

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

**In Re: AUTOMOTIVE PARTS  
ANTITRUST LITIGATION**

**Case No. 12-md-02311  
Honorable Marianne O. Battani**

**In Re: WIRE HARNESS CASES**

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

**2:12-cv-00101-MOB-MKM**

**CLAIM FORM**

**Important Notice to Purchasers of Wire Harness Products  
Please Read This Entire Document Carefully**

**TO BE ELIGIBLE TO SHARE IN THE DISTRIBUTION OF THE PROCEEDS OF SETTLEMENTS  
WITH THE FURUKAWA AND MITSUBISHI ELECTRIC DEFENDANTS YOU MUST COMPLETE  
AND MAIL THIS CLAIM FORM, POSTMARKED ON OR BEFORE NOVEMBER 14, 2018, OR  
HAVE PREVIOUSLY SUBMITTED A VALID CLAIM FORM IN CONNECTION WITH PRIOR  
SETTLEMENTS IN THIS LITIGATION**

**Instructions for Completing Claim Form**

If you are a direct purchaser of Wire Harness Products (and have not excluded yourself from the Furukawa and Mitsubishi Electric Settlement Classes), you may be entitled to share in the distribution of the proceeds of settlements with Defendants Furukawa Electric Co., Ltd. and American Furukawa, Inc. (collectively, "Furukawa"), and Defendants Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., and Mitsubishi Electric Automotive America, Inc. (collectively, "Mitsubishi Electric") (the "Furukawa and Mitsubishi Electric Settlement Fund").

To receive your share of the Furukawa and Mitsubishi Electric Settlement Fund, you must either have previously submitted a valid Claim Form in connection with the prior settlements with the Lear, G.S. Electech, Tokai Rika, Chiyoda, Fujikura, LEONI, Sumitomo and Yazaki Defendants, or you must submit a timely and valid Claim Form in accordance with the instructions set forth herein **postmarked no later than November 14, 2018**. If you submitted a Claim Form in connection with the prior settlements, you may submit a Claim Form at this time, but are not required to do so, because the information from your original Claim Form will be used to determine the amount of your distribution from the proceeds of the Furukawa and Mitsubishi Electric Settlement Fund. If you believe you have additional information that you did not include in your previously submitted Claim Form, then you may submit a Claim Form with that additional information. If you did not previously submit a Claim Form in connection with the prior settlements and would like to share in the proceeds of the Furukawa and Mitsubishi Electric settlements, then you must submit a Claim Form **postmarked by November 14, 2018**.

Please note that if you have chosen to be excluded from the Furukawa Settlement Class, you may not participate in the distribution of the portion of the Furukawa and Mitsubishi Electric Settlement Fund attributable to the Furukawa settlement, and if you chose to be excluded from the Mitsubishi Electric Settlement Class, you may not participate in the distribution of the portion of the Furukawa and Mitsubishi Electric Settlement Fund attributable to the Mitsubishi Electric settlement.

**Eligibility:** You are eligible to submit a claim seeking to share in the distribution of the Wire Harness Settlement Fund if, during the period from January 1, 2000 to December 13, 2016, you purchased one or more Wire Harness Products in the United States **directly** from one or more of the following companies and/or their current or former subsidiaries, joint ventures, or affiliates: (1) Chiyoda Manufacturing Corporation; (2) Denso Corporation; (3) Denso International America, Inc.; (4) Fujikura Ltd.; (5) Fujikura Automotive America LLC; (6) Furukawa Electric Co., Ltd.; (7) American Furukawa, Inc.; (8) Furukawa Wiring Systems America, Inc. f/k/a Furukawa Lear Corporation and Lear Furukawa Corporation; (9) G.S. Electech, Inc.; (10) G.S. Wiring Systems Inc.; (11) G.S.W. Manufacturing, Inc.; (12) Lear Corporation; (13) LEONI Wiring Systems, Inc.; (14) Leonische Holding Inc.; (15) Mitsubishi Electric Corporation; (16) Mitsubishi Electric US Holdings, Inc.; (17) Mitsubishi Electric Automotive America, Inc.; (18) Sumitomo Electric Industries, Ltd.; (19) Sumitomo Wiring Systems, Ltd.; (20) Sumitomo Electric Wiring Systems, Inc.; (21) K&S Wiring Systems, Inc.; (22) Sumitomo Wiring Systems (U.S.A.), Inc.; (23) Tokai Rika Co., Ltd.; (24) TRAM, Inc.; (25) Yazaki Corporation; or (26) Yazaki North America, Inc.

For purposes of each of the proposed settlements, “Wire Harnesses” are electrical distribution systems used to direct and control electronic components, wiring, and circuit boards in motor vehicles. “Wire Harness Products” means Wire Harnesses and the following related products: automotive electrical wiring, lead wire assemblies, cable bond, automotive wiring connectors, automotive wiring terminals, high voltage wiring, electronic control units, fuse boxes, relay boxes, junction blocks, power distributors, and speed sensor wire assemblies used in motor vehicles.

**Submission of Claim:** Each Claim Form must be signed and Certified by you (the claimant) or a person authorized to act on your behalf, and must be **postmarked no later than November 14, 2018**, and addressed to:

Settlement Administrator  
Wire Harness Products Direct Purchaser Antitrust Litigation  
PO Box 5110  
Portland, OR 97208-5110

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.

**Confirmation of Receipt of Claim:** The receipt of a claim 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.

**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 and also may be obtained on-line at [www.AutoPartsAntitrustLitigation.com](http://www.AutoPartsAntitrustLitigation.com).

**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, may delay processing, or may otherwise adversely affect your 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 may delay, adversely affect, or result in denial of the claim.

The Claim Form asks for certain information relating to your purchases of Wire Harness Products, as well as an explanation of the available documentation (such as account statements and extracts of books and records) that supports your claimed purchases.

**ONLY INCLUDE IN YOUR CLAIM FORM PURCHASES OF WIRE HARNESS PRODUCTS THAT YOU MADE IN THE UNITED STATES *DIRECTLY* FROM ONE OR MORE OF THE COMPANIES LISTED ABOVE UNDER THE “ELIGIBILITY” HEADING, AND/OR THEIR CURRENT OR FORMER SUBSIDIARIES, JOINT VENTURES OR AFFILIATES, DURING THE PERIOD FROM JANUARY 1, 2000 TO DECEMBER 13, 2016.**

**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.

**Identity of Contact Person:** Provide the name, telephone number and e-mail address of the person to be contacted about the information in your Claim Form.

**Assistance:** If you have any questions about your claim, you may contact the Settlement Administrator at the above address. You may also contact your own attorney or other person to assist you, at your own expense.

**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 Wire Harness Products in the United States from any of the listed companies and/or their current or former subsidiaries, joint ventures, or affiliates during the period from January 1, 2000 to December 13, 2016. As part of the claims administration process, you may be required to verify certain information about your Wire Harness Products purchases, such as which Wire Harness Products you purchased, the dollar amount(s) purchased, the date(s) of the purchases, and the company(ies) from which you directly purchased the Wire Harness Products. If verification of your purchases is sought as part of the claims administration process, you may need to submit purchase records to verify your claim.

**NOTICE REGARDING SOLICITATIONS FROM CLAIMS ASSISTANCE COMPANIES: THERE ARE COMPANIES THAT WRITE OR CALL CLASS MEMBERS AND OFFER THEIR SERVICES IN FILING CLAIM FORMS OR PROVIDING OTHER INFORMATION ABOUT POTENTIAL RECOVERY OF MONIES IN CLASS ACTIONS IN EXCHANGE FOR A PORTION OF ANY SETTLEMENT FUNDS THAT THE CLASS MEMBER MAY ULTIMATELY RECOVER. PLEASE BE ADVISED THAT THESE COMPANIES ARE NOT AFFILIATED WITH PLAINTIFFS, DEFENDANTS OR COUNSEL FOR PLAINTIFFS OR DEFENDANTS, AND YOU DO NOT NEED TO USE ONE OF THOSE COMPANIES TO ASSIST YOU OR HELP YOU IN FILING A CLAIM.**

[CLAIM FORM STARTS NEXT PAGE]



CLAIM FORM

**I. IDENTITY OF CLAIMANT**

Indicate below your (the claimant's) name and mailing address. Please note: Correspondence concerning your claim will be directed to you at your mailing address. **You should notify the Settlement Administrator promptly if your address changes after you have submitted this Claim Form.**

Name:

[Grid for Name]

Address:

[Grid for Address]

City:

State:

Zip Code:

[Grid for City, State, Zip Code]

Country:

[Grid for Country]

E-mail Address:

[Grid for E-mail Address]

Claimant is a (Check one):

- Corporation  Individual  Trustee in Bankruptcy  Partnership

Other (specify, and provide the name and address of the person or entity on whose behalf you are acting):

Name:

[Grid for Name]

Address:

[Grid for Address]

City:

State:

Zip Code:

[Grid for City, State, Zip Code]

Country:

[Grid for Country]

E-mail Address:

[Grid for E-mail Address]

**II. CONTACT PERSON**

Indicate below the person to be contacted regarding this claim and the person's telephone numbers and e-mail address:

Name:

[Grid for Name]

Area Code

Telephone No. (Day)

Area Code

Telephone No. (Evening)

[Grid for Day Telephone]

[Grid for Evening Telephone]

Area Code

Fax Number

[Grid for Fax Number]

E-mail Address:

[Grid for E-mail Address]

If it is different from the claimant’s address stated above, provide the contact person’s address:

Address:

Grid for address input

City:

State:

Zip Code:

Grids for city, state, and zip code input

PLEASE PROMPTLY NOTIFY THE SETTLEMENT ADMINISTRATOR OF ANY CHANGE IN THE ADDRESSES AND TELEPHONE NUMBERS SET FORTH ABOVE.

III. YOUR PURCHASES

On the attached Schedule of Purchases worksheet, list the total amount of direct purchases of Wire Harness Products in the United States from each company listed above and/or their current or former subsidiaries, joint ventures, or affiliates for each year during the period from January 1, 2000 to December 13, 2016. The purchase amounts must be the net amounts paid after deducting any discounts, rebates, price reductions, taxes, delivery and freight charges. Purchases from companies that are not listed above 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 those records. You must identify those records (e.g., invoices, purchase journals, accounts payable journals, etc.) in the Section entitled “Proof of Purchases.”

When records are not available, you may submit purchase information based on estimates. If you do submit your purchase information based on estimates, you must explain in the Proof of Purchases section why documents are not available to you and why the estimate is reasonable. In the explanation of how you calculated the estimated purchases, you must identify the documents you used as a basis for your estimates. Estimates can be based on extrapolation from similar circumstances in analogous contexts in the same year (for which you have documentation), or extrapolation from the same or nearly the same circumstances, but 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 Wire Harness Products 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. If you are using sales data and trends to estimate your purchases, you must explain your calculations and retain the documentation used for your calculations until the claims review process has been completed.

IV. PROOF OF PURCHASES

List and identify below those records (e.g., invoices, purchase journals, accounts payable journals, etc.) you used to calculate your claimed purchases. If you based your claim on estimates, list and identify below those records (e.g., invoices, purchase journals, sales journals, accounts payable journals, etc.) you used as the basis of your estimates, and explain how you calculated your estimated payments.

Horizontal lines for listing records

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 the claims review process has been completed.

**V. CLAIMS BASED UPON ASSIGNMENT OR TRANSFER**

If the claimant on whose behalf this claim is being submitted acquired from some other person or entity (as assignee, transferee, successor or otherwise) the rights that are the basis of the claim being made, please check the box below and attach copies of legal documents that support the acquisition of the claimant's claim.

Yes - This claim is based upon an assignment or transfer and I have attached copies of supporting legal documents.

**VI. EXCLUSION FROM SETTLEMENT CLASS**

Identify any Settlement Class from which you excluded yourself. Specify Furukawa, Mitsubishi Electric, or both, as appropriate, or enter none.

**VII. SUBSTITUTE FORM W-9**

Each claimant must provide the information requested in the following box. If the correct information is not provided, a portion of any payment that the claimant may be entitled to receive from the Furukawa and Mitsubishi Electric Settlement Fund may be withheld.

**Request for Federal Taxpayer Identification Number and Certification**

Claimant's federal taxpayer identification number is:

Employer Identification Number  
(for corporations, trusts, etc.)

Social Security Number  
(for individuals)

-

or

-   -

Name of taxpayer whose identification number is written above:

First Name:

MI:

Last Name:

I certify that the above taxpayer is **NOT** subject to backup withholding under the provisions of Section 3406(a)(1)(C) of the Internal Revenue Code.

NOTE: If you have been notified by the I.R.S. that you are subject to backup withholding, please strike out the word "NOT" in the previous sentence.

Under penalty of perjury, I certify that the foregoing information is true and correct.

Dated:   -   -    
MM DD YY

Signature

Print Name

Instructions regarding IRS Form W-9 are available at the Internal Revenue Service website at <http://www.irs.gov>.

**VIII. CERTIFICATION**

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 Wire Harness Products listed were made by the claimant **directly** from one or more of the companies listed and/or their current or former subsidiaries, joint ventures, or affiliates, that the claimant is a member of either the Furukawa or Mitsubishi Electric settlement class 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 Settlement and Hearing. 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 appropriate criminal penalties.

Date: \_\_\_\_\_, 2018

(Signature)

(Print your name here)

(Title or position [if claimant is not an individual])



**THIS CLAIM FORM MUST BE SENT TO THE FOLLOWING ADDRESS, POSTMARKED NO LATER THAN NOVEMBER 14, 2018:**

Settlement Administrator  
Wire Harness Products Direct Purchaser Antitrust Litigation  
PO Box 5110  
Portland, OR 97208-5110

A Claim Form received by the Settlement Administrator shall be deemed to have been submitted when posted if it is mailed by **November 14, 2018**, a postmark is indicated on the envelope, and it is mailed and addressed in accordance with the above instructions. In all other cases, the Claim Form shall be deemed to have been submitted when actually received by the Settlement Administrator.

You should be aware 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.**

Reminder Checklist:

1. Please sign the Claim Form on page 4.
2. Please be sure that **all** required information has been provided.
3. Your claim may be subject to review and verification by the Settlement Administrator. Accordingly, you should maintain all of the documentation supporting your claim until the claims review process has been completed.
4. Keep a copy of the completed Claim Form for your records.
5. If you desire an acknowledgment of receipt of your claim, please send it by certified mail, return receipt requested.
6. If you move after submitting your Claim Form, please promptly send the Settlement Administrator your new address.

If you have any questions concerning this Claim Form or need additional copies, contact the Settlement Administrator at: Wire Harness Products Direct Purchaser Antitrust Litigation PO Box 5110, Portland, OR 97208-5110, or at 1-877-845-2749. Copies of the Claim Form also may be obtained online at [www.AutoPartsAntitrustLitigation.com](http://www.AutoPartsAntitrustLitigation.com).

