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

IN RE AUTOMOTIVE PARTS ANTITRUST
LITIGATION

Case No. 12-MD-02311
Honorable Sean F. Cox

IN RE: OXYGEN SENSORS

2:15-cv-03101-SFC-RSW
2:15-cv-12918-SFC-RSW

THIS RELATES TO:
ALL DIRECT PURCHASER ACTIONS

IMPORTANT NOTICE TO PURCHASERS OF OXYGEN SENSORS
PLEASE READ THIS ENTIRE DOCUMENT CAREFULLY

YOU MUST COMPLETE AND SUBMIT A CLAIM FORM, POSTMARKED ON OR BEFORE
SEPTEMBER 30, 2022, TO BE ELIGIBLE TO SHARE IN THE DISTRIBUTION OF THE
PROCEEDS OF SETTLEMENTS WITH THE DENSO AND NGK DEFENDANTS

INSTRUCTIONS FOR COMPLETING A CLAIM FORM

If you are a **direct** purchaser of Oxygen Sensors (and you have remained in either or both of the DENSO and NGK Settlement Classes), you may be entitled to share in the distribution of the proceeds of settlements with the DENSO and NGK Defendants (the “Settlement Funds”). To receive your share of the Settlement Funds, 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 the DENSO or NGK 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 DENSO or NGK Settlement Fund if, during the period from January 1, 2000 through February 4, 2019 (the “Class Period”), you purchased Oxygen Sensors in the United States **directly** from one or more of the following companies, their parents (for the DENSO Settlement Class), subsidiaries (for the DENSO Settlement Class), controlled subsidiaries (for the NGK Settlement Class), affiliates (for each Settlement Class), or joint ventures (for each Settlement Class): (1) DENSO Corporation; (2) DENSO International America, Inc.; (3) DENSO Products & Services Americas, Inc.; (4) Hitachi, Ltd.; (5) NGK Spark Plug Co., Ltd.; (6) NGK Spark Plugs (U.S.A.) Holding, Inc.; (7) NGK Spark Plugs (U.S.A.), Inc.; (8) NTK Technologies, Inc.; (9) Robert Bosch GmbH; or (10) Robert Bosch LLC.

The meaning of the term “Oxygen Sensors” is defined in each settlement agreement, but generally means electronic sensors located before and after the catalytic converter in the exhaust system used to measure the amount of oxygen in the exhaust. Oxygen Sensors provide signals or data to the automobile’s engine management computer, which then adjusts the ratio of air/fuel injected into the engine to compensate for excess air or excess fuel.

Submission of Claim: If you are submitting a 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 September 30, 2022**, and addressed to:

Settlement Administrator
Oxygen Sensors Direct Purchaser Antitrust Litigation
PO Box 4234
Portland, OR 97208-4234



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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 **September 30, 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/OxygenSensors.

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 Oxygen Sensors, 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 OXYGEN SENSORS 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 FEBRUARY 4, 2019.

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 February 4, 2019) in which you directly purchased Oxygen Sensors 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-OS.com, or by calling 1-877-890-8128.

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 Oxygen Sensors in the United States from any of the listed companies during the period from January 1, 2000 through February 4, 2019. As part of the claims administration process, you may be required to verify certain information about your Oxygen Sensors purchases such as the quantity of product(s) purchased, the type of product(s) purchased, the dollar amount(s), the date(s) of the purchases, and the company(ies) from which you **directly** purchased the Oxygen Sensors. 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: Oxygen Sensors Direct Purchaser Antitrust Litigation, P.O. Box 4234, Portland, OR 97208-4234, via email at info@AutoPartsAntitrustLitigation-OS.com, or by calling 1-877-890-8128. 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 PLAINTIFFS OR DEFENDANTS OR THEIR COUNSEL, AND YOU DO NOT NEED TO USE THEM TO FILE A CLAIM.



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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 First Name:

MI:

Last Name:

Contact Person Email 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 Oxygen Sensors in the United States from each company listed in the "Eligibility" section above for each year during the period from January 1, 2000 through February 4, 2019. **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), extrapolation from the same or nearly the same circumstances 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 Oxygen Sensors 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.



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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 Oxygen Sensors listed were made by the claimant **directly** from the companies listed, that the claimant is a member of the DENSO or NGK Settlement Classes and has not requested exclusion from both 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 of Direct Purchaser Class Actions with NGK Defendants 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):



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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 February 4, 2019) in which you **directly** purchased Oxygen Sensors 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-OS.com, or by calling 1-877-890-8128.

Year Purchased	Bosch Defendants ¹		DENSO Defendants ²		Hitachi, Ltd.		NGK Defendants ³	
	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 Oxygen Sensors 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 "Bosch Defendants" refers to and includes Robert Bosch GmbH and Robert Bosch LLC.

² DENSO Defendants" refers to and includes DENSO Corporation; DENSO International America, Inc; and DENSO Products & Services America's, Inc. (f/k/a DENSO Sales California, Inc.).

³ "NGK Defendants" refers to and includes NGK Spark Plug Co., Ltd.; NGK Spark Plugs (U.S.A.) Holding, Inc.; NGK Spark Plugs (U.S.A.), Inc.; and NTK Technologies, Inc.



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Year Purchased (cont.)	Bosch Defendants		DENSO Defendants		Hitachi, Ltd.		NGK 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		(\$)		(\$)		(\$)		(\$)
2018		(\$)		(\$)		(\$)		(\$)
1/1/2019 through 2/4/2019		(\$)		(\$)		(\$)		(\$)
TOTAL AMOUNT PURCHASED (Required)								