 13-1003</b>						
T.RAD	\$ 4,991,180.03	\$ 79,051.42	\$ 1,768.33	\$ 4,910,360.28	\$ 731,747.30	\$ 4,178,612.98
DENSO	\$ 13,519,419.58	\$ 214,149.57	\$ 4,790.39	\$ 13,300,479.62	\$ 1,982,050.53	\$ 11,318,429.09
Calsonic	\$ 4,438,927.24	\$ 70,536.53	\$ 1,577.86	\$ 4,366,812.85	\$ 650,732.94	\$ 3,716,079.91
Mitsuba	\$ 2,901,129.63	\$ 46,131.52	\$ 1,031.93	\$ 2,853,966.18	\$ 425,289.89	\$ 2,428,676.29
<b>Radiators Settlement Fund</b>						<b>\$ 21,641,798.28</b>

<b>Shock Absorbers - 15-3303</b>						
Hitachi	\$ 10,563,062.98	\$ 167,764.77	\$ 3,752.79	\$ 10,391,545.42	\$ 1,548,530.84	\$ 8,843,014.59
KYB	\$ 23,555,598.98	\$ 373,414.70	\$ 8,353.05	\$ 23,173,831.23	\$ 3,453,369.11	\$ 19,720,462.12
Showa	\$ 8,097,657.63	\$ 128,382.36	\$ 2,871.83	\$ 7,966,403.44	\$ 1,187,154.20	\$ 6,779,249.25
<b>Shock Absorbers Settlement Fund</b>						<b>\$ 35,342,725.95</b>

Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
<b>Spark Plugs - 15-3003</b>						
DENSO	\$ 8,357,882.38	\$ 132,407.20	\$ 2,961.86	\$ 8,222,513.32	\$ 1,225,325.95	\$ 6,997,187.37
Bosch	\$ 23,071,175.87	\$ 366,413.24	\$ 8,196.43	\$ 22,696,566.20	\$ 3,382,205.08	\$ 19,314,361.12
NGK Spark Plugs	\$ 10,107,791.64	\$ 160,549.64	\$ 3,591.39	\$ 9,943,650.61	\$ 1,481,785.33	\$ 8,461,865.28
<b>Spark Plugs Settlement Fund</b>						<b>\$ 34,773,413.77</b>

<b>Starters - 13-1103</b>						
Hitachi	\$ 2,840,501.99	\$ 45,022.27	\$ 1,007.12	\$ 2,794,472.60	\$ 416,433.30	\$ 2,378,039.30
DENSO	\$ 8,315,844.42	\$ 131,744.31	\$ 2,947.04	\$ 8,181,153.07	\$ 1,219,162.22	\$ 6,961,990.85
MELCO	\$ 14,083,728.99	\$ 223,041.33	\$ 4,989.29	\$ 13,855,698.37	\$ 2,078,354.76	\$ 11,777,343.61
Bosch	\$ 808,287.56	\$ 12,820.70	\$ 286.79	\$ 795,180.07	\$ 118,497.44	\$ 676,682.63
Mitsuba	\$ 7,510,812.48	\$ 119,322.58	\$ 2,669.17	\$ 7,388,820.73	\$ 1,101,067.67	\$ 6,287,753.06
<b>Starters Settlement Fund</b>						<b>\$ 28,081,809.45</b>

<b>Steel Tubes - 16-4003</b>						
Usui Kokusai	\$ 4,224,988.55	\$ 67,139.03	\$ 1,501.86	\$ 4,156,347.66	\$ 619,369.74	\$ 3,536,977.92
Maruyasu	\$ 4,236,050.85	\$ 67,179.33	\$ 1,502.76	\$ 4,167,368.76	\$ 621,020.46	\$ 3,546,348.30
Sanoh	\$ 6,821,652.60	\$ 108,170.75	\$ 2,419.71	\$ 6,711,062.14	\$ 1,000,081.97	\$ 5,710,980.17
<b>Steel Tubes Settlement Fund</b>						<b>\$ 12,794,306.38</b>

Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
<b>Steering Angle Sensors - 13-1603</b>						
Panasonic	\$ 4,746,631.23	\$ 75,180.43	\$ 1,681.74	\$ 4,669,769.06	\$ 695,894.00	\$ 3,973,875.07
Tokai Rika	\$ 539,151.14	\$ 8,529.86	\$ 190.81	\$ 530,430.47	\$ 79,045.91	\$ 451,384.56
<b>Steering Angle Sensors Settlement Fund</b>						<b>\$ 4,425,259.63</b>

<b>Switches - 13-1303</b>						
Panasonic	\$ 3,990,119.49	\$ 63,214.47	\$ 1,414.07	\$ 3,925,490.95	\$ 584,979.87	\$ 3,340,511.08
Tokai Rika	\$ 2,787,375.22	\$ 44,222.07	\$ 989.22	\$ 2,742,163.93	\$ 408,635.66	\$ 2,333,528.27
<b>Switches Settlement Fund</b>						<b>\$ 5,674,039.35</b>

<b>Valve Timing Control Devices - 13-2503</b>						
Hitachi	\$ 2,938,308.74	\$ 46,595.36	\$ 1,042.31	\$ 2,890,671.07	\$ 430,767.42	\$ 2,459,903.65
Aisan Seiki	\$ 15,907,856.77	\$ 251,974.99	\$ 5,636.52	\$ 15,650,245.26	\$ 2,332,215.39	\$ 13,318,029.87
DENSO	\$ 3,724,518.10	\$ 59,025.39	\$ 1,320.36	\$ 3,664,172.35	\$ 546,036.80	\$ 3,118,135.55
MELCO	\$ 2,725,643.10	\$ 43,211.98	\$ 966.62	\$ 2,681,464.50	\$ 402,219.68	\$ 2,279,244.83
Mikuni	\$ 532,490.49	\$ 8,424.75	\$ 188.46	\$ 523,877.28	\$ 78,069.32	\$ 445,807.96
<b>Valve Timing Control Devices Settlement Fund</b>						<b>\$ 21,621,121.86</b>

Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
<b>Windshield Washer Systems - 13-2803</b>						
DENSO	\$ 289,901.35	\$ 4,576.14	\$ 102.37	\$ 285,222.84	\$ 42,505.17	\$ 242,717.67
Mitsuba	\$ 1,214,578.98	\$ 19,266.77	\$ 430.99	\$ 1,194,881.22	\$ 178,060.66	\$ 1,016,820.56
<b>Windshield Washer Systems Settlement Fund</b>						<b>\$ 1,259,538.23</b>

<b>Windshield Wipers - 13-0903</b>						
DENSO	\$ 2,822,058.64	\$ 44,736.10	\$ 1,000.72	\$ 2,776,321.82	\$ 413,728.08	\$ 2,362,593.74
Bosch	\$ 386,662.33	\$ 6,120.59	\$ 136.91	\$ 380,404.83	\$ 56,688.56	\$ 323,716.27
Mitsuba	\$ 26,177,050.75	\$ 415,669.79	\$ 9,298.27	\$ 25,752,082.69	\$ 3,837,537.50	\$ 21,914,545.19
<b>Windshield Wipers Settlement Fund</b>						<b>\$ 24,600,855.19</b>

<b>Wire Harness - 12-0103</b>						
Fujikura	\$ 5,394,276.83	\$ 85,451.25	\$ 1,911.49	\$ 5,306,914.09	\$ 790,841.23	\$ 4,516,072.86
KL Sales	\$ 166,008.45	\$ 2,615.11	\$ 58.50	\$ 163,334.84	\$ 24,341.21	\$ 138,993.63
Lear	\$ 2,214,829.97	\$ 34,889.72	\$ 780.46	\$ 2,179,159.79	\$ 324,752.49	\$ 1,854,407.30
Sumitomo	\$ 27,155,965.10	\$ 429,981.54	\$ 9,618.41	\$ 26,716,365.15	\$ 3,981,309.64	\$ 22,735,055.51
Yazaki	\$ 55,693,435.36	\$ 880,769.37	\$ 19,702.25	\$ 54,792,963.74	\$ 8,165,389.17	\$ 46,627,574.57
DENSO	\$ 12,458,703.97	\$ 197,310.34	\$ 4,413.71	\$ 12,256,979.92	\$ 1,826,549.49	\$ 10,430,430.43

## Sorted by Automotive Parts Case

Defendant	12/1/2024 Balance	\$100 Minimum Funding	\$100 Reserve Funding	Post \$100 Distribution Balance	15% Reserve	Pro Rata Funding Available
Furukawa	\$ 36,361,634.66	\$ 575,276.51	\$ 12,868.57	\$ 35,773,489.58	\$ 5,331,043.61	\$ 30,442,445.97
G.S. ELECTECH	\$ 2,580,084.14	\$ 40,912.77	\$ 915.19	\$ 2,538,256.18	\$ 378,250.72	\$ 2,160,005.46
Leoni	\$ 1,245,866.52	\$ 19,713.84	\$ 440.99	\$ 1,225,711.69	\$ 182,658.05	\$ 1,043,053.64
MELCO	\$ 2,727,197.61	\$ 43,224.72	\$ 966.91	\$ 2,683,005.98	\$ 402,450.90	\$ 2,280,555.08
Tokai Rika	\$ 627,872.24	\$ 9,928.00	\$ 222.08	\$ 617,722.16	\$ 92,054.65	\$ 525,667.51
Chiyoda	\$ 1,507,674.82	\$ 23,922.84	\$ 535.14	\$ 1,483,216.84	\$ 221,027.89	\$ 1,262,188.95
<b>Wire Harness Settlement Fund</b>						<b>\$ 124,016,450.92</b>

**Aggregate**

<b>Totals</b>	<b>\$ 990,612,933.48</b>		<b>\$</b>	<b>971,901,233.48</b>		<b>\$ 827,067,431.59</b>
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\*For purposes of the \$100 Minimum and Pro Rata Distributions, the Occupant Safety Restraint Systems - TK Holdings, Inc. and Occupant Safety Restraint Systems - Takata Corporation Settlement Funds have been grouped with the Round 5 Settlement Funds.