

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

**IN RE AUTOMOTIVE PARTS
ANTITRUST LITIGATION**

**2:12-md-02311
Honorable Sean F. Cox**

IN RE: FUEL INJECTION SYSTEMS

**THIS DOCUMENT RELATES TO:
DIRECT PURCHASER ACTIONS**

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

**IMPORTANT NOTICE TO PURCHASERS OF FUEL INJECTION SYSTEMS
PLEASE READ THIS ENTIRE DOCUMENT CAREFULLY**

**YOU MUST COMPLETE AND SUBMIT A CLAIM FORM, POSTMARKED ON OR BEFORE
MARCH 25, 2022, TO BE ELIGIBLE TO SHARE IN THE DISTRIBUTION OF THE PROCEEDS OF
SETTLEMENTS WITH THE AISAN, DENSO, HIAMS, KEIHIN, MARUYASU, MIKUNI, MITSUBA,
AND MITSUBISHI ELECTRIC DEFENDANTS**

INSTRUCTIONS FOR COMPLETING A CLAIM FORM

If you are a **direct** purchaser of Fuel Injection Systems and you have remained in one or more of the Aisan, DENSO, HIAMS, Keihin, Maruyasu, Mikuni, MITSUBA, and/or MITSUBISHI ELECTRIC Settlement Classes, you may be entitled to share in the distribution of the proceeds of the settlements with the Aisan, DENSO, HIAMS, Keihin, Maruyasu, Mikuni, MITSUBA, and MITSUBISHI ELECTRIC Defendants (the “Fuel Injection Systems Settlement Fund”). To receive your share of the Fuel Injection Systems Settlement Fund, you or a person 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 one or more of the Aisan, DENSO, HIAMS, Keihin, Maruyasu, Mikuni, MITSUBA, and MITSUBISHI ELECTRIC Settlement Classes you may not participate in the distribution of the settlement funds attributable to the settlement classes from which you chose to be excluded.

Eligibility: You are eligible to submit a claim seeking to share in the distribution of the Fuel Injection Systems Settlement Fund if, during the period from January 1, 2000 through March 12, 2018 (the “Class Period”), you purchased Fuel Injection Systems in the United States **directly** from one or more of the following companies, including their parents (for the DENSO Settlement Class), subsidiaries (for each Settlement Class), affiliates (for each Settlement Class), and joint ventures (for each Settlement Class except HIAMS): (1) Aisan Industry Co., Ltd.; (2) Franklin Precision Industry, Inc.; (3) Aisan Corporation of America; (4) Hyundam Industrial Co., Ltd.; (5) Hitachi Automotive Systems, Ltd.; (6) Hitachi Automotive Systems Americas, Inc.; (7) Hitachi, Ltd.; (8) DENSO Corporation; (9) DENSO International America Inc.; (10) DENSO International Korea Corporation (f/k/a separately as DENSO International Korea Corporation and DENSO Korea Automotive Corporation); (11) Hitachi Astemo, Ltd. (f/k/a Keihin Corporation); (12) Hitachi Astemo Indiana, Inc. (f/k/a Keihin North America, Inc.); (13) Maruyasu Industries Co., Ltd.; (14) Mikuni Corporation; (15) Mikuni American Corporation; (16) MITSUBA Corporation; (17) American Mitsuba Corporation; (18) Mitsubishi Electric Corporation; (19) Mitsubishi Electric US Holdings, Inc.; (20) Mitsubishi Electric Automotive America, Inc.; (21) Robert Bosch GmbH; (22) Bosch Electrical Drives Co., Ltd.; and (23) Robert Bosch LLC.

“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.

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.

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, 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; or by calling 1-888-266-9280. 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, 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:

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, or by calling 1-888-266-9280.

Year Purchased	Aisan ¹		DENSO ²		HIAMS ³	
	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.**

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

² 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.).

³ 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		(\$)		(\$)		(\$)
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, 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, or by calling 1-888-266-9280.

Year Purchased	Keihin ⁴		Maruyasu ⁵		Mikuni ⁶	
	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.**

⁴ 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.).

⁵ Maruyasu refers to Maruyasu Industries Co., Ltd.

⁶ 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		(\$)		(\$)		(\$)
TOTAL AMOUNT PURCHASED (Required)						

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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, or by calling 1-888-266-9280.

Year Purchased	MITSUBA ⁷		MITSUBISHI ELECTRIC ⁸		Bosch ⁹	
	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.**

⁷ MITSUBA refers to and includes MITSUBA Corporation and American Mitsuba Corporation.

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

⁹ 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		(\$)		(\$)		(\$)
TOTAL AMOUNT PURCHASED (Required)						