

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

IN RE AUTOMOTIVE PARTS ANTITRUST LITIGATION : **Master File No. 12-md-02311**
: **Honorable Sean F. Cox**

IN RE: FUEL INJECTION SYSTEMS

THIS DOCUMENT RELATES TO: : **2:13-cv-02201-SFC-RSW**
ALL DIRECT PURCHASER CASES : **2:15-cv-11827-SFC-RSW**
: **2:15-cv-13423-SFC-RSW**

NOTICE

NOTICE OF PROPOSED SETTLEMENTS OF DIRECT PURCHASER CLASS ACTION WITH AISAN, MIKUNI, KEIHIN, AND MARUYASU DEFENDANTS, AND HEARING ON:

- (1) APPROVAL OF PROPOSED AISAN, MIKUNI, KEIHIN, AND MARUYASU SETTLEMENTS;**
- (2) MOTION OF SETTLEMENT CLASS COUNSEL FOR AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION COSTS AND EXPENSES, AND A SERVICE AWARD TO THE CLASS REPRESENTATIVE; AND**
- (3) PLAN OF DISTRIBUTION OF THE AISAN, DENSO, HIAMS, KEIHIN, MARUYASU, MIKUNI, MITSUBA, AND MITSUBISHI ELECTRIC SETTLEMENT PROCEEDS.**

TO: ALL INDIVIDUALS AND ENTITIES THAT PURCHASED FUEL INJECTION SYSTEMS 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 Aisan Industry Co., Ltd., Franklin Precision Industry, Inc., Hyundam Industrial Co., Ltd., and Aisan Corporation of America (collectively, the "Aisan Defendants"); (b) Defendants Mikuni Corporation and Mikuni American Corporation (collectively, the "Mikuni Defendants"); (c) Defendants Hitachi Astemo, Ltd. (f/k/a Keihin Corporation) and Hitachi Astemo Indiana, Inc. (f/k/a Keihin North America, Inc.) (collectively, the "Keihin Defendants"); and (d) Defendant Maruyasu Industries Co., Ltd. (the "Maruyasu Defendant") (all Defendants referenced in this paragraph are collectively referred to as the "Settling Defendants");
- (2) Settlement Class Counsel's motion for an award of attorneys' fees and reimbursement of litigation costs and expenses from the Aisan, Mikuni, Keihin, and Maruyasu settlement proceeds;
- (3) A proposed plan of distribution to Settlement Class members of the proceeds of the Aisan, Mikuni, Keihin, and Maruyasu Settlements as well as the already-approved settlements with MITSUBISHI ELECTRIC, HIAMS, MITSUBA and DENSO and a proposed Claim Form that you may submit to share in those settlement proceeds; and
- (4) the request for a service award for the Class Representative, which would be paid from the Fuel Injection Systems Settlement Fund.

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

BACKGROUND

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

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

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

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

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

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

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

WHO IS IN THE SETTLEMENT CLASSES?

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

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

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

The Keihin Settlement Class is defined as follows:

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

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

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

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

WHAT IS THIS LITIGATION ABOUT?

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

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

WHAT RELIEF DO THE PROPOSED SETTLEMENTS PROVIDE?

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

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

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

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

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

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

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

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

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

HOW WILL THE SETTLEMENT FUNDS BE DISTRIBUTED?

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

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

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

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

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

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

REQUEST FOR ATTORNEYS' FEES AND EXPENSES

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

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

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

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

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

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

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

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

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

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

Co-Lead Counsel for the Direct Purchaser Settlement Classes

Barry A. Pupkin
Jeremy W. Dutra
SQUIRE PATTON BOGGS (US) LLP
2550 M Street, NW
Washington, DC 20037
Telephone: (202) 457-6000

Counsel for the Aisan Defendants

Richard Brosnick
AKERMAN LLP
1251 Avenue of the Americas, 37th Floor
New York, NY 10020
Telephone: (212) 880-3834

Counsel for the Mikuni Defendants

Anita F. Stork
COVINGTON & BURLING LLP
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105
Telephone: (415) 591-7050

Counsel for the Keihin Defendants

Eileen M. Cole
WHITE & CASE LLP
701 Thirteenth Street, NW
Washington, D.C. 20005
Telephone: (202) 626-3600

Counsel for Maruyasu Industries Co., Ltd.

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

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

Counsel for the MITSUBA Defendants

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

Counsel for the DENSO Defendants

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

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

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

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

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

Dated: December 9, 2021

BY ORDER OF:

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