

**NOTICE OF HEARING
IN CANADIAN AUTO PARTS PRICE-FIXING CLASS ACTIONS**

**If you bought or leased, directly or indirectly, a new or used Automotive Vehicle or certain automotive parts, since January 1995 you should read this notice carefully.
It may affect your legal rights.**

A. WHAT IS A CLASS ACTION?

A class action is a lawsuit filed by one person on behalf of a large group of people.

B. WHAT ARE THESE CLASS ACTIONS ABOUT?

Class actions have been started in Canada claiming that many companies participated in conspiracies to fix the prices of automotive parts sold in Canada and/or sold to manufacturers for installation in Automotive Vehicles¹ sold in Canada.

This notice is about proposed settlements relating to 18 automotive parts (see Part D) and a proposed distribution relating to 17 automotive parts (see Part J) (the “Relevant Parts”). A description of the Relevant Parts is included in Schedule A hereto.

The class actions were started in British Columbia, Ontario and/or Quebec, but include Canadian residents in all provinces and territories. The class actions claim that the companies that sell the Relevant Parts were involved in conspiracies to illegally increase the prices of these products. These class actions ask the applicable Courts to require these companies to return any extra money they may have received due to the alleged conspiracies.

C. WHO IS AFFECTED BY THE CLASS ACTIONS?

These class actions were certified as class proceedings as against the Settling Defendants for the purposes of implementing the settlement agreements.

You are affected by the class actions mentioned above and/or are a “member” of the settlement class of those actions if you are a person in Canada who, during the relevant class period (see Schedule A):

- purchased or leased, directly or indirectly, a new or used Automotive Vehicle in Canada;
- purchased a new or used Automotive Vehicle for import into Canada; or
- purchased, directly or indirectly, a Relevant Part in Canada.

¹ In the Alps, Bosch, Calsonic, INOAC, Mikuni, NSK, Panasonic, Schaeffler, Showa, and USUI Settlements, Automotive Vehicle is defined as: all passenger cars, sport utility vehicles (SUVs), vans, and light trucks (up to 10,000 lbs). In the Faurecia Settlement, Automotive Vehicle is defined as: all automobiles, passenger cars, sport utility vehicles (SUVs), vans, trucks, buses and, without limitation, any other type of vehicle containing Automotive Exhaust Systems. In the KYB Settlement, Automotive Vehicle is defined as: all automobiles, passenger cars, sport utility vehicles (SUVs), vans, trucks, buses, motorcycles, and without limitation, any other type of vehicle containing Shock Absorbers.

D. WHAT SETTLEMENTS HAVE BEEN REACHED IN THE CLASS ACTIONS?

A settlement is when a defendant agrees to pay money to the members of the class action in exchange for full release of the claims against them, without admitting liability for any of the claims.

The defendants listed below (the “Settling Defendants”) have agreed to pay the amounts set out below in exchange for a full release of the claims against them relating to the pricing of the Relevant Parts and for the dismissal of any actions commenced in Canada by settlement class members relating to the pricing of the Relevant Parts.² The Settling Defendants do not admit any liability, wrongdoing or fault.

Alps Electric Co., Ltd., Alps Electric (North America), Inc., and Alps Automotive Inc.	
Heater Control Panels	\$425,000.00
Faurecia SA, Faurecia Emissions Control Technologies Canada, Ltd., Faurecia Emissions Control Technologies, USA, LLC, Faurecia Exhaust Systems, LLC (misnamed as Faurecia Exhaust Systems, Inc.) and Faurecia Systèmes d’Échappement	
Automotive Exhaust Systems	\$207,962.04
INOAC Corporation, INOAC USA, Inc., INOAC Interior Systems LLC, INOAC Interior Systems LP, and INOAC Canada Limited ³	
Plastic Interior Trim	USD\$325,000
Kayaba Industry Co. Ltd. d/b/a KYB Corporation and KYB Americas Corporation	
Shock Absorbers	\$4,840,000
Marelli Corporation (formerly known as Calsonic Kansei Corporation) and Marelli North America, Inc. (formerly known as Calsonic Kansei North America, Inc.)	
Air Conditioning Systems	\$878,935.99
Automatic Transmission Fluid Warmers and Oil Coolers	\$64,867.52
Heater Control Panels	\$50,000.00
Instrument Panel Clusters	\$50,000.00
Plastic Interior Trim	\$50,000.00
Radiators	\$952,907.73
Total	\$2,046,711.24
Mikuni Corporation and Mikuni American Corporation	
Fuel Injection Systems	\$395,976.00

² The exact terms of the releases and dismissals vary slightly as between the Settlement Agreements. Please refer to the Settlement Agreements for additional information.

³ The Plaintiffs intend to discontinue the Plastic Interior Trim action against the defendants, Springfield Interior Trim, LLC, Blenheim Interior Trim, LLP, and Intertec Systems, in accordance with the terms of the INOAC settlement.

Valve Timing Control Devices	\$98,994.00
Total	\$494,970.00
NSK Ltd., NSK Corporation, NSK Canada Inc., NSK Americas, Inc., NSK Europe Ltd., NSK Steering Systems Co., Ltd., and NSK Steering Systems America, Inc.	
Bearings	USD\$2,992,500.00
Electric Powered Steering Assemblies	USD\$338,500.00
Manual Steering Columns	USD\$169,000.00
Total	USD\$3,500,000.00
Panasonic Corporation, Panasonic Corporation of North America, and Panasonic Canada, Inc.	
Air Conditioning Systems	\$126,000.00
High Intensity Discharge Ballasts	\$927,000.00
Steering Angle Sensors	\$1,056,000.00
Switches	\$891,000.00
Total	\$3,000,000.00
Robert Bosch GmbH, Robert Bosch LLC, Robert Bosch North America Corporation, Bosch Brake Components LLC, and Robert Bosch Inc.	
Braking Systems	\$319,326.88
Schaeffler AG, Schaeffler Group USA Inc., Schaeffler Canada Inc., Schaeffler Technologies GmbH & Co. KG, and FAG Kugelfischer GmbH	
Bearings	\$3,336,675.00
Hitachi Astemo Ohio Manufacturing, Inc. (f/k/a American Showa, Inc.), Hitachi Astemo Canada, Inc. (f/k/a Showa Canada Inc.), and Hitachi Astemo, Ltd. (f/k/a Showa Corporation)	
Electric Powered Steering Assemblies	\$696,627.00
Shock Absorbers	\$1,672,853.00
Total	\$2,369,480.00
USUI International Corporation, USUI Co., Ltd. (f/k/a USAI Kokusai Sangyo Kaisha Ltd.)	
Automotive Steel Tubes	\$792,000.00

Where the class actions are continuing, the Settling Defendants have also agreed to provide cooperation to the plaintiffs in pursuing the applicable class actions against the remaining defendants.

E. SETTLEMENT APPROVAL HEARINGS

Depending on where each action was commenced, the settlements are subject to the approval of one or more of the Ontario, British Columbia and/or Quebec Courts (see Schedule "B"). However, in all

circumstances, the settlements are national in scope. Even where there is no action commenced in British Columbia or Quebec, residents of those provinces are included in the national classes of the actions commenced in Ontario.

The Ontario Court will hold a hearing to decide whether to approve these settlements at Osgoode Hall, 130 Queen Street West, in the City of Toronto on May 13, 2021 at 10:00 a.m. Depending on the status of the COVID-19 situation, the Ontario hearing may proceed by videoconference, teleconference or in writing. Please visit www.siskinds.com/autoparts for updates.

The Quebec Court will hold a hearing to decide whether to approve some of these settlements virtually on May 31, 2021 at 11:00 a.m. (<https://url.justice.gouv.qc.ca/7GyhK>)⁴.

In accordance with the *Canadian Judicial Protocol for the Management of Multi-Jurisdictional Class Actions*, if the Ontario Court approves the settlements, the BC settlement approval applications will be heard in writing.

The Courts will decide whether the settlements are fair, reasonable, and in the best interests of settlement class members.

F. HOW CAN I PARTICIPATE IN THE SETTLEMENT APPROVAL HEARING?

If you are a member of a settlement class, you can present your submissions on, or objections to, the settlements, distribution protocol and/or Class Counsel fees before the Courts, in the manner set out below.

Submissions in writing

If you want to address the Courts in writing, you must send your written submissions to Class Counsel by email to autoparts@sotosllp.com and autopartsclassaction@siskinds.com no later than May 6, 2021.

The written submissions must state the nature of any comments or objections, and whether you intend to appear at the settlement approval hearing(s). The written submissions can be provided in English or French (where necessary, an unofficial translation will be provided to the Courts).

Class Counsel will provide a copy of any written submissions to the Courts being asked to approve the settlement agreements.

Attending in person before the Courts

Settlement classes members may (but do not need to) attend the settlement approval hearing(s).

Some of the settlements are only subject to approval by the Ontario Court. You may attend the Ontario hearing in person by being present at **Osgoode Hall, 130 Queen Street West, in the City of Toronto on**

⁴ The User Guide to join the hearing can be found at the following address:
https://www.justice.gouv.qc.ca/fileadmin/user_upload/contenu/documents/Fr__français_/centredoc/publications/systeme-judiciaire/MJQ_Guide_Audience_Teams-public_VF.pdf

May 13, 2021 at 10:00 a.m. Depending on the status of the COVID-19 situation, the Ontario hearing may proceed by videoconference, teleconference or in writing. Please visit www.siskinds.com/autoparts for updates.

You can attend the Ontario hearing as an observer or to make oral submissions to the Court. If you wish to make oral submissions, please contact Class Counsel no later than May 6, 2021. If you are unable to attend in person, but wish to make oral submissions to the Ontario Court, please contact Class Counsel at autopartsclassaction@siskinds.com and Class Counsel will make the necessary arrangements for you to make submissions to the Ontario Court.

Where the settlement is also subject to the approval of the Quebec Court, you may attend the Quebec hearing virtually on May 31, 2021 at 11:00 am (<https://url.justice.gouv.qc.ca/7GyhK>)⁵. You can attend as an observer or to make oral submissions to the Quebec Court. If you are unable to attend, but wish to make oral submissions to the Quebec Court, please contact Class Counsel at recours@siskindsdesmeules.com, to the attention of Karim Diallo, and Class Counsel will make the necessary arrangements for you to make submissions to the Quebec Court.

Where the settlement is not subject to the approval of the Quebec Court, persons in Quebec may (but do not need to) attend the Ontario hearing. If you wish to attend the Ontario hearing and make oral submissions, please contact Class Counsel at recours@siskindsdesmeules.com, to the attention of Karim Diallo no later than May 6, 2021. If you are unable to attend in person, but wish to make oral submissions to the Ontario Court, please contact Class Counsel at recours@siskindsdesmeules.com, to the attention of Karim Diallo, and Class Counsel will make the necessary arrangements for you to make submissions to the Ontario Court. If the circumstances related Covid-19 and Quebec courts activities allow it, Quebec residents may be given the opportunity to attend remotely from the Quebec courthouse.

G. WHAT STEPS SHOULD I TAKE TO PROTECT MY RIGHTS?

If you want to be a member of any of these class actions, you do not need to do anything. However, there are three steps that you should take to protect your legal rights:

1. You should keep records of any purchases or leases of all new Automotive Vehicles, Relevant Parts or other automotive parts in respect of which there is pending litigation (see www.siskinds.com/autoparts for a complete list) from January 1995 onward. Records include invoices, receipts, original purchase or lease records, or historical accounting records.
2. Automotive dealerships should keep records of any sales or leases of new Automotive Vehicles, Relevant Parts or other automotive parts from January 1995 onward.
3. You should register online at www.siskinds.com/autoparts to receive updates about these class actions and the other auto parts price-fixing class actions.

H. WHAT IF I DON'T WANT TO BE IN THE CLASS ACTIONS?

Members of the Braking Systems and Manual Steering Columns settlement classes can opt out. Rights to opt-out of the other relevant actions was previously provided and have already passed.

⁵ The User Guide to join the hearing can be found at the following address:
https://www.justice.gouv.qc.ca/fileadmin/user_upload/contenu/documents/Fr__français_/centredoc/publications/systeme-judiciaire/MJQ_Guide_Audience_Teams-public_VF.pdf

You can opt out of the Braking Systems and/or Manual Steering Columns class actions by sending a signed letter to Class Counsel, with the following information:

- your full name, current address and telephone number;
- if you are writing on behalf of a company, the name of the company and your position at the company; and
- a statement saying that you (or the company) want to opt out of the Braking Systems and/or Manual Steering Column class actions.

Requests to opt out of the Braking Systems and/or Manual Steering Column class actions must be post-marked by June 19, 2021.

If you exclude yourself or opt out:

- you will not be eligible to participate in the ongoing class action, and
- you will not receive any money from the class action, but
- you will be able to start or continue your own case against the defendants regarding the claims at issue in the class action.

If you do nothing, and so do not exclude yourself or opt out:

- you will be eligible to participate in the ongoing class action, and
- you may receive money from the class action, but
- you will not be able to start or continue your own case against the defendants regarding the claims at issue in the class action.

This is your only chance to exclude yourself or opt out of the Braking Systems and Manual Steering Columns class actions. No further right to opt out will be provided.

I. WHAT HAPPENS TO THE MONEY PAID UNDER THE SETTLEMENTS?

At this stage, the settlement funds (less approved fees and expenses) are being held in interest-bearing trust accounts for the benefit of settlement class members. The plaintiffs are seeking approval of the method for distributing the aggregate settlement funds from 17 class actions (see section J below). In those cases, the courts will be asked to decide how the settlement funds will be distributed and how you can apply to receive money from these settlements. In the other cases, the settlement funds will continue to be held in trust for the benefit of settlement class members.

J. PROPOSED DISTRIBUTION OF SETTLEMENT FUNDS

At the settlement approval hearings, in the actions listed in the chart below, the Courts will be asked to approve a protocol for distributing the aggregate settlement funds, plus accrued interest, less Court-approved legal fees and other expenses. A copy of the proposed distribution protocol is available at www.siskinds.com/autoparts or www.sotosllp.com/class-actions/current-cases/auto-parts/ or from Class Counsel.

The protocol is designed to compensate purchasers of the below-listed parts and/or new Automotive Vehicles containing the below-listed parts in a manner that generally reflects the anticipated impact of the alleged price-fixing.

Based on information to date—both through publicly available documents and information obtained in the prosecution of the actions—the following vehicles are potentially affected by the alleged wrongful conduct (the “Affected Vehicles”):

Class Action	Aggregate Settlement Funds	Brands	Event Period	Post Event Period
Alternators	\$8,270,000	Aston Martin, BMW, Chrysler, Ford, GM, Honda/Acura, Jaguar Land Rover, Lincoln, Nissan/Infiniti, Subaru, Volkswagen, Volvo	January 1, 2000 to February 28, 2010	March 1, 2010 to February 28, 2014
Automatic Transmission Fluid Warmers and Oil Coolers	\$480,343.85	Toyota/Lexus	November 1, 2002 to February 28, 2010	March 1, 2010 to February 28, 2014
Automotive Brake Hoses	\$272,419.03	Toyota/Lexus	November 1, 2005 to September 30, 2009	October 1, 2009 to September 30, 2013
Automotive Hoses	\$868,133.04	Nissan/Infiniti, Toyota/Lexus	February 1, 2004 to September 30, 2010	October 1, 2010 to September 30, 2014
Fuel Injection Systems	\$5,113,769.36	GM, Nissan/Infiniti	January 1, 2000 to February 28, 2010	March 1, 2010 to February 28, 2014
Heater Control Panels	\$987,500	GM (Pontiac Vibe only), Toyota/Lexus	January 1, 2000 to February 28, 2010	March 1, 2010 to February 28, 2014
Inverters	\$450,000	GM, Nissan/Infiniti	January 1, 2000 to February 28, 2010	March 1, 2010 to February 28, 2014
Motor Generators	\$300,000	GM, Nissan/Infiniti	January 1, 2000 to February 28, 2010	March 1, 2010 to February 28, 2014
Occupant Safety Systems	\$10,827,424.23	BMW, Honda/Acura, GM (Pontiac Vibe only), Mazda, Nissan/Infiniti,	January 1, 2003 to June 30, 2011	July 1, 2011 to December 4, 2014

Class Action	Aggregate Settlement Funds	Brands	Event Period	Post Event Period
		Subaru, Toyota/Lexus, Volkswagen		
Oxygen Sensors	\$4,266,343.65	Chrysler, Ford, GM, Honda/Acura, Nissan/Infiniti, Subaru, Toyota/Lexus	January 1, 2000 to July 31, 2011	August 1, 2011 to July 31, 2015
Radiators	\$4,366,883.40	GM (Pontiac Vibe and Saab 9-2x only), Honda/Acura, Subaru, Toyota/Lexus	November 1, 2002 to February 28, 2010	March 1, 2010 to February 28, 2014
Spark Plugs	\$3,805,343.65	Chrysler, Ford, GM, Honda/Acura, Nissan/Infiniti, Subaru, Toyota/Lexus	January 1, 2000 to July 31, 2011	August 1, 2011 to July 31, 2015
Starters	\$5,481,599.32	Aston Martin, BMW, Chrysler, Ford, GM, Honda/Acura, Jaguar Land Rover, Lincoln, Nissan/Infiniti, Volkswagen, Volvo	January 1, 2000 to June 30, 2010	July 1, 2010 to June 30, 2014
Steering Angle Sensors	\$1,606,000	GM (Pontiac Vibe only), Toyota/Lexus	September 1, 2003 to February 28, 2010	March 1, 2010 to February 28, 2014
Switches	\$1,105,155	GM (Pontiac Vibe only), Toyota/Lexus	September 1, 2003 to February 28, 2010	March 1, 2010 to February 28, 2014
Windshield Wiper Systems	\$4,601,388.97	Chrysler, Honda/Acura, Nissan/Infiniti, Subaru, Toyota/Lexus	January 1, 2000 to February 28, 2010	March 1, 2010 to February 28, 2014

No wrongdoing is alleged as against Aston Martin, BMW, Chrysler, Ford, General Motors, Honda/Acura, Jaguar Land Rover, Lincoln, Mazda, Nissan/Infiniti, Subaru, Toyota/Lexus, Volkswagen, Volvo (the “Automakers”). They are not defendants in the class actions. The Automakers were unaware of alleged price-fixing in respect of the above-listed parts that they purchased for installation in their automotive vehicles. No wrongdoing is alleged as against the Automakers.

Subject to further order of the Ontario Court, the settlement funds will be distributed on a *pro rata* (or proportional) basis on the value of your claim relative to the value of all approved claims. The value of your claim will depend on:

- a) The purchase price of the Affected Vehicle: The purchase price will be based on the information provided as part of the claims process or, where permitted pursuant to the distribution protocol, the manufacturer's suggested retail price (or 40% thereof for leased vehicles).
- b) The timing of the Affected Vehicle purchase or lease: Purchases or leases entered into during the Event Period will be valued at 100%. Purchases or leases entered into during the Post Event Period will be discounted by 50% to reflect the additional litigation risks associated with proving damages during this period.
- c) The categorization of the Settlement Class Member: Settlement Class Members will be categorized as follows:
 - i. *Automaker*. Automakers' purchases or leases will be valued at 7.5% of the purchase price.
 - ii. *Dealer* means a Settlement Class Member who purchased Affected Vehicles from an Automaker or a subsidiary thereof, for resale to End Users. Dealer's purchases or leases will be valued at 25% of the purchase price.
 - iii. *End User* means a Settlement Class Member who purchased or leased an Affected Vehicle for its own use and not for commercial resale. End Users' purchases or leases will be valued at 67.5% of the purchase price.

Sample Calculation:

If an End User purchased Affected Vehicles with purchase prices totaling \$50,000 during the Event Period and \$150,000 during the Post Event Period, its Affected Vehicle Purchases for the purposes of determining its pro rata share of the Net Settlement Funds would be calculated as follows:

\$50,000 (representing the purchase price) x 1 (representing the timing of the purchase or lease)
x 0.675 (representing the categorization of the Settlement Class Member as an End User) =
\$33,750

Plus

\$150,000 (representing the purchase price) x 0.5 (representing the timing of the purchase or
lease) x 0.675 (representing the categorization of the Settlement Class Member as an End User) =
\$50,625

For a total of \$84,375

Assuming the value of all qualifying Settlement Class Members' Affected Vehicle Purchases totalled \$10 million, this Settlement Class Member would be entitled to 0.84% (\$84,375/\$10 million) of the Net Settlement Funds.

Notwithstanding the foregoing, subject to further order of the Ontario Court following the adjudication of all claims:

- a) claims that are valued at less than \$5 will be held in abeyance pending further distributions in the auto parts class actions. This threshold for payment applies after summing all entitlements pursuant to the proposed Distribution Protocol.
- b) all valid Claims that are valued at or above \$5 will be assigned a minimum value of \$25. The \$25 valuation target is not an estimate of any damages suffered. This minimum valuation applies after summing all entitlements pursuant to the proposed Distribution Protocol.

In addition to the actions listed above, the Ontario Court will also be asked to approve a protocol for distributing the aggregate settlement funds, plus accrued interest, less Court-approved legal fees and other expenses in the Automotive Constant-Velocity-Joint Boot Products action (the “CVJB Distribution Protocol”). A copy of the proposed CVJB Distribution Protocol is available at www.siskinds.com/autoparts or www.sotosllp.com/class-actions/current-cases/auto-parts/ or from Class Counsel.

The CVJB Distribution Protocol is designed to compensate Automakers with manufacturing facilities in Canada who purchased at least \$100,000 in Automotive Constant-Velocity-Joint Boots directly from GKN plc or one of its subsidiaries between January 1, 2006 and October 1, 2014. **No wrongdoing is alleged against GKN plc. It is not a defendant in the CVJB class action.** GKN plc was identified as a target of the conspiracy in a U.S. guilty plea relating to CVJB.

K. APPLYING FOR SETTLEMENT FUNDS

Information about how to apply for the settlement funds will be available in a future notice and will be posted online at: www.siskinds.com/autoparts or www.sotosllp.com/class-actions/current-cases/auto-parts/. If you did not receive this notice by mail or email, please register online at: www.siskinds.com/autoparts or by telephone at 1-888-977-9806 to ensure that further notices will be sent to you directly, by mail or email.

As additional auto parts cases resolve, it is likely that some of the resolved cases will relate to the same brands and years covered by the proposed Distribution Protocol. Subject to court approval, your eligibility for settlement benefits in those cases will depend on applying for settlement benefits in accordance with the proposed Distribution Protocol.

L. WHO ARE THE LAWYERS WORKING ON THESE CLASS ACTIONS AND HOW ARE THEY PAID?

The law firms of Siskinds LLP and Sotos LLP represent members of these class actions in Ontario, and in provinces other than British Columbia or Quebec, as well as corporations of more than 50 employees in Quebec.

Siskinds LLP can be reached at:

Telephone (toll free): 1-800-461-6166

Email: autopartsclassaction@siskinds.com

Mail: 680 Waterloo Street, London, ON N6A 3V8 Attention: Linda Visser / Sylvia Flower

Sotos LLP can be reached at:

Telephone (toll free): 1-888-977-9806

Email: autoparts@sotosllp.com

Mail: 180 Dundas Street West, Suite 1200, Toronto, ON M5G 1Z8 Attention: Jean-Marc Leclerc

The law firm of Camp Fiorante Matthews Mogerman LLP represents members of the Air Conditioning Systems, Alternators, Automotive Exhaust Systems, Automotive Steel Tubes, Bearings, Braking Systems, Fuel Injection Systems, Heater Control Panels, Instrument Panel Clusters, Occupant Safety Systems, Plastic Interior Trim, Radiators, Starters, Steering Angle Sensors, and Windshield Wiper Systems class actions in British Columbia. They can be reached at:

Telephone: 1-800-689-2322

Email: aslevin@cfmlawyers.ca

Mail: #400 – 856 Homer Street, Vancouver, BC V6B 2W5 Attention: David Jones

The law firm of Siskinds Desmeules s.e.n.c.r.l. represents members of the Alternators, Bearings, Fuel Injection Systems, Heater Control Panels, Instrument Panel Clusters, Inverters, Motor Generators, Occupant Safety Systems, Oxygen Sensors, Radiators, Spark Plugs, Shock Absorbers, Starters, and Windshield Wiper Systems actions in Quebec. They can be reached at:

Telephone: 418-694-2009

Email: recours@siskindsdesmeules.com

Mail: Les promenades du Vieux-Quebec, 43 rue De Buade, bureau 320, Quebec City, QC G1R 4A2
Attention: Erika Provencher

The law firm of Klein Avocats Plaideurs represents members of the Automotive Steel Tubes and Plastic Interior Trim class actions in Quebec. They can be reached at:

Telephone: 514-764-8362

Email: channouche@kleinavocats.com

Mail: 1800-500, Place d'Armes, Montreal, QC H2Y 2W2

As an individual, you do not have to pay the lawyers working on these class actions any money out-of-pocket. The lawyers will be paid from the money collected in these class actions. The Courts will be asked to decide how much the lawyers will be paid. The lawyers will collectively be asking that the Courts approve legal fees of up to 25% of the settlement funds, plus disbursements and applicable taxes. Any approved legal fees will be paid out of the settlement funds. Class Counsel reserve the right to ask the Courts to allow Class Counsel to use the settlement funds to pay for any future adverse cost awards or future disbursements.

M. WHERE CAN I ASK MORE QUESTIONS?

For more information, and relevant documents (including copies of the settlement agreements and distribution protocol), please visit www.siskinds.com/autoparts.

For copies of the Ontario statements of claim, visit the Canadian Class Action Database at: <http://www.cba.org/Publications-Resources/Class-Action-Database>.

For a copy of the Quebec motions for authorization or to receive more information about class actions in Quebec, visit the Quebec Registry of Class Actions at <https://www.registredesactionscollectives.quebec/>.

To receive future notices and updates regarding the auto parts class actions and any future settlements, register online at www.siskinds.com/autoparts.

If you have questions that are not answered online, please contact Class Counsel at the numbers listed above.

N. INTERPRETATION

This notice contains a summary of some of the terms of the settlement agreements listed in part D. If there is a conflict between the provisions of this notice and the settlement agreements, the terms of the settlement agreements shall prevail.

Schedule “A” – Part Descriptions and Settlement Class Period

Part	Description⁶	Settlement Class Period
Air Conditioning Systems	Air Conditioning Systems means systems that cool the interior environment of an Automotive Vehicle and are part of an Automotive Vehicle’s thermal system. An Air Conditioning System may include, to the extent included in the relevant request for quotation, compressors, condensers, HVAC units (blower motors, actuators, flaps, evaporators, heater cores, and filters embedded in a plastic housing), control panels, sensors, and associated hoses and pipes.	January 1, 2001 to December 10, 2019
Alternators	Alternators are devices that charge an Automotive Vehicle’s battery and power the electrical system of an Automotive Vehicle when its engine is running.	January 1, 2000 to February 28, 2014
Automatic Transmission Fluid Warmers and Oil Coolers	Automatic Transmission Fluid Warmers are devices located within an Automotive Vehicle’s engine that improve fuel economy by warming transmission fluid to lower its viscosity, allowing the transmission fluid to flow more easily. Automatic Transmission Fluid Warmers include Oil Coolers. Oil Coolers are devices located within an Automotive Vehicle’s engine that remove surplus heat form the engine oil.	November 1, 2002 to August 30, 2017
Automotive Brake Hoses	Automotive Brake Hoses are high and low pressure hoses made from a variety of materials, including but not limited to rubber, metal, and silicone, which carry brake fluid through the hydraulic brake system of an Automotive Vehicle.	November 1, 2005 to September 30, 2013
Automotive Constant-Velocity-Joint Boot Products	Automotive Constant-Velocity-Joint Boot Products are rubber or plastic covers that are used to cover and protect the constant-velocity joints of Automotive Vehicles from contaminants.	January 1, 2006 to October 1, 2014
Automotive Exhaust Systems	Automotive Exhaust Systems are automotive systems that collect exhaust gases from the engine and guides them out of the Automotive Vehicle. For the purpose of the Settlement Agreement, the term Automotive Exhaust Systems includes the following related components, to the extent included in the relevant request for quotation: manifolds, flex pipes, catalytic converters, converters, diesel oxidation catalysts, diesel particulate filters, oxygen sensors, exhaust gas temperature sensors, isolators, gaskets, clamps, resonator assemblies, pipe accessories, mufflers, muffler assemblies, and tubes.	January 1, 2002 to December 10, 2019

⁶ The exact definition of the Relevant Parts vary slightly as between the settlements. For more information, please review the settlement agreements, available online at www.siskinds.com/autoparts or www.sotosllp.com/class-actions/current-cases/auto-parts/.

Part	Description⁶	Settlement Class Period
Automotive Hoses	Automotive Hoses are high and low pressure hoses made from a variety of materials, including but not limited to rubber, metal, and silicone, which carry and transfer fluid throughout and between various component parts of an Automotive Vehicle.	February 1, 2004 to September 30, 2014
Automotive Steel Tubes	Automotive Steel Tubes means tubes used in Automotive Vehicles for fuel distribution, braking and other automotive systems, including, without limitation, chassis tubes (including brake and fuel tube) and engine parts (including fuel injection rails, oil level tubes, and oil strainer tubes).	December 1, 2003 to June 2, 2020
Bearings	Bearings are friction-reducing devices installed in new Automotive Vehicles that allows one moving part to glide past another moving part and includes automotive wheel hub unit bearings.	April 20, 1998 to July 9, 2020
Braking Systems	Braking Systems means hydraulic and electronic braking systems. Hydraulic braking systems consist of an actuation system and a foundation system. The actuation system is further made up of a brake booster and main brake cylinder, while the foundation system is further made up of a disc brake with saddle or drum brake and wheel brake cylinder. Electronic braking systems prevent automobiles from skidding by providing electronic stability controls when braking (anti-lock braking system or "ABS") or under all driving conditions (electronic stability control or "ESC"). Both Hydraulic Braking Systems and Electronic Braking Systems can be contained within the same vehicle.	February 1, 2007 to February 8, 2021
Electric Powered Steering Assemblies	Electric Powered Steering Assemblies are devices in an Automotive Vehicle that link the steering wheel to the tires, and includes the column, intermediate shaft, and electric power steering electric control unit, among other parts, but does not include the steering wheel or tires.	January 1, 2005 to August 13, 2018
Fuel Injection Systems	Fuel Injection Systems are systems that admit fuel or a fuel/air mixture into the engine cylinders of Automotive Vehicles. The term "Fuel Injection Systems" as used herein also includes any of the components of such systems including, without limitation: injectors; high pressure pumps; rail assemblies; feed lines; fuel pumps and fuel pump modules.	January 1, 2000 to March 20, 2017
Heater Control Panels	Heater Control Panels means the operational panels located in an Automotive Vehicle which incorporate buttons and switches to control the temperature of the interior environment of an Automotive Vehicle.	January 1, 2000 to November 2, 2016

Part	Description⁶	Settlement Class Period
High Intensity Discharge Ballasts	High Intensity Discharge Ballast means electrical devices that limit the amount of electrical current flowing to a high intensity discharge headlamp installed in an Automotive Vehicle, which would otherwise rise to destructive levels due to the high intensity discharge headlamp's negative resistance.	July 1, 1998 to August 13, 2018
Instrument Panel Clusters	Instrument Panel Clusters, also known as meters, are the mounted array of instruments and gauges housed in front of the drive of an Automotive Vehicle.	January 1, 1998 to December 9, 2015
Inverters	Inverters provide power to motors by converting direct current (DC) electricity from an Automotive Vehicle's battery to alternating current (AC) electricity. Every Automotive Vehicle with an electric traction motor requires Inverters to power them. The Inverter converts high voltage DC electricity into multi-phase AC current that drives the three-phase induction or permanent magnet electric machines used to actuate the motor in hybrid and electric Automotive Vehicles.	January 1, 2000 to February 28, 2014
Manual Steering Columns	Manual Steering Columns is the steering column shaft on which an Automotive Vehicle's steering wheel is mounted and by which it is connected with the steering gears.	September 1, 2007 to December 2, 2020
Motor Generators	Motor Generators are electric motors used to power electric drive systems that can also capture energy from the process of stopping an Automotive Vehicle to generate electricity through regenerative braking.	January 1, 2000 to February 28, 2014
Occupant Safety Systems	Occupant Safety Systems are the collection of safety devices in Automotive Vehicles, including but not limited to seat belts, steering wheels, and air bags.	January 1, 2003 to December 4, 2014
Oxygen Sensors	Oxygen Sensors detect the amount of oxygen in an Automotive Vehicle's exhaust gases and sends a signal to the engine management computer or "engine control unit" which adjusts the air/fuel mixture to the optimal level. Oxygen Sensors include air fuel ratio sensors (a type of "wideband" Oxygen Sensor). Air fuel ratio sensors are paired with a special interface circuit that will produce an electric current corresponding to the actual portion of exhaust gas/oxygen concentration enabling more precise control of the air/fuel ratio injected into the engine.	January 1, 2000 to July 31, 2015
Plastic Interior Trim	Plastic Interior Trim are molded trim parts made from plastics, polymers, elastomers and/or resins manufactured and/or sold for installation in the interiors of Automotive Vehicles.	June 1, 2004 to June 2, 2020

Part	Description⁶	Settlement Class Period
Radiators	Radiators are devices that cool Automotive Vehicle engines and help prevent the engines from overheating. Radiators are a form of heat exchanger constructed from thin-walled tubes, and usually filled with a combination of water and antifreeze, which extracts heat from inside the engine block. Radiators indirectly expose coolant, heated by traveling through the engine block, to cool air as the vehicle moves. The term Radiators includes the following components, to the extent that they were procured as part of an assembly that includes a Radiator: fans, fan motors, hoses, pumps, covers, shrouds, thermostats, and expansion tanks.	June 1, 2000 to August 30, 2017
Shock Absorbers	Shock Absorbers are the part(s) of the suspension system on Automotive Vehicles that absorbs and dissipates energy to help cushion Automotive Vehicles on uneven roads leading to improved ride quality and vehicle handling.	January 1, 1995 to April 2, 2019
Spark Plugs	Spark Plugs are an engine component in an Automotive Vehicle which deliver high electric voltage from the ignition system to the combustion chamber for an internal combustion engine. Spark Plugs ignite the compressed fuel/air mixture with an electric spark while containing combustion pressure within the engine.	January 1, 2000 to July 31, 2015
Starters	Starters are a device that powers an Automotive Vehicle's battery to "turn over" and start while the driver turns the ignition switch.	January 1, 2000 to June 30, 2014
Steering Angle Sensors	Steering Angle Sensors means a sensor installed on a steering column of an Automotive Vehicle that detects the angle of the vehicle's steer and sends signals to a vehicle computer, which, in turn, controls an Automotive Vehicle's stability during turns.	September 1, 2003 to March 29, 2018
Switches	Switches means steering wheel switches, turn switches, wiper switches, combination switches and door courtesy switches used in Automotive Vehicles.	June 1, 2003 to August 13, 2018
Valve Timing Control Device	Valve Timing Control Devices are devices within the variable valve timing system of an Automotive Vehicle that control the timing of the opening and closing of engine valves.	January 1, 2000 to March 20, 2017

Part	Description⁶	Settlement Class Period
Windshield Wiper Systems	Windshield Wiper Systems are devices used to remove rain and debris from an Automotive Vehicle's windshield. Windshield Wiper Systems generally consist of an arm, pivoting at one end and with a long rubber blade attached to the other end. The term Windshield Wiper Systems include the following components, to the extent that they were procured as part of a Windshield Wiper System: windshield wipers, motors, linkage arms and blades.	January 1, 2000 to February 28, 2014

Schedule “B” – Approving Courts

Settling Defendant	Part	Approving Court(s)
Alps	Heater Control Panels	Ontario, British Columbia and Quebec
Bosch	Braking Systems	Ontario and British Columbia
Calsonic	Air Conditioning Systems	Ontario and British Columbia
	Automatic Transmission Fluid Warmers and Oil Coolers	Ontario
	Heater Control Panels	Ontario, British Columbia and Quebec
	Instrument Panel Clusters	Ontario, British Columbia and Quebec
	Plastic Interior Trim	Ontario and British Columbia
	Radiators	Ontario, British Columbia and Quebec
Faurecia	Automotive Exhaust Systems	Ontario and British Columbia
INOAC	Plastic Interior Trim	Ontario and British Columbia
KYB	Shock Absorbers	Ontario and Quebec
Mikuni	Fuel Injection Systems	Ontario
	Valve Timing Control Devices	Ontario
NSK	Bearings	Ontario, British Columbia and Quebec
	Electric Powered Steering Assemblies	Ontario
	Manual Steering Columns	Ontario
Panasonic	Air Conditioning Systems	Ontario and British Columbia
	High Intensity Discharge Ballasts	Ontario
	Steering Angle Sensors	Ontario and British Columbia
	Switches	Ontario
Schaeffler	Bearings	Ontario, British Columbia and Quebec
Showa	Electric Powered Steering Assemblies	Ontario
	Shock Absorbers	Ontario and Quebec
USUI	Automotive Steel Tubes	Ontario and British Columbia