

1 The Indirect-Purchaser Plaintiffs (“IPPs”) and the States of Arkansas, California, Florida,
2 Michigan, Missouri, New York, West Virginia, and Wisconsin (“Settling States”) have jointly
3 moved for preliminary approval of combined class, *parens patriae*, and governmental entity
4 settlements (the “Proposed Settlements”) with the AUO, LG Display, and Toshiba Defendants (as
5 identified in the Proposed Settlements, and inclusive of related entities identified in the Proposed
6 Settlements) (collectively, the “Settling Defendants”).

7 The Court, having reviewed the motion, the Proposed Settlements, the arguments of
8 counsel, and the records on file in this action, finds that preliminary approval of the Proposed
9 Settlements should be, and hereby is, GRANTED.

10 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

11 1. The Proposed Settlements with the Settling Defendants are preliminarily approved,
12 subject to a final approval hearing of the Proposed Settlements (the “Fairness Hearing”).

13 2. The following class is provisionally certified for settlement purposes only, pursuant
14 to Rule 23 of the Federal Rules of Civil Procedure:

15 All persons and entities in Arkansas who, from January 1, 1999 to
16 December 31, 2006, as residents of Arkansas, purchased TFT-LCD
17 Panels incorporated in televisions, monitors, and/or laptop computers in
18 Arkansas indirectly from one or more of the named Defendants or
19 Quanta Display, Inc., for their own use and not for resale. Specifically
20 excluded from the Class are defendants; the officers, directors, or
21 employees of any defendant in the Actions; the parent companies and
22 subsidiaries of any defendant; the legal representatives and heirs or
23 assigns of any defendant; and their named affiliates and co-
24 conspirators. Also excluded are any federal, state or local
25 governmental entities, any judicial officer presiding over this action
26 and the members of his/her immediate family and judicial staff, and any
27 juror assigned to this Action.

28 3. The following class is provisionally certified for settlement purposes only, pursuant
to Rule 23 of the Federal Rules of Civil Procedure:

29 All persons and entities in Missouri or Rhode Island who, from January
30 1, 1999 to December 31, 2006, as residents of Missouri or Rhode
31 Island, respectively, purchased TFT-LCD Panels incorporated in
32 televisions, monitors, and/or laptop computers in Missouri or Rhode
33 Island, respectively, indirectly from one or more of the named
34 Defendants or Quanta Display, Inc., primarily for business use (and not
35 for personal, family, or household use) and not for resale. Specifically

1 excluded from the Class are defendants; the officers, directors, or
2 employees of any defendant; the parent companies and subsidiaries of
3 any defendant; the legal representatives and heirs or assigns of any
4 defendant; and the named affiliates and co-conspirators. Also excluded
5 are any federal, state or local governmental entities, any judicial officer
6 presiding over this action and the members of his/her immediate family
7 and judicial staff, and any juror assigned to this Action.

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4. The following class is provisionally certified for settlement purposes only, pursuant
to Rule 23 of the Federal Rules of Civil Procedure:

All persons and entities in Arizona, Arkansas, California, District of
Columbia, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts,
Michigan, Minnesota, Mississippi, Missouri, Nevada, New Mexico,
New York, North Carolina, North Dakota, Rhode Island, South Dakota,
Tennessee, Vermont, West Virginia, or Wisconsin who, from January
1, 1999 to December 31, 2006, as residents of the respective state,
purchased TFT-LCD Panels incorporated in televisions, monitors,
and/or laptop computers in the respective state, indirectly from one or
more of the named Defendants or Quanta Display, Inc., for their own
use and not for resale, and whose purchases bring them within the
definition of the certified direct purchaser product class in this
Multidistrict Litigation No. 1827 and who did not opt-out of that class.
Specifically excluded from the Class are defendants; the officers,
directors, or employees of any defendant; the parent companies and
subsidiaries of any defendant; the legal representatives and heirs or
assigns of any defendant; and the named affiliates and co-conspirators.
Also excluded are any federal, state or local governmental entities, any
judicial officer presiding over this action and the members of his/her
immediate family and judicial staff, and any juror assigned to this
Action.

5. With respect to the above-referenced settlement-only classes, the Court finds that
the requirements of Rule 23(a) of the Federal Rules of Civil of Procedure have been satisfied in
that: (i) there are numerous class members, making joinder of all class members impracticable; (ii)
there are questions of fact and law that are common to all members of the class; (iii) the claims of
the class representative are typical of the claims of the class; and (iv) the class representative will
fairly and adequately protect the interests of the class.

6. With respect to the above-referenced settlement-only classes, the Court further
finds that the requirements of Rule 23(b)(3) of the Federal Rules of Civil Procedure have been
satisfied for settlement purposes only in that: (i) questions of fact and law common to the class
members predominate over any questions affecting only individual members; and (ii) a class

1 action is superior to other available methods for the fair and efficient adjudication of this
2 controversy.

3 7. With respect to the above-referenced settlement-only classes, the Court hereby
4 appoints as class representative Robert Harmon for purposes of the settlement-only class defined at
5 paragraph 2; the Court hereby appoints as class representatives Benjamin Larry Luber and Dr.
6 Robert Mastronardi for purposes of the settlement-only class defined at paragraph 3; the Court
7 hereby appoints as class representatives all of the individuals identified in the Court's class
8 certification orders dated March 28, 2010 (Dkt. 1642) and July 28, 2011 (Dkt. 3198), incorporated
9 herein by reference, for purposes of the settlement-only class defined at paragraph 4. The Court
10 hereby appoints Zelle Hofmann Voelbel & Mason LLP and the Alioto Law Firm as counsel for the
11 above-referenced settlement-only classes.

12 8. The Court finds that the Proposed Settlements fall within the range of possible final
13 approval. The Court further finds that there is a sufficient basis for notifying class members of the
14 Proposed Settlements, and for enjoining class members from proceeding in any other action
15 pending the conclusion of the Fairness Hearing.

16 9. The Court will conduct a Fairness Hearing on November 29, 2012 at 3:30 p.m. The
17 Fairness Hearing will be conducted to determine the following:

- 18 a. Whether the Proposed Settlements are fair, reasonable, and adequate, and should be
19 granted final approval;
- 20 b. Whether final judgments should be entered dismissing the claims of the class
21 members against the Settling Defendants with prejudice under the terms of the
22 Proposed Settlements; and
- 23 c. Such other matters as the Court may deem appropriate.

24 10. To avoid the possible duplication of class notices, notice of the settlements shall be
25 combined and sent in one notice regarding the settlements with all Settling Defendants.

26 11. The Court further finds that notice by publication is the best notice that is
27 practicable under the circumstances, and constitutes valid, due, and sufficient notice that complies
28 with the requirements of Rule 23 of the Federal Rules of Civil Procedure. In addition, the Court

1 finds that the proposed notice plan and forms of notice comport with due process of law and are
2 proper under Ark. Code Ann. § 4-75-315(b)(2) and Cal. Bus. & Prof. Code § 16760(b)(1).

3 12. The Court preliminarily approves the plan of distribution proposed by the IPPs and
4 the Settling States in the motion for preliminary approval, and approves the proposed claim form
5 substantially in the form attached hereto as Exhibit A.

6 13. Within 30 days of this Order, the Notice Administrator (as designated by co-lead
7 class counsel for the Indirect-Purchaser Plaintiffs and the Settling States in the motion for
8 preliminary approval) shall cause notice substantially in the form attached hereto as Exhibit B
9 (short-form notice) to be published according to the Notice Plan described in the declaration of
10 Katherine Kinsella, filed concurrently with the motion for preliminary approval. Within 30 days
11 of this Order, the Notice Administrator shall cause notice substantially in the form attached hereto
12 as Exhibit C (long-form notice) to be posted on the internet at www.LCDclass.com.

13 14. Members of the classes certified by Orders of this Court dated March 28, 2010 and
14 July 28, 2011, as modified by the January 26, 2012 Order, were already given an opportunity to
15 exclude themselves, and another opportunity is not necessary or required.

16 15. Members of the above-referenced settlement-only classes shall have the opportunity
17 to exclude themselves from the Proposed Settlements. These settlement-only class members may
18 exercise the right to be excluded from the Proposed Settlements by mailing a request for exclusion
19 to the Notice Administrator no later than 60 days after commencement of the Notice Plan.
20 Requests for exclusion must be in writing and set forth the name and address of the person or
21 entity that wishes to be excluded, as well as all trade names or business names and addresses used
22 by such person or entity, must state that the person or entity wishes to be excluded, and must be
23 signed by the person or entity seeking exclusion. No later than 20 days after the last date for class
24 members to opt-out of the Proposed Settlements, the IPPs and the Settling States shall file with the
25 Court a list of all persons and entities who have timely requested exclusion from the Proposed
26 Settlements. Any timely request for exclusion received from an IPP class member shall be deemed
27 also to be an election of exclusion from such state's *parens patriae* claims (if applicable), and
28 vice-versa.

1 16. Any class member who does not properly and timely request exclusion from the
2 Proposed Settlements shall, upon final approval of the Proposed Settlements, be bound by the
3 terms and provisions of the Proposed Settlements so approved, including but not limited to the
4 releases, waiver, and covenants described in the Proposed Settlements, whether or not such person
5 or entity objected to the Proposed Settlements and whether or not such person or entity makes a
6 claim against the settlement funds.

7 17. Each class member who does not timely seek exclusion shall have the right to
8 object to the Proposed Settlements by filing written objections with the Court no later 60 days after
9 commencement of the Notice Plan, copies of which shall be served on all counsel listed in the
10 long-form notice. Failure to timely file and serve written objections will preclude a class member
11 from objecting to the Proposed Settlements.

12 18. Each class member who does not timely seek exclusion shall have the right to
13 appear at the Fairness Hearing by filing a Notice of Intention to Appear no later than 60 days after
14 commencement of the Notice Plan, copies of which shall be served on all counsel listed in the
15 long-form notice.

16 19. All briefs, memoranda, and papers in support of final approval of the settlement
17 shall be filed not later than 14 days before the Fairness Hearing, and shall be posted on the internet
18 at www.LCDclass.com. Any briefs, memoranda, and papers in support of a request for Attorneys' fees or
19 reimbursement and/or advancement of costs to be heard at the same time as the Fairness Hearing
20 shall be filed not later than 30 days before the date that objections to the Proposed Settlement are
21 due, and shall be posted on the internet at www.LCDclass.com.

22 20. All further IPP and Settling State proceedings as to the Settling Defendants are
23 hereby stayed except for any actions required to effectuate the Proposed Settlements or that are
24 otherwise permitted by the Proposed Settlements or agreed to by the IPPs, the Settling States, and
25 the Settling Defendants.

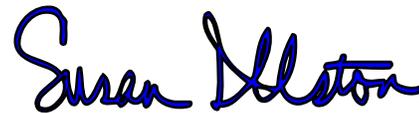
26 21. Pending the final determination of whether the Proposed Settlements should be
27 approved, each IPP class representative and each member of the IPP classes, and any person
28 purporting to assert their claims, is hereby enjoined from commencing or prosecuting, either

1 directly or indirectly, any action in any other court asserting any of the Released Claims; provided,
2 that this injunction shall not apply to individual claims of any member of the IPP Classes who has
3 timely and properly opted out from the IPP Classes as permitted by the Court. Such injunction
4 shall remain in force until final approval or until such time as the parties notify the Court that the
5 Proposed Settlements have been terminated. This injunction is necessary to protect and effectuate
6 the Proposed Settlements, this Preliminary Approval Order, and the Court's flexibility and
7 authority to effectuate the Proposed Settlements and to enter final judgment when appropriate, and
8 is in aid of the Court's jurisdiction and to protect its judgments.

9 22. The Court retains exclusive jurisdiction over this action to consider all further
10 matters arising out of or connected with the Proposed Settlements.

11 **IT IS SO ORDERED.**

12 Dated: 7/30/12
13 _____



14 _____
15 The Honorable Susan Y. Illston,
16 United States District Judge

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EXHIBIT A



FOR OFFICIAL USE ONLY
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LCD FLAT PANEL ANTITRUST SETTLEMENTS CLAIM FORM

Complete this Claim Form to receive a payment from Settlements totaling approximately \$1.1 Billion. It is expected that a minimum payment of \$25.00 will be distributed to eligible Class Members that submit a valid Claim Form. Your claim must be submitted online or postmarked by **Month 00, 2012.**

Consumers (individual or business) in 24 states and the District of Columbia that indirectly purchased a LCD Flat Panel which has been incorporated into a TV, monitor or notebook computer can get a payment from the Settlements. "Indirectly" means that you purchased the LCD Flat Panel from someone other than the manufacturer of the flat panel. **You must answer the three Eligibility Questions below, by checking the box, to see if you are eligible.**

PART 1: ELIGIBILITY QUESTIONS

Did you reside in one of the following states or the District of Columbia between January 1, 1999 and December 31, 2006: Arizona, Arkansas, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nevada, New Mexico, New York, North Carolina, North Dakota, Rhode Island, South Dakota, Tennessee, Vermont, West Virginia and Wisconsin?

Yes No

Did you buy a television, monitor and/or notebook computer containing a LCD Flat Panel within one of these states or the District of Columbia, for your own use and not for resale, while residing in that state or the District of Columbia between January 1, 1999 and December 31, 2006?

Yes No

Did you buy a television, monitor and/or notebook computer containing a LCD Flat Panel from a company other than the following LCD Flat Panel manufacturers: AU Optronics, Chimei, Chunghwa, Epson, HannStar, Hitachi, LG, Samsung, Sharp or Toshiba? For example, if you purchased one of these products from a retailer like Best Buy or a computer manufacturer like Dell, your answer should be "Yes." The brand of product does not change your answer. So, if you bought a Samsung-branded television or a Toshiba-branded notebook computer from Best Buy your answer is still "Yes." However, for example, if your only purchase was a television or notebook computer bought directly from Samsung or Toshiba, your answer would be "No."

Yes No

You are eligible for payment only if you answered "Yes" to all three Eligibility Questions above. To get a payment you must submit your Claim Form online at www.LCDclass.com or complete Parts 1, 2, 3 and 4 of this Claim Form and mail it to: LCD Claims, P.O. Box 8025, Faribault, MN 55021-9425. You cannot file a claim if you answered "No" to any of the Eligibility Questions.

If you have questions about your eligibility to participate or on how the Settlement Fund will be distributed, you should review the Class Notice and other documents at the website. You can also call 1-855-225-1886 if you have any questions.

PART 2: PURCHASE INFORMATION

Enter the total number of the following products you purchased from **January 1, 1999 through December 31, 2006** which contain a LCD Flat Panel. Only include qualifying products for which you answered "Yes" to the three Eligibility Questions:

Total Number of Televisions	
Total Number of Monitors	
Total Number of Notebooks	

All claims are subject to audit and large claims will require verification.



PART 3: CLASS MEMBER INFORMATION

Type or print neatly in blue or black ink.

Last Name First Name

Entity Name

Person to contact if there are questions regarding this claim:

Specify one of the following:

Individual Business (1-10 Employees) Business (11-50 Employees) Business (Greater than 50 Employees)

Number and Street or P.O. Box

City State Zip Code

Telephone Number (Day) Email Address

Individuals: Provide the last 4 digits of your Social Security Number: - -

Businesses: Provide your Federal Taxpayer Identification Number: -

PART 4: SIGN AND DATE CLAIM FORM

I (we) declare under penalty of perjury under the laws of the United States of America, that the information provided in this Claim Form is true and correct.

Signature

____ / ____ / ____
Date

Print Name

Title (if you are filling out this form for a business)

Claims may be audited and any false or fraudulent claim is subject to prosecution.

REMINDER:

Please make sure that you:

1. Complete all four parts of this Claim Form;
2. Sign the Claim Form;
3. Submit your Claim Form online or by mail **postmarked no later than Month 00, 2012** to:

www.LCDClass.com **OR** *LCD Claims*
 P.O. Box 8025
 Faribault, MN 55021-9425
4. Keep a copy of the completed Claim Form for your records;
5. Retain your proof of purchase documentation until your claim is closed. You will be notified if you are required to provide this documentation during the claim verification process.

EXHIBIT B

If You Bought a TV, Monitor or Notebook Computer That Contained a LCD Flat Panel Screen

File a Claim Now to Get Money from Settlements Totaling Almost \$1.1 Billion.

This is the second notice in this case. Settlements have now been reached with AU Optronics, LG Display and Toshiba (“New Settlements”). The Court previously approved Settlements with seven other Defendants.

Members of the Statewide Damages Classes can file a claim now to get a payment from all Settlements (see below).

What are the lawsuits about?

The lawsuits claim that the Defendants conspired to fix, raise, maintain or stabilize prices of thin film transistor liquid crystal display (“TFT-LCD” or “LCD”) Flat Panels, resulting in overcharges to consumers who bought TVs, monitors or notebook computers containing Flat Panels. The Defendants deny Plaintiffs’ allegations or that consumers paid any overcharge. The Court has not decided who is right.

Who is included in the lawsuits?

This case has recovered money for consumers in 24 states and the District of Columbia and governmental entities in eight states, and nationwide injunctive relief to stop the Defendants’ alleged behavior.

Statewide Damages Classes: Generally, include any person or business that indirectly purchased a TFT-LCD Flat Panel, which had been incorporated in a TV, monitor or notebook computer, from any of the Defendants or Quanta Display Inc., from January 1, 1999 to December 31, 2006, for their own use and not for resale, while residing in the 24 states or the District of Columbia. “Indirectly” means that you purchased the product containing the LCD Flat Panel from someone other than the manufacturer of the LCD Flat Panel.

The purchase must have been made in the same state where the person or business resided. Businesses in Rhode Island and Missouri and indirect purchasers who also had direct purchases (previously not included) may now participate in all 10 Settlements.

The 24 states are: AZ, AR, CA, FL, HI, IA, KS, ME, MA, MI, MN, MS, MO, NV, NM, NY, NC, ND, RI, SD, TN, VT, WV and WI. See specific class definitions at www.LCDclass.com.

Nationwide Class: Includes any person or business that indirectly purchased in the United States, a TFT-LCD Flat Panel, which had been incorporated in a TV, monitor or notebook computer, from any of the Defendants or Quanta Display Inc., between January 1, 1999 and February 13, 2012, for their own use and not for resale, and resided in the United States on February 13, 2012.

Attorneys General Actions: The Attorneys General of AR, CA, FL, MI, MO, NY, WV and WI are participating in these Settlements to resolve related claims arising from the same allegations as asserted in the class actions: (1) on behalf of state residents under state law and the doctrine of *parens patriae*, which allows a state to bring a lawsuit on behalf of its citizens, and/or for governmental entities; and (2) for civil penalties.

What do the Settlements provide?

Three New Settlements totaling \$543,500,000 are being presented to the Court for approval. In addition, AU Optronics and LG Display are making payments to resolve claims for civil penalties brought by the Attorneys General. To the extent AU Optronics, LG Display and Toshiba continue to manufacture LCD Flat Panels, they have agreed not to engage in conduct that is at issue in these lawsuits and/or will establish (or maintain) a program to educate their employees about complying with the law. The combined Settlement Fund (totaling \$1,082,055,647) will be used to pay individual and business consumers in the 24 states and DC. A portion of the Settlement Fund will be distributed to governmental entities in the eight states with Attorneys General Actions.

Payments will be based on the number of valid claims filed as well as on the number/type of LCD Flat Panel products you purchased. It is expected that a minimum payment of \$25 will be made to all Class Members who submit a valid claim. It is possible that any money remaining after claims are paid will be distributed to charities, governmental entities or other beneficiaries approved by the Court. More details are provided in the Settlement Agreements and other documents available at www.LCDclass.com, or by calling the toll-free number below.

The cost to administer the Settlements, attorneys’ fees, costs and expenses, and awards to the Class Representatives will come out of the Settlement Fund. Plaintiffs’ counsel will request attorneys’ fees not to exceed one-third of the Settlement Fund, plus reimbursement of costs and expenses.

How can I get a payment?

You must submit a Claim Form to get a payment. You can submit a Claim Form online or by mail. The deadline to submit a Claim Form is **Month 00, 2012**. Claim Forms are available at the website or by calling 1-855-225-1886.

What are my rights?

The Court will hold a hearing on **Month 00, 2012** to consider whether to approve the New Settlements. If you stay in the Classes, you may object to the New Settlements, plan of distribution, attorneys’ fees and costs, and awards to Class Representatives by **Month 00, 2012**. You or your own lawyer may appear and speak at the hearing at your own expense.

With the exception noted below, the first notice gave you an opportunity to exclude yourself. If you did not exclude yourself, you have given up your right to sue the Defendants on your own for the claims in this case. Only individuals and businesses that indirectly purchased a LCD Flat Panel: (1) while residing in Arkansas; (2) while residing in Missouri or Rhode Island that was not primarily for household or personal use; or (3) that had a direct purchase in addition to an indirect purchase, have until **Month 00, 2012** to exclude themselves from the litigation involving AU Optronics, LG Display and Toshiba. If you reside outside of the 24 states and the District of Columbia you keep any right you may have to sue the Defendants for monetary relief.

For More Information: 1-855-225-1886 www.LCDclass.com

Text: “LCDclass” to 41513 (Text messaging rates may apply)

EXHIBIT C

U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

If You Bought a TV, Monitor or Notebook Computer that Contained a LCD Flat Panel Screen

You Could Get Money from Settlements Totaling Almost \$1.1 Billion.

A Federal Court authorized this notice. This is not a solicitation from a lawyer.

- Please read this notice carefully. Your legal rights are affected whether you act or don't act.
- This is the second notice in this case. There are 10 Settlements of litigation involving overcharges in the price of thin film transistor liquid crystal display ("TFT-LCD" or "LCD") Flat Panels purchased indirectly from the Defendants. "Indirectly" means that you purchased the LCD Flat Panel from someone other than the manufacturer of the Flat Panel (for example, you bought a TV, monitor or notebook computer containing a LCD Flat Panel from a retailer, like Best Buy).
- Since the first notice, the Court has approved Settlements with seven Defendants. Settlements have now been reached with the three remaining Defendants, AU Optronics, LG Display and Toshiba ("New Settlements").
- These Settlements provide for payments to consumers, including businesses, in 24 states and the District of Columbia (the Statewide Damages Classes). They also provide for injunctive relief to consumers nationwide (the Nationwide Class) to stop Defendants' conduct that is the subject of the lawsuits. Eight states Attorneys General are also recovering money for their citizens and governmental entities. Defendants deny all of the claims in the lawsuits. See Question 6 for specific Class definitions.

Members of the Statewide Damages Classes can file a claim now to get a payment from all 10 Settlements (see Question 12).

- You can make a claim if you are a consumer in the District of Columbia, Arizona, Arkansas, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nevada, New Mexico, New York, North Carolina, North Dakota, Rhode Island, South Dakota, Tennessee, Vermont, West Virginia or Wisconsin. The Settlements will also pay governmental entities in eight states.
- AU Optronics and LG Display have also agreed not to engage in the conduct that is the subject of the lawsuits.

YOUR LEGAL RIGHTS AND OPTIONS IN THESE SETTLEMENTS	
SUBMIT A CLAIM	The only way to get a payment.
OBJECT	You can write to the Court explaining why you disagree with the New Settlements, plan of distribution, requested attorneys' fees, costs, and Class Representative awards.
GO TO THE HEARING	Ask to speak in Court about your opinions.
EXCLUDE YOURSELF	The only option that allows you to individually sue AU Optronics, LG Display or Toshiba about the claims in this case. You can only exclude yourself if: (1) you indirectly purchased a LCD Flat Panel in Arkansas while residing in Arkansas; or (2) you previously did <u>not</u> have an opportunity to exclude yourself from the Classes proceeding against AU Optronics, LG Display and Toshiba. See Questions 13 and 14 for specifics.
DO NOTHING	Get no payment. Give up rights.

These rights and options – **and the deadlines to exercise them** – are explained in this Notice.

VISIT WWW.LCDCLASS.COM OR CALL TOLL FREE 1-855-225-1886
PARA UNA NOTIFICACIÓN EN ESPAÑOL, VISITAR NUESTRO WEBSITE O LLAMAR

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BASIC INFORMATION

1. What is this Notice about?

This Notice is to inform you about the three New Settlements that have been reached and about your right to file a claim. You have the right to know about the New Settlements and about your legal rights and options before the Court decides whether to approve the New Settlements.

Members of the Statewide Damages Classes can file a claim now to get a payment from all 10 Settlements (see Question 12).

The Court in charge is the United States District Court for the Northern District of California. The case is called *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL No. 1827. The people who sued are called the Plaintiffs, and the companies they sued are called the Defendants (see Question 5).

2. What is a TFT-LCD Flat Panel?

TFT-LCD Flat Panels (thin-film transistor liquid display panels) are the glass display panels used in many flat screen televisions, monitors and notebook computers. Monitors have various uses, including as desktop computers and TVs.

3. What are the lawsuits about?

The lawsuits claim that the Defendants conspired to fix, raise, maintain or stabilize prices of LCD Flat Panels, resulting in overcharges to consumers who bought TVs, monitors or notebook computers containing the Flat Panels. The Defendants deny Plaintiffs' allegations or that indirect purchaser consumers suffered any overcharge.

On July 11, 2012, the Court approved Settlements totaling over \$538,555,647 with Defendants Chimei, Chunghwa, Epson, HannStar, Hitachi, Samsung and Sharp. There are three New Settlements totaling \$543,500,000 with AU Optronics, LG Display and Toshiba. The Court still has to decide whether to approve the New Settlements. The total amount of all 10 Settlements is \$1,082,055,647.

4. What is a class action?

In a class action, people called class representatives sue on behalf of a group or a "class" of people who have similar claims. In a class action, the court resolves the issues for all class members except those who exclude themselves from the Class.

WHO IS INCLUDED

5. Who are the Defendant companies?

The Defendants are or were manufacturers and/or suppliers of LCD Flat Panels.

The Defendant companies are:

- AU Optronics Corp.; AU Optronics Corp. America, Inc. ("AU Optronics");
- Chimei Innolux Corp.; Chi Mei Corp.; Chi Mei Optoelectronics Corp.; Chi Mei Optoelectronics USA, Inc.; CMO Japan Co., Ltd. ("Chimei");
- Chunghwa Picture Tubes Ltd. ("Chunghwa");

- Epson Imaging Devices Corp. (“Epson”);
- HannStar Display Corp. (“HannStar”);
- Hitachi, Ltd.; Hitachi Displays, Ltd.; Hitachi Electronic Devices (USA), Inc. (“Hitachi”);
- LG Display Co., Ltd.; LG Display America, Inc. (“LG Display”);
- Samsung Electronics Co., Ltd.; Samsung Semiconductor, Inc.; Samsung Electronics America, Inc. (“Samsung”);
- Sharp Corp.; Sharp Electronics Corp. (“Sharp”);
- Toshiba Corp.; Japan Display Central, Inc. (formerly known as Toshiba Mobile Display Co., Ltd.); Toshiba America Electronic Components, Inc.; Toshiba America Information Systems, Inc. (“Toshiba”); and
- Defendants’ United States affiliates.

6. How do I know if I am in the Classes?

This case has recovered money (“damages”) for consumers in 24 states and the District of Columbia, and nationwide injunctive relief to stop the Defendants’ alleged illegal behavior and make sure that it doesn’t happen in the future (*see* Question 11).

Statewide Damages Classes: The Statewide Damages Classes were brought to recover money, and generally include any person or business that indirectly purchased a TFT-LCD Flat Panel, which had been incorporated in a TV, monitor or notebook computer, from any of the Defendants (listed in Question 5) or Quanta Display Inc., from January 1, 1999 to December 31, 2006, for their own use and not for resale, while residing in the 24 states or the District of Columbia. The purchase must have been made in the same state where the person or business resided.

The 24 states are: Arizona, Arkansas, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nevada, New Mexico, New York, North Carolina, North Dakota, Rhode Island, South Dakota, Tennessee, Vermont, West Virginia and Wisconsin.

Previously, certain consumers in these 24 states and the District of Columbia were not included in the Statewide Damages Classes for the ongoing litigation against AU Optronics, LG Display, Toshiba and their United States affiliates, if: (1) in addition to your indirect purchase, you purchased a product containing a TFT-LCD Flat Panel in the United States between January 1, 1996 and December 11, 2006 directly from any of the Defendants and did not exclude yourself from the Direct Purchaser Class (*see* www.tftlcdclassaction.com for more information); or (2) you purchased a TV, monitor and/or notebook computer in Missouri or Rhode Island, while residing there, and your purchase was primarily for business use and not for your own personal, family or household use. **These exceptions no longer apply.** Consumers in the 24 states and the District of Columbia who fall within these categories are now included in the Statewide Damages Classes for all 10 Settlements.

Nationwide Class: The Nationwide Class was brought to stop Defendants’ alleged illegal behavior and includes any person or business that indirectly purchased in the United States, a TFT-LCD Flat Panel, which had been incorporated in a TV, monitor and/or notebook computer, from any of the Defendants (listed in Question 5) or Quanta Display Inc., between January 1, 1999 and February 13, 2012, for their own use and not for resale, and resided in the United States on February 13, 2012.

The specific class definitions are available at www.LCDclass.com.

7. Are the Attorneys General involved?

The Attorneys General of Arkansas, California, Florida, Michigan, Missouri, New York, West Virginia and Wisconsin are participating in these Settlements and have asserted claims: (1) on behalf of state residents under state law and the doctrine of *parens patriae*, which allows a state to bring a lawsuit on behalf of its citizens, and/or for governmental entities; and (2) for civil penalties. The claims brought by the Attorneys General arise from the same alleged conduct by the Defendants as asserted in the class actions. The Attorneys General's lawsuits, other than California, are pending in federal court. The California Attorney General filed in California state court. The Attorneys General have entered into separate settlements resolving their claims for civil penalties.

THE SETTLEMENTS' BENEFITS

8. What do the Settlements provide?

The Court has already approved seven settlements totaling \$538,555,647. The three New Settlements totaling \$543,500,000 are being presented to the Court for approval.

NEW SETTLEMENTS

AU Optronics Settlement: AU Optronics will pay \$161,500,000 into the Settlement Fund.

LG Display Settlement: LG Display will pay \$361,000,000 into the Settlement Fund.

Toshiba Settlement: Toshiba will pay \$21,000,000 into the Settlement Fund.

The combined Settlement Fund totaling \$1,082,055,647 will be used to pay individual and business consumers in the 24 states and the District of Columbia. A portion of the Settlement Fund will be distributed to governmental entities in the eight states with the Attorneys General Actions. The amount to be distributed to governmental entities will be computed after deduction of attorney fees and costs and will not exceed 5% of the amount available for distribution. In addition to the Settlement Fund, AU Optronics and LG Display are making payments to resolve claims for civil penalties brought by the Attorneys General. More details about the anticipated distribution of the Settlement Fund are available in the Settlement Agreements and other documents available at www.LCDclass.com.

Any interest earned will be added to the Settlement Fund. The cost to administer the Settlements as well as attorneys' fees and costs and payments to the Class Representatives will come out of the combined Settlement Fund (*see* Question 17).

9. How much money can I get?

A plan has been submitted to the Court explaining how the Settlement Fund will be distributed to Class Members. Payments will be determined on a *pro rata* basis. This means payments will be based on the number of valid claims filed as well as on the number/type of LCD Flat Panel product(s) you purchased. Based on data obtained during the course of the litigation, a claim for the purchase of a LCD Flat Panel TV will be given twice the value as a claim for the purchase of a monitor or a notebook computer. It is expected that a minimum payment of \$25 will be made to all Class Members who submit a valid claim.

The maximum payment will be three times your estimated actual money damages. It is possible that any money remaining after claims are paid will be distributed to charities, governmental entities or other beneficiaries approved by the Court.

In order to receive a payment you need to file a valid claim (see Question 12). The Claim Form provides additional details on how to submit a claim. Further information is available at www.LCDclass.com or by calling 1-855-225-1886.

10. When will I get a payment?

Payments will be distributed after the Court grants final approval to the New Settlements and after any appeals are resolved. If the Court approves the New Settlements after a hearing on Month 00, 2012, there may be appeals. We don't know how much time it could take to resolve any appeals that may be filed.

11. What is the injunctive relief?

AU Optronics and LG Display have agreed not to engage in certain conduct that would violate the antitrust laws that are at issue in these lawsuits. AU Optronics, LG Display and Toshiba also have agreed to establish (or maintain) a program to educate their employees about complying with the law, as long as they manufacture LCD Flat Panels, and report on their compliance with this requirement for a period up to five years.

HOW TO GET A PAYMENT

12. How can I get a payment?

If you are a Class Member and you want to participate in the Settlements, you must complete and submit a Claim Form. We urge you to submit a Claim Form online at www.LCDclass.com. If you do not file online, you can also file a paper Claim Form by mail.

The Claim Form can be found at www.LCDclass.com or you can obtain a copy by calling, toll free, 1-855-225-1886. If you choose to submit your claim online, you must do so on or before **Month 00, 2012**. If you choose to submit a Claim Form by mail, it must be postmarked by **Month 00, 2012**, and mailed to:

LCD Claims
P.O. 00000
City, ST 00000-0000

RIGHT TO EXCLUDE YOURSELF

13. Who has a right to be excluded?

The first notice about these lawsuits provided an opportunity for all Class Members to exclude themselves from the Classes and the Attorneys General Actions. That notice required that all exclusion rights for the Classes proceeding against the seven settling defendants, and with limited exceptions, all exclusion rights against AU Optronics, LG Display and Toshiba had to be exercised by April 13, 2012. Only someone who falls into one of the three categories stated below still has a right to request exclusion at this time.

VISIT WWW.LCDCLASS.COM OR CALL TOLL FREE 1-855-225-1886
PARA UNA NOTIFICACIÓN EN ESPAÑOL, VISITAR NUESTRO WEBSITE O LLAMAR

If you are a Class Member, you can exclude yourself from the litigation involving AU Optronics, LG Display and Toshiba only if: (1) you purchased a TFT-LCD Flat Panel in Arkansas while residing in Arkansas; (2) in addition to your indirect purchase, you also purchased a product containing a TFT-LCD Flat Panel in the United States between January 1, 1996 and December 11, 2006 directly from any of the Defendants and did not exclude yourself from the Direct Purchaser Class (*see* www.tftlcdclassaction.com for more information); or (3) you purchased a TV, monitor and/or notebook computer containing a TFT-LCD Flat Panel in Missouri or Rhode Island, while residing there, and your purchase was primarily for business use and not for your own personal, family or household use. Everyone else was previously provided an opportunity to exclude themselves as part of the first notice.

14. How do I get out of the Classes or Attorneys General Actions?

If you still have the right, and choose to exclude yourself from the Classes and Attorneys General Actions (including any *parens patriae* claims), you must send a request for exclusion by mail stating that you want to be excluded from *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL No. 1827. Your request for exclusion must also include your name, address, telephone number and your signature. You must mail your exclusion request no later than **Month 00, 2012**, to:

LCD Indirect Exclusions
P.O. Box 8025
Faribault, MN 55021-9425

Please note that if you only exclude yourself from the litigation involving AU Optronics, LG Display and Toshiba, you can still file a claim in the other seven settlements.

REMAINING IN THE CLASSES OR ATTORNEYS GENERAL ACTIONS

15. What am I giving up if I stay in the lawsuits against AU Optronics, LG Display and Toshiba?

If you do not exclude yourself, you will have given up your right to sue AU Optronics, LG Display and Toshiba on your own for the claims in this case (*see* Questions 13 and 14). In return for paying the Settlement amounts, the three new settling Defendants (and certain related entities defined in the Settlement Agreements) will be released from all claims relating to the facts underlying these lawsuits, as more fully described in the Settlement Agreements. The Settlement Agreements describe the released claims in detail, so read them carefully since those descriptions are binding on you. If you have any questions, you can talk to Class Counsel or the Attorneys General listed in Question 7 for free, or you can, of course, talk to your own lawyer if you have questions about what this means. The Settlement Agreements and the specific releases are available at www.LCDclass.com. If you reside outside of the 24 states and the District of Columbia you retain any right you may have to sue the Defendants for monetary relief.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer representing me?

The Court has appointed Zelle Hofmann Voelbel & Mason LLP and the Alioto Law Firm to represent you as “Co-Lead Class Counsel” for the Classes. As noted above, Attorneys General of eight states are also representing consumers as *parens patriae* and/or governmental entities in their states. You do not have to

pay Class Counsel or the Attorneys General separately. The attorneys will be paid by asking the Court for a share of the Settlement proceeds. If you want to be represented by your own lawyer, and have that lawyer appear in court for you in this case, you may hire one at your own expense.

17. How will the lawyers be paid?

Class Counsel and the Attorneys General will ask the Court for attorneys' fees based on their work on this litigation, not to exceed one-third of the \$1,082,055,647 Settlement Fund, plus reimbursement of their costs and expenses. Class Counsel will also request awards to the Class Representatives who helped the lawyers on behalf of the Classes. Any payment to the attorneys will be subject to Court approval and the Court may award less than the requested amount. The fees, costs, expenses and awards that the Court orders, plus the costs to administer the Settlement, will come out of the Settlement Fund.

The attorneys' motion(s) for fees, costs and expenses and Class Representative awards will be filed on or before Month 00, 2012. The motion(s) will be posted on the website at www.LCDclass.com. You may register at the website or by calling 1-855-225-1886 to receive an email when the motion(s) are filed.

OBJECTING OR COMMENTING ON THE NEW SETTLEMENTS, PLAN OF DISTRIBUTION, ATTORNEYS' FEES AND COSTS, AND AWARDS TO CLASS REPRESENTATIVES

18. How do I object or comment?

If you have comments about, or disagree with, any aspect of the New Settlements, the plan of distribution, requested attorneys' fees, use of settlement funds to pay administration and litigation costs and expenses, or awards to Class Representatives, you may express your views to the Court by writing to the addresses below. The written response needs to include your name, address, telephone number, the case name and number (*In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL No. 1827), a brief explanation of your reasons for objecting and your signature. The response must be postmarked no later than **Month 00, 2012** and mailed to both addresses below:

COURT	NOTICE ADMINISTRATOR
Clerk's Office United States District Court for the District of Northern California 16 th Floor 450 Golden Gate Avenue San Francisco, CA 94102	LCD Indirect Objections P.O. Box 8025 Faribault, MN 55021-9425

THE FAIRNESS HEARING

19. When and where will the Court consider the New Settlements, the plan of distribution, request for attorneys' fees and costs, and awards to Class Representatives?

The Court has already approved the seven original settlements. The Court will hold a Fairness Hearing at _____ on **Month 00, 2012**, at the United States District Court for the Northern District of California,

VISIT WWW.LCDCLASS.COM OR CALL TOLL FREE 1-855-225-1886
PARA UNA NOTIFICACIÓN EN ESPAÑOL, VISITAR NUESTRO WEBSITE O LLAMAR

Courtroom 10, 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.LCDclass.com. At this hearing the Court will consider whether each of the New Settlements is fair, reasonable and adequate. The Court will also consider the plan of distribution, and the requests for attorneys' fees and costs, and awards to Class Representatives. If there are objections or comments, the Court will consider them at this time. After the hearing, the Court will decide whether to approve each of the three New Settlements, plan of distribution and the requests for attorneys' fees and costs, and awards to Class Representatives. We do not know how long these decisions will take.

20. Do I have to come to the hearing?

No. Class Counsel and the Attorneys General will answer any questions the Court may have. But you are welcome to come at your own expense. If you send an objection or comment, you don't have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay another lawyer to attend, but it's not required.

21. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intent to Appear in *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL No. 1827." Be sure to include your name, address, telephone number and your signature. Your Notice of Intent to Appear must be postmarked no later than **Month 00, 2012**, and must be sent to the addresses listed in Question 18. You cannot speak at the hearing if you have excluded yourself from the Classes.

GET MORE INFORMATION

22. Where can I get more information?

This Notice summarizes the 10 Settlements as well as the process to get a payment in these Settlements. You can get more information about all of the Settlements and a Claim Form at www.LCDclass.com, or by calling 1-855-225-1886 or writing to LCD Settlements, P.O. Box 8025, Faribault, MN 55021-9425.