

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

**IN RE AUTOMOTIVE PARTS ANTITRUST
LITIGATION**

In Re: ALTERNATORS

THIS RELATES TO:

ALL DIRECT PURCHASER ACTIONS

**CASE NO. 12-MD-02311
HON. MARIANNE O. BATTANI**

**Case No. 2:13-cv-00701-MOB-MKM
Case No. 2:15-cv-11828-MOB-MKM
Case No. 2:15-cv-13634-MOB-MKM**

**SETTLEMENT CLASS COUNSEL’S REPORT ON DISSEMINATION
OF NOTICE OF PROPOSED SETTLEMENTS WITH THE MITSUBISHI ELECTRIC,
HIAMS, AND DENSO DEFENDANTS AND CLASS MEMBERS’ RESPONSE**

Settlement Class Counsel submit the following report concerning the dissemination of notice pursuant to this Court's Order dated June 6, 2019 (2:13-cv-00701, ECF No. 90) (the “Notice Order”), and Settlement Class members’ response to the notice program. As described more fully below, notice was mailed to 2,240 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 requests for an award of attorneys’ fees and reimbursement of litigation costs and expenses, and incentive payments to the Class Representatives. 16 requests for exclusion from one or more of the settlements were submitted. None of the proposed settlements are subject to rescission as a result of the requests for exclusion.

Settlement Class Counsel respectfully submit that the complete absence of objections and the small number of opt-outs militate strongly in favor of approval of the proposed settlements,

the proposed plan for distribution of settlement funds, and the requests for attorneys' fees and litigation costs and expenses and incentive payments.

I. DISSEMINATION OF NOTICE TO THE CLASSES

Pursuant to the Court's Notice Order, on June 27, 2019, Epiq Class Action & Claims Solutions, Inc. ("Epiq"), the Notice and Claims Administrator retained by Direct Purchaser Plaintiff, mailed 2,240 copies of the Notice of Proposed Settlements of Direct Purchaser Class Action with the MITSUBISHI ELECTRIC, HIAMS, and DENSO Defendants and Hearing on Final Settlement Approval and Related Matters, and Claim Form (the "Notice") to potential Settlement Class members by first class mail, postage prepaid. Declaration of Angie Birdsell, 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/Alternators, a website dedicated to this litigation. *Id.* at ¶ 9.

Also in accordance with the Notice Order, the Summary Notice of Proposed Settlements of Direct Purchaser Class Action with MITSUBISHI ELECTRIC, HIAMS, and DENSO Defendants and Hearing on Settlement Approval and Related Matters ("Summary Notice") was published in *Automotive News* on July 1, 2019. *Id.* at ¶ 8. Additionally, an online banner notice appeared for a 21 day period on www.AutoNews.com, the digital version of *Automotive News*, and an Informational Press Release was issued nationwide on July 1, 2019 via PR Newswire's "Auto Wire," which targets auto industry trade publications. *Id.*

Notice to the MITSUBISHI ELECTRIC, HIAMS, and DENSO Settlement Classes 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 REQUESTS FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND INCENTIVE PAYMENTS

The Notice advised that any objection to the proposed settlements, the proposed plan for distribution of settlement funds, or to Settlement Class Counsel's requests for an award of attorneys' fees and litigation costs and expenses and incentive payments to the Class Representatives had to be filed with the Clerk by August 16, 2019, 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 any of the proposed settlements, the distribution plan, or to the fee and expense request or the incentive payment request has been filed with the Court or received by Settlement Class Counsel.

III. REQUESTS FOR EXCLUSION

The Notice further advised that requests for exclusion from the MITSUBISHI ELECTRIC, HIAMS, and DENSO Settlement Classes had to be mailed to Settlement Class Counsel and to counsel for the Settling Defendants, postmarked no later than August 16, 2019. As of this date, Settlement Class Counsel have received 16 requests for exclusion from one or more of the proposed settlements.¹ None of the proposed settlements are subject to rescission as a result of the requests for exclusion.

Settlement Class Counsel respectfully submit that, for the reasons set forth in the Memorandum in Support of Direct Purchaser Plaintiffs' Motion for Final Approval of Proposed Settlements with the MITSUBISHI ELECTRIC, HIAMS, and DENSO Defendants and Proposed

¹ Settlement Class Counsel received 16 requests for exclusion from the DENSO Settlement Class, 7 requests for exclusion from the HIAMS Settlement Class, and 13 requests for exclusion from the MITSUBISHI ELECTRIC Settlement Class. The entities that requested exclusion are set forth in Exhibit 2 and the Settlement Classes from which they opted out are reflected in Exhibit 3.

Plan for Distribution of Settlement Funds (the “Final Approval Brief”) (2:13-cv-00701, ECF No. 92), each of the proposed settlements, is fair, reasonable and adequate under the relevant criteria, and warrants final approval.

IV. THE REACTION OF MEMBERS OF THE SETTLEMENT CLASSES SUPPORTS APPROVAL OF THE SETTLEMENTS, THE PROPOSED PLAN FOR DISTRIBUTION, AND THE REQUESTS FOR AN AWARD OF FEES AND EXPENSES AND INCENTIVE PAYMENTS

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 2,240 potential Settlement Class members identified by Defendants, and a copy of the Notice was (and remains) posted online at www.AutoPartsAntitrustLitigation.com/Alternators. The Summary Notice was published in *Automotive News* on July 1, 2019, and on that same day an Informational Press Release was issued nationwide via PR Newswire’s “Auto Wire.” Additionally, an online banner notice appeared over a 21-day period on www.AutoNews.com, the digital version of *Automotive News*. The low number of opt-outs and total absence of objections militates strongly in favor of approval

of the proposed settlements, the proposed plan for distribution of settlement funds, and the requests for attorneys' fees and reimbursement of litigation costs and expenses and incentive payments.

V. REQUEST FOR AN AWARD OF ATTORNEYS' FEES

As of June 30, 2019, Plaintiff's Counsel's lodestar, based upon historical rates, was \$1,312,589.25. Direct Purchaser Plaintiff's Memorandum in Support of Their Motion for an Award of Attorney's Fees and Litigation Costs and Expenses and an Incentive Payment to the Class Representatives, at 9 (the "Fee Brief") (2:13-cv-00701, ECF No. 93). Since that date, Plaintiff's Counsel have continued their efforts on behalf of the Settlement Classes by, among other things, drafting the final settlement approval submissions and overseeing the dissemination of notice to members of the Settlement Classes in accordance with the Notice Order. As a result of this continued effort, as of August 31, 2019, Plaintiff's Counsel's combined lodestar was \$1,373,376.50. Were the Court to award a fee of 30% of the combined MITSUBISHI ELECTRIC, HIAMS, and DENSO settlement proceeds of \$9,606,594, less litigation expenses of \$27,245.25, the multiplier on the more current lodestar would be approximately 2.09.

VI. CONCLUSION

Based upon the foregoing, and for the reasons set forth in Direct Purchaser Plaintiff's Final Approval Brief and Fee Brief, it is respectfully requested that the Court grant final approval of the proposed MITSUBISHI ELECTRIC, HIAMS, and DENSO settlements, the proposed plan for distribution of settlement funds, and the requests for attorneys' fees and litigation costs and expenses, and incentive awards to the Class Representatives.

DATED: September 20, 2019

Respectfully submitted,

/s/David H. Fink
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Darryl Bressack (P67820)
Nathan J. Fink (P75185)

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Interim Co-Lead Class Counsel and Settlement Class Co-Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2019, 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**

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION	:	12-MD-02311
	:	Honorable Marianne O. Battani
IN RE: ALTERNATORS	:	
	:	
THIS RELATES TO: ALL DIRECT PURCHASER CASES	:	2:13-CV-00701-MOB-MKM
	:	2:15-CV-11828-MOB-MKM
	:	2:15-CV-13634-MOB-MKM
	:	

**DECLARATION OF ANGIE BIRDELL RE DISSEMINATION OF NOTICE TO THE
DIRECT PURCHASER MITSUBISHI ELECTRIC, HIAMS, AND DENSO
SETTLEMENT CLASSES**

I, Angie Birdsell, 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 Plaintiffs and the MITSUBISHI ELECTRIC, Hitachi Automotive Systems (HIAMS), and DENSO Defendants, as well as the corresponding Class Notice program. This declaration is based upon my personal knowledge and information provided by Defendants' counsel, Plaintiffs' 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*, accompanied by an online banner ad that ran for 21 days on www.AutoNews.com;
 - 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 2,240 names and addresses of potential Class Members.

6. On June 27, 2019, Epiq mailed the Claim Packages by first class mail, postage prepaid, to the 2,240 potential Class Members. A copy of the Claim Package is attached hereto as Exhibit A.

7. As of September 13, 2019, Epiq has received a total of 566 Claim Packages returned by the U.S. Postal Service as undeliverable and has remailed 232 Claim Packages to those records. As of September 13, 2019, there are 334 records that remain undeliverable.

PUBLICATION NOTICE

8. Epiq caused the publication of the Summary Publication Notice in one edition of *Automotive News* on July 1, 2019, which was accompanied by an online banner ad that ran for a 21-day period on *www.AutoNews.com*, the digital version of *Automotive News*. An Informational Press Release was issued via PR Newswire's "Auto Wire" on July 1, 2019. Confirmation of the publication and copies of the Summary Publication Notice as it appeared in *Automotive News*, the

banner ad from *www.AutoNews.com*, and the Informational Notice are attached hereto as Exhibit B.

SETTLEMENT WEBSITE

9. On June 27, 2019, 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/Alternators*. 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. As of September 13, 2019, there have been 3,725 page views and 825 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 August 16, 2019. As of September 13, 2019, Epiq has received 16 requests for exclusion from the DENSO Settlement Class, 7 requests for exclusion from the HIAMS Settlement Class, and 13 requests for exclusion from the MITSUBISHI ELECTRIC 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 16th day of September, 2019 in Beaverton, Oregon.



Angie Birdsell
Project Manager, Client Services | Epiq

EXHIBIT A

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

IN RE AUTOMOTIVE PARTS ANTITRUST LITIGATION
IN RE: ALTERNATORS
THIS RELATES TO: ALL DIRECT PURCHASER ACTIONS

CASE NO. 12-MD-02311
HON. MARIANNE O. BATTANI

2:13-CV-00701-MOB-MKM
2:15-CV-11828-MOB-MKM
2:15-CV-13634-MOB-MKM

NOTICE

NOTICE OF PROPOSED SETTLEMENTS OF DIRECT PURCHASER CLASS ACTION WITH MITSUBISHI ELECTRIC, HIAMS AND DENSO DEFENDANTS, AND HEARING ON:

- (1) APPROVAL OF PROPOSED SETTLEMENTS;**
- (2) PLAN OF DISTRIBUTION OF THE SETTLEMENT FUND; AND**
- (3) MOTION OF SETTLEMENT CLASS COUNSEL FOR AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION COSTS AND EXPENSES, AND INCENTIVE PAYMENTS TO THE CLASS REPRESENTATIVES**

TO: ALL INDIVIDUALS AND ENTITIES THAT PURCHASED ALTERNATORS IN THE UNITED STATES DIRECTLY FROM DEFENDANTS (OR THEIR SUBSIDIARIES, AFFILIATES OR JOINT VENTURES) FROM JANUARY 1, 2000 THROUGH MARCH 12, 2018.

PLEASE READ THIS NOTICE CAREFULLY. YOUR LEGAL RIGHTS MAY BE AFFECTED BY LITIGATION NOW PENDING IN THIS COURT.

WHAT IS THE PURPOSE OF THIS NOTICE AND WHY WAS IT SENT TO ME?

This Notice is given pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Eastern District of Michigan, Southern Division (the "Court"). The purpose of this Notice is to inform you of a hearing before the Court to consider:

- (1) Proposed settlements with (a) Defendants Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., and Mitsubishi Electric Automotive America, Inc. (collectively, the "MITSUBISHI ELECTRIC Defendants"); (b) Defendant Hitachi Automotive Systems, Ltd. ("HIAMS") for HIAMS, Hitachi, Ltd. and Hitachi Automotive Systems Americas, Inc (collectively "HIAMS Defendants"); and (c) Defendants DENSO Corporation, DENSO International America, Inc., DENSO Korea Corporation (f/k/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation), DENSO Automotive Deutschland GmbH, DENSO Products and Services Americas, Inc. (f/k/a DENSO Sales California, Inc.), ASMO Co., Ltd., ASMO North America, LLC, ASMO Greenville of North Carolina, Inc. and ASMO Manufacturing, Inc. (collectively, the "DENSO Defendants") (all Defendants referenced in this paragraph are collectively referred to as the "Settling Defendants");
- (2) A proposed plan of distribution of MITSUBISHI ELECTRIC, HIAMS and DENSO settlement proceeds to Settlement Class members and a proposed Claim Form that you may submit in order to share in the settlement proceeds; and

- (3) Settlement Class Counsel's motion for an award of attorneys' fees and reimbursement of litigation costs and expenses, and incentive payments to the Class Representatives.

This Notice provides information concerning the proposed settlements, the proposed plan of distribution, and the motion for attorneys' fees and reimbursement of litigation costs and expenses, and incentive payments. The Notice also advises you of your rights to: participate in the settlement claims process; exclude yourself from any or all of the Settlement Classes; and object to the terms of the proposed settlements, the plan of distribution, and the requests for fees, costs and expenses, and incentive payments to the Class Representatives in connection with the Court hearing on these matters.

BACKGROUND

Plaintiff has reached settlements with the MITSUBISHI ELECTRIC Defendants, the HIAMS Defendants and the DENSO Defendants totaling \$9,606,594. Under the terms of the proposed settlements, MITSUBISHI ELECTRIC will pay a total of \$7,295,825 (the "MITSUBISHI ELECTRIC Settlement Fund"), HIAMS will pay a total of \$2,210,769 (the "HIAMS Settlement Fund"), and DENSO will pay a total of \$100,000 (the "DENSO Settlement Fund") (the three settlement funds are collectively referred to as the "Alternators Settlement Fund"). As discussed below, the MITSUBISHI ELECTRIC Settlement is subject to rescission based upon valid and timely requests for exclusion by members of the MITSUBISHI ELECTRIC Settlement Class.

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 Alternators 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 "Alternators" is defined in each settlement agreement, but generally includes electromechanical devices that generate an electric current while an engine is in operation. Alternators provide power to a vehicle's electrical system and charge its battery. These proposed settlements do not relate to, and have no effect upon, cases involving any product other than Alternators.

If you are a member of the MITSUBISHI ELECTRIC, HIAMS or DENSO Settlement Classes (defined below), you have the rights and options summarized here:

- You may remain in any or all of the MITSUBISHI ELECTRIC, HIAMS or DENSO Settlement Classes and be eligible to share in the proceeds of, and be bound by the terms of, those settlements in which you elect to remain;
- You may exclude yourself from any or all of the MITSUBISHI ELECTRIC, HIAMS or DENSO 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 MITSUBISHI ELECTRIC, HIAMS or DENSO Settlement Classes, you may object to that proposed settlement, to the proposed plan of distribution of the Alternators Settlement Fund, or to Settlement Class Counsel's request for an award of attorneys' fees and reimbursement of litigation costs and expenses, and incentive payments to the Class Representatives. You may also appear at the hearing where the Court will consider these matters;
- You may enter an appearance in the litigation through your own counsel at your own expense; and
- Any Settlement Class member who wishes to participate in the distribution of the MITSUBISHI ELECTRIC, HIAMS and DENSO Settlement Funds must complete and submit a copy of the Claim Form **on or before October 11, 2019**.

WHO IS IN THE SETTLEMENT CLASSES?

The Court has provisionally certified a Direct Purchaser MITSUBISHI ELECTRIC Settlement Class ("MITSUBISHI ELECTRIC Settlement Class"), Direct Purchaser HIAMS Settlement Class (the "HIAMS Settlement Class"), and a Direct Purchaser DENSO Settlement Class (the "DENSO Settlement Class") for the purpose of disseminating notice of the proposed MITSUBISHI ELECTRIC, HIAMS and DENSO settlements.

The MITSUBISHI ELECTRIC Settlement Class is defined as follows:

All individuals and entities who purchased Alternators 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 HIAMS Settlement Class is defined as follows:

All individuals and entities who purchased Alternators in the United States directly from Defendants (or their subsidiaries or affiliates) 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 MITSUBISHI ELECTRIC and HIAMS Settlement Class definitions set forth above, the following entities are Defendants: Hitachi Automotive Systems, Ltd.; Hitachi Automotive Systems Americas, Inc.; Hitachi, Ltd.; DENSO Corporation; DENSO International America, Inc.; DENSO Products and Services Americas, Inc. (f/k/a DENSO Sales California, Inc.); DENSO International Korea Corporation (f/k/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation); MITSUBA Corporation; American Mitsuba Corporation; Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; Mitsubishi Electric Automotive America, Inc.; Robert Bosch GmbH; Robert Bosch LLC.

The DENSO Settlement Class is defined as follows:

All individuals and entities who purchased Alternators in the United States directly from one or more Defendant(s) (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.

For purposes of the DENSO Settlement Class definitions set forth above, the Defendants are: DENSO Corporation; DENSO International America, Inc.; DENSO Products & Services Americas, Inc. (f/k/a DENSO Sales California, Inc.); and DENSO Korea Corporation (f/k/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation); Hitachi Automotive Systems, Ltd.; Hitachi Automotive Systems Americas, Inc.; Hitachi, Ltd.; MITSUBA Corporation; American Mitsuba Corporation; Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; Mitsubishi Electric Automotive America, Inc.; Robert Bosch GmbH; Robert Bosch LLC; Nikko Electric Indus., Sawafuji Electric Co., Ltd.; Valeo S.A.; and any of their parents, subsidiaries, and affiliates.

Plaintiffs Irving Levine Automotive Distributors, Inc. and All European Auto Supply, Inc. have been appointed by the Court to serve as "Class Representatives" for the Mitsubishi Electric, HIAMS and DENSO 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, Direct Purchaser Plaintiffs filed a class action lawsuit against Defendants on behalf of a class of direct purchasers of Alternators, alleging that they conspired to raise, fix, maintain, and stabilize prices, rig bids, and allocate the supply of Alternators sold in the United States, in violation of federal antitrust laws. Direct Purchaser Plaintiffs further alleged that as a result of the conspiracy, they and other direct purchasers of Alternators were injured by paying more than they would have paid in the absence of the alleged illegal conduct.

The Settling Defendants all deny Direct Purchaser Plaintiffs' allegations and liability and have asserted defenses to Direct Purchaser Plaintiffs' 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 Direct Purchaser Plaintiffs' claims or the Settling Defendants' defenses. These settlements are with the MITSUBISHI ELECTRIC Defendants, HIAMS Defendants and DENSO Defendants only.

WHAT RELIEF DO THE PROPOSED SETTLEMENTS PROVIDE?

Plaintiffs, on behalf of the MITSUBISHI ELECTRIC Settlement Class, entered into a settlement agreement with the MITSUBISHI ELECTRIC Defendants on March 5, 2018 (the “MITSUBISHI ELECTRIC Settlement Agreement”), under which the MITSUBISHI ELECTRIC Defendants have agreed to pay \$7,295,825. The MITSUBISHI ELECTRIC Settlement Agreement gives MITSUBISHI ELECTRIC and Plaintiff the right to withdraw from the settlement based upon valid and timely requests for exclusion by MITSUBISHI ELECTRIC Settlement Class members.

Plaintiffs, on behalf of the HIAMS Settlement Class, entered into a settlement with HIAMS for the HIAMS Defendants on May 14, 2018 (the “HIAMS Settlement Agreement”), under which HIAMS agreed to pay \$2,210,769.

Direct Purchaser Plaintiffs, on behalf of the DENSO Settlement Class, entered into a settlement agreement with the DENSO Defendants on February 4, 2019 (the “DENSO Settlement Agreement”), under which the DENSO Defendants have agreed to pay \$100,000.

As part of the settlement agreements described above, the MITSUBISHI ELECTRIC Defendants, the HIAMS Defendants, and the DENSO Defendants all agreed to cooperate with Settlement Class Counsel with respect to the prosecution of claims against any remaining Defendants.

This Notice is only a summary of the terms of the proposed settlements. The MITSUBISHI ELECTRIC, HIAMS and DENSO Settlement Agreements contain other important provisions, including the release of claims against the MITSUBISHI ELECTRIC, HIAMS and DENSO 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/Alternators. 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 MITSUBISHI ELECTRIC, HIAMS or DENSO 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 Representatives and by Settlement Class Counsel. If you remain in any of the MITSUBISHI ELECTRIC, HIAMS or DENSO 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 Alternators 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 incentive payments to the Class Representatives (the “Net Alternators 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. Any Claim Form submitted electronically must be submitted **on or before October 11, 2019**. Any Claim Form submitted via mail must be **postmarked on or before October 11, 2019**.

The Net Alternators Settlement Fund will be distributed *pro rata* to all Claimants based upon their eligible **direct** purchases in the United States from Defendants or their co-conspirators 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 Alternators in the United States directly from any Defendant (or its parents, affiliates, subsidiaries, or joint ventures) 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 three Settlement Classes. If you wish to exclude yourself from any or all of the Settlement Classes, you must send a request for exclusion, in writing, by certified mail, return receipt requested, **postmarked no later than August 16, 2019**, to Settlement Class Counsel, and to counsel for Settling Defendants, at the addresses set forth below, and to the following address:

Settlement Administrator
Alternators Direct Purchaser Antitrust Litigation
P.O. Box 6727
Portland, OR 97228-6727

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 Alternators during the Class Period for the Settlement Class from which you seek exclusion, the Alternators purchased during the Class Period, and the dollar amount of your purchases. If you validly exclude yourself from any or all of the three 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, AND INCENTIVE PAYMENTS

The Court has appointed the law firms identified above as Settlement Class Counsel. These law firms, 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 Alternators Settlement Fund.

Settlement Class Counsel will also request incentive payments to Direct Purchaser Plaintiffs Irving Levine Automotive Distributors, Inc. and All European Auto Supply, Inc., which were appointed by the Court to serve as Class Representatives for the Settlement Classes, in the total amount of \$40,000.

The application for attorneys' fees and litigation costs and expenses and incentive payments will be filed on or before July 26, 2019. After that date, the petition for attorneys' fees will be available for your review on the settlement website at www.AutoPartsAntitrustLitigation.com/Alternators. If you remain a member of any of the three Settlement Classes and you wish to object to the requests for fees and expenses or incentive payments, 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 October 3, 2019, at 11:00 a.m., at the Theodore Levin United States Courthouse, 231 West Lafayette Boulevard, Detroit, MI 48226, Courtroom 252 (or such other courtroom as may be assigned for the hearing), to determine whether to approve: the proposed MITSUBISHI ELECTRIC, HIAMS and DENSO settlements; the proposed plan of distribution of the Alternators Settlement Fund; and Settlement Class Counsel's requests for an award of attorneys' fees and reimbursement of litigation costs and expenses and incentive payments. The 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 any of the MITSUBISHI ELECTRIC, HIAMS or DENSO Settlement Classes and you wish to object to that proposed settlement, or to the proposed plan of distribution of the Alternators Settlement Fund, or to Settlement Class Counsel's requests for an award of attorneys' fees and reimbursement of litigation costs and expenses, and incentive payments, you must do so in writing and at your own expense. Any such objection must include the caption of this litigation, must be signed, and must be **filed no later than August 16, 2019**, 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 August 16, 2019**:

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

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

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

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

Co-Lead Counsel for the Direct Purchaser Settlement Classes

Michael T. Brody
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654
Telephone: (312) 222-9350

Counsel for the Mitsubishi Electric Defendants

Craig P. Seebald
VINSON & ELKINS LLP
2200 Pennsylvania Ave NW
Suite 500-W
Washington, DC 20037
Telephone: (202) 639-6500

Counsel for the HIAMS 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 Alternators 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: Alternators Direct Purchaser Antitrust Litigation, P.O. Box 6727, Portland, OR 97228-6727.

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/Alternators. Questions concerning the proposed MITSUBISHI ELECTRIC and/or HIAMS and/or DENSO 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: June 27, 2019

BY ORDER OF:

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

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

IN RE AUTOMOTIVE PARTS ANTITRUST LITIGATION
In Re: ALTERNATORS
THIS RELATES TO: ALL DIRECT PURCHASER ACTIONS

CASE NO. 12-MD-02311
HON. MARIANNE O. BATTANI

2:13-cv-00701-MOB-MKM
2:15-cv-11828-MOB-MKM
2:15-cv-13634-MOB-MKM

**IMPORTANT NOTICE TO PURCHASERS OF ALTERNATORS
PLEASE READ THIS ENTIRE DOCUMENT CAREFULLY**

**YOU MUST COMPLETE AND SUBMIT A CLAIM FORM, POSTMARKED ON OR BEFORE
OCTOBER 11, 2019, TO BE ELIGIBLE TO SHARE IN THE DISTRIBUTION OF THE PROCEEDS OF
SETTLEMENTS WITH THE MITSUBISHI ELECTRIC, HIAMS AND DENSO DEFENDANTS**

INSTRUCTIONS FOR COMPLETING A CLAIM FORM

If you are a **direct** purchaser of Alternators (and you have remained in any or all of the MITSUBISHI ELECTRIC, HIAMS and DENSO Settlement Classes), you may be entitled to share in the distribution of the proceeds of settlements with those Defendants (the "Settlement Fund"). To receive your share of the Settlement Fund, you or a person you have authorized to act on your behalf must submit a timely and valid Claim Form in accordance with the instructions set forth herein.

Please note that if you have chosen to be excluded from any of the MITSUBISHI ELECTRIC, HIAMS or DENSO Settlement Classes you may not participate in the distribution of the settlement funds attributable to the settlement with that Defendant.

Eligibility: You are eligible to submit a claim seeking to share in the distribution of the Settlement Fund if, during the period from January 1, 2000 through March 12, 2018 (the "Class Period"), you purchased Alternators in the United States **directly** from one or more of the following companies (including their parents (for DENSO Settlement Class), subsidiaries, affiliates, and joint ventures (for DENSO and MITSUBISHI ELECTRIC Settlement Classes)): (1) DENSO Corporation; (2) DENSO International America, Inc.; (3) DENSO Products & Services Americas, Inc. (f/k/a DENSO Sales California, Inc.); (4) DENSO Korea Corporation (f/k/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation); (5) Hitachi, Ltd.; (6) Hitachi Automotive Systems, Ltd.; (7) Hitachi Automotive Systems Americas, Inc.; (8) Mitsubishi Electric Corp.; (9) Mitsubishi Electric US Holdings, Inc.; (10) Mitsubishi Electric Automotive America, Inc.; (11) Robert Bosch GmbH; (12) Robert Bosch, LLC; (13) MITSUBA Corp.; (14) American Mitsuba Corp.; (15) Nikko Electric Industries; (16) Sawafuji Electric Co., Ltd.; and (17) Valeo S.A.

The meaning of the term "Alternators" is defined in each settlement agreement, but generally includes electromechanical devices that generate an electric current while an engine is in operation. Alternators provide power to a vehicle's electrical system and charge its battery.

Submission of Claim: If you are submitting a paper Claim Form, the 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 October 11, 2019**. Paper Claim Forms should be addressed to:

Settlement Administrator
Alternators Direct Purchaser Antitrust Litigation
PO Box 6727
Portland, OR 97228-6727

Claim Forms may also be submitted electronically via the settlement website, www.AutoPartsAntitrustLitigation.com/Alternators. If you submit an electronic Claim Form you will be given a submission confirmation number and the ability to provide a digital version of the Schedule of Purchases. Electronic Claim Forms must be **submitted no later than October 11, 2019**.

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 (1) when it is submitted online, or (2) when it is posted, if it is addressed in accordance with the above instructions and **mailed by October 11, 2019**, 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.

**REMINDER: YOU MAY SUBMIT YOUR CLAIM ELECTRONICALLY AT
WWW.AUTOPARTSANTITRUSTLITIGATION.COM/ALTERNATORS**

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/Alternators.

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 Alternators, a description of available documentation that supports your claimed purchases, and summary totals of your purchases from each Defendant and for each year during the class period.

ONLY INCLUDE IN YOUR CLAIM FORM PURCHASES OF ALTERNATORS 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 Alternators 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-Alternators.com, or by calling 1-888-526-1272.

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 Alternators 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 Alternator 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 Alternators. You may be asked to submit purchase records to verify your claim.

Confirmation of Receipt of Claim: The receipt of paper 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. If you submit an electronic Claim Form through the settlement website you will receive a confirmation code.

Assistance: If you have any questions concerning this Claim Form or need additional copies, contact the Settlement Administrator at: Alternators Direct Purchaser Antitrust Litigation PO Box 6727, Portland, OR 97228-6727, via email at info@AutoPartsAntitrustLitigation-Alternators.com, or by calling 1-888-526-1272. You may also contact your own attorney or other person to assist you, at your own expense.

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 OR DEFENDANTS OR THEIR COUNSEL, AND YOU DO NOT NEED TO USE THEM TO FILE A CLAIM.



CLAIM FORM

I. IDENTITY OF CLAIMANT

Please indicate whether the person filing this claim is a direct filer or a third party filer (select only one):

- Direct Filer** (you, or your company, made the direct purchases of Alternators during the Class Period)
- Third Party Filer** (you, or your company, are authorized to file this claim on behalf of the claimant listed below)

If you selected "**Direct Filer**," please indicate your (the claimant's) name and contact information in Section II ("Claimant Information"). Then, skip Section III, and proceed directly to Section IV.

If you selected "**Third Party Filer**," please indicate the claimant's name and contact information in Section II ("Claimant Information"). Then, please provide your filer information in Section III ("Third Party Filer Information"), before proceeding to Section IV. Please note: If you selected "**Third Party Filer**," correspondences concerning this claim will be directed to the contact person provided in "Third Party Filer Information."

II. CLAIMANT INFORMATION

Claimant Name (Individual or Entity):

[Grid for Claimant Name]

Address 1:

[Grid for Address 1]

Address 2:

[Grid for Address 2]

City:

[Grid for City]

State:

[Grid for State]

ZIP Code:

[Grid for ZIP Code]

Country:

[Grid for Country]

Contact Person:

[Grid for Contact Person]

Contact Person E-Mail Address:

[Grid for Contact Person E-Mail Address]

Contact Person Phone Number:

[Grid for Contact Person Phone Number]

- Corporation
- Individual
- Trustee in Bankruptcy
- Partnership
- Other

If the claimant on whose behalf this claim is being submitted acquired the rights that are the basis of their claim from some other person or entity (as assignee, transferee, successor or otherwise), please check the box below and attach copies of legal documents that support the acquisition of your claim

- This claim is based upon an assignment or transfer and I have attached copies of supporting legal documents.

PLEASE PROMPTLY NOTIFY THE SETTLEMENT ADMINISTRATOR OF ANY CHANGE IN THE INFORMATION SET FORTH ABOVE.

III. THIRD PARTY FILER INFORMATION

Only complete this section if you selected "Third Party Filer" at the start of Section I. Please note: As a Third Party Filer, you are required to provide supporting documents demonstrating the authorization to file on behalf of the claimant. If no documentation is provided upon submission of this claim, the Settlement Administrator will request the documentation prior to completion of processing.

Filer Entity (if applicable):

Address 1:

Address 2:

City:

State:

ZIP Code:

Country:

Contact Person:

Contact Person E-Mail Address:

Contact Person Phone Number:

PLEASE PROMPTLY NOTIFY THE SETTLEMENT ADMINISTRATOR OF ANY CHANGE IN THE INFORMATION SET FORTH ABOVE.

IV. PURCHASES

On the attached Schedule of Purchases: General Worksheet, list the total amount of **direct** purchases of Alternators in the United States from each company listed in the "Eligibility" section above for each year during the period from January 1, 2000 through March 12, 2018. **The purchase amounts must be the net amounts paid after deducting any discounts, rebates, price reductions, taxes, or delivery and freight charges, and must be provided in United States dollar (USD) currency. Purchases from companies that are not listed above, or are in non-USD currency, should not be included.**

When records are available to allow you to calculate and document the dollar amount of your purchases, you must base your purchase information on these records.

When records are not available, you may submit purchase information based on estimates. Estimates can be based on extrapolation from similar circumstances in analogous contexts in the same year (for which you have documentation), or extrapolation from the same or nearly the same circumstances, but in other years (for which you have documentation), or from reports of actual or estimated vehicle production and your records or estimates of the value of Alternator content per vehicle. For example, if you have no records allowing you to calculate your purchases in 2004, you may calculate those purchases by using available records dated as close to that year as possible (e.g., 2003 or 2005), adjusting for appropriate volume differences and any inflationary unit costs.

Please note that your claim is subject to audit by the Settlement Administrator and you may, at a later time, be required to provide copies of some or all of the underlying documentation supporting your claim. Therefore, please retain your documentation until this litigation has been concluded and the claims review process has been completed. If you submit your purchase information based on estimates, or sales data and 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.

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:

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:

- MITSUBISHI ELECTRIC
- HIAMS
- DENSO
- None

Please note, this does not constitute a formal request for exclusion. In order to formally request exclusion, if you have not already done so, please refer to the instructions provided in the Notice of Proposed Settlements with MITSUBISHI ELECTRIC, HIAMS and DENSO 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:

Employer Identification Number (for corporations, trusts, etc.)	Social Security Number (for individuals)
<input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>

Business Name OR Name of taxpayer whose identification number is written above:

--

I certify that the above federal taxpayer identification number is correct, that the taxpayer is **NOT** subject to backup withholding under the provisions of Section 3406(a)(1)(C) of the Internal Revenue Code, that the taxpayer is a U.S. person or entity, and that the taxpayer is exempt from FATCA reporting.

NOTE: If you have been notified by the I.R.S. that you are subject to backup withholding, please strike out the word "**NOT**" in the previous sentence. Instructions regarding IRS Form W-9 are available at the Internal Revenue Service website at <http://www.irs.gov>.

THE INTERNAL REVENUE SERVICE DOES NOT REQUIRE YOUR CONSENT TO ANY PROVISION OF THIS DOCUMENT OTHER THAN THE CERTIFICATIONS REQUIRED TO AVOID BACKUP WITHHOLDING.

I, _____, declare under penalty of perjury that the information contained in this Claim Form is true and correct to the best of my knowledge and belief, that I am authorized to sign and submit this claim on behalf of the claimant, that the specific purchases of Alternators listed were made by the claimant **directly** from the companies listed, that the claimant is a member of any of the MITSUBISHI ELECTRIC, HIAMS or DENSO Settlement Classes and has not requested exclusion from all of those Settlement Classes, that this claim is the only claim being submitted by the claimant, that the claimant does not know of any other claim being submitted for the same purchases, that the claimant has not transferred or assigned its claims, and that I have read the accompanying Instructions and the Notice of Proposed Settlements with MITSUBISHI ELECTRIC, HIAMS and DENSO Defendants. Claimant submits to the exclusive jurisdiction of the United States District Court for the Eastern District of Michigan for the purpose of investigation or discovery (if necessary) with respect to this claim and any proceeding or dispute arising out of or relating to this claim. The filing of a false claim is a violation of the criminal laws of the United States and may subject the violator to criminal penalties.

Date: - -

MM DD YYYY

--

Signature

--

Printed Name

--

Title of position (If claimant is not an individual)

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, affiliates, and joint ventures) and year of the Class Period (January 1, 2000 through March 12, 2018) in which you directly purchased Alternators in the United States. A full version of this claim and worksheet is available for electronic submissions through the settlement website www.AutoPartsAntitrustLitigation.com/Alternators. If you have questions regarding the completion of the Schedule of Purchases, please contact the Settlement Administrator via email at info@AutoPartsAntitrustLitigation-Alternators.com, or by calling 1-888-526-1272.

Year Purchased	DENSO Defendants ¹		HIAMS Defendants ²		MITSUBISHI ELECTRIC Defendants ³		Bosch Defendants ⁴	
	Est. Quantity of Products Purchased	Amount Purchased	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		(\$)		(\$)		(\$)		(\$)
2007		(\$)		(\$)		(\$)		(\$)

List the quantity of products purchased and dollar amount of **direct purchases** of Alternators 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, delivery and freight charges. **INDIRECT PURCHASES ARE NOT ELIGIBLE**

¹ DENSO Corporation, DENSO International America, Inc., DENSO Products & Services Americas, Inc. (f/k/a DENSO Sales California, Inc.), and/or DENSO Korea Corporation (f/k/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation).

² Hitachi, Ltd., Hitachi Automotive Systems, Ltd., and/or Hitachi Automotive Systems Americas, Inc.

³ Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., and/or Mitsubishi Electric Automotive America, Inc.

⁴ Robert Bosch GmbH and Robert Bosch, LLC.

Year Purchased (cont.)	DENSO Defendants		HIAMS Defendants		MITSUBISHI ELECTRIC Defendants		Bosch Defendants	
	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased
2008		(\$)		(\$)		(\$)		(\$)
2009		(\$)		(\$)		(\$)		(\$)
2010		(\$)		(\$)		(\$)		(\$)
2011		(\$)		(\$)		(\$)		(\$)
2012		(\$)		(\$)		(\$)		(\$)
2013		(\$)		(\$)		(\$)		(\$)
2014		(\$)		(\$)		(\$)		(\$)
2015		(\$)		(\$)		(\$)		(\$)
2016		(\$)		(\$)		(\$)		(\$)
2017		(\$)		(\$)		(\$)		(\$)
1/1/2018 through 3/12/2018		(\$)		(\$)		(\$)		(\$)
TOTAL AMOUNT PURCHASED (Required)								

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, affiliates, and joint ventures) and year of the Class Period (January 1, 2000 through March 12, 2018) in which you directly purchased Alternators in the United States. A full version of this claim and worksheet is available for electronic submissions through the settlement website www.AutoPartsAntitrustLitigation.com/Alternators. If you have questions regarding the completion of the Schedule of Purchases, please contact the Settlement Administrator via email at info@AutoPartsAntitrustLitigation-Alternators.com, or by calling 1-888-526-1272.

Year Purchased	MITSUBA Defendants ⁵		Nikko Electric		Sawafuji Electric Co., Ltd.		Valeo S.A.	
	Est. Quantity of Products Purchased	Amount Purchased	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		(\$)		(\$)		(\$)		(\$)
2007		(\$)		(\$)		(\$)		(\$)

List the quantity of products purchased and dollar amount of **direct purchases** of Alternators 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, delivery and freight charges. **INDIRECT PURCHASES ARE NOT ELIGIBLE**

⁵ MITSUBA Corp. and American Mitsuba Corp.

Year Purchased (cont.)	MITSUBA Defendants		Nikko Electric		Sawafuji Electric Co., Ltd.		Valeo S.A.	
	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased	Est. Quantity of Products Purchased	Amount Purchased
2008		(\$)		(\$)		(\$)		(\$)
2009		(\$)		(\$)		(\$)		(\$)
2010		(\$)		(\$)		(\$)		(\$)
2011		(\$)		(\$)		(\$)		(\$)
2012		(\$)		(\$)		(\$)		(\$)
2013		(\$)		(\$)		(\$)		(\$)
2014		(\$)		(\$)		(\$)		(\$)
2015		(\$)		(\$)		(\$)		(\$)
2016		(\$)		(\$)		(\$)		(\$)
2017		(\$)		(\$)		(\$)		(\$)
1/1/2018 through 3/12/2018		(\$)		(\$)		(\$)		(\$)
TOTAL AMOUNT PURCHASED (Required)								

EXHIBIT B

CONFIRMATION OF PUBLICATION

IN THE MATTER OF: *Auto Parts – Alternators*

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:

7.1.19 – Automotive News
7.1.19 – PR Newswire's Auto Wire

(c) Banner advertisements are appearing on the following digital properties on the following dates:

7.1.19 – 7.21.19 – Automotive News (AutoNews.com)

x Kathleen Komraus
(Signature)

Media & Design Manager
(Title)

OPINION

All suppliers need a product technology strategy

Daron Gifford

Like it or not, the automotive industry's shift to electrification is in full swing.

Tesla has deservedly gotten the lion's share of attention with its electric drivetrain designs, new classes of components and innovative battery technology. But in truth, there is no significant car manufacturer in the world right now without its own plans to go electric, whether in part or in full.

As in any period of disruptive change, a lot of this work has been done effectively from scratch. It's generally too expensive for any company, even one with a \$40 billion to \$50 billion market cap such as Tesla, to develop all of this tech in-house. Research and development are expensive, especially in automotive, where so much work and refinement has gone into every vehicle component for decades. That's why automotive manufacturers typically buy most of the parts from

existing suppliers (or direct the buy), then put them together to build the vehicle.

Suppliers need to employ a product technology strategy that's more specific than simply a business strategy. It's about addressing targeted technology needs in both near-term programs and future vehicles, in order to make the end products better, while simultaneously increasing the odds of a profitable future for your company.

Managing this transition in technologies will be crucial for companies to make large, industry-changing innovations without having to invest in massive high-risk research and manufacturing development to catch up. It also provides a targeted way for a new company to buy some time, judge the market's reaction to what it is doing and then move forward with real customer- and consumer-tested feedback.

New world for suppliers

Tesla is just one example of this approach in action, but the fact remains that every company, particularly automotive suppliers, needs to have a product technology strategy in place. It's the only way for suppliers to survive in the face of the sweeping changes that are coming to the industry, and the only way to effectively prepare for new challenges such as electrification and autonomy.

Because that change is coming fast. According to our research projections, electric vehicles will make up 20 percent of the global vehicle market by 2030, jumping to 53 percent in 2040. And by 2050, just over 30 years from now, 88 percent of all vehicles on the road will be electric, with adoption being driven by lower battery costs, lower charging costs, improved infrastructure, social attitudes

toward emissions and increasing government incentives to electrify.

There will be overlap. Consider the similarities between the traditional automotive drivetrain and the new world of electrics. They utilize different technologies, but when you get right down to the distribution of power to the wheels, they are functionally similar. It's just that a battery has taken the place of the engine. Instead of a transmission, mechanical power is transferred through a traction motor and gearbox. Some things might need to be configured differently, and designed differently, but at the end of the day, suppliers will still be needed to create those parts for electric vehicles. There is still a lot of machining and assembling that needs to be done to put these cars together, and that work isn't going away.

Some saw this challenge long ago and responded. Look no further than BorgWarner's nearly billion-dollar purchase of traction motor supplier Remy International in 2016.

BorgWarner has since followed up with more acquisitions and now has its own subsidiary devoted to nothing but the electric drivetrain.

But the drivetrain is just the beginning.

Suppliers also need to find ways to offer value-added technology in the worlds of software, connectivity and autonomous capabilities, as well as everything that happens in a vehicle's interior. Once cars get

to the level of fully autonomous driving — an ambition far beyond electrification, which will also take much longer to be realized — the requirements for what the rest of the car will look like change dramatically.

After all, you're not going to need a steering wheel if the car is completely autonomous. You would not even need brake and accelerator pedals. Frankly, the whole dashboard as we know it could disappear. It's going to be an entirely different user experience, and suppliers will need an entirely different mindset — a product technology mindset — in order to meet those needs.

Evolving requirements

In fact, this is already happening. For instance, French company Faurecia, one of the world's largest automotive technology companies, recently acquired Clarion, which makes electronic components and cockpit technologies. This move will give the joint company the capability to supply all of the infotainment, electronics and drive assistance hardware that autonomous vehicles in the future will need, plus the seats and other interior components that Faurecia has long specialized in.

It's a clear message that the company wants to move from making a few specialized parts to instead supplying everything that will be

needed in the autonomous interior.

Beyond the user experience, automotive safety systems are also opportunities for a major disruption. The requirements for seat belts and airbags might change in autonomous vehicles when they have technology to completely avoid an accident,

opening up new opportunities for suppliers in developing advanced collision prevention systems and updating the structural safety aspects of the vehicle.

Given the regulatory issues surrounding these technologies, it might be a long time before real

change happens. But whatever happens, it's a clear reminder that suppliers need to be prepared to evolve. Every company needs a product technology strategy to follow these fundamental shifts in the market. And the time to create one is now.

LEGAL NOTICE

IF YOU PURCHASED ALTERNATORS 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 MITSUBISHI ELECTRIC, HIAMS AND DENSO DEFENDANTS

Proposed settlements totaling approximately \$9,606,594.00 have been reached in *In re Automotive Parts Antitrust Litigation*, Master File No. 12-md-02311, 2:13-cv-00701, 2:15-cv-11828, 2:15-cv-13634 (E.D. Mich.), with the MITSUBISHI ELECTRIC, HIAMS and DENSO Defendants (collectively, the "Settling Defendants").

What is the lawsuit about? This class action is part of coordinated legal proceedings involving Alternators 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 "Alternators" is defined in each of the settlement agreements, but generally refers to electromechanical devices that generate an electric current while an engine is in operation. Alternators provide power to a vehicle's electrical system and charge its battery.

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

Direct Purchaser Plaintiffs have reached settlements with the MITSUBISHI ELECTRIC Defendants, the HIAMS Defendants and the DENSO Defendants totaling \$9,606,594.00. Under the terms of the proposed settlements, MITSUBISHI ELECTRIC will pay a total of \$7,295,825.00, HIAMS will pay a total of \$2,210,769.00, and DENSO will pay a total of \$100,000.00 (the three settlement funds are collectively referred to as the "Alternators Settlement Fund"), and each of the Settling Defendants agreed to provide cooperation to assist Direct Purchaser Plaintiffs in the prosecution of the claims against any remaining, non-settling Defendants.

Who is included? The Court has preliminarily approved, and has provisionally certified the MITSUBISHI ELECTRIC, HIAMS and DENSO Settlement Classes. You are a member of one or more of these Settlement Classes if you purchased Alternators in the United States directly from any of the following entities (or depending on the specific settlement agreements, their parents, subsidiaries, affiliates or joint ventures, each a "Defendant") during the period from January 1, 2000 through March 12, 2018: Hitachi Automotive Systems, Ltd.; Hitachi Automotive Systems Americas, Inc.; Hitachi, Ltd.; DENSO Corporation; DENSO International America, Inc.; DENSO Products and Services Americas, Inc. (P/S/a DENSO Sales California, Inc.); DENSO International Korea Corporation (I/K/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation); Mitsuba Corporation; American Mitsuba Corporation; Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; Mitsubishi Electric Automotive America, Inc.; Robert Bosch GmbH; Robert Bosch LLC; Nikko Electric Indus.; Sawafuji Electric Co., Ltd.; and Valeo S.A.

A Notice of Proposed Settlements and Claim Form (the "Notice") was mailed to potential MITSUBISHI ELECTRIC, HIAMS and DENSO Settlement Class members on or about June 27, 2019. The Notice describes the litigation and options available to Settlement Class members with respect to the MITSUBISHI ELECTRIC, HIAMS and DENSO settlements in more detail. If you did not receive the Notice you may obtain a copy on the internet at www.AutoPartsAntitrustLitigation.com/Alternators, 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

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

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

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? MITSUBISHI ELECTRIC, HIAMS and DENSO have agreed to pay a total of \$9,606,594.00 to settle the Class Members' claims against them. The MITSUBISHI ELECTRIC Settlement is subject to rescission based upon valid and timely requests for exclusion by members of the MITSUBISHI ELECTRIC Settlement Class. In exchange for these payments, members of the class who do not request to be excluded from the class will release their claims against the Settling Defendants as set forth in the Settlement Agreements. As part of the settlements, all of the Settling Defendants have agreed to provide cooperation in the prosecution of claims against any remaining Defendants.

Your rights may be affected. If you are a member of any or all of the MITSUBISHI ELECTRIC, HIAMS or DENSO 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 Representatives and by Settlement Class Counsel. **In order to share in the proceeds of any of the MITSUBISHI ELECTRIC, HIAMS 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. Any Claim Form submitted electronically must be submitted on or before October 11, 2019. Any Claim Form submitted via mail must be postmarked on or before October 11, 2019.**

If you wish to exclude yourself from any or all of the MITSUBISHI ELECTRIC, HIAMS or DENSO Settlement Classes, you must send a request for exclusion, in writing, by certified mail, return receipt requested, postmarked no later than August 16, 2019, in accordance with the procedures set forth in the Notice. If you validly exclude yourself from any or all of the MITSUBISHI ELECTRIC, HIAMS or DENSO 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 the MITSUBISHI ELECTRIC, HIAMS and/or DENSO Settlement Classes, you have the right to object to that proposed settlement, or to the proposed plan of distribution of the Alternators Settlement Fund, or to Settlement Class Counsel's requests for an award of attorneys' fees and litigation costs and expenses, and incentive payments to the Class Representatives, by following the procedures set forth in the Notice. **Your objection must be filed no later than August 16, 2019.**

The Court has scheduled a hearing on October 3, 2019, 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 incentive payments to the Class Representatives. The hearing may be continued without further notice to you.

If you believe you are a member of any of the MITSUBISHI ELECTRIC, HIAMS or DENSO 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 of the Settlement Class Counsel identified above. **Do not contact the Clerk of the Court or the Judge.**

Dated: July 1, 2019

BY ORDER OF:
 The United States District Court for the Eastern District of Michigan, Southern Division



Daron Gifford leads Plante Moran's automotive industry consulting services.

\$9,606,594.00 in Direct Purchaser Settlements reached with Alternator Manufacturers in Price Fixing Class Action Lawsuit

NEWS PROVIDED BY

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

Jul 01, 2019, 08:00 ET

DETROIT, July 1, 2019 /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 Mitsubishi Electric Defendants, Hitachi Automotive Systems, Ltd. ("HIAMS") Defendants, and DENSO 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 alternators sold in the United States, in violation of federal antitrust laws.

The settlements affect those who purchased alternators in the United States between January 1, 2000 and March 12, 2018 directly from any of the following entities (or depending on the specific settlement agreements, their parents, subsidiaries, affiliates and joint ventures): Hitachi Automotive Systems, Ltd.; Hitachi Automotive Systems Americas, Inc.; Hitachi, Ltd.; DENSO Corporation; DENSO International America, Inc.; DENSO Products and Services Americas, Inc. (f/k/a DENSO Sales California, Inc.); DENSO International Korea Corporation (f/k/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation); Mitsuba Corporation; American Mitsuba Corporation; Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; and Mitsubishi Electric Automotive America, Inc.; Robert Bosch GmbH; and Robert Bosch LLC; Nikko Electric Indus.; Sawafuji Electric Co., Ltd.; and Valeo S.A.

A hearing will be held on October 3, 2019, at 11:00 a.m., before the Honorable Marianne O. Battani, United States District Judge, at the Theodore Levin United States Courthouse, 231 West Lafayette Boulevard, Detroit, MI 48226, Courtroom 252, for the purpose of determining: (1) whether the proposed settlements with the Mitsubishi Electric Defendants, HIAMS Defendants, and DENSO Defendants totaling \$9,606,594.00 should be approved by the Court as fair, reasonable and adequate; (2) whether the Court should approve the proposed plan of distribution of Mitsubishi Electric, HIAMS and DENSO settlement proceeds to members of the settlement classes and the proposed Claim Form; and (3) whether the Court should approve Settlement Class Counsel's request for an award of attorneys' fees, reimbursement of litigation costs and expenses, and an incentive payment to the Class Representative.

A Notice of Proposed Settlements and Claim Form (the "Notice") was mailed to potential Settlement Class members on or about June 27, 2019. The Notice describes the litigation and options available to Settlement Class members with respect to the Mitsubishi Electric, HIAMS and DENSO settlements in more detail. The Notice also explains what steps a Settlement Class Member must take to (1) remain in the settlement classes and file a Claim Form to share in the settlement proceeds, (2) object to the settlements, or (3) request exclusion from the settlement classes. The Notice and other important documents related to the Settlements can be accessed at www.AutopartsAntitrustLitigation.com/Alternators, or by calling 1-888-526-

1272, or writing to Alternators Direct Purchaser Antitrust Litigation, P.O. Box 6727, Portland, OR 97228-6727. Those who believe they may be a member of any of the Mitsubishi Electric, HIAMS and DENSO settlement classes, are urged to obtain a copy of the Notice.

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

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The moves show the continuing evolution of FCA CEO Mike Manley's management team, which has included returning some executives to brands and roles where they have prior experience.

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FCA shuffle puts familiar leaders over Jeep, Dodge

The moves show the continuing evolution of FCA CEO Mike Manley's management team, which has included returning some executives to brands and roles where they have prior experience.

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EXHIBIT 2

EXHIBIT 2

AUTOMOTIVE PARTS ANTITRUST LITIGATION, CASE NO. 12-MD-02311,
 ALTERNATORS, 2:13-CV-00701-MOB-MKM, 2:15-CV-11828-MOB-MKM,
2:15-CV-13634-MOB-MKM

**REQUESTS FOR EXCLUSION FROM THE DIRECT
PURCHASER SETTLEMENT CLASSES**

<p>CARBURETOR AND IGNITION SERVICE</p> <p>B & R AUTO ELECTRIC</p> <p>DAIMLER TRUCKS NORTH AMERICA LLC</p> <p>SUZUKI Suzuki Motor of America, Inc. and Suzuki Motor Corporation, along with companies in which Suzuki Motor Corporation directly or indirectly owns the majority of voting rights, excluding Maruti Suzuki India Limited</p> <p>JERRY GRAHAM, INC., DBA JERRY'S STARTER & ALTERNATOR SERVICE</p> <p>FORD Ford Motor Company and its wholly owned divisions, subsidiaries and affiliates</p> <p>BMW BMW Manufacturing Co., LLC, along with its parent company (Bayerische Motoren Werke Aktiengesellschaft) and affiliated entities (including BMW of North America, LLC and BMW Consolidation Services Co., LLC)</p> <p>HEAVY DUTY AMERICA</p> <p>SUBARU OF INDIANA AUTOMOTIVE, INC.</p>	<p>TOYOTA Toyota Motor North America, Inc. Toyota Motor Engineering & Manufacturing North America, Inc. Toyota Motor Sales U.S.A., Inc. Toyota Motor Manufacturing, Mississippi, Inc. Toyota Motor Manufacturing, Indiana, Inc. Toyota Motor Manufacturing, Kentucky, Inc. Toyota Motor Manufacturing Toyota Motor Corporate Service Toyota Motors of America Toyota Motor Manufacturing de Baja California, S. de R.L. de C.V. Toyota Motor Manufacturing, West Virginia, Inc. Toyota Motor Manufacturing, Alabama, Inc. Toyota Motor Manufacturing, Texas, Inc. Toyota Motor Manufacturing, Canada, Inc. Toyota Motor Corporation Toyota Motor Engineering New United Motor Manufacturing, Inc. Bodine Aluminum, Inc. TABC, Inc. Canadian Autoparts Toyota Inc. Toyota Motor Manufacturing de Guanajuato, S.A. de C.V. Toyota Motor Manufacturing California, Inc Toyota Motor Manufacturing, Northern Kentucky, Inc.</p> <p>NISSAN Nissan Motor Co., Ltd. and Nissan North America, Inc., including their subsidiaries and majority-owned affiliates</p>
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SUBARU

Subaru Corporation f/k/a Fuji Heavy Industries Ltd.
Subaru of America, Inc.

HONDA

American Honda Motor Co., Inc.
Honda of America Mfg., Inc.
Honda R&D Americas, Inc.

FCA

FCA US LLC and/or its predecessors-in-interest: DaimlerChrysler, Chrysler LLC, and Chrysler Group LLC

MINITUBISHI MOTORS NORTH AMERICA, INC.

GENERAL MOTORS

General Motors LLC ("GM"), General Motors Company, and General Motors Holdings LLC, along with all their subsidiaries (in which GM directly or indirectly owns 50% or more of the voting rights) and majority-owned affiliates

EXHIBIT 3

Exhibit 3**AUTOMOTIVE PARTS ANTITRUST LITIGATION, CASE NO. 12-MD-02311**

ALTERNATORS, 2:13-CV-00701-MOB-MKM, 2:15-CV-11828-MOB-MKM, 2:15-CV-13634-MOB-MKM

Requests for Exclusion

Class Member	DENSO	HIAMS	MELCO
AMERICAN HONDA MOTOR CO., INC.	X		X
B & R AUTO ELECTRIC	X	X	X
BMW MANUFACTURING CO., LLC	X		
CARBURETOR AND IGNITION SERVICE	X	X	X
DAIMLER TRUCKS NORTH AMERICA LLC	X		
FCA US LLC	X		X
FORD MOTOR COMPANY	X	X	X
GENERAL MOTORS LLC	X	X	X
HEAVY DUTY AMERICA	X	X	X
JERRY'S STARTER & ALTERNATOR SERVICE	X	X	X
MINI OF NORTH AMERICA, INC.	X		X
NISSAN MOTOR CO., LTD.	X	X	X
SUBARU CORPORATION	X		X
SUBARU OF INDIANA AUTOMOTIVE, INC.	X		X
SUZUKI MOTOR CORPORATION	X		X
TOYOTA MOTOR NORTH AMERICA, INC.	X		

X = Requested Exclusion from Settlement