

**NOTICE OF HEARING & DISCONTINUANCE  
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 March 1996, you should read this notice carefully.  
It may affect your legal rights.**

**A. WHAT IS THIS NOTICE ABOUT?**

This notice relates to proposed settlements in the class actions listed in Part C below, and the discontinuance of claims relating to industry bearings (see Part K).

**B. WHAT IS A CLASS ACTION?**

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

**C. 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 Vehicles<sup>1</sup> sold in Canada.

This notice is about class actions relating to the following automotive parts (the “Relevant Parts”):

<b>Part</b>	<b>Description<sup>2</sup></b>	<b>Class Period</b>
Anti-Vibration Rubber Parts	Anti-Vibration Rubber Parts means rubber and metal parts that are installed in Automotive Vehicles to reduce the transmission of engine and road vibration. Every Automotive Vehicle contains Anti-Vibration Rubber Parts.	March 1, 1996 to April 2, 2019
Autolights	Autolights are headlights and rear combination lights used in Automotive Vehicles. A headlight is an automotive light installed in the front of an Automotive Vehicle, and may include a headlight, clearance light, and/or turn signal. A rear combination light is an automotive light installed in the rear of an Automotive Vehicle, and may include a back-up light, tail light, stop light, and/or turn signal.	June 1, 1997 to April 2, 2019

<sup>1</sup> In the Alpha, Continental, Espar, JTEKT, Koito, Maruyasu, Meritor, NTN, Tokai Rika, Toyo Tire, and Yamashita Settlements, Automotive Vehicle is defined as: all passenger cars, sport utility vehicles (SUVs), vans, and light trucks (up to 10,000 lbs). In the Tenneco and Toyota Gosei 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 Alleged Parts.

<sup>2</sup> 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](http://www.siskinds.com/autoparts) or [www.sotosllp.com/class-actions/current-cases/auto-parts/](http://www.sotosllp.com/class-actions/current-cases/auto-parts/).

Part	Description <sup>2</sup>	Class Period
Automotive Access Mechanisms	Automotive Access Mechanisms means a variety of automotive access mechanisms used within a vehicle including, but not limited to, inside and outside door handles, tailgate or trunk handles; keys, lock sets, key sets and door locks; and electrical steering column locks and mechanical steering column locks.	January 1, 2002 to June 2, 2020
Automotive Brake Hoses	Automotive Brake Hoses means 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.	February 1, 2004 to April 2, 2019
Automotive Constant-Velocity-Joint Boot Products	Automotive Constant-Velocity-Joint Boot Products means rubber or plastic covers that are used to cover and protect the constant-velocity joints of Automotive Vehicles from contaminants.	January 1, 2006 to June 2, 2020
Automotive Exhaust Systems	Automotive Exhaust Systems means an automotive system that collects exhaust gases from the engine and guides them out of the Automotive Vehicle. For the purpose of this 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
Automotive Hoses	Automotive Hoses means 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 April 2, 2019
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 tubes) and engine parts (including fuel injection rails, oil level tubes, and oil strainer tubes).	December 1, 2003 to June 2, 2020
Bearings	Bearings mean a friction-reducing device 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
Body Sealing Parts	Body Sealing Parts means body-side opening seals, door-side weather stripping, glass-run channels, trunk lids, trunk lid weather stripping and other smaller seals, which are installed in Automotive Vehicles to keep the interior dry from rain and free from wind and exterior noises.	January 1, 2000 to May 14, 2019

Part	Description <sup>2</sup>	Class Period
Electric Powered Steering Assemblies	Electric Powered Steering Assemblies means a device in an Automotive Vehicle that links 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 means systems that admit fuel or a fuel/air mixture into the engine cylinders of Automotive Vehicles. For the purposes of this Settlement Agreement, the term Fuel Injection Systems includes any of the components of such systems including, without limitation: injectors; high pressure pumps; rail assemblies; feed lines; fuel pumps; fuel pump modules; electronic throttle bodies, airflow meters, engine electronic control units, manifold absolute pressure sensors, pressure regulators, pulsation dampers; purge control valves; and other components sold as a unitary system.	January 1, 2000 to March 20, 2017
Heater Control Panels	Heater Control Panels are the operational panels located in the centre console of 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
High Intensity Discharge Ballasts	High Intensity Discharge Ballasts are 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 means the mounted array of instruments and gauges, also known as meters, housed in front of the driver of an Automotive Vehicle.	January 1, 1998 to December 9, 2015
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
Plastic Interior Trim	Plastic Interior Trim means 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
Steering Angle Sensors	Steering Angle Sensors are sensors installed in the steering column of an Automotive Vehicle that detect 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 are steering wheel switches, turn switches, wiper switches, combination switches and door courtesy switches used in Automotive Vehicles.	June 1, 2003 to August 13, 2018

For more information about the particular class actions, visit [www.siskinds.com/autoparts](http://www.siskinds.com/autoparts) or [www.sotosllp.com/class-actions/current-cases/auto-parts/](http://www.sotosllp.com/class-actions/current-cases/auto-parts/).

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.

#### **D. 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 (as set out in the chart above):

- 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.

#### **E. 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 Settling Defendants do not admit any liability, wrongdoing or fault.

Settlements have been achieved with:

- Alpha Corporation and Alpha Technology Corporation (“Alpha”);
- Continental AG, Continental Automotive Systems, Inc. Continental Tire Canada, Inc. (formerly known as Continental Automotive Canada, Inc.), Continental Automotive Electronics LLC, and Continental Automotive Korea, Ltd. (“Continental”);
- Eberspächer Gruppe GmbH & Co. KG, Eberspächer Exhaust Technology GmbH (formerly Eberspächer Exhaust Technology GmbH & Co. KG), Eberspächer North America, Inc., and Eberspächer Climate Control Systems Canada Inc. (formerly Espar Products Inc.) (“Espar”);
- JTEKT Corporation, JTEKT North America Corporation, JTEKT Automotive North America, Inc., Koyo Deutschland GmbH, Koyo Corporation of U.S.A. and Koyo Canada Inc. (“JTEKT”);
- Koito Manufacturing Co., Ltd. and North American Lighting, Inc. (“Koito”);
- Maruyasu Industries Co., Ltd. and Curtis-Maruyasu America, Inc. (“Maruyasu”);
- Meritor, Inc. (“Meritor”);

- NTN Corporation, NTN USA Corporation, NTN Bearing Corp. of America, NTN Bearing Corp. of Canada Ltd., NTN Wälzlager (Europa) GmbH, and NTN-SNR Roulements SA (“NTN”);
- Tenneco Inc., Tenneco GmbH, Tenneco Automotive Operating Company Inc., and Tenneco Canada Inc. (“Tenneco”);
- Tokai Rika Co., Ltd., TRAM, Inc., TRMI, Inc., TRIN, Inc., TRQSS, Inc., and TAC Manufacturing Inc. (“Tokai Rika”);
- Toyo Tire & Rubber Co., Ltd., Toyo Tire North America OE Sales LLC and Toyo Automotive Parts (USA), Inc. (“Toyo Tire”);
- Toyoda Gosei Co., Ltd., Toyoda Gosei North America Corporation, Waterville TG Inc., TG Automotive Sealing Kentucky, LLC, TG Kentucky, LLC, TG Fluid Systems USA Corporation, TG Missouri Corporation, TG Minto Corporation, Fuel Total Systems Kentucky Corporation, Toyoda Gosei Holdings Inc., Toyoda Gosei Rubber Mexico S.A. De C.V., Meteor Sealing Systems, LLC, and LMI Custom Mixing, LLC (“Toyoda Gosei”); and
- Yamashita Rubber Co., Ltd. and YUSA Corporation (“Yamashita”).

These defendants (“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 (in the case of Tokai Rika, the pricing of Wire Harnesses<sup>3</sup>) and for the dismissal of any actions commenced in Canada by settlement class members relating to the pricing of the Relevant Parts.<sup>4</sup>

Alpha	
Automotive Access Mechanisms	<b>USD\$295,000</b>
Continental	
Instrument Panel Clusters	<b>\$605,790</b>
Espar	
Automotive Exhaust Systems	<b>\$190,000</b>
JTEKT	
Bearings	\$4,570 000
EPS Assemblies	\$430 000
Total	<b>USD\$5,000,000</b>
Koito	
Autolights	\$3,666,000
HID Ballasts	\$234,000
Total	<b>\$3,900,000</b>

<sup>3</sup> Wire Harnesses are assemblies of cables and other integrated components that transmit signals or electric power between electronic components throughout an Automotive Vehicle. The Tokai Rika settlement provides for a release of claims relating to the pricing of Automotive Wire Harness Systems because Tokai Rika had previously been named in the Automotive Wire Harness Systems action (that action was discontinued as against Tokai Rika).

<sup>4</sup> The exact terms of the releases and dismissals vary slightly as between the Settlement Agreements. Please refer to the Settlement Agreements for additional information.

<b>Maruyasu</b>	
Automotive Steel Tubes	USD\$601,000
Fuel Injection Systems	USD\$38,000
Total	<b>USD\$639,000</b>
<b>Meritor</b>	
Automotive Exhaust Systems	<b>\$141,361</b>
<b>NTN</b>	
Bearings	<b>\$959,574.78</b>
<b>Tenneco</b>	
Automotive Exhaust Systems	<b>\$2,618,655</b>
<b>Tokai Rika</b>	
Heater Control Panels	\$212,500
Occupant Safety Systems	\$4,712,500
Steering Angle Sensors	\$150,000
Switches	\$550,000
Total	<b>\$5,625,000</b>
<b>Toyo Tire</b>	
Anti-Vibration Rubber Parts	\$5,136,220.88
Automotive Constant-Velocity-Joint Boot Products	\$258,969.12
Total	<b>\$5,395,190</b>
<b>Toyoda Gosei</b>	
Automotive Brake Hoses	\$97,419.03
Automotive Constant-Velocity-Joint Boot Products	\$105,846.66
Automotive Hoses	\$801,883.04
Body Sealing Parts	\$4,411,627.59
Occupant Safety Systems	\$942,124.23
Plastic Interior Trim	\$751,852.16
Total	<b>\$7,110,752.71</b>
<b>Yamashita</b>	
Anti-Vibration Rubber Parts	<b>\$948,528</b>

The Settling Defendants have also agreed to provide cooperation to the plaintiffs in pursuing the applicable class actions against the remaining defendants. The Settling Defendants do not admit any liability, wrongdoing or fault.

## F. 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. 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 August 27, 2020 at 10:00 a.m. Depending on the status of the COVID-19 situation, it is possible that the Ontario hearing will proceed by videoconference, teleconference or in writing. Please visit [www.siskinds.com/autoparts](http://www.siskinds.com/autoparts) for updates.

The Quebec Court will hold a hearing to decide whether to approve some of these settlements in virtual hearing room 9001 (<https://webtrc.scvc.gouv.qc.ca>; code: 86219001)<sup>5</sup> on September 24, 2020 at 9:00 a.m.

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.

The following chart identifies which Courts will be asked to approve the settlements:

Settling Defendant	Part	Approving Court(s)
Alpha	Automotive Access Mechanisms	Ontario
Continental	Instrument Panel Clusters	Ontario, British Columbia and Quebec
Espar	Automotive Exhaust Systems	Ontario and British Columbia
JTEKT	Bearings	Ontario, British Columbia and Quebec
	EPS Assemblies	Ontario
Koito	Autolights	Ontario, British Columbia and Quebec
	HID Ballasts	Ontario
Maruyasu	Automotive Steel Tubes	Ontario and British Columbia
	Fuel Injection Systems	Ontario and Quebec
Meritor	Automotive Exhaust Systems	Ontario and British Columbia
NTN	Bearings	Ontario, British Columbia and Quebec
Tenneco	Automotive Exhaust Systems	Ontario and British Columbia
Tokai Rika	Heater Control Panels	Ontario, British Columbia and Quebec
	Occupant Safety Systems	Ontario, British Columbia and Quebec
	Steering Angle Sensors	Ontario
	Switches	Ontario

<sup>5</sup> The User Guide to join the hearing can be found at the following address: [https://www.justice.gouv.qc.ca/fileadmin/user\\_upload/contenu/professionnels-securise/FR/asv/Guide\\_utilisation\\_general\\_WebRTC.pdf](https://www.justice.gouv.qc.ca/fileadmin/user_upload/contenu/professionnels-securise/FR/asv/Guide_utilisation_general_WebRTC.pdf)

Toyo Tire	Anti-Vibration Rubber Parts	Ontario, British Columbia and Quebec
	Automotive Constant-Velocity-Joint Boot Products	Ontario
Toyoda Gosei	Automotive Brake Hoses	Ontario
	Automotive Constant-Velocity-Joint Boot Products	Ontario
	Automotive Hoses	Ontario and British Columbia
	Body Sealing Parts	Ontario
	Occupant Safety Systems	Ontario, British Columbia and Quebec
	Plastic Interior Trim	Ontario and British Columbia
Yamashita	Anti-Vibration Rubber Parts	Ontario, British Columbia and Quebec

## 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](http://www.siskinds.com/autoparts) for a complete list) from January 1995 onward. Records include invoices, receipts and bank or loan statements.
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](http://www.siskinds.com/autoparts) to receive updates about these class actions and the other auto parts price-fixing class actions.

There are over 40 cases pending in Canada relating to the alleged price-fixing of automotive parts relating to conduct as far back as January 1995. See [www.siskinds.com/autoparts](http://www.siskinds.com/autoparts) for a complete list of cases. You should keep related purchase records from January 1995 onward.

## H. 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 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](mailto:autoparts@sotosllp.com) and [autopartsclassaction@siskinds.com](mailto:autopartsclassaction@siskinds.com) no later than August 24, 2020.

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**

All members of the settlement classes may (but do not need to) attend the hearing before the applicable Courts to approve the settlements.

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 August 27, 2020 at 10:00 a.m.** Depending on the status of the COVID-19 situation, it is possible that the Ontario hearing will proceed by videoconference, teleconference or in writing. Please visit [www.siskinds.com/autoparts](http://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 August 24, 2020. 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](mailto: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 via videoconference (<https://webrtc.scvc.gouv.qc.ca>; code: 86219001)<sup>6</sup>. 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](mailto: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.

#### **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. At a later date, the courts will decide how the settlement funds will be distributed and how you can apply to receive money from these settlements. Watch for another notice at a later time explaining how to claim money from the settlements.

#### **J. WHAT IF I DON'T WANT TO BE IN THE CLASS ACTIONS?**

Members of the Anti-Vibration Rubber Parts, Autolights, Automotive Brake Hoses, Automotive Exhaust Systems, Automotive Hoses, Body Sealing Parts, EPS Assemblies, Fuel Injection Systems, Heater Control Panels, HID Ballasts, Instrument Panel Clusters, Occupant Safety Systems, and Switches actions were previously provided an opportunity to exclude themselves from the class actions (“opt out”) and were advised that no further right to opt out would be provided.

Members of the Automotive Access Mechanisms, Automotive Constant-Velocity-Joint Boot Products, Automotive Steel Tubes, Bearings, Plastic Interior Trim, and Steering Angle Sensors settlement classes can opt out.

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<sup>6</sup> The User Guide to join the hearing can be found at the following address:  
[https://www.justice.gouv.qc.ca/fileadmin/user\\_upload/contenu/professionnels-securise/FR/asv/Guide\\_utilisation\\_general\\_WebRTC.pdf](https://www.justice.gouv.qc.ca/fileadmin/user_upload/contenu/professionnels-securise/FR/asv/Guide_utilisation_general_WebRTC.pdf)

You can opt out 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 class actions. You must identify which class actions you (or the company) want to opt out of.

Requests to opt out of the proceedings must be post-marked by October 5, 2020.

If you are a resident of Québec and wish to opt out, you must also send your opt-out letter to the Clerk of the Superior Court of Quebec, located at 300, Boulevard Jean-Lesage, Québec (Québec) G1K 8K6, by October 5, 2020.

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 class actions relating to Automotive Access Mechanisms, Automotive Constant-Velocity-Joint Boot Products, Automotive Steel Tubes, Bearings, Plastic Interior Trim, and Steering Angle Sensors. No further right to opt out will be provided.

Parallel class proceedings were commenced in Ontario and British Columbia against other defendants relating to the pricing of Plastic Interior Trim. The right to opt out applies in those actions as well and no further right to opt out will be provided in respect of those actions. Information on those actions and the companies named as defendants is available on Class Counsel's website at: [www.siskinds.com/autoparts](http://www.siskinds.com/autoparts).

#### **K. NOTICE OF DISCONTINUANCE IN BEARINGS CLASS ACTION**

The Bearings Statement of Claim currently asserts claims on behalf of persons in Canada who purchased bearings and/or who purchased and/or leased products containing bearings (including automotive vehicles, light, medium and heavy duty vehicles, buses, commercial vehicles, industrial machinery, construction equipment, mining equipment and/or railway vehicles).

The Ontario Court approved amendments to the Bearings Statement of Claim to discontinue the industrial bearings portion of the class action. As a result, the class action will only advance claims relating to bearings installed in new Automotive Vehicles. These claims are advanced on behalf of persons in

Canada who purchased bearings for installation in new Automotive Vehicles and/or who purchased or leased new Automotive Vehicles.

If you purchased industrial bearings and/or purchased and/or leased industrial machinery containing bearings you may have the option of commencing your own action. The limitation period for bringing a claim, if there is any time left within it, will recommence on October 5, 2020, subject to any tolling of limitation periods as a result of COVID-19. On the expiry of the limitation period, your right to sue may be extinguished. Limitation periods vary across Canada. As a result, you should seek legal advice from local counsel.

If you wish to pursue a court claim regarding industrial bearings or industrial machinery containing bearings, you should issue a Notice of Action or Statement of Claim (or equivalent document in your province), if you have not already done so, before the applicable limitation period expires. You may wish to consult your own lawyer about this.

#### **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 x 2286

Email: [autopartsclassaction@siskinds.com](mailto: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](mailto: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 Mogergerman LLP represents members of the Anti-Vibration Rubber Parts, Autolights, Automotive Exhaust Systems, Bearings, Fuel Injection Systems, Heater Control Panels, Instrument Panel Clusters, Occupant Safety Systems, and Plastic Interior Trim class actions in British Columbia. They can be reached at:

Telephone: 1-800-689-2322

Email: [aslevin@cfmlawyers.ca](mailto:aslevin@cfmlawyers.ca)

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

The law firm of Klein Lawyers LLP represents members of the Automotive Access Mechanisms, Automotive Hoses, and Body Sealing Parts class action in British Columbia. They can be reached at:

Telephone: 604-874-7171

Email: [dtanjuatco@callkleinlawyers.com](mailto:dtanjuatco@callkleinlawyers.com)

Mail: 1385 West 8<sup>th</sup> Avenue, #400, Vancouver, BC V6H 3V9 Attention: Angela Bessflug

The law firm of Siskinds Desmeules s.e.n.c.r.l. represents members of the Anti-Vibration Rubber Parts, Autolights, Bearings, Fuel Injection Systems, Heater Control Panels, Instrument Panel Clusters, and Occupant Safety Systems class actions in Quebec. They can be reached at:

Telephone: 418-694-2009

Email: [recours@siskindsdesmeules.com](mailto: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 Access Mechanisms, Automotive Exhaust Systems, Automotive Steel Tubes, Body Sealing Parts, and Plastic Interior Trim class actions in Quebec. They can be reached at:

Telephone: 514-764-8362

Email: [channouche@kleinavocats.com](mailto: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.** 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), please visit [www.siskinds.com/autoparts](http://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](http://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 section E. If there is a conflict between the provisions of this notice and the settlement agreements, the terms of the settlement agreements shall prevail.