

**NOTICE OF CERTIFICATION FOR SETTLEMENT PURPOSES
AND SETTLEMENT APPROVAL HEARING
IN THE CANADIAN AUTO PARTS PRICE-FIXING CLASS ACTIONS**

**If you bought or leased a new or used vehicle, or certain automotive parts, since
January 1, 1999, 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 which claim that many companies participated in conspiracies to fix the prices of automotive parts sold in Canada.

This notice is about class actions relating to the following automotive parts:

- Automotive Wire Harness Systems (“AWHS”). An AWHS is the electrical distribution system in a vehicle. For more information, see www.classaction.ca/auto-parts-automotive-wire-harness-systems/
- Electronic Control Units (“ECU”). An ECU is a wide variety of different types of electronic modules that control one or more of the different electrical systems or sub-systems in an automotive vehicle. For more information, see www.classaction.ca/auto-parts-electronic-control-units-ecu/
- Heater Control Panels (“HCP”). A HCP is a panel located in the centre console of an automotive vehicle that incorporates buttons and switches that control the temperature of the interior environment of the vehicle. For more information see www.classaction.ca/autoparts/auto-parts-heater-control-panels-hcp/

All vehicles contain AWHS, ECU and HCP.

The class actions were started in BC, Ontario and/or Quebec, but the cases include Canadian residents in all provinces and territories who were affected by the alleged conspiracy. These class actions claim that the companies that sell the relevant parts were involved in a conspiracy to illegally increase the prices of these products. These class actions ask that the Court require these companies to return any extra money that they may have received due to this alleged conspiracy.

C. WHO IS AFFECTED BY THE CLASS ACTIONS?

The class actions are about AWHS, ECU and HCP installed in all vehicles. The class actions are also about all purchased (new or used) or leased vehicles containing AWHS, ECU or HCP.

AWHS Class Action:

You are affected by the AWHS class action and a “member” of either Settlement Class A or Settlement Class B if you are a person in Canada who between January 1, 1999 and December 4, 2014 or between December 5, 2014 and November 2, 2016:

- purchased or leased a new or used vehicle in Canada;
- purchased a new or used vehicle for import into Canada; or
- purchased an AWHS (or a component of one) in Canada.

ECU Class Action:

You are affected by the ECU class action and a “member” of the settlement class if you are a person in Canada who between January 1, 1999 and November 2, 2016:

- purchased or leased a new or used vehicle in Canada;
- purchased a new or used vehicle for import into Canada; or
- purchased an ECU in Canada.

HCP Class Action

You are affected by the HCP class action and a “member” of the settlement class if you are a person in Canada who between January 1, 2000 and November 2, 2016:

- purchased or leased a new or used vehicle in Canada;
- purchased a new or used vehicle for import into Canada; or
- purchased an HCP in Canada.

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 being released from the case.

Sumitomo Electric Industries, Ltd., SEWS Canada Ltd., Sumitomo Wiring Systems, Ltd., Sumitomo Electric Wiring Systems, Inc., Sumitomo Wiring Systems (U.S.A.), Inc., K & S Wiring Systems Inc. and Sumitomo Electric Wintec America, Inc. (collectively, the “Sumitomo defendants”) have settled the AWHS action for \$10,700,000, the ECU action for \$150,000, and the HCP action for \$150,000, in exchange for a full release of the claims against them relating to the pricing of AWHS, ECU and HCP. The Sumitomo defendants have also agreed to provide cooperation to the plaintiffs in pursuing the applicable class actions against the remaining defendants.

G.S. Electech, Inc., G.S.W. Manufacturing Inc. and G.S. Wiring Systems Inc. (collectively, the “G.S. Electech defendants”) have settled the AWHS action for \$120,000 in exchange for a full release of the claims against them relating to the pricing of AWHS.

The Sumitomo and G.S. Electech defendants do not admit any liability, wrongdoing or fault.

The settlements are subject to Court approval in Ontario, British Columbia and Quebec. The Courts will hold hearings to decide whether to approve these settlements in the Ontario Court in the City of Toronto on December 19, 2016 at 10:00 a.m. and the Quebec Court in the City of Quebec on December 20, 2016 at 4:00 p.m. and the British Columbia Court in the City of Vancouver on January 3, 2017 at 9:00 a.m. The Courts will decide whether the settlements are fair, reasonable, and in the best interests of settlement class members.

Previous settlements have been reached with five other groups of defendants in the AWHS class action. The settlements achieved to date total approximately \$25.2 million. The settlement funds, plus interest, less court approved fees and expenses, are being held in trust for the benefit of settlement class members. A method for distributing the settlement funds will be submitted to the courts for approval at a later date. Once the courts have approved the method for distributing the settlement funds, another notice will be provided regarding how the settlement funds will be distributed and how to apply to receive settlement funds.

E. WHAT DO I NEED TO DO?

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

1. You should keep records of any purchases or leases of all vehicles or automotive parts for installation in all vehicles from January 1, 1995 onward. Records include invoices, receipts and bank or loan statements.
2. You should register online at www.classaction.ca/autoparts to receive updates about these class actions and the other auto parts price-fixing class actions.

If you want to tell the Court what you think about the proposed settlements or speak to the Court at the hearings listed above, you must send your written submissions to Class Counsel by email at autopartsclassaction@siskinds.com no later than December 12, 2016.

You may (but do not need to) attend the hearings. If you wish to attend the hearings, please contact class counsel for additional details.

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

At this stage, the settlement funds (minus approved fees and expenses) will be held in an interest-bearing trust account. At a later date, the Court will decide how the settlement funds will be distributed and how you can apply to receive money from these settlements. Watch for another notice explaining how to claim money from the settlements.

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

Members of AWHs Settlement Class A (purchases made between January 1, 1999 and December 4, 2014) were already provided an opportunity to exclude themselves from the class action ("**opt-out**") and advised that no further right to opt-out would be provided. Members of AWHs Settlement Class B (purchases made between December 5, 2014 and November 2, 2016) can only opt-out if they do not also fall within the scope of AWHs Settlement Class A. All members of the ECU and HCP settlement classes can opt-out.

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;
- a statement saying that you (or the company) want to opt-out of the AWHs Settlement Class B, ECU and/or HCP class actions;
- for members of AWHs Settlement Class B, a statement that you (or the company) is not a member of AWHs Settlement Class A; and
- your reason for opting out.

Requests to opt-out of the proceedings must be post-marked by January 25, 2017. For residents of British Columbia, further information will be posted online at www.classaction.ca/autoparts regarding the deadline to opt-out of the ECU Settlement Class.

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 this class action, but
- you will be able to start 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 this class action, but
- you will not be able to start 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 AWHs Settlement Class B, ECU and HCP class actions.

H. 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 ext. 1315

Email: autopartsclassaction@siskinds.com

Mail: 680 Waterloo Street, London, ON N6A 3V8 Attention: Charles Wright

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 represents members of these class actions in British Columbia. British Columbia Class Counsel can be reached at:

Telephone: 1-800-689-2322

Email: aslevin@cfmlawyers.ca

Mail: #400 - 856 Homer Street, Vancouver, BC V6B 2W5 Attention: Sharon Matthews, Q.C.

The law firm of Siskinds Desmeules s.e.n.c.r.l. represents individuals and corporations of 50 or less employees who are members of these class actions in Quebec. Quebec Class Counsel 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: Barbara Ann Cain.

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 Sumitomo and G.S. Electech 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 costs award or future disbursements. At a later date, class counsel will ask the Courts to approve the distribution of the remaining settlement funds to settlement class members.

I. WHERE CAN I ASK MORE QUESTIONS?

For more information, please visit www.classaction.ca/autoparts. If you have questions that are not answered online, please contact Class Counsel at the numbers listed above.

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

J. INTERPRETATION

This notice contains a summary of some of the terms of the Sumitomo and G.S. Electech settlement agreements. If there is a conflict between the provisions of this notice and the settlement agreements, the terms of the settlement agreements shall prevail.

This notice has been approved by the Ontario, British Columbia and Quebec Courts.