

**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**

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**

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
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Telephone: (224) 632-4500

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Co-Lead Counsel for the Direct Purchaser Settlement Class

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Counsel for Chiyoda Defendants

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Counsel for LEONI Defendants

Counsel for the Sumitomo Defendants

John M. Majoras
JONES DAY
51 Louisiana Ave. N.W.
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Telephone: (202) 879-3939

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