

**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: SPARK PLUGS

**2:15-cv-03001-SFC-RSW
2:15-cv-11774-SFC-RSW**

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

**IMPORTANT NOTICE TO PURCHASERS OF SPARK PLUGS
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 Spark Plugs (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 Spark Plugs 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) NGK Spark Plug Co., Ltd.; (5) NGK Spark Plugs (U.S.A.) Holding, Inc.; (6) NGK Spark Plugs (U.S.A.), Inc.; (7) NTK Technologies, Inc.; (8) Robert Bosch GmbH; or (9) Robert Bosch LLC.

The meaning of the term “Spark Plugs” is defined in each settlement agreement, but generally means engine components for delivering high electric voltage from the ignition system to the combustion chamber of an internal combustion engine. They ignite the compressed fuel/air mixture with an electric spark while containing combustion pressure within the engine. Spark Plugs have a basic manufacturing design composed primarily of a shell, an insulator, a center electrode and an external (ground) electrode.

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
Spark Plugs Direct Purchaser Antitrust Litigation
PO Box 4655
Portland, OR 97208-4655

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/SparkPlugs.

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 Spark Plugs, 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 SPARK PLUGS 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 Spark Plugs 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-SP.com, or by calling 1-877-890-8078.

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 Spark Plugs 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 Spark Plugs purchases such as the quantity of product(s) purchased, the type of product(s) purchased, the dollar amounts, the date(s) of the purchases, and the company(ies) from which you **directly** purchased the Spark Plugs. 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: Spark Plugs Direct Purchaser Antitrust Litigation, P.O. Box 4655, Portland, OR 97208-4655, via email at info@AutoPartsAntitrustLitigation-SP.com, or by calling 1-877-890-8078. 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.

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 Spark Plugs 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.

Signature

Date: - -
MM DD YYYY

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 February 4, 2019) in which you **directly** purchased Spark Plugs 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-SP.com, or by calling 1-877-890-8078.

Year Purchased	Bosch Defendants ¹		DENSO Defendants ²		NGK Defendants 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		(\$)		(\$)		(\$)
2007		(\$)		(\$)		(\$)

List the quantity of products purchased and dollar amount of **direct purchases** of Spark Plugs 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.

Year Purchased (cont.)	Bosch Defendants		DENSO Defendants		NGK Defendants	
	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)		(\$)		(\$)		(\$)