

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

IN RE AUTOMOTIVE PARTS ANTITRUST  
LITIGATION

In Re: FUEL INJECTION SYSTEMS

THIS RELATES TO:  
ALL DIRECT PURCHASER ACTIONS

CASE NO. 12-MD-02311  
HON. SEAN F. COX

2:13-cv-02201-SFC-RSW  
2:15-cv-11827-SFC-RSW  
2:15-cv-13423-SFC-RSW

**SETTLEMENT CLASS COUNSEL’S REPORT ON DISSEMINATION OF  
NOTICE OF PROPOSED SETTLEMENTS WITH THE AISAN, MIKUNI, KEIHIN,  
AND MARUYASU DEFENDANTS AND CLASS MEMBERS’ RESPONSE**

Settlement Class Counsel submit the following report concerning the dissemination of notice pursuant to this Court’s Order dated November 12, 2021 (2:13-cv-02201, ECF No. 178) (the “Notice Order”), and Settlement Class members’ response to the notice program. As described more fully below, notice was mailed to 1,096 potential Settlement Class members and published in accordance with the Notice Order. No objections were filed to any of the proposed settlements, to the proposed plan for distribution of settlement funds, or to Settlement Class Counsel’s request for an award of attorneys’ fees and reimbursement of litigation costs and expenses, and a service award to the Class Representative. No requests for exclusion from the Settlement Classes have been submitted.

Settlement Class Counsel respectfully submit that the complete absence of objections and opt-out requests militates strongly in favor of approval of the proposed settlements, the proposed

plan for distribution of settlement funds, and the request for attorneys' fees and litigation costs and expenses, and a service award to the Class Representative.

**I. DISSEMINATION OF NOTICE TO THE CLASS**

Pursuant to the Court's Notice Order, on December 9, 2021, Epiq Class Action & Claims Solutions, Inc. ("Epiq"), the Notice and Claims Administrator retained by Direct Purchaser Plaintiff, mailed 1,096 copies of the Notice of Proposed Settlements of Direct Purchaser Class Action with Aisan, Mikuni, Keihin, and Maruyasu Defendants and Hearing on Settlement Approval and Related Matters, and Claim Form (the "Notice") to potential Settlement Class members by first class mail, postage prepaid. Declaration of Tiffany Shroyer, Project Manager for Epiq. Exhibit 1 at ¶ 6. Epiq also re-mailed returned notices for which updated addresses were obtained. *Id.* at ¶ 7. In addition, a copy of the Notice was (and remains) posted online at [www.AutoPartsAntitrustLitigation.com/fis](http://www.AutoPartsAntitrustLitigation.com/fis), a website dedicated to this litigation. *Id.* at ¶ 9.

Also, in accordance with the Notice Order, the Summary Notice of Proposed Settlement of Direct Purchaser Class Action with Aisan, Mikuni, Keihin, and Maruyasu Defendants and Hearing on Settlement Approval and Related Matters ("Summary Notice") was published in *Automotive News* on December 20, 2021. *Id.* at ¶ 8. Additionally, an Informational Press Release was issued nationwide on December 20, 2021 via PR Newswire's "Auto Wire," which targets auto industry trade publications. *Id.*

Notice to the Settlement Class under Fed. R. Civ. P. 23 has, therefore, been provided as ordered by the Court.

**II. ABSENCE OF OBJECTIONS TO THE PROPOSED SETTLEMENTS, THE PROPOSED DISTRIBUTION PLAN, AND REQUEST FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES, AND A SERVICE AWARD TO THE CLASS REPRESENTATIVE**

The Notice advised that any objection to the proposed settlements, the proposed plan for distribution of settlement funds, or Settlement Class Counsel's request for an award of attorneys' fees and litigation costs and expenses, and a service award to the Class Representative had to be filed with the Clerk by January 31, 2022, with copies mailed to Settlement Class Counsel and to counsel for the Settling Defendants.

As of the date of the filing of this Report, no objection to the proposed settlements, the distribution plan or the request for fees and expenses and a service award to the Class Representative has been filed with the Court or received by Settlement Class Counsel.<sup>1</sup>

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<sup>1</sup> Counsel for the Aisan, Mikuni, and Keihin Defendants have informed Settlement Class Counsel that their clients fulfilled their obligations under 28 U.S.C. § 1715 (the "Class Action Fairness Act of 2005" or "CAFA"), by disseminating the requisite notice to the appropriate federal and state officials at least ninety days prior to the final approval hearing. Counsel for Defendant Maruyasu has informed Settlement Class Counsel that the requisite CAFA notice has been sent out, but that the 90-day period for finally approving the Maruyasu settlement will not be completed until May 9, 2022. Plaintiff submits that orders finally approving the settlements with the Aisan, Mikuni, and Keihin Defendants may properly be entered as of the date of the final approval hearing and that an order finally approving the settlement with Defendant Maruyasu may properly be entered on May 9, 2022, when the 90-day CAFA period has been satisfied. *See e.g., Wilcox v. Swapp*, No. 2:17- CV-275-RMP, 2020 WL 2110411, at \*2 (E.D. Wash. Apr. 22, 2020) (Court held final judgment order in abeyance to allow for completion of 90-day CAFA notice period); *Gatdula v. CRST Int'l, Inc.*, No. CV1101285VAPOPX, 2015 WL 12697656, at \*12 (C.D. Cal. Aug. 26, 2015) (same); *Precision Assocs., Inc. v. Panalpina World Transp. (Holding) Ltd.*, No. 08-CV-42 JG VVP, 2013 WL 4525323, at \*17 (E.D.N.Y. Aug. 27, 2013) (same); *In re Processed Egg Prod. Antitrust Litig.*, 284 F.R.D. 249, 258 (E.D. Pa. 2012) (same); *Kay Co. v. Equitable Prod. Co.*, No. CIV.A. 2:06-CV-00612, 2010 WL 1734869, at \*4 (S.D.W. Va. Apr. 28, 2010), amended, No. 2:06-CV-00612, 2010 WL 11493187 (S.D.W. Va. Nov. 3, 2010) (same); *D.S. ex rel. S.S. v. New York City Dep't of Educ.*, 255 F.R.D. 59, 80 (E.D.N.Y. 2008) (Court provisionally approved settlement pending completion of 90-day CAFA notice period).

### **III. REQUESTS FOR EXCLUSION**

The Notice further advised that requests for exclusion from the Settlement Class had to be mailed to Settlement Class Counsel and to counsel for the Settling Defendants, postmarked no later than January 31, 2022. As of the date of filing this Report, no requests for exclusion have been submitted.

Settlement Class Counsel respectfully submit that, for the reasons set forth in the Memorandum in Support of Direct Purchaser Plaintiff's Motion for Final Approval of Proposed Settlements with the Aisan, Mikuni, Keihin, and Maruyasu Defendants and Proposed Plan for Distribution of Settlement Funds (the "Final Approval Brief") (2:12-cv-02201, ECF No. 182), the proposed settlements are fair, reasonable, and adequate under the relevant criteria, and warrant final approval.

### **IV. THE REACTION OF MEMBERS OF THE SETTLEMENT CLASSES SUPPORTS APPROVAL OF THE SETTLEMENTS, THE PROPOSED PLAN FOR DISTRIBUTION, AND THE REQUEST FOR AN AWARD OF FEES AND EXPENSES, AND A SERVICE AWARD TO THE CLASS REPRESENTATIVE**

The reaction of the class has been recognized repeatedly by courts within this Circuit, and elsewhere, as a factor in evaluating the fairness, reasonableness, and adequacy of a proposed settlement. *See, e.g., Sheick v. Auto. Component Carrier LLC*, No. 2:09-cv-14429, 2010 WL 4136958, at \*22 (E.D. Mich. Oct. 18, 2010) ("scarcity of objections – relative to the number of class members overall – indicates broad support for the settlement among Class Members."); *In re Cardizem CD Antitrust Litig.*, 218 F.R.D. 508, 527 (E.D. Mich. 2003) ("That the overwhelming majority of class members have elected to remain in the Settlement Class, without objection, constitutes the 'reaction of the class,' as a whole, and demonstrates that the Settlement is 'fair, reasonable, and adequate.'"); *In re Delphi Corp. Sec., Deriv. & "ERISA" Litig.*, 248

F.R.D. 483, 499 (E.D. Mich. 2008) (small number of opt-outs or objections is indicative of the adequacy of the settlement).

Individual notice of the proposed settlements was mailed to 1,096 potential Settlement Class members, and a copy of the Notice was (and remains) posted on-line at [www.AutoPartsAntitrustLitigation.com/fis](http://www.AutoPartsAntitrustLitigation.com/fis). The Summary Notice was published in *Automotive News* on December 20, 2021, and on that same day an Informational Press Release was issued nationwide via PR Newswire's "Auto Wire," which targets auto industry trade publications. The total absence of objections and opt-outs militates strongly in favor of approval of the proposed settlements, the proposed plan for distribution of settlement funds, and the request for attorneys' fees and reimbursement of litigation costs and expenses, and an incentive award to the Class Representative.

#### **V. REQUEST FOR AN AWARD OF ATTORNEYS' FEES**

Settlement Class Counsel's lodestar, based upon historical rates, from September 1, 2019 through December 31, 2021 was \$855,480.5.<sup>2</sup> Direct Purchaser Plaintiff's Motion for an Award of Attorneys' Fees, Litigation Costs and Expenses, and a Service Award to the Class Representative, at 10-11 (the "Fee Brief") (2:13-cv-02201, ECF No. 183). Plaintiff's counsel request a fee totaling 30% of the Settlement Fund, which amounts to \$915,600. Excluding the work performed by Settlement Class Counsel after December 31, 2021 regarding overseeing the notice and claims process and the preparation of the final approval papers, the current multiplier

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<sup>2</sup> The Court previously awarded Plaintiff's counsel attorneys' fees in connection with the earlier settlements with the MITSUBISHI ELECTRIC, HIAMS, MITSUBA, and DENSO Defendants. That fee award was based on Plaintiff's counsel's historical lodestar from the inception of the case through August 31, 2019. Plaintiff's counsel now request fees based only on their historical lodestar from September 1, 2019 through December 31, 2021.

is 1.07. Moreover, this, of course, does not factor in the future time Settlement Class Counsel will be required to put into the administration of the settlements.

**VI. CONCLUSION**

Based upon the foregoing, and for the reasons set forth in Direct Purchaser Plaintiff's Final Approval Brief and Fee Brief, Direct Purchaser Plaintiff respectfully requests that the Court grant final approval of the proposed settlements, the proposed plan for distribution of settlement funds, and the request for attorneys' fees and litigation costs and expenses, and a service award to the Class Representative.

DATED: February 24, 2022

Respectfully Submitted,

/s/ David H. Fink

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Nathan J. Fink (P75185)

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Purchaser Plaintiff***

**CERTIFICATE OF SERVICE**

I hereby certify that on February 24, 2022, I electronically filed the foregoing paper with the Clerk of the court using the ECF system which will send notification of such filing to all counsel of record registered for electronic filing.

By: /s/Nathan J. Fink  
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# **EXHIBIT 1**

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

_____	:	
<b>In Re: AUTOMOTIVE PARTS</b>	:	<b>CASE NO. 12-MD-02311</b>
<b>ANTITRUST LITIGATION</b>	:	<b>Honorable Sean F. Cox</b>
_____	:	
	:	
<b>In Re: FUEL INJECTION SYSTEMS</b>	:	
_____	:	
	:	<b>2:13-cv-02201-SFC-RSW</b>
	:	<b>2:15-cv-11827-SFC-RSW</b>
<b>THIS RELATES TO:</b>	:	<b>2:15-cv-13423-SFC-RSW</b>
<b>ALL DIRECT PURCHASER ACTIONS :</b>	:	
_____	:	

**DECLARATION OF TIFFANY SHROYER RE DISSEMINATION OF NOTICE TO THE  
DIRECT PURCHASER SETTLEMENT CLASSES**

I, Tiffany Shroyer, hereby declare as follows:

1. I am a Project Manager for Epiq Class Action & Claims Solutions, Inc. ("Epiq"), the Settlement Administrator in the above-captioned case. I am familiar with the actions taken by Epiq with respect to the proposed settlements reached in this case between the Direct Purchaser Plaintiff and the Aisan, Mikuni, Keihin, and Maruyasu Defendants, as well as the corresponding Class Notice program. This declaration is based upon my personal knowledge and information provided by Plaintiff's counsel and employees and staff under my supervision and is accurate and truthful to the best of my knowledge.

2. Epiq was established in 1968 as a client services and data processing company. Epiq has been administering bankruptcies since 1985 and settlements since 1993, including settlements of class actions, mass tort litigations, Securities and Exchange Commission enforcement actions, Federal Trade Commission disgorgement actions, insurance disputes, bankruptcies, and other major litigation.

3. Epiq has administered more than 1,000 settlements, including some of the largest and most complex cases ever settled. Epiq's class action case administration services include: coordination of all notice requirements; design of direct-mail notices; establishment and implementation of notice fulfillment

services; coordination with the United States Postal Service (“USPS”); notice website development and maintenance; dedicated telephone lines with recorded information and/or telephone agents; receipt and processing of opt-outs; claims database management; claim adjudication; funds management; and award calculations and distribution services. Epiq works with the settling parties, the Court, and the Class Members in a neutral facilitation role to implement settlement administration services based on the negotiated terms of a settlement.

#### **OVERVIEW OF EPIQ’S RESPONSIBILITIES AS THE SETTLEMENT ADMINISTRATOR**

4. Epiq’s responsibilities included the following:
  - a. Printing the Court-approved Direct Purchaser Class Notice and Claim Form (“Claim Package”) to be sent to putative Class Members;
  - b. Searching the National Change of Address (“NCOA”) database for updated addresses, if any, for putative Class Members;
  - c. Mailing the Claim Package by USPS First-class mail to putative Class Members;
  - d. Causing the Summary Publication Notice to be placed in one edition of *Automotive News*;
  - e. Issuing an informational press release via *PR Newswire*;
  - f. Maintaining a toll-free telephone number with customer service telephone agents and an option to request a call back if reached during non-business hours;
  - g. Maintaining an informational website that provides the public access to pertinent documents and settlement information.

#### **CLASS NOTICE**

5. In preparation for mailing the Claim Package, Epiq received lists of potential Settlement Class members from Settlement Class Counsel. Epiq then submitted the names and addresses of those

potential Class Members to cross-reference with the NCOA database for updated address information. By eliminating duplicate records and invalid mailing addresses, Epiq refined the database to include 1,096 names and addresses of potential Class Members.

6. On December 9, 2021, Epiq mailed the Claim Packages by first class mail, postage prepaid, to the 1,096 potential Class Members. A copy of the Claim Package is attached hereto as Exhibit A.

7. As of February 22, 2022, Epiq has received a total of 200 Claim Packages returned by the U.S. Postal Service as undeliverable and has re-mailed 84 Claim Packages to potential Class Members. As of February 22, 2022, 116 Claim Packages remain undeliverable.

#### **PUBLICATION NOTICE**

8. Epiq caused the publication of the Summary Publication Notice in one edition of *Automotive News* on December 20, 2021. Additionally, an Informational Press Release was issued via PR Newswire's "Auto Wire" on December 20, 2021. Confirmation of the publication and copies of the Summary Publication Notice as it appeared in *Automotive News*, and the Informational Notice are attached hereto as Exhibit B.

#### **SETTLEMENT WEBSITE**

9. On December 9, 2021, Epiq updated portions of the public settlement website to provide Direct Purchase Class Members with information related to the proposed settlements. The domain name for the website is [www.AutoPartsAntitrustLitigation.com/FIS](http://www.AutoPartsAntitrustLitigation.com/FIS). The website provides general case information and links to important documents, including the Settlement Agreements, the Notice and Claim Form, and other documents related to the settlements.

10. Between December 9, 2021 and February 22, 2022, there were 1,500 views and 776 unique visitors to the settlement website.

**REQUESTS FOR EXCLUSION**

11. Class Members could request exclusion from the Settlement Classes, so long as they did so by submitting a request in writing that was postmarked by January 31, 2022. As of February 22, 2022, Epiq has received 0 requests for exclusion from the Aisin Settlement Class, 0 requests for exclusion from the Mikuni Settlement Class, 0 requests for exclusion from the Keihin Settlement Class, and 0 requests for exclusion from the Maruyasu Settlement Class.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 23rd day of February 2022 in McMinnville, Oregon.

*Tiffany Shroyer*

\_\_\_\_\_  
Tiffany Shroyer

Project Manager, Client Services | Epiq

# EXHIBIT A



This Notice provides information concerning the proposed settlements, the motion for attorneys' fees and reimbursement of litigation costs and expenses, and a service award, and the proposed plan of distribution of the Fuel Injection Systems Settlement Fund. The Notice also advises you of your rights with respect to a Court hearing on these matters.

## **BACKGROUND**

You were previously informed that Plaintiff had reached settlements with the MITSUBISHI ELECTRIC Defendants, the HIAMS Defendants, the MITSUBA Defendants, and the DENSO Defendants totaling \$10,110,449. After conducting a fairness hearing, the Court entered orders approving those settlements on October 15, 2019.

Plaintiff has now reached settlements with the Aisan Defendants, the Mikuni Defendants, the Keihin Defendants, and the Maruyasu Defendant totaling \$3,052,000. Under the terms of the proposed settlements, Aisan will pay a total of \$2,010,000 (the "Aisan Settlement Fund"), Mikuni will pay a total of \$865,000 (the "Mikuni Settlement Fund"), Keihin will pay a total of \$97,000 (the "Keihin Settlement Fund"), and Maruyasu will pay a total of \$80,000 (the "Maruyasu Settlement Fund") (all the settlement funds (including those from the settlements previously approved by the Court) are collectively referred to herein as the "Fuel Injection Systems Settlement Fund").

This litigation, and the proposed settlements, are part of coordinated legal proceedings involving a number of parts used in motor vehicles. This litigation and the proposed settlements relate solely to Fuel Injection Systems purchased in the United States **directly** from a Defendant, or depending on the specific settlement agreement, its parents, subsidiaries, affiliates, or joint ventures. The meaning of the term "Fuel Injection Systems" is defined in each settlement agreement, but generally includes any system or any component of a system that admits fuel or a fuel/air mixture into engine cylinders and may include fuel injectors, high pressure pumps, rail assemblies, feed lines, electronic throttle bodies, engine control units, fuel pumps, fuel pump modules, pressure regulators, pulsation dampers, electronic throttle motors, electronic throttle control motors, as well as an array of meters (e.g., airflow meters and/or air mass meters), sensors (e.g., air mass sensors, altitude sensors, boost pressure sensors, cam position sensors, manifold absolute pressure sensors, mark sensors, phase sensors, pressure sensors, and/or speed sensor temperature sensors), valves (e.g., check valves, cut-off valves, injection valves, and/or purge control valves), and other components sold as a unitary system, as part of a broader system, such as an engine management system, or as separate components. These proposed settlements do not relate to, and have no effect upon, cases involving any product other than Fuel Injection Systems.

If you are a member of any of the Aisan, Mikuni, Keihin and/or Maruyasu Settlement Classes (defined below), you have the rights and options summarized here:

- You may remain in any or all of the Aisan, Mikuni, Keihin or Maruyasu Settlement Classes and be eligible to share in the proceeds of, and be bound by the terms of, any settlement in which you elect to participate;
- You may exclude yourself from any or all of the Aisan, Mikuni, Keihin or Maruyasu Settlement Classes, in which case you will **not** be bound by any settlement from which you exclude yourself and will **not** be eligible to share in the proceeds of that settlement;
- If you remain in any of the Aisan, Mikuni, Keihin and/or Maruyasu Settlement Classes, you may object to that proposed settlement or to Settlement Class Counsel's request for an award of attorneys' fees and reimbursement of litigation costs and expenses, and a service award for the Class Representative. You may also appear at the hearing where the Court will consider these matters; and
- You may enter an appearance in the litigation through your own counsel at your own expense.

With respect to the MITSUBISHI ELECTRIC, HIAMS, MITSUBA and DENSO Settlement Classes, you previously received notice of those Settlement Classes and were given an opportunity to opt out. You are bound by whatever decisions you previously made regarding those Settlement Classes. If you previously chose to remain in any of the MITSUBISHI ELECTRIC, HIAMS, MITSUBA or DENSO Settlement Classes, you are eligible to share in the proceeds of any settlement in which you elected to participate. You also have the right to object to the proposed plan of distribution of the Fuel Injection Systems Settlement Fund, and to the request for a service award to the Class Representative. If you previously chose to opt out of one or more of those Settlement Classes, you are not eligible to share in the proceeds of those Settlement Classes, and you do not have a right to object to the proposed plan of distribution relating to those Settlement Classes.

Any Settlement Class member who wishes to participate in the distribution of the Fuel Injection Systems Settlement Fund must complete and submit a copy of the Claim Form on or before March 25, 2022.



### WHO IS IN THE SETTLEMENT CLASSES?

The Court has provisionally certified a Direct Purchaser Aisan Settlement Class (“Aisan Settlement Class”), a Direct Purchaser Mikuni Settlement Class (the “Mikuni Settlement Class”), a Direct Purchaser Keihin Settlement Class (the “Keihin Settlement Class”), and a Direct Purchaser Maruyasu Settlement Class (the “Maruyasu Settlement Class”) for the purpose of disseminating notice of the proposed Aisan, Mikuni, Keihin, and Maruyasu settlements.

The Aisan, Mikuni, and Maruyasu Settlement Classes are defined as follows:

All individuals and entities who purchased Fuel Injection Systems in the United States directly from one or more Defendants (or their subsidiaries, affiliates, or joint ventures) from January 1, 2000 through March 12, 2018. Excluded from the Settlement Class are Defendants, their present and former parent companies, subsidiaries and affiliates, federal governmental entities and instrumentalities of the federal government, and states and their subdivisions, agencies and instrumentalities.

The Keihin Settlement Class is defined as follows:

All individuals and entities who purchased Fuel Injection Systems in the United States directly from one or more Defendants (or any current or former subsidiaries, affiliates, or joint ventures) from January 1, 2000 through March 12, 2018. Excluded from the Settlement Class are Defendants, their present and former parent companies, subsidiaries and affiliates, federal governmental entities and instrumentalities of the federal government, and states and their subdivisions, agencies and instrumentalities.

For purposes of the Aisan, Mikuni, Keihin, and Maruyasu Settlement Class definitions set forth above, the following entities are Defendants: Aisan Industry Co., Ltd; Franklin Precision Industry, Inc.; Aisan Corporation of America; Hyundam Industrial Co., Ltd; Hitachi Automotive Systems, Ltd.; Hitachi Automotive Systems Americas, Inc.; Hitachi, Ltd.; DENSO Corporation; DENSO International America, Inc.; DENSO International Korea Corporation (f/k/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation); Hitachi Astemo, Ltd. (f/k/a Keihin Corporation); Hitachi Astemo Indiana, Inc. (f/k/a Keihin North America, Inc.); Maruyasu Industries Co., Ltd.; Mikuni Corporation; Mikuni American Corporation; MITSUBA Corporation; American Mitsuba Corporation; Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; Mitsubishi Electric Automotive America, Inc.; Robert Bosch GmbH; Bosch Electrical Drives Co., Ltd.; Robert Bosch LLC.

Plaintiff Vitec, L.L.C. has been appointed by the Court to serve as “Class Representative” for the Aisan, Mikuni, Keihin, and Maruyasu Settlement Classes.

The Court has appointed the law firms of Freed Kanner London & Millen LLC, Kohn, Swift & Graf, P.C., Preti, Flaherty, Beliveau & Pachios LLP, and Spector Roseman & Kodroff, P.C. to serve as “Settlement Class Counsel” for the Settlement Classes.

### WHAT IS THIS LITIGATION ABOUT?

In May 2015, Plaintiff filed a class action lawsuit against Defendants on behalf of a class of direct purchasers of Fuel Injection Systems, alleging that they conspired to raise, fix, maintain, and stabilize prices, rig bids, and allocate the supply of Fuel Injection Systems sold in the United States, in violation of federal antitrust laws. Plaintiff further alleges that as a result of the conspiracy, it and other direct purchasers of Fuel Injection Systems were injured by paying more than they would have paid in the absence of the alleged illegal conduct.

The Settling Defendants all deny Plaintiff’s allegations and liability and have asserted defenses to Plaintiff’s claims. The Settling Defendants have agreed to settle this matter to avoid the expense and burden of further litigation. The Court has not issued any findings or rulings with respect to the merits of Plaintiff’s claims or the Settling Defendants’ defenses. As the Court has already approved the prior settlements with MITSUBISHI ELECTRIC, HIAMS, MITSUBA, and DENSO Defendants, this litigation will be fully resolved if the Court approves the settlements with the Aisan, Mikuni, Keihin, and Maruyasu Defendants.

### WHAT RELIEF DO THE PROPOSED SETTLEMENTS PROVIDE?

Plaintiff, on behalf of the Aisan Settlement Class, entered into a settlement with the Aisan Defendants on November 20, 2020 (the “Aisan Settlement Agreement”), under which the Aisan Defendants have agreed to pay \$2,010,000. Pursuant to the Aisan Settlement Agreement, the Aisan Defendants also agreed to cooperate with Plaintiff in the prosecution of the lawsuit against any remaining, non-settling Defendants.

Plaintiff, on behalf of the Mikuni Settlement Class, entered into a settlement with the Mikuni Defendants on May 6, 2021 (the “Mikuni Settlement Agreement”), under which the Mikuni Defendants agreed to pay \$865,000. The Mikuni Defendants also agreed to cooperate with Plaintiff in the continuing prosecution of any remaining, non-settling Defendants.

Plaintiff, on behalf of the Keihin Settlement Class, entered into a settlement with the Keihin Defendants on June 4, 2021 (the “Keihin Settlement Agreement”), under which the Keihin Defendants agreed to pay \$97,000. The Keihin Defendants also agreed to cooperate with Plaintiff in the continuing prosecution of any remaining, non-settling Defendants.

Plaintiff, on behalf of the Maruyasu Settlement Class, entered into a settlement with the Maruyasu Defendants on August 4, 2021 (the “Maruyasu Settlement Agreement”), under which the Maruyasu Defendants agreed to pay \$80,000. The Maruyasu Defendants have also agreed to cooperate with Plaintiff in the continuing prosecution of any remaining, non-settling Defendants.

This Notice is only a summary of the terms of the proposed settlements. The Aisan, Mikuni, Keihin, and Maruyasu Settlement Agreements contain other important provisions, including the release of certain claims against the Aisan, Mikuni, Keihin, and Maruyasu Defendants (and companies and people affiliated with them). For the complete terms of the settlements, you are referred to the settlement agreements, which are on file with the Clerk of Court and are available on-line at [www.AutoPartsAntitrustLitigation.com/FIS](http://www.AutoPartsAntitrustLitigation.com/FIS). The proposed settlements must receive final approval by the Court to become effective.

If you wish to object to the approval of any of the settlements, you may do so, but only in accordance with the procedures set forth below. If you do not object to a settlement, you do not need to take any action at this time to indicate your support for, or lack of objection to, that settlement.

#### **HOW DO I REMAIN IN THE SETTLEMENT CLASSES AND WHAT HAPPENS IF I DO?**

If you are a member of any of the Aisan, Mikuni, Keihin, and/or Maruyasu Settlement Classes as defined above, you will automatically remain in that Settlement Class unless you elect to be excluded. If you wish to remain in a Settlement Class, you do not need to take any action at this time with respect to that Settlement Class and your interests will be represented by the Class Representative and by Settlement Class Counsel. If you remain in any of the Aisan, Mikuni, Keihin, or Maruyasu Settlement Classes and the proposed settlement with that Defendant is approved and becomes effective, you will be bound by its terms, including the release provisions, whether or not you receive a share of the settlement proceeds attributable to that settlement.

You will have no responsibility to individually pay attorneys’ fees or expenses. Any such fees and expenses will be paid solely from amounts obtained from the Defendants, whether by settlement or judgment, and must be approved by the Court after notice to you and a hearing. If you choose, you may also have your own attorney enter an appearance on your behalf and at your expense.

#### **HOW WILL THE SETTLEMENT FUNDS BE DISTRIBUTED?**

The Fuel Injection Systems Settlement Fund, with accrued interest, less any amounts approved by the Court for payment of attorneys’ fees, litigation and settlement administration costs and expenses, and a service award to the Class Representative (the “Net Fuel Injection Systems Settlement Fund”), will be distributed among the members of the Settlement Classes who complete and timely submit a copy of the Claim Form that is included with this Notice, **postmarked on or before March 25, 2022**. The Net Fuel Injection Systems Settlement Fund will be distributed pro rata to all Claimants based upon their direct purchases in the United States from Defendants during the applicable Class Period. The distribution will take place as soon as practicable after review, determination, and audit of the Claim Forms by the Settlement Administrator and approval by the Court of the Settlement Administrator’s recommendations as to the amounts to be paid to the Claimants.

**Do not dispose of any document that reflects your purchases of Fuel Injection Systems in the United States directly from any Defendant (or its subsidiaries or affiliates) during the period from January 1, 2000 through March 12, 2018. You may need those documents to complete and substantiate your Claim Form, which will be subject to inquiry and verification.**

#### **WHAT IF I DO NOT WANT TO REMAIN IN ONE OR MORE OF THE SETTLEMENT CLASSES?**

You may exclude yourself from any or all of the Aisan, Mikuni, Keihin and/or Maruyasu Settlement Classes. If you wish to exclude yourself from any or all of the Aisan, Mikuni, Keihin and/or Maruyasu Settlement Classes, you must send a request for exclusion, in writing, by certified mail, return receipt requested, **postmarked no later than January 31, 2022**, to Settlement Class Counsel, and to counsel for the Settling Defendants, at the addresses set forth below, and to the following address:

Settlement Administrator  
Fuel Injection Systems Direct Purchaser Antitrust Litigation  
P.O. Box 3656  
Portland, OR 97208-3656

Your request for exclusion must identify the Settlement Class or Classes from which you are seeking exclusion and must include the full name and address of the purchaser (including any predecessor or successor entities and any trade names). You are also requested to identify the Defendant(s) (or parent, affiliate, subsidiary, or joint venture) from which you purchased Fuel Injection Systems during the Class Period for the Settlement Class from which you seek exclusion, the Fuel Injection Systems purchased during the Class Period, and the dollar amount of your purchases. If you validly exclude yourself from any or all of the Settlement Classes, you will not be bound by any decision concerning the Settlement Class or Classes from which you exclude yourself and you may pursue individually any claims you may have against that Defendant (at your own expense), but you will not be eligible to share in the settlement proceeds attributable to that Defendant.

### **REQUEST FOR ATTORNEYS' FEES AND EXPENSES**

Settlement Class Counsel, together with other firms that have worked on this litigation, will file a petition for an award of attorneys' fees and reimbursement of their costs and expenses in prosecuting the case. The request of Settlement Class Counsel for attorneys' fees will not exceed 30 percent (30%) of the Aisan, Mikuni, Keihin and Maruyasu settlement proceeds.

Settlement Class Counsel will also request a service award for Plaintiff Vitec, L.L.C., which was appointed by the Court to serve as Class Representative for the Settlement Classes, in the amount of \$25,000.

The application for attorneys' fees and litigation costs and expenses and service award will be filed on or before January 10, 2022. If you remain a member of any of the Aisan, Mikuni, Keihin and/or Maruyasu Settlement Classes and you wish to object to the requests for fees and expenses or service award, or if you previously chose to remain in any of the MITSUBISHI ELECTRIC, HIAMS, MITSUBA and DENSO Settlement Classes and you wish to object to the request for a service award, you must do so in writing in accordance with the procedures for objections set forth below. If you do not oppose any of these requests, you do not need to take any action in that regard.

### **WHEN WILL THE COURT CONSIDER THESE MATTERS AND HOW CAN I TELL THE COURT WHAT I THINK ABOUT THE SETTLEMENTS?**

The Court will hold a hearing on March 10, 2022, at 2:00 p.m., at the Theodore Levin United States Courthouse, 231 West Lafayette Boulevard, Detroit, MI 48226, Courtroom 817 (or such other courtroom as may be assigned for the hearing), to determine whether to approve: the proposed Aisan, Mikuni, Keihin, and Maruyasu settlements; the proposed plan of distribution of the Fuel Injection Systems Settlement Fund; and Settlement Class Counsel's requests for an award of attorneys' fees and reimbursement of litigation costs and expenses, and a service award. If the Court believes that it is appropriate, the hearing may be conducted remotely by telephone or other electronic means. If the Court determines to hold the hearing remotely, Settlement Class Counsel shall post that information on the website devoted to the direct purchaser litigation ([www.AutoPartsAntitrustLitigation.com/FIS](http://www.AutoPartsAntitrustLitigation.com/FIS)) and provide any Settlement Class member that has informed the Court that it intends to participate at the hearing the information required to do so remotely. The Fairness Hearing may be rescheduled, continued or adjourned, and the courtroom assigned for the hearing may be changed, without further notice to you.

If you remain a member of the any of the Aisan, Mikuni, Keihin, or Maruyasu Settlement Classes, you have the right to object to that proposed settlement, and to Settlement Class Counsel's requests for an award of attorneys' fees and litigation costs and expenses. If you remain a member of the any of the Aisan, Mikuni, Keihin, or Maruyasu Settlement Classes, or if you previously chose to remain in any of the MITSUBISHI ELECTRIC, HIAMS, MITSUBA and DENSO Settlement Classes, you also have the right to object to the proposed plan of distribution of the Fuel Injection Systems Settlement Fund, and to the request for a service award to the Class Representative. Any such objection must include the caption of this litigation, specify which settlement(s) are being objected to, must be signed, and must be **filed no later than January 31, 2022**, with the Clerk of Court, United States District Court for the Eastern District of Michigan, Southern Division, Theodore Levin United States Courthouse, 231 West Lafayette Boulevard, Detroit, MI 48226, and mailed to the following counsel, **postmarked no later than January 31, 2022**:

Steven A. Kanner  
FREED KANNER LONDON  
& MILLEN LLC  
2201 Waukegan Road, Suite 130  
Bannockburn, IL 60015  
Telephone: (224) 632-4500

Gregory P. Hansel  
PRETI, FLAHERTY, BELIVEAU  
& PACHIOS LLP  
One City Center, P.O. Box 9546  
Portland, ME 04112-9546  
Telephone: (207) 791-3000

Joseph C. Kohn  
KOHN, SWIFT & GRAF, P.C.  
1600 Market Street, Suite 2500  
Philadelphia, PA 19103  
Telephone: (215) 238-1700

Eugene A. Spector  
SPECTOR ROSEMAN & KODROFF, P.C.  
Two Commerce Square  
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Philadelphia, PA 19103  
Telephone: (215) 496-0300

*Co-Lead Counsel for the Direct Purchaser Settlement Classes*

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*Counsel for the Mikuni Defendants*

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*Counsel for the Keihin Defendants*

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701 Thirteenth Street, NW  
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*Counsel for Maruyasu Industries Co., Ltd.*

Michael T. Brody  
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Telephone: (312) 222-9350

*Counsel for the Mitsubishi Electric Defendants*

Craig P. Seebald  
VINSON & ELKINS LLP  
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Telephone: (202) 639-6500

*Counsel for the HIAMS Defendants*

Rachel S. Brass  
GIBSON, DUNN & CRUTCHER LLP  
555 Mission Street, Suite 3000  
San Francisco, CA 94105-0921  
Telephone: (415) 393-8293

*Counsel for the MITSUBA Defendants*

Steven F. Cherry  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006  
Telephone: (202) 663-6000

*Counsel for the DENSO Defendants*

If you do not object to any of the proposed settlements, or to the related matters set forth above, you do not need to appear at the hearing or take any other action at this time. You must, however, complete and timely submit a Claim Form if you wish to share in the distribution of the Fuel Injection Systems Settlement Fund.

**WHAT SHOULD I DO IF I WANT ADDITIONAL INFORMATION OR IF MY ADDRESS CHANGES?**

If this Notice reached you at an address other than the one on the mailing label, or if your address changes, please send your correct address to: Fuel Injection Systems Direct Purchaser Antitrust Litigation, P.O. Box 3656, Portland, OR 97208-3656.

The Settlement Agreements, Complaints, and other public documents filed in this litigation are available for review during normal business hours at the offices of the Clerk of Court, United States District Court for the Eastern District of Michigan, Southern Division, Theodore Levin United States Courthouse, 231 West Lafayette Boulevard, Detroit, MI 48226, and through the Court's Public Access to Court Electronic Records (PACER) system after registration and payment of a modest fee. Copies of the Settlement Agreements and certain other documents relevant to this litigation are available at [www.AutoPartsAntitrustLitigation.com/FIS](http://www.AutoPartsAntitrustLitigation.com/FIS). Questions concerning the proposed Aisan, Mikuni, Keihin, or Maruyasu settlements, this Notice, or the litigation may be directed to any of the Settlement Class Counsel identified above.

**Please do not contact the Clerk of the Court or the Judge.**

Dated: December 9, 2021

BY ORDER OF:

The United States District Court for the Eastern District  
of Michigan, Southern Division



phase sensors, pressure sensors, and/or speed sensor temperature sensors), valves (e.g., check valves, cut-off valves, injection valves, and/or purge control valves), and other components sold as a unitary system, as part of a broader system, such as an engine management system, or as separate components.

**Submission of Claim:** Each Claim Form must be signed and verified by the claimant or a person authorized to act on behalf of the claimant, and must be **postmarked no later than March 25, 2022**, and addressed to:

Settlement Administrator  
Fuel Injection Systems Direct Purchaser Antitrust Litigation  
P.O. Box 3656  
Portland, OR 97208-3656

Do **not** send your Claim Form to the Court or to any of the parties or their counsel. If you receive multiple copies of the Claim Form, complete only one Claim Form covering all of your qualifying purchases. Do not submit more than one claim, and do not submit duplicate claims.

A Claim Form received by the Settlement Administrator shall be deemed to have been submitted when it is posted, if it is addressed in accordance with the above instructions and mailed by March 25, 2022, and a postmark is indicated on the envelope. In all other cases, the Claim Form shall be deemed to have been submitted when it is actually received by the Settlement Administrator.

Please note that it will take a significant amount of time to process all of the Claim Forms and to administer the Settlement Fund. This work will be completed as promptly as time permits, given the need to review each Claim Form. Accurate claims processing takes a significant amount of time. Thank you for your patience.

**Photocopies of Form:** A claim may be submitted on a photocopy of the Claim Form. Other forms, or altered versions of the Claim Form, will not be accepted. Additional copies of the Claim Form may be requested from the Settlement Administrator or obtained at the settlement website [www.AutoPartsAntitrustLitigation.com/FIS](http://www.AutoPartsAntitrustLitigation.com/FIS).

**Completion and Support of Claim:** Please type or neatly print all requested information. Failure to complete all parts of the Claim Form may result in denial of the claim, delay its processing, or otherwise adversely affect the claim. All information submitted in a Claim Form is subject to further inquiry and verification. The Settlement Administrator may ask you to provide supporting information. Failure to provide requested information also might delay, adversely affect, or result in denial of the claim.

The Claim Form asks for certain information relating to your purchases of Fuel Injection Systems, a description of available documentation that supports your claimed purchases, and summary totals of your purchases from each Defendant for each year during the class period.

**ONLY INCLUDE IN YOUR CLAIM FORM PURCHASES OF FUEL INJECTION SYSTEMS IN THE UNITED STATES DIRECTLY FROM ONE OR MORE OF THE COMPANIES LISTED ABOVE UNDER THE “ELIGIBILITY” HEADING DURING THE PERIOD FROM JANUARY 1, 2000 TO MARCH 12, 2018.**

**INDIRECT PURCHASES ARE NOT ELIGIBLE.**

**Schedule of Purchases: General Worksheet:** Please fill out the Schedule of Purchases: General Worksheet with the company names, the quantity of products purchased, and purchase totals for each year of the Class Period (January 1, 2000 through March 12, 2018) in which you directly purchased Fuel Injection Systems in the United States. If you have questions regarding the completion of the Schedule of Purchases, please contact the Settlement Administrator via email at [info@AutoPartsAntitrustLitigation-FIS.com](mailto:info@AutoPartsAntitrustLitigation-FIS.com), or by calling 1-888-266-9280.

**Claims of Separate Entities:** Each corporation, trust, or other business entity making a claim must submit its claim on a separate Claim Form.

**Taxpayer Identification Number:** A Claim Form is not complete without the federal taxpayer identification number of the claimant.

**Keep a Copy:** You should keep a copy of your completed Claim Form for your records. You should also retain all of your documents and records relating to **direct** purchases of Fuel Injection Systems in the United States from any of the listed companies during the period from January 1, 2000 through March 12, 2018. As part of the claims administration process, you may be required to verify certain information about your Fuel Injection Systems purchases such as the quantity of product(s) purchased, the type of products purchased, the dollar amount(s), the date(s) of the purchases, and the company(ies) from which you **directly** purchased the Fuel Injection Systems. You may be asked to submit purchase records to verify your claim.

**Confirmation of Receipt of Claim:** The receipt of Claim Forms will not be confirmed or acknowledged automatically by the Settlement Administrator. If you wish to have confirmation that your Claim Form has been received, send it by certified mail, return receipt requested.

**Assistance:** If you have any questions concerning this Claim Form or need additional copies, contact the Settlement Administrator at: Fuel Injection Systems Direct Purchaser Antitrust Litigation, P.O. Box 3656, Portland, OR 97208-3656; via email at [info@AutoPartsAntitrustLitigation-FIS.com](mailto:info@AutoPartsAntitrustLitigation-FIS.com); or by calling 1-888-266-9280. You may also contact your own attorney or other person to assist you, at your own expense.

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**NOTICE REGARDING SOLICITATIONS FROM CLAIMS ASSISTANCE COMPANIES: THERE ARE COMPANIES THAT CONTACT CLASS MEMBERS TO OFFER ASSISTANCE IN FILING A CLAIM IN EXCHANGE FOR A PORTION OF ANY SETTLEMENT FUNDS THE CLASS MEMBER MAY RECOVER. THESE COMPANIES ARE NOT AFFILIATED WITH PLAINTIFF, DEFENDANTS, OR THEIR COUNSEL, AND YOU DO NOT NEED TO USE THEM TO FILE A CLAIM.**







trends, you may be required to explain how you calculated the estimated purchases, and you may be required to provide the documents you used as a basis for your estimates. You should retain those documents until this litigation has been concluded and the claims review process has been completed.

Here, provide a brief description of the documents (e.g., invoices, purchase journals, accounts payable journals, etc.) or estimation methods used to calculate your claimed purchases:

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**FAILURE TO COMPLY WITH THE ABOVE INSTRUCTIONS REGARDING PURCHASES MAY RESULT IN A DELAY PROCESSING YOUR CLAIM.**

**V. EXCLUSION FROM SETTLEMENT CLASS**

Identify the Settlement Class(es), if any, **from which you excluded yourself**. If you have not excluded yourself from any of the Settlement Classes, mark “None” and proceed to Section VI:

- Aisan
- DENSO
- HIAMS
- Keihin
- Maruyasu
- Mikuni
- MITSUBA
- MITUBISHI ELECTRIC
- None

**Please note, this does not constitute a formal request for exclusion. In order to formally request exclusion from the Aisan, Mikuni, Keihin, or Maruyasu Settlement Classes, if you have not already done so, please refer to the instructions provided in the Notice of Proposed Settlements with Aisan, Mikuni, Keihin, or Maruyasu Defendants.**

**VI. SUBSTITUTE FORM W-9 AND CERTIFICATION**

Each claimant must provide the following tax information, required by the IRS. If the correct information is not provided, a portion of any payment that the claimant may be entitled to receive from the Settlement Fund may be withheld for tax purposes.

Claimant’s federal taxpayer identification number is:

-              or       -   -

Employer Identification Number (for corporations, trusts, etc.)                      Social Security Number (for individuals)



**SCHEDULE OF PURCHASES: GENERAL WORKSHEET**

Please fill out the charts on both sides (front and back) of the Schedule of Purchases: General Worksheet, listing the quantity of products purchased and purchase totals for each Defendant, including their parents, subsidiaries, joint ventures, and affiliates, and year of the Class Period (January 1, 2000, through March 12, 2018) in which you directly purchased Fuel Injection Systems in the United States. If you have questions regarding the completion of the Schedule of Purchases, please contact the Settlement Administrator via email at [info@AutoPartsAntitrustLitigation-FIS.com](mailto:info@AutoPartsAntitrustLitigation-FIS.com), or by calling 1-888-266-9280.

Year Purchased	Aisan <sup>1</sup>		DENSO <sup>2</sup>		HIAMS <sup>3</sup>	
	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased
2000		(\$)		(\$)		(\$)
2001		(\$)		(\$)		(\$)
2002		(\$)		(\$)		(\$)
2003		(\$)		(\$)		(\$)
2004		(\$)		(\$)		(\$)
2005		(\$)		(\$)		(\$)
2006		(\$)		(\$)		(\$)

List the quantity of products purchased and dollar amount of **direct purchases** of Fuel Injection Systems from each of the Defendants for each year during the class period. The purchase amounts must be the net amounts paid after deducting any discounts, rebates, taxes, and delivery and freight charges. **INDIRECT PURCHASES ARE NOT ELIGIBLE.**

<sup>1</sup> Aisan refers to and includes Aisan Industry Co., Ltd.; Franklin Precision Industry, Inc.; Aisan Corporation of America; and Hyundam Industrial Co., Ltd.

<sup>2</sup> DENSO refers to and includes DENSO Corporation; DENSO International America, Inc.; and DENSO International Korea Corporation (f/k/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation). Additionally, DENSO International America, Inc.'s subsidiaries include, among others, DENSO Products & Services Americas, Inc. (f/k/a DENSO Sales California, Inc.).

<sup>3</sup> HIAMS refers to and includes Hitachi Automotive Systems, Ltd.; Hitachi Automotive Systems Americas, Inc.; and Hitachi, Ltd.

Year Purchased (cont.)	Aisan		DENSO		HIAMS	
	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased
2007		(\$)		(\$)		(\$)
2008		(\$)		(\$)		(\$)
2009		(\$)		(\$)		(\$)
2010		(\$)		(\$)		(\$)
2011		(\$)		(\$)		(\$)
2012		(\$)		(\$)		(\$)
2013		(\$)		(\$)		(\$)
2014		(\$)		(\$)		(\$)
2015		(\$)		(\$)		(\$)
2016		(\$)		(\$)		(\$)
2017		(\$)		(\$)		(\$)
1/1/18 through 3/12/18		(\$)		(\$)		(\$)
<b>TOTAL AMOUNT PURCHASED (Required)</b>						

**SCHEDULE OF PURCHASES: GENERAL WORKSHEET**

Please fill out the charts on both sides (front and back) of the Schedule of Purchases: General Worksheet, listing the quantity of products purchased and purchase totals for each Defendant, including their parents, subsidiaries, joint ventures, and affiliates, and year of the Class Period (January 1, 2000 through March 12, 2018) in which you directly purchased Fuel Injection Systems in the United States. If you have questions regarding the completion of the Schedule of Purchases, please contact the Settlement Administrator via email at [info@AutoPartsAntitrustLitigation-FIS.com](mailto:info@AutoPartsAntitrustLitigation-FIS.com), or by calling 1-888-266-9280.

Year Purchased	Keihin <sup>4</sup>		Maruyasu <sup>5</sup>		Mikuni <sup>6</sup>	
	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased
2000		(\$)		(\$)		(\$)
2001		(\$)		(\$)		(\$)
2002		(\$)		(\$)		(\$)
2003		(\$)		(\$)		(\$)
2004		(\$)		(\$)		(\$)
2005		(\$)		(\$)		(\$)
2006		(\$)		(\$)		(\$)

List the quantity of products purchased and dollar amount of **direct purchases** of Fuel Injection Systems from each of the Defendants for each year during the class period. The purchase amounts must be the net amounts paid after deducting any discounts, rebates, taxes, and delivery and freight charges. **INDIRECT PURCHASES ARE NOT ELIGIBLE.**

<sup>4</sup> Keihin refers to and includes Hitachi Astemo, Ltd. (f/k/a Keihin Corporation) and Hitachi Astemo Indiana, Inc. (f/k/a Keihin North America, Inc.).

<sup>5</sup> Maruyasu refers to Maruyasu Industries Co., Ltd.

<sup>6</sup> Mikuni refers to and includes Mikuni Corporation and Mikuni American Corporation.

Year Purchased (cont.)	Keihin		Maruyasu		Mikuni	
	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased
2007		(\$)		(\$)		(\$)
2008		(\$)		(\$)		(\$)
2009		(\$)		(\$)		(\$)
2010		(\$)		(\$)		(\$)
2011		(\$)		(\$)		(\$)
2012		(\$)		(\$)		(\$)
2013		(\$)		(\$)		(\$)
2014		(\$)		(\$)		(\$)
2015		(\$)		(\$)		(\$)
2016		(\$)		(\$)		(\$)
2017		(\$)		(\$)		(\$)
1/1/18 through 3/12/18		(\$)		(\$)		(\$)
<b>TOTAL AMOUNT PURCHASED (Required)</b>						



**SCHEDULE OF PURCHASES: GENERAL WORKSHEET**

Please fill out the charts on both sides (front and back) of the Schedule of Purchases: General Worksheet, listing the quantity of products purchased and purchase totals for each Defendant, including their parents, subsidiaries, joint ventures, and affiliates, and year of the Class Period (January 1, 2000 through March 12, 2018) in which you directly purchased Fuel Injection Systems in the United States. If you have questions regarding the completion of the Schedule of Purchases, please contact the Settlement Administrator via email at [info@AutoPartsAntitrustLitigation-FIS.com](mailto:info@AutoPartsAntitrustLitigation-FIS.com), or by calling 1-888-266-9280.

Year Purchased	MITSUBA <sup>7</sup>		MITSUBISHI ELECTRIC <sup>8</sup>		Bosch <sup>9</sup>	
	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased
2000		(\$)		(\$)		(\$)
2001		(\$)		(\$)		(\$)
2002		(\$)		(\$)		(\$)
2003		(\$)		(\$)		(\$)
2004		(\$)		(\$)		(\$)
2005		(\$)		(\$)		(\$)
2006		(\$)		(\$)		(\$)

List the quantity of products purchased and dollar amount of **direct purchases** of Fuel Injection Systems from each of the Defendants for each year during the class period. The purchase amounts must be the net amounts paid after deducting any discounts, rebates, taxes, and delivery and freight charges. **INDIRECT PURCHASES ARE NOT ELIGIBLE.**

<sup>7</sup> MITSUBA refers to and includes MITSUBA Corporation and American Mitsuba Corporation.

<sup>8</sup> MITSUBISHI ELECTRIC refers to and includes Mitsubishi Electric Automotive America, Inc.; Mitsubishi Electric Corp.; and Mitsubishi Electric US Holdings, Inc.

<sup>9</sup> Bosch refers to and includes Robert Bosch GmbH; Bosch Electrical Drives Co., Ltd.; and Robert Bosch LLC.

Year Purchased (cont.)	MITSUBA		MITSUBISHI ELECTRIC		Bosch	
	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased
2007		(\$)		(\$)		(\$)
2008		(\$)		(\$)		(\$)
2009		(\$)		(\$)		(\$)
2010		(\$)		(\$)		(\$)
2011		(\$)		(\$)		(\$)
2012		(\$)		(\$)		(\$)
2013		(\$)		(\$)		(\$)
2014		(\$)		(\$)		(\$)
2015		(\$)		(\$)		(\$)
2016		(\$)		(\$)		(\$)
2017		(\$)		(\$)		(\$)
1/1/18 through 3/12/18		(\$)		(\$)		(\$)
<b>TOTAL AMOUNT PURCHASED (Required)</b>						

# EXHIBIT B

## CONFIRMATION OF PUBLICATION

IN THE MATTER OF: *Auto Parts – Fuel Injection Systems*

I, Kathleen Komraus, hereby certify that

- (a) I am the Media & Design Manager at Epiq Class Action & Claims Solutions, a noticing administrator, and;
- (b) The Notice of which the annexed is a copy was published in the following publications on the following date:

*12.20.2021 – Automotive News*

*12.20.2021 – PR Newswire's Auto Wire*

X *Kathleen Komraus*  
\_\_\_\_\_  
(Signature)

Media & Design Manager  
\_\_\_\_\_  
(Title)

# Automotive News

DECEMBER 20, 2021

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\$169/YEAR; \$6/COPY



Toyota CEO Akio Toyoda presented 16 future battery-electric vehicles, including the Lexus RZ, below, which is expected to begin arriving in U.S. showrooms in late 2022 or early 2023.

## FULLY CHARGED

As Lexus leads Toyota's EV shift, it will rely on dealers to give it an edge

Larry P. Vellequette  
lvellequette@crain.com

Lexus may be behind other luxury brands when it comes to getting full-electric vehicles into its U.S. showrooms, but when the first of at least four new EVs arrives late next year, the brand will rely heavily on its dealer network to catch up with — and perhaps overtake — its competitors.

Lexus has been cast in a starring role in the \$70 billion investment Toyota Motor Corp. will make globally in electrification, including half for battery-electric vehicles. CEO Akio Toyoda laid out the automaker's ambitious plans in a presentation in Tokyo last week that featured him speaking in front of 16 future battery-electrics. Those vehicles, which Toyoda said



were planned for production and were among 30 EVs planned for global markets by 2030, included a midsize pickup, an off-roader heavily resembling the former Toyota FJ Cruiser and four Lexus vehicles.

But for Lexus to succeed in the U.S. — the brand's biggest global market — it will need the help of supporting players: its lineup of

gasoline-electric and plug-in hybrids.

The luxury brand plans to use the courtesy fleets maintained by its dealers for their service customers to also serve as loaner vehicles for those who buy or lease its upcoming EVs and need to travel beyond where charging infrastructure is built out, explained Andrew Gilleland, head of Lexus at Toyota Motor North America.

"Internally, we're talking about how we can leverage our dealers in terms of

see **LEXUS**, Page 28

**Gilleland: Leverage dealers for a better EV experience.**



## Demand forces delays for 2 Ford EVs

Production displaced by Mach-E in Mexico

Michael Martinez  
mdmartinez@crain.com

DETROIT — Going into 2021, Ford Motor Co. was treading carefully to ensure electric vehicle production didn't get too far ahead of demand.

Now, it's scrambling to figure out how to build enough EVs to keep up with a flood



Ford is dedicating its entire plant in Cuautitlan, Mexico, to the Mustang Mach-E.

of orders for the Mustang Mach-E and nearly 200,000 reservations for the F-150 Lightning that isn't even on sale yet. The

push to churn out more of both nameplates is delaying the next two EVs that Ford planned to follow the Lightning and displacing them from the Mexico factory that was to make them.

It's the latest example of the speed with which automakers are reshaping production schedules and the choices they have to make as the industry collectively pivots toward electrification.

"Flexibility is becoming really important,"

see **FORD**, Page 27

### TALK FROM THE TOP

Hyundai CEO Jaehoon Chang is marshaling the Korean automaker's resources to plunge deeper into EVs to make sure Hyundai is a leader both globally and in the U.S. | PAGE 26 |



## At Hyundai, full speed ahead to deploy EVs

CEO forecasts 57% surge in sales in 2022

Hans Greimel  
hgreimel@crain.com

Hot-selling Hyundai has successfully checked off a long to-do list as the mass-market brand and its Genesis luxury stablemate have moved up the sales chart. Higher quality? Check. Better design? Check. More crossovers? Done and done. A fuller premium portfolio? Roger.

Now, Hyundai Motor Co. has a new order of business: mastering electric vehicles.

CEO Jaehoon Chang is so bullish about the company's prospects that he forecasts Hyundai and Genesis global EV sales surging 57 percent to 220,000 vehicles in 2022 from a tally of 140,000 expected this year.

The outlook is part of a newly upgraded internal goal at Hyundai Motor Group to sell 1.7 million EVs in 2026. That revised objective

**"We will go very aggressively on electrification."**

Jaehoon Chang, CEO, Hyundai Motor Co.

covers the Hyundai, Kia and Genesis brands and represents an ambitious extension of the earlier goal of 1 million worldwide in 2025.

To get there, Hyundai will invest in EV factory capacity in the U.S. under a \$7.4 billion plan that will be detailed next year. It will introduce a new dedicated EV platform to underpin an expanded global lineup that will include 13 all-electric offerings, leveraging the Ioniq EV subline. At the same time, the automaker will all but halt investment into new internal combustion engines as it splurges on areas ranging from new battery technologies to EV production bases.

see **CHANG**, Page 27

■ Hyundai prices electric Ioniq 5 crossover to move off lots | PAGE 3 |

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Board appointments  
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## AURORA Airport-to-hotel runs a possibility

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then pull into a terminal just off some set of surface roads near the freeway.

From there, we expect the same technology to transfer to passenger vehicles. Imagine applications that look a lot like that: going from, say, an airport onto the freeway, drives down the freeway and pulls off at a convention center or hotel district and delivers passengers there. That's the right, initial application for our approach to market, and we think it's the right approach overall.

Because we have this partnership with Uber, we're able to support

those trips without having to serve all the trips because drivers on Uber will be able to take people places that we can't go. And then over time, as we expand the capabilities of the Aurora driver, we'll expand the types of places that we can serve.

**Studies show a reluctance by the public about sharing roadways with self-driving vehicles. How big of a concern is that, and how can those fears be addressed?**

If you asked people before the iPhone came out if they wanted an iPhone, I don't think you'd get anywhere near 40 percent of Americans saying that they thought it'd be useful for them. I'm just not particularly worried about that statistic.

As soon as someone has tried it, the [thinking] flips. We're all experienced

in having a vehicle that's been driven, whether it was your parents while you were a child or taking a taxi or an Uber somewhere. It's normal to be in a vehicle where you're not the driver. The difference is if there's an Aurora driver driving or if there's someone behind the steering wheel.

What I see is, people who get into a self-driving vehicle — there's initially a lot of excitement and energy. And then after a couple minutes, you get into, "That's all it does? It just drives itself?" and then a few more minutes, they have their phones out. And then, not too long after that, they're convinced it's a better driver than they are.

I expect that as more people have the opportunity to engage with the technology and try out real self-driving systems, not just driver-assistance systems, that this will solve itself. **AN**

## NIGHTTIME Partners eyed for U.S. deployment

continued from Page 9

in the U.S. as well, because of lighter traffic. But he is quick to note that the vehicles are fully capable and safe to operate during the day.

**Targeted approach**

The medium-duty trucks are equipped with the company's Level 4 full-stack self-driving system, which includes DeepRoute.ai's sensing solution, DeepRoute-Sense, and perception technology — engineered specifically for urban areas.

Zhou sees DeepRoute.ai's autonomous technology as a great way to combat the fatigue and distracted driving among delivery drivers, which often leads to accidents on the road.

The CEO also contends that the company's strategy aligns well with the regulatory and urban infrastructure plans being put in place in the U.S. to support commercial usage of autonomous vehicles.

Still, Zhou believes in a more localized, targeted approach to the U.S. market, as opposed to a business strategy centered on the mass deployment of autonomous trucks.

"That's just ... not ready yet, but if we just do some special routes and special times, especially for the medium-duty truck ... normally they just drive the same way, day by day, same times, and this can limit your risk," he said.

DeepRoute.ai expects its self-driving commercial trucks to be fully operational in Shenzhen by early in the first quarter of 2022. The company's target commercial client base in the U.S. consists of convenience stores and supermarkets through strategic partnerships, said Zhou, with California being the company's first target market.

"We cannot just do a service for only one scenario," he explained. "That's why we collaborate with our partners, our local partners, so we do this business together."

**Trucks now, robotaxis later**

The tech startup — which in September secured \$300 million in series B funding led by the capital firm Alibaba Group — also produces self-driving robotaxis, which are deployed in Hangzhou, Wuhan and Shenzhen in China. DeepRoute.ai also is testing its robotaxis in Fremont, Calif., home to its U.S. headquarters.

The company this month announced that it will offer its full-stack Level 4 self-driving system to automakers, Tier 1 suppliers and mobility companies to mass-produce AVs.

However, Zhou said that DeepRoute.ai's medium-duty autonomous trucks offer the company the most immediate business opportunities in the U.S., especially given Alibaba Group's ties to the e-commerce, community retail and logistics services sectors.

"Technology-wise, the trucks share the same self-driving system with our robotaxis, and both are operating in urban environments," Zhou said in an email. "While commercialization of the robotaxi may take years, the commercialization of autonomous trucking is already a fact." **AN**

### LEGAL NOTICE

#### IF YOU PURCHASED FUEL INJECTION SYSTEMS IN THE UNITED STATES DIRECTLY FROM ANY OF THE ENTITIES IDENTIFIED BELOW FROM JANUARY 1, 2000 THROUGH MARCH 12, 2018, YOUR LEGAL RIGHTS MAY BE AFFECTED BY PROPOSED SETTLEMENTS WITH THE AISAN, MIKUNI, KEIHIN, AND MARUYASU DEFENDANTS

Proposed settlements totaling approximately \$3.05 million have been reached in *In re Automotive Parts Antitrust Litigation*, Master File No.12-md-02311, 2:13-cv-02201, 2:15-cv-11827, 2:15-cv-13423 (E.D. Mich.), with the Aisan, Mikuni, Keihin, and Maruyasu Defendants (collectively, the "Settling Defendants").

**What is the lawsuit about?** This class action is part of coordinated legal proceedings involving Fuel Injection Systems purchased in the United States directly from a Defendant (as defined below). These proceedings do not relate to, and have no effect upon, cases involving any other product.

The term "Fuel Injection Systems" is defined in each of the settlement agreements, but generally includes any system or any component of a system that admits fuel or a fuel/air mixture into engine cylinders and may include fuel injectors, high pressure pumps, rail assemblies, feed lines, electronic throttle bodies, engine control units, fuel pumps, fuel pump modules, pressure regulators, pulsation dampers, electronic throttle motors, electronic throttle control motors, as well as an array of meters (e.g., airflow meters and/or air mass meters), sensors (e.g., air mass sensors, altitude sensors, boost pressure sensors, cam position sensors, manifold absolute pressure sensors, mark sensors, phase sensors, pressure sensors, and/or speed sensor temperature sensors), valves (e.g., check valves, cut-off valves, injection valves, and/or purge control valves), and other components sold as a unitary system, as part of a broader system, such as an engine management system, or as separate components.

Direct Purchaser Plaintiff alleges that Defendants conspired to raise, fix, maintain, and stabilize prices, rig bids, and allocate the supply of Fuel Injection Systems sold in the United States, in violation of federal antitrust laws. Plaintiff further alleges that as a result of the conspiracy, it and other direct purchasers of Fuel Injection Systems were injured by paying more than they would have paid in the absence of the alleged illegal conduct.

In October 2019, the Court approved settlements with the Mitsubishi Electric, HIAMS, MITSUBA, and the DENSO Defendants totaling \$10,110,449. Plaintiff has now reached settlements with the Aisan, Mikuni, Keihin, and Maruyasu Defendants totaling \$3,052,000. All of the settlements combined total \$13,162,449 (the settlement funds are collectively referred to as the "Fuel Injection Systems Settlement Fund"). Under the terms of the proposed settlements, Aisan will pay a total of \$2,010,000, Mikuni will pay a total of \$865,000, Keihin will pay a total of \$97,000, and Maruyasu will pay a total of \$80,000, and each of the Settling Defendants has agreed to provide cooperation to assist Plaintiff in the prosecution of its claims, should that be necessary.

**Who is included?** The Court has preliminarily approved the Aisan, Mikuni, Keihin, and Maruyasu settlements, and has provisionally certified Aisan, Mikuni, Keihin, and Maruyasu Settlement Classes. You are a member of one or more of these Settlement Classes if you purchased Fuel Injection Systems in the United States directly from any of the following entities (or depending on the specific settlement agreement, their parents, subsidiaries, affiliates or joint ventures, each a "Defendant") during the period from January 1, 2000 through March 12, 2018: Aisan Industry Co., Ltd; Franklin Precision Industry, Inc.; Aisan Corporation of America; Hyundam Industrial Co., Ltd; Hitachi Automotive Systems, Ltd.; Hitachi Automotive Systems Americas, Inc.; Hitachi, Ltd.; DENSO Corporation; DENSO International America, Inc.; DENSO International Korea Corporation (f/k/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation); Hitachi Astemo, Ltd. (f/k/a Keihin Corporation); Hitachi Astemo Indiana, Inc. (f/k/a Keihin North America, Inc.); Maruyasu Industries Co., Ltd.; Mikuni Corporation; Mikuni American Corporation; MITSUBA Corporation; American Mitsuba Corporation; Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; Mitsubishi Electric Automotive America, Inc.; Robert Bosch GmbH; Bosch Electrical Drives Co., Ltd.; Robert Bosch LLC.

Plaintiff Vitec, L.L.C. has been appointed by the Court to serve as Class Representative for the Aisan, Keihin, Maruyasu, and Mikuni Settlement Classes. The Court has appointed the law firms of Freed Kanner London & Millen LLC, Kohn, Swift & Graf, P.C., Preti, Flaherty, Beliveau & Pachios LLP, and Spector Roseman & Kodroff, P.C. to serve as "Co-Lead Settlement Class Counsel" for the Settlement Classes.

A Notice of Proposed Settlements and Claim Form (the "Notice") was mailed to potential Aisan, DENSO, HIAMS, Keihin, Maruyasu, Mikuni, MITSUBA, and MITSUBISHI ELECTRIC Settlement Class members on or about December 9, 2021. The Notice describes in more detail the litigation and options available to Settlement Class members with respect to the Aisan, Mikuni, Keihin, and Maruyasu settlements, the proposed plan of distribution of the Fuel Injection Systems Settlement Fund, and the requests for an award of attorneys' fees and litigation costs and expenses, and a service award to the Class Representative. If you did not receive the Notice you may obtain a copy on the internet at [www.AutoPartsAntitrustLitigation.com/FIS](http://www.AutoPartsAntitrustLitigation.com/FIS) or by calling or writing to any of the following Settlement Class Counsel:

Gregory P. Hansel  
PRETI, FLAHERTY, BELIVEAU  
& PACHIOS LLP  
One City Center, P.O. Box 9546  
Portland, ME 04112-9546  
Telephone: (207) 791-3000

Steven A. Kanner  
FREED KANNER LONDON  
& MILLEN LLC  
2201 Waukegan Road, Suite 130  
Bannockburn, IL 60015  
Telephone: (224) 632-4500

Joseph C. Kohn  
KOHNS, SWIFT & GRAF, P.C.  
1600 Market Street, Suite 2500  
Philadelphia, PA 19103  
Telephone: (215) 238-1700

Eugene A. Spector  
SPECTOR ROSEMAN &  
KODROFF, P.C.  
Two Commerce Square  
2001 Market Street, Suite 3420  
Philadelphia, PA 19103  
Telephone: (215) 496-0300

**What do the settlements provide?** Aisan, Mikuni, Keihin, and Maruyasu have agreed to pay a total of \$3,052,000 to settle the Class Members' claims against them. In exchange for these payments, members of a Settlement Class who do not request to be excluded from that Settlement Class will release their claims against the Settling Defendants as set forth in the Settlement Agreement. As part of the settlements all the Settling Defendants have agreed to provide cooperation if necessary.

**Your rights may be affected.** If you are a member of any or all of the Aisan, Mikuni, Keihin, and/or Maruyasu Settlement Classes you will automatically remain a member of those Settlement Classes unless you elect to be excluded. If you wish to remain in a Settlement Class, you do not need to take any action at this time and your interests will be represented by the Class Representative and by Settlement Class Counsel. **To share in the proceeds of any of the Aisan, DENSO, HIAMS, Keihin, Maruyasu, Mikuni, MITSUBA, and MITSUBISHI ELECTRIC MITSUBISHI ELECTRIC, HIAMS, MITSUBA or DENSO settlements, however, you must complete and timely submit a copy of the Claim Form that was mailed to potential Settlement Class members along with the Notice, postmarked on or before March 25, 2022.**

If you wish to exclude yourself from any or all of the Aisan, Mikuni, Keihin, and/or Maruyasu Settlement Classes, you must send a request for exclusion, in writing, by certified mail, return receipt requested, **postmarked no later than January 31, 2022**, in accordance with the procedures set forth in the Notice. If you validly exclude yourself from any or all of the Aisan, Mikuni, Keihin, or Maruyasu Settlement Classes, you will not be bound by any decision concerning that settlement class and you can pursue individually any claims you may have against that Defendant (at your own expense), but you will not be eligible to share in the settlement proceeds attributable to that Defendant.

If you remain a member of any of the Aisan, Mikuni, Keihin, or Maruyasu Settlement Classes, you have the right to object to that proposed settlement, and to Settlement Class Counsel's requests for an award of attorneys' fees and litigation costs and expenses. If you remain in any of the Aisan, Mikuni, Keihin, or Maruyasu Settlement Classes, or if you previously chose to remain in any of the Mitsubishi Electric, HIAMS, MITSUBA, and the DENSO Settlement Classes, you also have the right to object to the proposed plan of distribution of the Fuel Injection Systems Settlement Fund, and to the request for a service award, by following the procedures set forth in the Notice. **Your objection must be filed no later than January 31, 2022.**

The Court has scheduled a hearing on March 10, 2022, to consider whether to approve: the proposed settlements; the proposed plan of distribution of settlement funds; and Settlement Class Counsel's requests for an award of attorneys' fees and litigation costs and expenses, and a service award for the Class Representative. If the Court believes that it is appropriate, the hearing may be conducted remotely by telephone or other electronic means. If the Court decides to hold the hearing remotely, Settlement Class Counsel will post that information on the website devoted to the direct purchaser litigation ([www.AutoPartsAntitrustLitigation.com/FIS](http://www.AutoPartsAntitrustLitigation.com/FIS)) and provide any class member that has informed the Court that it intends to participate the information required to do so remotely. The hearing may be continued without further notice to you.

If you believe you are a member of any of the Aisan, DENSO, HIAMS, Keihin, Maruyasu, Mikuni, MITSUBA, and/or MITSUBISHI ELECTRIC Settlement Classes, you are urged to obtain a copy of the Notice, which explains your rights regarding the settlements and related matters.

If you have questions concerning this litigation, you may contact any one of the Settlement Class Counsel identified above. **Do not contact the Clerk of the Court or the Judge.**

Dated: December 20, 2021

BY ORDER OF:

The United States District Court for the Eastern  
District of Michigan, Southern Division

# \$3,052,000 in Direct Purchaser Settlements Reached with Fuel Injection Systems Manufacturers in Price Fixing Class Action Lawsuit

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NEWS PROVIDED BY

**The United States District Court for the Eastern District of Michigan, Southern Division →**

Dec 20, 2021, 08:00 ET

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DETROIT, Dec. 20, 2021 /PRNewswire/ -- Freed Kanner London & Millen LLC; Kohn, Swift & Graf, P.C.; Preti, Flaherty, Beliveau & Pachios, LLP; and Spector Roseman & Kodroff, P.C. ("Settlement Class Counsel") announce that the United States District Court for the Eastern District of Michigan Southern Division ("Court") has approved the following announcement of proposed class action settlements with the Aisan, Mikuni, Keihin and Maruyasu Defendants (collectively "Settling Defendants"). The settlements resolve allegations against the Settling Defendants that they conspired to raise, fix, maintain, and stabilize prices, rig bids, and allocate the supply of fuel injection systems sold in the United States, in violation of federal antitrust laws. These settlements are in addition to the settlements the Court previously approved with the DENSO, HIAMS, MITSUBA, and MITSUBISHI ELECTRIC Defendants. (The proceeds of the eight settlement funds are referred to collectively to as the "Fuel Injection Systems Settlement Fund").

The settlements affect those who purchased fuel injection systems in the United States between January 1, 2000 and March 12, 2018 directly from any one of the following entities (or depending on the specific settlement agreements, their parents, subsidiaries, affiliates, and joint ventures): Aisan Industry Co., Ltd; Franklin Precision Industry, Inc.; Aisan Corporation of America; Hyundam Industrial Co., Ltd; Hitachi Automotive Systems, Ltd.; Hitachi Automotive Systems Americas, Inc.; Hitachi, Ltd.; DENSO Corporation; DENSO International America, Inc.; DENSO International Korea Corporation (f/k/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation); Hitachi Astemo, Ltd. (f/k/a Keihin Corporation); Hitachi Astemo Indiana, Inc. (f/k/a Keihin North America, Inc.); Maruyasu Industries Co., Ltd.; Mikuni Corporation; Mikuni American Corporation; MITSUBA Corporation; American Mitsuba Corporation; Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; Mitsubishi Electric Automotive America, Inc.; Robert Bosch GmbH; Bosch Electrical Drives Co., Ltd.; Robert Bosch LLC

A hearing will be held on March 10, 2022, at 2:00 p.m., before the Honorable Sean F. Cox, United States District Judge, at the Theodore Levin United States Courthouse, 231 West Lafayette Boulevard, Detroit, MI 48226, Courtroom 817 (or such other courtroom as may be assigned for the hearing), for the purpose of determining whether to approve: (1) the proposed settlements with the Aisan, Mikuni, Keihin, and Maruyasu Defendants totaling \$3,052,000; (2) Settlement Class Counsel's request for an award from the Aisan, Mikuni, Keihin, and Maruyasu settlement proceeds of attorneys' fees and litigation costs and expenses; (3) the proposed plan of distribution of the Fuel Injection Systems Settlement Fund; and (4) a service award for the Class Representative.

A Notice of Proposed Settlements and Claim Form (the "Notice") was mailed to potential Settlement Class members on or about December 9, 2021. The Notice describes the litigation and options available to Settlement Class members with respect

to the Aisan, Mikuni, Keihin, and Maruyasu settlements in more detail. The Notice also explains the options available to members of the DENSO, HIAMS, MITSUBA, and MITSUBISHI ELECTRIC Settlement Classes. The Notice and other important documents related to the settlements can be accessed at [www.AutoPartsAntitrustLitigation.com/FIS](http://www.AutoPartsAntitrustLitigation.com/FIS), or by calling 1-888-266-9280 or writing to Fuel Injection Systems Direct Purchaser Antitrust Litigation, P.O. Box 3656, Portland, OR 97208-3656. Those who believe they may be a member of any of the Aisan, DENSO, HIAMS, Keihin, Maruyasu, Mikuni, MITSUBA or MITSUBISHI ELECTRIC settlement classes, are urged to obtain a copy of the Notice.

URL: [www.AutoPartsAntitrustLitigation.com/FIS](http://www.AutoPartsAntitrustLitigation.com/FIS)

SOURCE The United States District Court for the Eastern District of Michigan, Southern Division