

**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 Marianne O. Battani**

In Re: WIRE HARNESS CASES

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

**2:12-cv-00101-MOB-MKM
2:14-cv-13773-MOB-MKM**

**SETTLEMENT CLASS COUNSEL’S REPORT ON DISSEMINATION
OF NOTICE OF PROPOSED SETTLEMENTS WITH CHIYODA, FUJIKURA, LEONI,
SUMITOMO, AND YAZAKI DEFENDANTS AND CLASS MEMBERS’ RESPONSE**

Settlement Class Counsel submit the following report concerning the dissemination of notice pursuant to this Court's Order dated May 5, 2017 (2:12-cv-00101, Doc. No. 474) (the “Notice Order”), and Settlement Class members’ response to the notice program. As described more fully below, notice was mailed to 7,472 potential Settlement Class members and published in accordance with the Notice Order. No objections were filed to any aspects of the proposed settlements, including the proposed plan for distribution of settlement funds, Settlement Class Counsel’s request for an award of attorneys' fees and litigation costs and expenses, Settlement Class Counsel’s request to use a portion of the settlement funds to pay for litigation expenses, or the request for incentive awards to the Settlement Class Representatives (collectively, the “Related Matters”). Eleven requests for exclusion from one or more of the settlements were submitted.

As a result of these opt-out requests, the Yazaki settlement amount was reduced to \$57,110,240.20 and the Fujikura settlement amount was reduced to \$9,405,000. Combining these

amounts with the proceeds of the Chiyoda, LEONI, and Sumitomo settlements, none of which are subject to reduction or rescission due to opt-outs, results in total settlement proceeds of \$94,086,240.10 attributable to these 5 proposed settlements. When combined with the previously approved Lear, G.S. Electech, and Tokai Rika settlements, the total amount of settlements achieved by Direct Purchaser Plaintiffs in the *Wire Harness Litigation* to date is \$102,736,240.10.

Settlement Class Counsel respectfully submit that the absence of objections and the small number of opt-outs militate strongly in favor of approval of the proposed settlements and the Related Matters.

I. DISSEMINATION OF NOTICE TO THE CLASSES

Pursuant to the Court's Notice Order, on May 19, 2017, Epiq Class Action & Claims Solutions ("Epiq"), the Notice and Claims Administrator retained by Direct Purchaser Plaintiffs, mailed 7,472 copies of the Notice of Proposed Settlements of Direct Purchaser Class Action with Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki Defendants and Hearing on Settlement Approval and Related Matters, and Claim Form (the "Notice") to potential Settlement Class members by first class mail, postage prepaid. Declaration of Nicole Hamann, Managing Director of Epiq, Exhibit 1 at ¶ 6. Epiq also re-mailed returned notices for which updated addresses were obtained. *Id.* at ¶ 7. In addition, a copy of the Notice was (and remains) posted online at www.autopartsantitrustlitigation.com, a website dedicated to this litigation. *Id.* at ¶ 9.

Also in accordance with the Notice Order, the Summary Notice of Proposed Settlements of Direct Purchaser Class Action with Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki Defendants and Hearing on Settlement Approval and Related Matters was published in *Automotive News* on May 29, 2017, and in the national edition of *The Wall Street Journal*, on May 30, 2017. *Id.* at ¶ 8.

Notice to the Direct Purchaser Settlement Class under Fed. R. Civ. P. 23 has, therefore, been provided as ordered by the Court.

II. ABSENCE OF OBJECTIONS TO THE PROPOSED SETTLEMENTS AND FEE AND EXPENSE REQUESTS

The Notice advised that any objection to the proposed settlements or to the Related Matters had to be filed with the Clerk by July 7, 2017, with copies mailed to Settlement Class Counsel and to counsel for the Settling Defendants.

No objections to either the proposed settlements or to the Related Matters were filed with the Court or sent to Settlement Class Counsel or counsel for the Settling Defendants, as of the date of the filing of this Report.

III. REQUESTS FOR EXCLUSION

The Notice further advised that requests for exclusion from any of the Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki Settlement Classes had to be sent to Settlement Class Counsel and to the Settling Defendants' counsel, postmarked no later than July 7, 2017. Eleven requests for exclusion from one or more of the proposed settlements were timely submitted.¹

Settlement Class Counsel respectfully submit that, for the reasons set forth in the Brief in Support of Direct Purchaser Plaintiffs' Motion for Final Approval of Proposed Settlements with Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki Defendants and Proposed Plan for Distribution of Settlement Funds (the "Motion for Final Approval"), each of the Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki settlements, which collectively provide for settlement payments totaling

¹ The specific entities that requested exclusion are set forth in Exhibit 2 and the Settlement Classes from which they opted out are reflected in Exhibit 3.

\$94,086,240.10 together with substantial cooperation by the Settling Defendants, are fair, reasonable and adequate under the relevant criteria, and warrant final approval.

IV. THE REACTION OF MEMBERS OF THE SETTLEMENT CLASSES SUPPORTS APPROVAL OF THE SETTLEMENTS AND LITIGATION EXPENSE REQUEST

The reaction of the class has been recognized repeatedly by courts within this Circuit and elsewhere as a factor in evaluating the fairness, reasonableness, and adequacy of a proposed settlement. *See, e.g., Sheick v. Auto. Component Carrier LLC*, No. 2:09-cv-14429, 2010 WL 4136958, at *22 (E.D. Mich. Oct. 18, 2010) (“scarcity of objections – relative to the number of class members overall – indicates broad support for the settlement among Class Members.”); *In re Cardizem CD Antitrust Litig.*, 218 F.R.D. 508, 527 (E.D. Mich. 2003) (“That the overwhelming majority of class members have elected to remain in the Settlement Class, without objection, constitutes the ‘reaction of the class,’ as a whole, and demonstrates that the Settlement is ‘fair, reasonable, and adequate.’”); *In re Delphi Corp. Sec., Deriv. & “ERISA” Litig.*, 248 F.R.D. 483, 499 (E.D. Mich. 2008) (small number of opt-outs or objections is indicative of the adequacy of the settlement). Individual notice of the proposed settlement was mailed to 7,472 potential Settlement Class members identified by Defendants, published in *Automotive News* and in *The Wall Street Journal*, and posted on-line. The absence of objections combined with relatively few opt-outs militates strongly in favor of approval of the proposed settlements and the litigation expense request.

V. CONCLUSION

Based upon the foregoing, and for the reasons set forth in Direct Purchaser Plaintiffs’ Motion for Final Approval and the Direct Purchaser Plaintiffs’ Motion for an Award of Attorney’s Fees, Litigation Costs and Expenses, and Incentive Awards to Class Representatives, and the briefs in

support thereof, it is respectfully requested that the Court grant final approval of: (1) the proposed Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki settlements, (2) the proposed plan for distribution of settlement funds, (3) Settlement Class Counsel's request for an award of attorneys' fees and litigation costs and expenses, (4) Settlement Class Counsel's request to use a portion of the settlement funds to pay for litigation expenses; and (5) the request for incentive awards to the Class Representatives.

DATED: July 28, 2017

Respectfully submitted,

/s/ David H. Fink

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Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2017, I electronically filed the foregoing paper with the Clerk of the court using the ECF system which will send notification of such filing to all counsel of record registered for electronic filing.

FINK + ASSOCIATES LAW

By: /s/Nathan J. Fink

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

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ANTITRUST LITIGATION	:	Honorable Marianne O. Battani
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In Re: WIRE HARNESS CASES	:	
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THIS RELATES TO:	:	2:12-cv-00101-MOB-MKM
ALL DIRECT PURCHASER CASES	:	2:14-cv-13773-MOB-MKM
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**SETTLEMENT CLASS COUNSEL’S REPORT ON DISSEMINATION
OF NOTICE OF PROPOSED SETTLEMENTS WITH CHIYODA, FUJIKURA, LEONI,
SUMITOMO, AND YAZAKI DEFENDANTS AND CLASS MEMBERS’ RESPONSE**

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| Ex. 1 | Declaration of Nicole Hamann |
| Ex. 2 | Requests for Exclusion from the Direct Purchaser Settlement Classes |
| Ex. 3 | Settlement Classes From Which Class Members Opted Out |

EXHIBIT 1

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

In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION	:	12-md-02311
	:	Honorable Marianne O. Battani

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THIS RELATES TO:	:	2:12-cv-00101-MOB-MKM
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**DECLARATION OF NICOLE HAMANN RE DISSEMINATION OF NOTICE OF
PROPOSED SETTLEMENTS WITH CHIYODA, FUJIKURA, LEONI, SUMITOMO,
AND YAZAKI DEFENDANTS**

I, Nicole Hamann, hereby declare as follows:

1. I am the Managing Director for Epiq Class Action & Claims Solutions, Inc. ("Epiq"), the Settlement Administrator in the above-captioned case. I am familiar with the actions taken by Epiq with respect to the proposed settlement reached in this case between the Direct Purchaser Plaintiffs and Defendants Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki and the corresponding Class Notice program. This declaration is based upon my personal knowledge and information provided by Defendants' counsel, Plaintiffs' counsel, and employees and staff under my supervision and is accurate and truthful to the best of my knowledge.

2. Epiq was established in 1968 as a client services and data processing company. Epiq has been administering bankruptcies since 1985 and settlements since 1993, including settlements of class actions, mass tort litigations, Securities and Exchange Commission enforcement actions, Federal Trade Commission disgorgement actions, insurance disputes, bankruptcies, and other major litigation.

3. Epiq has administered more than 1,000 settlements, including some of the largest and most complex cases ever settled. Epiq's class action case administration services include: coordination of all notice requirements; design of direct-mail notices; establishment and implementation of notice fulfillment services; coordination with the United States Postal Service ("USPS"); notice website development and maintenance; dedicated telephone lines with recorded information and/or telephone agents; receipt and processing of opt-outs; claims database management; claim adjudication; funds management; and award calculations and distribution services. Epiq works with the settling parties, the Court, and the Class Members in a neutral facilitation role to implement settlement administration services based on the negotiated terms of a settlement.

OVERVIEW OF EPIQ'S RESPONSIBILITIES AS THE SETTLEMENT

ADMINISTRATOR

4. Epiq's responsibilities included the following:
 - a. Printing the Court-approved Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki Direct Purchaser Class Notice ("Detailed Notice") and Claim Form to be sent to putative Class Members;
 - b. Searching the National Change of Address ("NCOA") database for updated addresses, if any, for putative Class Members;
 - c. Mailing the Detailed Notice by USPS First-class mail to putative Class Members;
 - d. Causing the Summary Publication Notice to be placed in one edition of *Automotive News* and in the national edition of *The Wall Street Journal*;
 - e. Maintaining a toll-free telephone number with customer service telephone agents and an option to request a call back if reached during non-business hours; and

- f. Maintaining an informational website that provides the public access to pertinent documents and Settlement information.

CLASS NOTICE

5. Epiq received the Settlement Class List in June and July 2014 in preparation for mailing notices regarding the Lear Corporation Settlement (“Initial Class List”). In September 2016, Epiq received an updated Class List before mailing the G.S. Electech and Tokai Rika Direct Purchase Class Notice (“Updated Class List”). In preparation for mailing the Detailed Notice, Epiq again received an updated Class List (“Second Updated Class List”). Epiq compared the Second Updated Class List against the Updated Class List to remove duplicate entries. Epiq then submitted the names and addresses of those potential Class Members to cross-reference with the NCOA database for updated address information. By eliminating duplicate records and invalid mailing addresses, Epiq refined the database to include 7,472 names and addresses of potential Class Members.

6. On May 19, 2017, Epiq mailed the Detailed Notice and Claim Form (“Claim Package”), by first class mail, postage prepaid, to the 7,472 potential Class Members. A copy of the Claim Package is attached herein as Exhibit A.

7. As of July 14, 2017, Epiq has received a total of 741 Detailed Notices returned by the U.S. Postal Service as undeliverable. Epiq has remailed 215 Detailed Notices (representing 213 unique class member records), resulting in 528 records that are currently undeliverable.

PUBLICATION NOTICE

8. Epiq caused the publication of the Summary Publication Notice in one edition of *Automotive News* on May 29, 2017, and in the national edition of *The Wall Street Journal*, on May

30, 2017. Copies of the Summary Publication Notice as it appeared in *Automotive News* and *The Wall Street Journal* are attached herein as Exhibit B.

SETTLEMENT WEBSITE

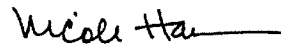
9. On May 18, 2017, Epiq updated portions of the public settlement website to provide Direct Purchase Class Members with information related to the Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki proposed Settlements. The domain name for the website is www.AutoPartsAntitrustLitigation.com/WH. The website provides general case information and links to important documents, including the Settlement Agreements, the Detailed Notice and Claim Form, and other documents related to the Settlements.

10. As of July 14, 2017, there have been 3,803 page views and 958 unique visitors to the settlement website.

REQUESTS FOR EXCLUSION

11. Class Members could request exclusion from any or all of the Chiyoda, Fujikura, LEONI, Sumitomo, and/or Yazaki Settlement Classes, so long as they did so by submitting a request in writing that was postmarked by July 7, 2017. As of July 14, 2017, Epiq has received a total of nine (9) requests for exclusion. A report summarizing the requests for exclusions is attached herein as Exhibit C.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 26th day of July, 2017 in Beaverton, Oregon.



Nicole Hamann, Managing Director
Epiq Class Action & Claims Solutions, Inc.

EXHIBIT A

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

**In Re: AUTOMOTIVE PARTS
ANTITRUST LITIGATION**

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Honorable Marianne O. Battani**

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**THIS DOCUMENT RELATES TO:
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NOTICE

**NOTICE OF PROPOSED SETTLEMENTS OF DIRECT PURCHASER CLASS ACTION WITH
CHIYODA, FUJIKURA, LEONI, SUMITOMO, AND YAZAKI DEFENDANTS AND HEARING ON:**

- (1) APPROVAL OF PROPOSED SETTLEMENTS;**
- (2) PLAN OF DISTRIBUTION OF SETTLEMENT FUND; AND**
- (3) MOTION OF CLASS COUNSEL FOR AWARD OF ATTORNEYS' FEES AND COSTS.**

TO: ALL PERSONS AND ENTITIES WHO PURCHASED WIRE HARNESS PRODUCTS IN THE UNITED STATES DIRECTLY FROM A DEFENDANT DURING THE PERIOD FROM JANUARY 1, 2000, THROUGH DECEMBER 13, 2016.

PLEASE READ THIS ENTIRE 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 Orders 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 Defendants Chiyoda Manufacturing Corporation ("Chiyoda"); Fujikura Ltd. and Fujikura Automotive America LLC (collectively, "Fujikura"); LEONI Wiring Systems, Inc. and Leonische Holding Inc. (collectively, "LEONI"); Sumitomo Electric Industries, Ltd., Sumitomo Wiring Systems, Ltd., Sumitomo Electric Wiring Systems, Inc., K&S Wiring Systems, Inc., and Sumitomo Wiring Systems (U.S.A.), Inc. (collectively, "Sumitomo"); and Yazaki Corporation and Yazaki North America, Inc. (collectively, "Yazaki") (all defendants referenced in this paragraph collectively, the "Settling Defendants");
- (2) A plan of distribution of the Wire Harness Settlement Fund to Settlement Class members and a proposed Claim Form that you must submit in order to share in the Settlement Fund proceeds; and
- (3) Settlement Class Counsel's request for an award of attorneys' fees and reimbursement of their litigation costs and out-of-pocket expenses from the Wire Harness Settlement Fund.

This Notice provides information concerning the proposed settlements, the proposed plan of distribution, and the motion for fees and costs, and advises you of your rights to participate in the settlement claims process, and/or exclude yourself from the Settlement Classes, and/or object to the terms of the proposed settlements, the plan of distribution and/or the motion for fees and costs in connection with the Court hearing on these matters.

BACKGROUND

You were previously notified of the existence of this class action, the nature of the Plaintiffs' claims, and a settlement with Lear Corporation ("Lear") in the amount of \$4,750,000. That settlement was approved by the Court in an Order dated January 7, 2015.

You were also notified of additional settlements with the G.S. Electech and Tokai Rika Defendants in the amounts of \$3,100,000 and \$800,000, respectively. These settlements were approved by the Court on February 6, 2017.

Plaintiffs have reached settlements with the Chiyoda (\$1,150,000), Fujikura (\$9,500,000), LEONI (\$1,000,000), Sumitomo (\$25,421,000), and Yazaki (\$212,080,000) Defendants totaling \$249,151,000. The Court has preliminarily approved, and has provisionally certified, Settlement Classes with respect to each of these settlements. When added to the Lear settlement, the G.S. Electech settlement, and the Tokai Rika settlement, the total of all settlements reached in this case is \$257,801,000, plus accruing interest (the "Wire Harness Settlement Fund"). As described below in more detail, some of the settlement amounts are subject to reduction, and/or rescission, in the event of valid and timely requests for exclusion by Settlement Class members.

This case is part of coordinated legal proceedings involving a number of parts used in motor vehicles. This case and the proposed settlements, however, relate solely to Wire Harness Products purchased **directly** from a Defendant. These proceedings do not relate to, and have no effect upon, cases involving any other product or purchaser.

Wire Harnesses are electrical distribution systems used to direct and control electronic components, wiring, and circuit boards in motor vehicles. "Wire Harness Products," for purposes of each of the proposed settlements, 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.

If you purchased one or more Wire Harness Products in the United States **directly** from any of the Defendants identified below during the period from January 1, 2000, through December 13, 2016 (the "Class Period"), you are a member of some or all of the Direct Purchaser Chiyoda, Fujikura, G.S. Electech, Lear, LEONI, Sumitomo, Tokai Rika, and Yazaki Settlement Classes, and have the rights and options summarized here:

- You may remain in any or all of the Chiyoda, Fujikura, LEONI, Sumitomo, and/or Yazaki 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 Chiyoda, Fujikura, LEONI, Sumitomo, and/or Yazaki 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 Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki Settlement Classes, you may object in writing to that proposed settlement or to the request to use a portion of the settlement funds attributable to that proposed settlement to pay Plaintiffs' future litigation expenses, and appear at the hearing personally or through your own counsel, at your own expense, where the Court will consider both whether the proposed settlements should be approved as fair, adequate, and reasonable and whether a portion of those settlement funds may be used to pay future litigation expenses;
- If you have remained in any or all of the Chiyoda, Fujikura, G.S. Electech, Lear, LEONI, Sumitomo, Tokai Rika, or Yazaki Settlement Classes, you may object in writing to the proposed plan of distribution of the Wire Harness Settlement Fund, to Settlement Class Counsel's request for an award of attorneys' fees and litigation costs and expenses, and/or to Settlement Class Counsel's request for payment of incentive awards to the Class Representatives. You may also appear at the hearing personally or through your own counsel, at your own expense, where the Court will consider these matters;
- You may enter an appearance in the litigation through your own counsel at your own expense; and
- In order to share in a distribution of the Wire Harness Settlement Fund, you must complete and submit the attached Claim Form, postmarked no later than September 15, 2017.

WHO IS IN THE SETTLEMENT CLASSES?

The Court has provisionally certified Direct Purchaser Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki Settlement Classes for purposes of disseminating notice of the proposed settlements.

The Chiyoda Settlement Class is defined as follows:

All individuals and entities (excluding Defendants and their present and former parents, subsidiaries, and affiliates) that purchased Wire Harness Products in the United States directly from one or more Defendants from January 1, 2000, through May 5, 2014.

The Fujikura Settlement Class is defined as follows:

All individuals and entities that purchased Wire Harness Products in the United States directly from one or more Defendants from January 1, 2000, through May 5, 2014 (the “Class Period”). Excluded from the Settlement Class is any potential Settlement Class Member that commenced an action against Fujikura prior to the Execution Date that was included in the MDL Litigation, and that alleged injuries resulting from direct purchases of Wire Harness Products from any Defendant during the Class Period. Also excluded from the Settlement Class is any Defendant and its present and former parents, subsidiaries, and affiliates.

The LEONI Settlement Class is defined as follows:

All individuals and entities (excluding Defendants and their present and former parents, subsidiaries, and affiliates) who purchased Wire Harness Products in the United States directly from one or more Defendants from January 1, 2000, through December 13, 2016.

The Sumitomo Settlement Class is defined as follows:

All individuals and entities (excluding Defendants and their present and former parents, subsidiaries, and affiliates) that purchased Wire Harness Products in the United States directly from one or more Defendants, any current or former subsidiary of any Defendant, or any alleged co-conspirators of the Defendants from January 1, 2000, through December 13, 2016.

The Yazaki Settlement Class is defined as follows:

All individuals and entities (excluding Defendants and their present and former parents, subsidiaries, and affiliates) that purchased Wire Harness Products in the United States directly from one or more Defendants or co-conspirators from January 1, 2000, through December 13, 2016.

For purposes of each of the Settlement Class definitions set forth above, the following entities are Defendants: Chiyoda Manufacturing Corporation; Denso Corporation; Denso International America, Inc.; Fujikura Ltd.; Fujikura Automotive America LLC; Furukawa Electric Co., Ltd.; American Furukawa, Inc.; Furukawa Wiring Systems America, Inc. f/k/a Furukawa Lear Corporation and Lear Furukawa Corporation; G.S. Electech, Inc.; G.S. Wiring Systems Inc.; G.S.W. Manufacturing, Inc.; Lear Corporation; LEONI Wiring Systems, Inc.; Leonische Holding Inc.; Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; Mitsubishi Electric Automotive America, Inc.; Sumitomo Electric Industries, Ltd.; Sumitomo Wiring Systems, Ltd.; Sumitomo Electric Wiring Systems, Inc.; K&S Wiring Systems, Inc.; Sumitomo Wiring Systems (U.S.A.), Inc.; Tokai Rika Co., Ltd.; TRAM, Inc.; Yazaki Corporation; and Yazaki North America, Inc.

Plaintiffs Paesano Connecting Systems, Inc.; Craft-Co Enterprises, Inc.; Findlay Industries, Inc.; Cesar-Scott, Inc.; Martinez Manufacturing, Inc.; South Star Corporation; and ACAP, L.L.C., f/k/a Aguirre, Collins & Aikman Plastics, LLC have been appointed by the Court to serve as “Class Representatives” for the Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki 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 & Willis, P.C. to serve as “Settlement Class Counsel” for the Settlement Classes.

WHAT IS THIS LITIGATION ABOUT?

Beginning in 2011, class action lawsuits were filed against Defendants by Plaintiffs, who are direct purchasers of Wire Harness Products in the United States. Plaintiffs allege that Defendants entered into a conspiracy to suppress and eliminate competition for Wire Harness Products by agreeing to rig bids for, and to raise, fix, stabilize, or maintain the prices of Wire Harness Products in violation of federal antitrust laws. Plaintiffs further allege that because of the conspiracy, they and other direct purchasers of Wire Harness Products in the United States have been injured by paying more for those products than they would have paid in the absence of the alleged illegal conduct, and they seek recovery of treble damages, together with reimbursement of costs and an award of attorneys’ fees.

Each of the Settling Defendants denies Plaintiffs’ allegations, and has 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 Plaintiffs’ claims or Defendants’ defenses. This is a settlement with the Settling Defendants only. Plaintiffs are continuing to prosecute the case against the remaining non-settling Defendants.

WHAT RELIEF DO THE PROPOSED SETTLEMENTS PROVIDE?

Plaintiffs, on behalf of the Fujikura Settlement Class, have entered into a settlement with Fujikura dated October 26, 2016, under which Fujikura has agreed to pay \$9,500,000. The Settlement Agreement gives Fujikura the right to reduce the amount of the Fujikura settlement by as much as, but no more than, \$95,000, and to withdraw from the settlement, in the event of valid and timely requests for exclusion by members of the Fujikura Settlement Class. Fujikura has also agreed to cooperate with Plaintiffs in the prosecution of the lawsuit against the remaining Defendants.

Plaintiffs, on behalf of the Sumitomo Settlement Class, have entered into a settlement with Sumitomo dated December 13, 2016, under which Sumitomo has agreed to pay \$25,421,000. The Settlement Agreement gives Sumitomo the right to withdraw from the settlement in the event of valid and timely requests for exclusion by members of the Sumitomo Settlement Class. Sumitomo has also agreed to cooperate with Plaintiffs in the prosecution of the lawsuit against the remaining Defendants.

Plaintiffs, on behalf of the Yazaki Settlement Class, have entered into a settlement with Yazaki dated December 27, 2016, under which Yazaki has agreed to pay \$212,080,000. The Settlement Agreement gives Yazaki the right to reduce the amount of the Yazaki settlement, but under no circumstances to an amount less than \$45,000,000, in the event of valid and timely requests for exclusion by members of the Yazaki Settlement Class. Yazaki has also agreed to cooperate with Plaintiffs in the prosecution of the lawsuit against the remaining Defendants.

Plaintiffs, on behalf of the Chiyoda Settlement Class, have entered into a settlement with Chiyoda dated January 4, 2017, under which Chiyoda has agreed to pay \$1,150,000, and to cooperate with Plaintiffs in the prosecution of the lawsuit against the remaining Defendants.

Plaintiffs, on behalf of the LEONI Settlement Class, have entered into a settlement with LEONI dated February 28, 2017, under which LEONI has agreed to pay \$1,000,000. LEONI has the right to terminate the Settlement Agreement if a certain percentage of Settlement Class members opt out of the settlement. LEONI has also agreed to cooperate with Plaintiffs in the prosecution of the lawsuit against the remaining Defendants.

The nature and extent of the cooperation agreed to by each of the Settling Defendants is described in detail in their respective Settlement Agreement. Copies of the Agreements are on file with the Clerk of Court and available online at www.AutoPartsAntitrustLitigation.com/WH. Each Settling Defendant has agreed to provide some or all of the following cooperation: (a) the production of documents and data potentially relevant to Direct Purchaser Plaintiffs' claims; (b) assistance in understanding information produced to Direct Purchaser Plaintiffs and facilitating the use of such information at trial; (c) meetings between Settlement Class Counsel and the Settling Defendants' attorneys who will provide proffers of information relevant to the claims in this litigation; (d) witness interviews; (e) depositions; (f) declarations or affidavits; and (g) trial testimony.

Settlement Class Counsel agreed to the proposed settlements to ensure a fair and reasonable resolution to this matter, and to provide benefits to the members of the Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki Settlement Classes. The proposed settlements recognize the existence of complex, contested issues of law and fact; the risks inherent in such complex litigation; the likelihood that in the absence of settlement, future proceedings would take several years and be extremely costly; and the magnitude of the benefits resulting from the settlements in light of the possible range of recovery that could be obtained through further litigation, including the risk of no recovery. Settlement Class Counsel believe that it is in the best interests of the Settlement Classes to enter into the proposed settlements and resolve this litigation as to the Settling Defendants.

This Notice is only a summary of the terms of the proposed settlements. The Settlement Agreements contain other important provisions, including releases of certain claims against the Settling Defendants, and you may examine the Agreements, which are on file with the Clerk of Court and available online at www.AutoPartsAntitrustLitigation.com/WH, for the complete terms of the settlements. The proposed settlements must receive final approval by the Court in order to become effective.

If you are a member of the Chiyoda Settlement Class, the Fujikura Settlement Class, the LEONI Settlement Class, the Sumitomo Settlement Class, and/or the Yazaki Settlement Class and the proposed settlement that relates to that Settlement Class is approved and becomes effective, you will be bound by its terms, including the release provisions. If you wish to object to approval of any of the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki 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 A SETTLEMENT CLASS AND WHAT HAPPENS IF I DO?

You were previously asked to decide whether you wanted to remain in the G.S. Electech, Tokai Rika, and Lear Settlement Classes. With respect to each of those Settlement Classes, you are bound by whatever decision you previously made.

If you are a member of the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki 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; your interests will be represented by the Class Representatives and by Settlement Class Counsel. **However, in order to share in the proceeds of any of those settlements, or any of the G.S. Electech, Lear, or Tokai Rika settlements, you must complete and return the attached Claim Form.** You will have no responsibility to individually pay attorneys' fees or expenses. Any 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.

If you remain a member of any of the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki 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 subsequently file a claim to receive a share of the settlement proceeds.

HOW DO I FILE A CLAIM FORM AND HOW WILL THE SETTLEMENT FUNDS BE DISTRIBUTED?

If you remain a member of any of the Settlement Classes and you wish to share in the settlement proceeds attributable to that settlement, you must complete and return the attached Claim Form, postmarked on or before September 15, 2017, to the following address:

Wire Harness Products Direct Purchaser Antitrust Litigation
P.O. Box 5110
Portland, OR 97208-5110

Any Settlement Class member who does not complete and submit a valid and timely Claim Form will not be entitled to share in any of the Wire Harness Settlement Fund proceeds. The Settlement Fund, with accrued interest, less any amounts approved by the Court for payment of attorneys' fees, litigation and administration costs and expenses, and incentive awards for the Class Representatives (the "Net Settlement Fund"), will be distributed among Settlement Class members who file timely and valid Claim Forms ("Claimants"). The Net Settlement Fund will be distributed *pro rata* to all Claimants based upon their **direct** purchases in the United States from Defendants during the period from January 1, 2000 through (a) May 5, 2014 (for **direct** purchases in the United States from Chiyoda, Fujikura, G.S. Electech, Lear and/or Tokai Rika), and (b) December 13, 2016 (for **direct** purchases in the United States from LEONI, Sumitomo and/or Yazaki). The distribution will take place as soon as practicable after review, verification, and audit of 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.

Please do not dispose of any document that reflects your purchases of Wire Harness Products in the United States directly from any Defendant during the period from January 1, 2000, to December 13, 2016. 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 SOME OR ALL OF THE SETTLEMENT CLASSES?

If you wish to exclude yourself from any of the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki Settlement Classes, you must send a request for exclusion, in writing, via certified mail, return receipt requested, **postmarked no later than July 7, 2017**, to Settlement Class Counsel and to counsel for the Settling Defendants, at the addresses set forth below, and to the following address:

Wire Harness Products Direct Purchaser Antitrust Litigation
P.O. Box 5110
Portland, OR 97208-5110

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) from which you purchased Wire Harness Products during the Class Period, the Wire Harness Products purchased, and the dollar amount of your purchases. If you

validly exclude yourself from any of the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki Settlement Classes, you will not be bound by any decision concerning that Settlement Class 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 AND INCENTIVE AWARDS

The Court has appointed the law firms identified above as Settlement Class Counsel. These law firms, together with other firms that have worked on this litigation, will file a petition for an award of attorneys' fees and reimbursement of their out-of-pocket costs and expenses incurred in prosecuting the case. To date, Settlement Class Counsel have not been paid any attorneys' fees for their work on this case since its inception in 2011. The request of Settlement Class Counsel for attorneys' fees will not exceed thirty (30) percent of the Wire Harness Settlement Fund. Settlement Class Counsel will also seek incentive awards to the Class Representatives in the amount of \$50,000 each.

The application for attorneys' fees and litigation costs and expenses, and incentive awards for the Class Representatives, will be filed on or before June 19, 2017. If you remained in any of the G.S. Electech, Lear, or Tokai Rika Settlement Classes, or remain in any of the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki Settlement Classes, and you wish to object to the requests for attorneys' fees and litigation costs and expenses, or incentive 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.

In connection with seeking final approval of the settlements, Plaintiffs will also seek permission from the Court to use up to ten (10) percent of the Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki settlement proceeds (up to a maximum amount of \$7.5 million) to pay Plaintiffs' future litigation expenses, including, but not limited to, costs for economic experts, depositions, costs related to document reproduction and review, and other costs incurred in prosecuting the case against the non-settling Defendants.

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

The Court will hold a hearing on August 8, 2017, at 10:00 a.m., at the Theodore Levin United States Courthouse, 231 West Lafayette Boulevard, Detroit, MI 48226, Courtroom 272, to determine whether to approve: the proposed Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki settlements; the request to utilize a portion of the settlement funds attributable to the proposed settlements with the Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki Defendants to pay Plaintiffs' future litigation expenses; the proposed plan of distribution of the Wire Harness Settlement Fund; Plaintiffs' counsel's requests for an award of attorneys' fees and litigation costs and expenses from the Wire Harness Settlement Fund; and the request for an award of incentive payments to the Class Representatives from the Wire Harness Settlement Fund. The hearing may be rescheduled without further notice to you.

If you do not exclude yourself from the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki Settlement Classes and you wish to object to one or more of the proposed settlements, or to Plaintiffs' request to utilize a portion of the settlement amount to pay their future litigation expenses, you must do so in writing and at your own expense. If you remained in any of the G.S. Electech, Lear, or Tokai Rika Settlement Classes, or remain a member of any of the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki Settlement Classes, you also have the right to object at your own expense, in writing, to: the proposed plan of distribution of the Wire Harness Settlement Fund; Plaintiffs' counsel's requests for an award of attorneys' fees and litigation expenses; and the request for an award of incentive payments to the Class Representatives.

If you wish to object to any of the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki settlements or related matters set forth above, you must do so in writing. Your objection must include the caption of this litigation, must be signed, must identify to which of the settlements you object, and be **filed no later than July 7, 2017**, 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 July 7, 2017**:

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

Joseph C. Kohn
KOHN, SWIFT & GRAF, P.C.
One South Broad Street, Suite 2100
Philadelphia, PA 19107
Telephone: (215) 238-1700

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

Eugene A. Spector
SPECTOR ROSEMAN KODROFF
& WILLIS, P.C.
1818 Market Street, Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300

Co-Lead Counsel for the Direct Purchaser Settlement Class

Michael Martinez
K&L GATES LLP
70 W. Madison Street, Suite 3100
Chicago, IL 60602
Telephone: (312) 807-4404

James L. Cooper
ARNOLD & PORTER LLP
555 Twelfth Street NW
Washington, DC 20004
Telephone: (202) 942-5000

Counsel for Chiyoda Defendants

Michael F. Tubach
O'MELVENY & MYERS LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111
Telephone: (415) 984-8876

Counsel for the Fujikura Defendants

Marguerite M. Sullivan
LATHAM & WATKINS LLP
555 Eleventh Street NW, Suite 1000
Washington, DC 20004
Telephone: (202) 637-1027

Counsel for LEONI Defendants

John M. Majoras
JONES DAY
51 Louisiana Ave. N.W.
Washington, D.C. 20001-2113
Telephone: (202) 879-3939

Counsel for the Sumitomo Defendants

Counsel for the Yazaki Defendants

If you do not object to any of the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki settlements, or to any of 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 the Claim Form if you wish to share in the distribution of the Wire Harness 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:

Wire Harness Products Direct Purchaser Antitrust Litigation
P.O. Box 5110
Portland, OR 97208-5110

The Settlement Agreements, Complaint, 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. Copies of the Settlement Agreements and certain other documents relevant to this litigation are available at www.AutoPartsAntitrustLitigation.com/WH. **In addition, all documents filed in the case may be obtained through the Public Access to Court Electronic Records system, after registration and payment of the required fees.** Questions concerning the proposed 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: May 19, 2017

BY ORDER OF:

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

**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
2:14-cv-13773-MOB-MKM**

CLAIM FORM

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

**You Must Complete And Mail This Proof Of Claim, Postmarked On Or Before September 15, 2017,
To Be Eligible To Share In The Distribution Of The Proceeds Of Settlements
With The Lear, G.S. Electech, And/Or Tokai Rika Defendants And, Subject To
Court Approval, The Chiyoda, Fujikura, LEONI, Sumitomo, And/Or Yazaki Defendants**

Instructions for Completing Claim Form

If you are a direct purchaser of Wire Harness Products (and you remained in any of the Chiyoda, Fujikura, G.S. Electech, Lear, LEONI, Sumitomo, Tokai Rika, and Yazaki Settlement Classes), you may be entitled to share in the distribution of the proceeds of the settlements with those Defendants (the "Wire Harness Settlement Fund"). To receive your share of any part of the Wire Harness Settlement Fund, you or a person you have authorized to act on your behalf (collectively referred to herein as "you") 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 any of the Chiyoda, Fujikura, G.S. Electech, Lear, LEONI, Sumitomo, Tokai Rika, and Yazaki 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 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: (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 September 15, 2017**, 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 online at www.AutoPartsAntitrustLitigation.com/WH.

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 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 such 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 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 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 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]

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III. YOUR 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.

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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, if any, from which you excluded yourself. Specify Chiyoda, Fujikura, G.S. Electech, Lear, LEONI, Sumitomo, Tokai Rika, or Yazaki, 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 Settlement Funds 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.)

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

OR

Social Security Number
(for individuals)

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

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 IRS 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.

Date:

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MM DD YY

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Signature

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Print Name

Instructions regarding IRS Form W-9 are available at the Internal Revenue Service website at 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 the companies listed, that the claimant is a member of the Chiyoda, Fujikura, G.S. Electech, Lear, LEONI, Sumitomo, Tokai Rika, and/or Yazaki Settlement Classes and has not requested exclusion from all 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: - -
MM DD YY

Signature

Print Name

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

**THIS CLAIM FORM MUST BE SENT TO THE FOLLOWING ADDRESS,
POSTMARKED NO LATER THAN SEPTEMBER 15, 2017:**

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 September 15, 2017, 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 fully 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 5–6.
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/WH.

NAME OF CLAIMANT _____ YEAR _____

TOTAL FOR YEAR: (\$)_____

Wire Harness Claim Form - Page 8 of 8

EXHIBIT B

LEGAL NOTICE

IF YOU PURCHASED WIRE HARNESS PRODUCTS DIRECTLY FROM CHIYODA, DENSO, FUJIKURA, FURUKAWA, G.S. ELECTECH, LEAR, LEONI, MITSUBISHI, SUMITOMO, TOKAI RIKI OR YAZAKI BETWEEN JANUARY 1, 2000 AND DECEMBER 13, 2016 YOUR LEGAL RIGHTS MAY BE AFFECTED BY PROPOSED SETTLEMENTS WITH THE CHIYODA, FUJIKURA, LEONI, SUMITOMO, AND YAZAKI DEFENDANTS

Proposed settlements totaling \$249,151,000 have been reached in *In re Automotive Parts Antitrust Litigation*, Master File No. 12-md-02311 (E.D. Mich.), 12-cv-00101, with the Chiyoda, Fujikura, LEONI (2:14-cv-13773), Sumitomo, and Yazaki Defendants (collectively, the "Settling Defendants").

What is the lawsuit about? This class action litigation is part of coordinated legal proceedings involving a number of parts used in motor vehicles. This case and the proposed settlements, however, relate solely to Wire Harness Products purchased directly from a Defendant (as defined below). These proceedings do not relate to, and have no effect upon, cases involving any other product or purchaser.

Wire harnesses are electrical distribution systems used to direct and control electronic components, wiring, and circuit boards in motor vehicles. "Wire Harness Products," for purposes of the settlements, means wire harnesses and the following related products: automotive electrical wiring, lead wire assemblies, cable band, 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.

Direct Purchaser Plaintiffs allege that Defendants entered into a conspiracy to suppress and eliminate competition for Wire Harness Products by agreeing to rig bids for, and to raise, fix, stabilize, or maintain the prices of, Wire Harness Products, in violation of federal antitrust laws. Plaintiffs further allege that, because of the conspiracy, they and other direct purchasers of Wire Harness Products were injured by paying more for those products than they should have paid, and seek recovery of treble damages, together with reimbursement of costs and an award of attorneys' fees.

You were previously notified of the existence of this class action, the nature of the Plaintiffs' claims, and a settlement with Lear Corporation ("Lear") in the amount of \$4,750,000. That settlement was approved by the Court in an Order dated January 7, 2015.

You were also notified of additional settlements with the G.S. Electech and Tokai Rika Defendants in the amounts of \$3,100,000 and \$800,000, respectively. These settlements were approved by the Court on February 6, 2017.

Additional proposed settlements have been reached with the Chiyoda (\$1,150,000), Fujikura (\$9,500,000), LEONI (\$1,000,000), Sumitomo (\$25,421,000), and Yazaki (\$212,080,000) Defendants totaling \$249,151,000. The Court has preliminarily approved, and has provisionally certified, Settlement Classes with respect to each of these settlements.

Each of the Settling Defendants denies Plaintiffs' allegations, and has agreed to settle this matter in order 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 Defendants' defenses. This is a settlement with the Settling Defendants only. The litigation is continuing against the remaining non-settling Defendants.

Who is included? The Court has provisionally certified Chiyoda and Fujikura Settlement Classes, which are composed of purchasers of Wire Harness Products in the United States directly from any Defendant during the period from January 1, 2000 through May 5, 2014. The Court has also provisionally certified LEONI, Sumitomo, and Yazaki Settlement Classes, which are composed of purchasers of Wire Harness Products in the United States directly from any Defendant during the period from January 1, 2000 through December 13, 2016.

For purposes of each of the Settlement Classes, the following entities are Defendants: Chiyoda Manufacturing Corporation; Denso Corporation; Denso International America, Inc.; Fujikura Ltd.; Fujikura Automotive America LLC; Furukawa Electric Co., Ltd.; American Furukawa, Inc.; Furukawa Wiring Systems America, Inc. d/b/a Furukawa Lear Corporation and Lear Furukawa Corporation; G.S. Electech, Inc.; G.S. Wiring Systems Inc.; G.S.W. Manufacturing, Inc.; Lear Corporation; LEONI Wiring Systems, Inc.; Leonische Holding Inc.; Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; Mitsubishi Electric Automotive America, Inc.; Sumitomo Electric Industries, Ltd.; Sumitomo Wiring Systems, Ltd.; Sumitomo Electric Wiring Systems, Inc.; K&S Wiring Systems, Inc.; Sumitomo Wiring Systems (U.S.A.), Inc.; Tokai Rika Co., Ltd.; TRAM, Inc.; Yazaki Corporation; and Yazaki North America, Inc.

A Notice of Proposed Settlements and Claim Form ("Notice") was mailed to potential members of the Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki Settlement Classes on or about May 19, 2017. The Notice describes the litigation and options available to Settlement Class members with respect to these settlements in more detail. If you have not received the Notice you may obtain a copy on the internet at www.AutoPartsAntitrustLitigation.com/WH, or by calling or writing to any of the following Settlement Class Counsel:

Settlement Class Counsel:

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.
One South Broad Street, Suite 2100
Philadelphia, PA 19107
Telephone: (215) 238-1700

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

Eugene A. Spector
SPECTOR ROSEMAN KODROFF & WILLIS, P.C.
1818 Market Street, Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300

What do the settlements provide? Chiyoda (\$1,150,000), Fujikura (\$9,500,000), LEONI (\$1,000,000), Sumitomo (\$25,421,000), and Yazaki (\$212,080,000) have agreed to pay a total of \$249,151,000 to settle the Class Members' claims against them. When added to the Lear settlement, the G.S. Electech settlement, and the Tokai Rika settlement, the total of all settlements reached in this case is \$257,801,000, plus accruing interest (the "Wire Harness Settlement Fund"). As described in more detail in the Notice, some of the settlement amounts are subject to reduction, and/or rescission, in the event of valid and timely requests for exclusion by Settlement Class members. Each of the Settling Defendants has also agreed to provide cooperation to assist Plaintiffs in the prosecution of their claims against the remaining Defendants.

Your rights may be affected. If you are a member of the Chiyoda Settlement Class, the Fujikura Settlement Class, the LEONI Settlement Class, the Sumitomo Settlement Class, or the Yazaki Settlement Class, you will automatically remain a member of 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; your interests will be represented by Plaintiffs and by Settlement Class Counsel. However, in order to share in the proceeds of any of those settlements, or any of the G.S. Electech, Lear, or Tokai Rika settlements, you must complete and return the Claim Form that was mailed to Settlement Class members with the Notice, postmarked no later than September 15, 2017.

If you wish to exclude yourself from any of the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki Settlement Classes, you must submit a written request for exclusion, postmarked no later than July 7, 2017, in accordance with the procedures set forth in the Notice. If you validly exclude yourself from any of the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki Settlement Classes, you will not be bound by any decision concerning that settlement class and you may pursue individually any claims you may have against that Defendant, but you will not be eligible to share in the settlement proceeds attributable to that Defendant.

If you do not exclude yourself from the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki Settlement Classes, you have the right to enter an appearance through counsel (at your own expense), and to object to that proposed settlement, as well as to Plaintiffs' request to utilize a portion of that settlement amount to pay Plaintiffs' future litigation expenses, by following the procedures set forth in the Notice. If you remained in any of the G.S. Electech, Lear, or Tokai Rika Settlement Classes, or remain a member of any of the Chiyoda, Fujikura, LEONI, Sumitomo, or Yazaki Settlement Classes, you also have the right to object, by following the procedures set forth in the Notice, to the proposed plan of distribution of the Wire Harness Settlement Fund; to Plaintiffs' counsel's requests for an award of attorneys' fees and litigation expenses; and to the request for an award of incentive payments to the Class Representatives.

The Court has scheduled a hearing on August 8, 2017, to consider whether to approve the proposed Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki settlements; the request to utilize a portion of the settlement funds attributable to the proposed settlements with the Chiyoda, Fujikura, LEONI, Sumitomo, and Yazaki Defendants to pay Plaintiffs' future litigation expenses; the proposed plan of distribution of the Wire Harness Settlement Fund; Plaintiffs' counsel's requests for an award of attorneys' fees and litigation costs and expenses from the Wire Harness Settlement Fund; and the request for an award of incentive payments to the Class Representatives from the Wire Harness Settlement Fund. The hearing may be rescheduled without further notice.

If you believe you are a member of any of the Settlement Classes, you are urged to obtain a copy of the detailed Notice, which discusses your rights regarding the settlements.

If you have questions concerning this litigation, you may contact Settlement Class Counsel identified above. Please do not contact the Clerk of the Court or the Judge.

Dated: May 29, 2017

BY ORDER OF:

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

autonev

the week on the web

05.22.17 .co

Most-read story: Fields departs in shake-up; ex-Steelcase head Jim Hackett named CEO



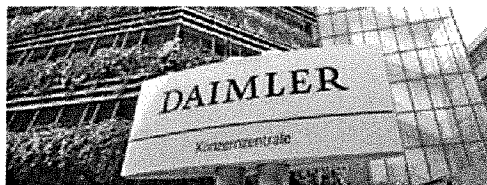
GM used defeat devices, suit claims

General Motors was accused of putting defeat device software in trucks with Duramax diesel engines to beat emissions tests. The lawsuit claims GM installed multiple such devices in two models of heavy-duty trucks from 2011 to 2016. The complaint asserts that the environmental damage caused by each truck could surpass that of Volkswagen's vehicles.



GM to cut jobs at International HQ

General Motors will slash headcount at its international headquarters in Singapore as part of efforts to reduce exposure to unpromising markets. GM International will reduce its staff to about 50 from 180 by year end, a person with knowledge of the matter told Reuters.



Bosch workers investigated in Daimler diesel pollution probe

German prosecutors who searched Daimler's offices as part of a probe into diesel pollution are also investigating employees at automotive supplier Bosch, *Handelsblatt* reported, citing the prosecutor's office.



Faraday seeks \$1B in funding

Electric-vehicle maker Faraday Future is planning to raise \$1 billion as it seeks to protect itself from the financial woes of its main backer, China's LeEco, a person with direct knowledge of the matter told Bloomberg. LeEco is suffering from a cash crunch after expanding too fast.

on our radar

■ 06.01: May U.S. sales released

From Automotive News, Bloomberg and Reuters

VW marketing exec moves to Toyota

Toyota North America has hired Volkswagen of America marketing executive Vinay Shahani as its vice president of integrated marketing operations. Gregory Tebbutt, VW senior director of marketing transformation, strategy and communications, "will oversee the marketing team until a successor for Vinay is identified," VW said.



Geely to buy stakes in Proton, Lotus

Chinese automaker Geely, which owns Volvo, will buy a 49.9 percent stake in struggling carmaker Proton from Malaysian conglomerate DRB-Hicom. Geely will also acquire a majority share of 51 percent in U.K. sports-car maker Lotus Cars from Proton.

Tesla names new head of HR

Tesla has replaced Arnon Geshuri, vice president of human resources, with Gaby Toledano, a former executive at video game company Electronic Arts, amid employee claims of a harsh work environment at the EV maker's California assembly plant. The automaker said Geshuri would be "taking a short break" before going on to a new project.

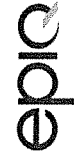


Automotive News
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EXHIBIT C



In Re: Automotive Parts Antitrust Litigation - Wire Harness Cases

2:12-cv-00101-MOB-MKM, 2:14-cv-13773-MOB-MKM (E.D. Mich)

Requests for Exclusion

Updated: July 14, 2017

Opt Out	Status	Business Name	Address 1	City	State	Zipcode	Postmark Date	Received Date	Settlements
1	Complete	ICOM NORTH AMERICA, LLC	54790 GRAND RIVER AVE	NEW HUDSON	MI	48165	5/23/2017	5/26/2017	Yazaki, Sumitomo, Chiyoda, Fujikura, LEONI
2	Complete	SEIREN NA dba VISCOTEC AUTOMOTIVE PDTS LLC	PO BOX 130	MORGANTOWN	NC	28680-0130	6/9/2017	6/15/2017	Yazaki, Sumitomo, Chiyoda, Fujikura, LEONI
3	Complete	NISSAN	35 W WACKER DR	CHICAGO	IL	60601	6/20/2017	6/22/2017	Yazaki, Sumitomo
4	Complete	SUBARU OF INDIANA AUTOMOTIVE INC.	5500 STATE ROAD EAST PO BOX 5689	LAFAYETTE	IN	47903	6/20/2017	6/23/2017	Yazaki, Fujikura
5	Complete	FORD MOTOR COMPANY	1633 BROADWAY	NEW YORK	NY	10019	6/30/2017	7/10/2017	Yazaki, Sumitomo, LEONI
6	Complete	FCA US LLC	865 SOUTH FIGUEROA STREET, 10TH FLOOR	LOS ANGELES	CA	90017	7/6/2017	7/10/2017	Yazaki
7	Complete	GENERAL MOTORS COMPANY	51 MADISON AVENUE, 22ND FLOOR	NEW YORK	NY	10010	7/7/2017	7/10/2017	Yazaki
8	Complete	HONDA MOTOR CO., INC.	633 BATTERY STREET	SAN FRANCISCO	CA	94111-1809	7/6/2017	7/10/2017	Yazaki, Sumitomo
9	Complete	TOYOTA NORTH AMERICA, INC.	6565 HEADQUARTERS DRIVE	PLANO	TX	75024	7/7/2017	7/12/2017	Yazaki, Sumitomo, Chiyoda, Fujikura, LEONI

EXHIBIT 2

EXHIBIT 2

**AUTOMOTIVE PARTS ANTITRUST LITIGATION, 12-MD-02311,
WIRE HARNESS PRODUCTS, 2:12-CV-00101-MOB-MKM, 2:14-cv-13773-MOB-MKM**

**REQUESTS FOR EXCLUSION FROM THE DIRECT
PURCHASER SETTLEMENT CLASSES**

<p>FORD Ford Motor Company Ford Motor Company of Canada Limited Ford Motor Company S.A. de C.V.</p> <p>FUJIKURA AUTOMOTIVE EUROPE SAU MKEM, SPOL. S.R.O.</p> <p>ICOM NORTH AMERICA, LLC</p> <p>SEIREN NORTH AMERICA, LLC, DBA VISCOTEC AUTOMOTIVE PRODUCTS, LLC</p> <p>NISSAN MOTOR CO., LTD.</p> <p>TOYOTA Toyota North America, Inc. Toyota Motor North America, Inc. Toyota Motor Engineering & Manufacturing North America, Inc. Toyota Motor Manufacturing, Mississippi, Inc. Toyota Motor Manufacturing, Indiana, Inc. Toyota Motor Manufacturing, Kentucky, Inc. Toyota Motor Manufacturing Toyota Motor Corporate Service Toyota Motors of America Toyota Motor Manufacturing of Baja California S.de. RL de C.V. Toyota Motor Manufacturing, West Virginia, Inc. Toyota Motor Manufacturing, Alabama, Inc. Toyota Motor Manufacturing, Texas, Inc. Toyota Motor Manufacturing, Canada Toyota Motor Corporation Toyota Motor Engineering New United Motor Manufacturing, Inc.</p>	<p>GENERAL MOTORS General Motors LLC General Motors Company General Motors Holdings LLC</p> <p>SUBARU OF INDIANA AUTOMOTIVE, INC.</p> <p>FCA FCA US LLC Chrysler Group LLC FCA Italy S.p.A. Fiat Group Automobiles S.p.A. Chrysler Corporation Daimler Chrysler Corporation DaimlerChrysler Company Chrysler LLC New CarCo Acquisition LLC Old CarCo LLC Chrysler Group LLC</p> <p>HONDA American Honda Motor Co., Inc. Honda of America Manufacturing, Inc. Honda R&D Americas, Inc. Honda Manufacturing of Alabama, LLC Honda Manufacturing of Indiana, LLC Honda Canada Inc. Honda of Canada Mfg. Honda de Mexico S.A. de C.V.</p>
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EXHIBIT 3

2:12-cv-00101-MOB-MKM; 2:14-cv-13773-MOB-MKM (E.D. Mich)

Requests for Exclusion

Updated: July 19, 2017

Class Member	Yazaki	Sumitomo	Chiyoda	Fujikura	LEONI
ICOM NORTH AMERICA, LLC	X	X	X	X	X
SEIREN NA dba VISCOTEC AUTOMOTIVE PDTS LLC	X	X	X	X	X
NISSAN MOTOR CO., LTD.	X	X			
SUBARU OF INDIANA AUTOMOTIVE, INC.	X			X	
FORD MOTOR COMPANY	X	X			X
FCA US LLC	X				
GENERAL MOTORS LLC	X				
AMERICAN HONDA MOTOR CO., INC.	X	X			
TOYOTA NORTH AMERICA, INC.	X	X	X	X	X
FUJIKURA AUTOMOTIVE EUROPE SAU	X	X	X	X	X
MKEM, SPOL. S.R.O.	X	X	X	X	X

X=Requested Exclusion from Settlement