

**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**

IN RE: SPARK PLUGS

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

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

NOTICE

NOTICE OF PROPOSED SETTLEMENTS OF DIRECT PURCHASER CLASS ACTIONS WITH NGK DEFENDANTS AND DENSO DEFENDANTS, AND HEARING ON:

- (1) APPROVAL OF PROPOSED SETTLEMENTS WITH NGK DEFENDANTS AND DENSO DEFENDANTS;**
- (2) PLANS OF DISTRIBUTION OF NGK AND DENSO SETTLEMENT FUNDS IN OXYGEN SENSORS AND SPARK PLUGS CASES; AND**
- (3) MOTIONS OF SETTLEMENT CLASS COUNSEL FOR AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION COSTS AND EXPENSES, AND SERVICE AWARDS TO THE CLASS REPRESENTATIVES.**

TO: ALL INDIVIDUALS AND ENTITIES THAT PURCHASED OXYGEN SENSORS OR SPARK PLUGS IN THE UNITED STATES DIRECTLY FROM DEFENDANTS (OR THEIR PARENTS, SUBSIDIARIES, AFFILIATES, OR JOINT VENTURES) FROM JANUARY 1, 2000 THROUGH FEBRUARY 4, 2019.

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 NGK Spark Plug Co., Ltd.; NGK Spark Plugs (U.S.A.) Holding, Inc.; NGK Spark Plugs (U.S.A.), Inc.; and NTK Technologies, Inc. (collectively, "NGK" or the "NGK Defendants"); and (b) 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 & Services Americas, Inc.; ASMO Co., Ltd.; ASMO North America, LLC; ASMO Greenville of North Carolina, Inc.; and ASMO Manufacturing, Inc. (collectively, "DENSO" or the "DENSO Defendants"), in the following cases: (a) *In Re: Oxygen Sensors* (Case No. 2:15-cv-03101-SFC-RSW) and (b) *In Re: Spark Plugs* (Case No. 2:15-cv-03001-SFC-RSW);

- (2) Proposed plans of distribution of settlement proceeds from settlements with the NGK and DENSO Defendants in the *Oxygen Sensors* and *Spark Plugs* cases, and proposed Claim Forms that you may submit in order to share in the settlement proceeds; and
- (3) Settlement Class Counsel's motions for an award of attorneys' fees, reimbursement of litigation costs and expenses, and service awards for the Class Representatives in each case.

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

BACKGROUND

Plaintiffs have reached separate settlements with the NGK Defendants and the DENSO Defendants in *In Re: Oxygen Sensors* and *In Re: Spark Plugs*, totaling \$1,400,000. Under the terms of the proposed settlements, NGK will pay \$600,000 and DENSO will pay \$100,000 in *In Re: Oxygen Sensors* (the "Oxygen Sensors Settlement Fund"), and NGK will pay \$600,000 and DENSO will pay \$100,000 in *In Re: Spark Plugs* (the "Spark Plugs Settlement Fund"). The Court has preliminarily approved each of these settlements.

This litigation and the four proposed settlements are part of coordinated legal proceedings involving a number of parts used in motor vehicles. The proposed settlements relate solely to Oxygen Sensors and Spark Plugs, respectively, that were purchased in the United States **directly** from any Defendant, as defined in the settlements, or, depending on the specific settlement agreement, their respective parents, subsidiaries, affiliates, or joint ventures.

The proposed settlements do not relate to, and have no effect upon, cases involving any products other than Oxygen Sensors and Spark Plugs.

If you are a member of any or all of the four proposed settlement classes (defined below), you have the rights and options summarized here:

- You may remain in any or all of the four proposed Oxygen Sensors and Spark Plugs 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 four proposed Oxygen Sensors and Spark Plugs 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 or all of the four proposed Oxygen Sensors and Spark Plugs Settlement Classes, you may object to the proposed settlement or to the proposed plan of distribution of the settlement fund(s) in the case(s) in which you remain. You may also appear at the hearing where the Court will consider these matters;
- If you remain in any or all of the four Oxygen Sensors or Spark Plugs Settlement Classes, you may enter an appearance through your own counsel at your own expense in the case(s) in which you remain; and
- Any Settlement Class member who wishes to participate in the distribution of the NGK and/or DENSO Settlement Funds must complete and submit a copy of the Claim Form in each of those cases in which they wish to participate on or before September 30, 2022.

WHO IS IN THE SETTLEMENT CLASSES?

The Court has provisionally certified the following Direct Purchaser Settlement Classes, for the purpose of disseminating notice of the proposed Oxygen Sensors settlements.

The NGK Oxygen Sensors Settlement Class is defined as follows:

All individuals and entities who purchased Oxygen Sensors in the United States directly from one or more Defendant(s) (or any of their controlled subsidiaries, affiliates, or joint ventures) between January 1, 2000, and February 4, 2019. Excluded from the Settlement Class are Defendants and 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 NGK-Oxygen Sensors Settlement Class definition set forth above, the following entities are Defendants: DENSO Corporation; DENSO International America, Inc.; DENSO Products & Services Americas, Inc.; Hitachi, Ltd.; NGK Spark Plug Co., Ltd.; NGK Spark Plugs (U.S.A.) Holding, Inc.; NGK Spark Plugs (U.S.A.), Inc.; NTK Technologies, Inc.; Robert Bosch GmbH; Robert Bosch LLC; and their respective subsidiaries, affiliates, and joint ventures.

The DENSO Oxygen Sensors Settlement Class is defined as follows:

All individuals and entities who purchased Oxygen Sensors in the United States directly from one or more Defendant(s) (or their subsidiaries, affiliates, or joint ventures) from January 1, 2000 through February 4, 2019. 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 Oxygen Sensors Settlement Class definition set forth above, the following entities are Defendants: Robert Bosch GmbH; Robert Bosch LLC; DENSO Corporation; DENSO International America, Inc.; DENSO Products & Services Americas, Inc.; NGK Spark Plug Co., Ltd.; NGK Spark Plugs (U.S.A.) Holding, Inc.; NGK Spark Plugs (U.S.A.), Inc.; NTK Technologies, Inc.; Hitachi, Ltd.; and their parents, subsidiaries, affiliates, and joint ventures.

Oxygen Sensors are defined as 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.

Plaintiffs KMB/CT, Inc. d/b/a KMB Warehouse Distributors, Inc. ("KMB Warehouse") and Hopkins Auto Supply, Inc. d/b/a Thrifty Auto Supply ("Thrifty Auto Supply") have been appointed by the Court to serve as Class Representatives for the NGK Oxygen Sensors Settlement Class and Plaintiffs All European Auto Supply, Inc. ("AEAS") and Irving Levine Automotive Distributors, Inc. ("Irving Levine") have been appointed as Class Representatives for the DENSO Oxygen Sensors Settlement Class.

The NGK Spark Plugs Settlement Class is defined as follows:

All individuals and entities who purchased Spark Plugs in the United States directly from one or more of the Defendants (or any of their controlled subsidiaries, affiliates, or joint ventures) between January 1, 2000, and February 4, 2019. Excluded from the Settlement Class are Defendants and 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 NGK Spark Plugs Settlement Class, the following entities are Defendants: DENSO Corporation; DENSO International America, Inc.; DENSO Products & Services Americas, Inc.; NGK Spark Plug Co., Ltd.; NGK Spark Plugs (U.S.A.) Holding, Inc.; NGK Spark Plugs (U.S.A.), Inc.; NTK Technologies, Inc.; Robert Bosch GmbH; Robert Bosch LLC; and their respective subsidiaries, affiliates, and joint ventures.

The DENSO Spark Plugs Settlement Class is defined as follows:

All individuals and entities who purchased Spark Plugs in the United States directly from one or more of the Defendant(s) (or their subsidiaries, affiliates, or joint ventures) from January 1, 2000 through February 4, 2019. Excluded from the Settlement Class are Defendants and 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 Spark Plugs Settlement Class definitions set forth above, the following entities are Defendants: Robert Bosch GmbH; Robert Bosch LLC; DENSO Corporation; DENSO International America, Inc.; DENSO Products & Services Americas, Inc.; NGK Spark Plug Co., Ltd.; NGK Spark Plugs (U.S.A.) Holding, Inc.; NGK Spark Plugs (U.S.A.), Inc.; NTK Technologies, Inc.; and their parents, subsidiaries, affiliates, and joint ventures.

Spark Plugs are defined as 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.

Plaintiffs Thrifty Auto Supply and Dyke, Inc. (“Dyke”) have been appointed by the Court to serve as Class Representatives for the NGK Spark Plugs Settlement Class and Plaintiffs Thrifty Auto Supply, Irving Levine, and KMB/CT, Inc. have been appointed by the Court to serve as Class Representatives for the DENSO Spark Plugs 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 “Co-Lead Settlement Class Counsel” for all four of the Oxygen Sensors and Spark Plugs Settlement Classes.

WHAT IS THIS LITIGATION ABOUT?

In May 2015, Plaintiffs filed separate class action lawsuits against Defendants on behalf of direct purchasers of Oxygen Sensors and on behalf of direct purchasers of Spark Plugs. Plaintiffs allege that Defendants, including NGK and DENSO, engaged in separate conspiracies to suppress and eliminate competition for Oxygen Sensors and Spark Plugs by agreeing to raise, fix, maintain, and/or stabilize prices, rig bids, and allocate markets and customers for Oxygen Sensors and Spark Plugs sold in the United States, in violation of federal antitrust laws. Plaintiffs further allege that because of the conspiracies, they and other direct purchasers of Oxygen Sensors and Spark Plugs were injured by paying more for those products than they would have paid in the absence of the alleged illegal conduct. Plaintiffs seek recovery of treble damages, together with the costs of bringing the lawsuit and attorneys’ fees.

DENSO and NGK deny these allegations and liability and have asserted defenses to these claims. DENSO and NGK have agreed to settle these cases to avoid the expense and burden of further litigation. The Court has not issued any findings or rulings with respect to the merits of Plaintiffs’ claims or DENSO’s and NGK’s defenses.

WHAT RELIEF DO THE PROPOSED SETTLEMENTS PROVIDE?

In 2019, Plaintiffs entered into settlements with the DENSO Defendants to settle their Oxygen Sensors claims for \$100,000 and their Spark Plugs claims for \$100,000. These settlements are part of a larger settlement with the DENSO Defendants (the “Global Settlement”) that resolved class action lawsuits filed on behalf of direct purchasers of various motor vehicle parts manufactured and sold by the DENSO Defendants in seventeen cases (“Collective Actions”). Under the terms of the Global Settlement, DENSO agreed to pay \$2,100,000 and provide substantial cooperation to assist Plaintiffs in the prosecution of their claims against the remaining non-settling Defendants in the Collective Actions, should the need for such cooperation arise. Final approval has already been granted in 15 of the 17 cases that make up the Collective Actions. The *Oxygen Sensors* and *Spark Plugs* settlements, if approved by the Court, will resolve Plaintiffs’ claims against DENSO in all of the Collective Action cases.

In January 2022, Plaintiffs entered into separate settlements with the NGK Defendants to settle their Oxygen Sensors claims for \$600,000 and their Spark Plugs claims for \$600,000.

This Notice is only a summary of the terms of the proposed settlements. Each of the NGK and DENSO settlement agreements in *Oxygen Sensors* and *Spark Plugs* contains other important provisions, including the release of certain claims against the NGK 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. The proposed NGK and DENSO settlements must receive final approval by the Court to become effective.

If you wish to object to the approval of any of the four NGK or DENSO 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 or all of the four NGK or DENSO Settlement Classes as defined above, you will automatically remain in 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 with respect to that Settlement Class, and your interests will be represented by the Class Representatives for the Settlement Class and by Settlement Class Counsel. If you remain in any of the NGK or DENSO Settlement Classes and that proposed settlement 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 NGK and DENSO 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 Oxygen Sensors and Spark Plugs Settlement Funds, with accrued interest, less any amounts approved by the Court for settlement administration costs and expenses (the "Net Settlement Funds") will be distributed among Settlement Class members who complete and timely submit a copy of the Claim Form for that case that is included with this Notice, **postmarked on or before September 30, 2022**.

The Net Settlement Funds in the *Oxygen Sensors* and *Spark Plugs* cases will be distributed *pro rata* to all Claimants in that case based upon their **direct** purchases of Oxygen Sensors and Spark Plugs, respectively, in the United States from the Defendants and their parents, subsidiaries, affiliates and/or joint ventures during the applicable time period, as defined above, for that case. The distributions in the *Oxygen Sensors* and *Spark Plugs* cases 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 in that case.

Do not dispose of any document that reflects your purchases of Oxygen Sensors or Spark Plugs in the United States directly from the Defendants (or their parents, subsidiaries, affiliates, or joint ventures) during the applicable time period for each Settlement Class, as defined above. You may need those documents to complete and substantiate your Claim Forms, 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 four of the Oxygen Sensors or Spark Plugs Settlement Classes. If you wish to exclude yourself from any or all of the Oxygen Sensors or Spark Plugs Settlement Classes, you must send a request for exclusion, in writing, by certified mail, return receipt requested, **postmarked no later than August 8, 2022** to Settlement Class Counsel, and to counsel for the NGK and/or DENSO Defendants, at the addresses set forth below, and to the following address:

Oxygen Sensors and Spark Plugs Direct Purchaser Antitrust Litigation
P.O. Box 4234
Portland, OR 97208-4234

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). For each Settlement Class for which you are requesting exclusion, you are also requested to identify: 1) the Defendant(s) (or parent, subsidiary, affiliate, or joint venture) from which you purchased the motor vehicle part(s) during the relevant time period (defined above), 2) the motor vehicle part(s) purchased during the relevant

time period (defined above), and 3) the dollar amount of your purchases. If you validly exclude yourself from any or all four 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 and at your own expense any claims you may have against NGK and/or DENSO in that specific case, but you will not be eligible to share in the settlement proceeds attributable to that case.

REQUEST FOR ATTORNEYS' FEES AND EXPENSES, AND SERVICE AWARDS

Settlement Class Counsel, together with other firms that have worked on this litigation, will file petitions for an award of attorneys' fees and reimbursement of their costs and expenses in prosecuting each of the cases. Each petition of Settlement Class Counsel for attorneys' fees will not exceed 33 percent (33%) of the respective Oxygen Sensors Settlement Fund and the Spark Plugs Settlement Fund.

Settlement Class Counsel will request service awards from the Oxygen Sensors Settlement Fund for Plaintiffs KMB Warehouse, Thrifty Auto Supply, Dyke, AEAS, and Irving Levine, which were appointed by the Court to serve as Class Representatives for the Oxygen Sensors Settlement Classes, not to exceed \$7,500 for each Class Representative. Settlement Class Counsel will also request service awards from the Spark Plugs Settlement Fund for Thrifty Auto Supply, Dyke, Irving Levine, and KMB/CT, Inc., which were appointed by the Court to serve as Class Representatives for the Spark Plugs Settlement Classes, not to exceed \$7,500 for each Class Representative.

The applications for attorneys' fees and litigation costs and expenses and service awards will be filed on or before July 18, 2022. If you remain a member of any of the four Settlement Classes and you wish to object to the requests for fees and expenses or service awards, 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 September 15, 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 NGK and DENSO settlements; the proposed plans of distribution of the NGK and DENSO Settlement Funds in the *Oxygen Sensors* and *Spark Plugs* cases; and Settlement Class Counsel's requests for an award of attorneys' fees and litigation costs and expenses, and service awards for the Class Representatives. 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) 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 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 or all four of the Oxygen Sensors or Spark Plugs Settlement Classes and you wish to object to a proposed settlement or proposed plan of distribution in the *Oxygen Sensors* or *Spark Plugs* cases, you must do so in writing and at your own expense. Any such objection must: 1) specify which settlement(s) are being objected to by including the caption of the specific case(s) to which you are objecting, 2) be signed, and 3) be **filed no later than August 8, 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 August 8, 2022**:

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Counsel for the NGK Defendants

If you do not object to any of the proposed settlements or to the proposed plans of distribution 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 for each case if you wish to share in the distribution of a Settlement Fund in that case.**

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: Oxygen Sensors and Spark Plugs Direct Purchaser Antitrust Litigation, P.O. Box 4234, Portland, OR 97208-4234.

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. Questions concerning the proposed Oxygen Sensors and Spark Plugs 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 20, 2022

BY ORDER OF:

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