

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION

4 IN RE TFT-LCD (FLAT PANEL)  
5 ANTITRUST LITIGATION

Case No. 3:07-MD-1827 SI  
MDL No. 1827

6 This Document Relates to:

7 All Indirect-Purchaser Actions;

8 *State of Missouri, et al. v. AU Optronics*  
9 *Corporation, et al.*, Case No. 10-cv-3619;

10 *State of Florida v. AU Optronics Corporation,*  
11 *et al.*, Case No. 10-cv-3517; and

12 *State of New York v. AU Optronics Corporation,*  
13 *et al.*, Case No. 11-cv-0711.

DECLARATION OF ROBIN M.  
NIEMIEC OF RUST CONSULTING,  
INC., NOTICE ADMINISTRATOR

14  
15 ROBIN M. NIEMIEC, declares and states that:

16  
17 1. I am over 21 years of age and have personal knowledge of the facts set forth  
18 herein, and if called as a witness, could and would testify hereto.

19 2. I am a Client Services Director for Rust Consulting, Inc. (“Rust”). Rust was  
20 retained as Notice Administrator to assist in providing notice to Class Members and to process  
21 claims submitted by Class Members to share in the settlement proceeds in this litigation. As  
22 used herein, “Class Member(s)” includes the *parens patriae* group members.

23  
24 3. I submit this declaration to provide the Court with information regarding the  
25 administration of the August 8, 2012, second notice program (the “Second Notice”) directed  
26 by ¶ 13 of the “Order Granting Preliminary Approval of Combined Class, *Parens Patriae*, and  
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2 Governmental Entity Settlements with AUO, LG Display, and Toshiba Defendants,” dated  
3 July 31, 2012 (the “Second Preliminary Approval Order”).

4           4.       As stated in ¶ 4 of the Declaration of Robin M. Niemiec of Rust Consulting,  
5 Inc., Notice Administrator, dated May 4, 2012 (the “Niemiec Declaration”), Rust established a  
6 dedicated website, www.LCDclass.com, to implement the approved notice program directed  
7 by ¶ 11 of the Preliminary Approval Order dated, January 26, 2012. The website contained  
8 basic information about the first group of proposed Settlements, contact information for Rust  
9 and links to important documents. On August 8, 2012, Rust updated the website by adding  
10 new documents relating to the final approval of the first group of Settlements, the Second  
11 Notice and second group of Settlements, additional dates regarding deadlines and, pursuant to  
12 the Second Preliminary Approval Order, the ability to and procedure for filing a claim online.  
13 A screen shot of the website homepage on that date is attached as Exhibit A.

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16           5.       The website includes links, in addition to those mentioned in the Niemiec  
17 Declaration, that permit any Class Member to view, download and/or print a copy of  
18 documents related to both the First and Second Notices and the first and second groups of  
19 Settlements. No documents which previously had been posted relating to the First Notice and  
20 first group of Settlements has been removed. The documents added on August 8, 2012,  
21 related to the Second Notice and second group of Settlements are:  
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- 24           • Second Long Form Notice (new Settlements and Plan of Distribution - English  
25           version) (A copy of the Second Long Form Notice is attached as Exhibit B);  
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- Second Summary Publication Notice (new Settlements and Plan of Distribution) (A copy of the Second Summary Publication Notice is attached as Exhibit C);
- Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements;
- Declaration of Adam Miller in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements;
- Declaration of Anne E Schneider in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements;
- Declaration of Francis Scarpulla in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements;
- Declaration of Janet S Netz in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements;
- Declaration of Katherine Kinsella in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary

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Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements;

- Order Granting Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements with AUO, LG Display, and Toshiba Defendants;
- AU Optronics Settlement Agreement;
- LG Display Settlement Agreement; and,
- Toshiba Settlement Agreement.

Screen shots of the website Court Documents page as of August 8, 2012 are attached as Exhibit D.

6. On August 10, 2012, Spanish language versions of the Second Long Form Notice and the Second Summary Publication Notice were added to the website. Attached hereto as Exhibit E, are screen shots of the website reflecting the addition of the Spanish language Notices that were added on August 10, 2012:

- Second Notice (new Settlements and Plan of Distribution - Spanish version)
- Second Summary Publication Notice (new Settlements and Plan of Distribution – Spanish version)

7. On September 10, 2012, Class Counsels’ Notice of Motion and Motion for Attorneys’ Fees and Incentive Awards, the State Attorneys General Fee Request and Class Counsels’ Second Motion for Reimbursement of Expenses documents were added to the website. Attached hereto Exhibit F, are screen shots of the Court Documents page reflecting that the following documents has been added:

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- Indirect-Purchaser Class Plaintiffs' Notice of Motion and Motion for Attorneys' Fees and Incentive Awards;
- Declaration of Brian T. Fitzpatrick;
- Declaration of Craig C. Corbitt in Support of Indirect-Purchaser Class Plaintiffs' Motion for Attorneys' Fees and Incentive Awards;
- Declaration of Joseph M. Alioto in Support of Plaintiffs' Application for Attorneys' Fees and Incentive Awards;
- Declaration of Richard M. Pearl;
- Compendium of IPP Counsel Declarations in Support of Motion for Attorneys' Fees and Incentive Awards;
  - Exhibits 1 – 115;
- State Attorneys General Notice of Motion and Joint Motion for Attorneys' Fees and Additional Costs;
- Joint Declaration of Lizabeth A. Brady and Anne E. Schneider in Support of State Attorneys General Joint Motion for Fees and Additional Costs;
  - Exhibits 1A - 1D;
  - Exhibit 2 Declaration of Lizabeth A. Brady in Support of the State Attorneys General Joint Motion for Attorneys' Fees and Additional Costs;
  - Exhibit 2A;
  - Exhibit 2B Part 1;
  - Exhibit 2B Part 2;

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- Exhibit 2B Part 3;
- Exhibit 2B Part 4;
- Exhibit 2B Part 5;
- Exhibit 2B Part 6;
- Exhibit 2B Part 7;
- Exhibit 2B Part 8;
- Exhibit 2C - 2F;
- Exhibit 3 Declaration of Anne E. Schneider in Support of the State Attorneys General Motion for Fees and Additional Costs;
- Exhibit 3A - 3G;
- Exhibit 4 Declaration of Kevin Wells in Support of the State Attorneys General Motion for Fees and Additional Costs;
- Exhibit 5 Declaration of Adam Miller in Support of Settling States' Joint Motion for Attorneys' Fees and Costs;
- Exhibits 5A - 5B;
- Exhibit 6 Declaration of M. Elizabeth Lippitt in Support of the State Attorneys General Motion for Fees and Additional Costs;
- Exhibits 6A - 6B;
- Exhibit 7 Declaration of Amy E. McFarlane in Support of the State Attorneys General Joint Motion for Attorneys' Fees and Additional Costs;
- Exhibits 7A - 7B;

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- Exhibit 8 Declaration of Gwendolyn J. Cooley in Support of the State Attorneys General Motion for Fees and Additional Costs;
- Exhibits 8A - 8B;
- Exhibit 9 Declaration of Douglas L. Davis in Support of the State Attorneys General Motion for Fees and Additional Costs;
- Indirect Purchaser Plaintiffs' Notice of Motion and Second Motion for Reimbursement of Expenses;
- Declaration of Jack W. Lee in Support of Indirect Purchaser Plaintiffs' Second Motion for Reimbursement of Expenses;
  - Exhibits 1 – 14; and
- Proposed Order Granting Indirect Purchaser Plaintiffs' Second Motion for Reimbursement of Expenses.

8. On September 20, 2012, language changes were made to update the website and the locations of the documents added on September 10, 2012 were rearranged. Screen shots of the modifications made on September 20, 2012 are attached as Exhibit G.

9. On October 1, 2012, additional documents and links were added to the Court Documents page. Attached hereto as Exhibit H, are screen shots of the updated Court Documents reflecting that the following documents had been added:

- Corrected State Attorneys General Notice of Motion and Joint Motion for Attorneys' Fees and Additional Costs;
- Corrected Joint Declaration of Lizabeth A. Brady and Anne E. Schneider In Support of State Attorneys General Joint Motion for Fees and Additional Costs;

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- Exhibit 1-C
- Exhibit 2 Corrected Declaration of Lizabeth A. Brady In Support of The State Attorneys General Joint Motion for Attorneys' Fees and Additional Costs;
- Exhibit 3 Corrected Declaration of Anne E. Schneider In Support of The States Attorneys General Motion for Fees and Costs;
- Exhibit 5 Amended Declaration of Adam Miller In Support of Settling States' Joint Motion for Attorneys' Fees and Costs;
- Supplemental Declaration of Jack W. Lee in Support of Indirect Purchaser Plaintiffs' and State Attorneys General Joint Motion for Interim Reimbursement of Expenses;
  - Exhibits 1 - 9; and
- Amended Order Appointing Martin Quinn As Special Master.

10. On October 18, 2012, the Home Page was modified to make the online claim form more obvious and accessible. Attached hereto as Exhibit I is a screen shot of the Home Page created on October 18, 2012.

11. On November 7, 2012, the Supplemental Compendium of IPP Counsel Declarations In Support of Motion for Attorneys' Fees and Incentive Awards with Exhibits was added to the website. Attached hereto as Exhibit J, are screen shots of the Court Documents Page from November 7, 2012.

12. On November 13, 2012, the Report And Recommendation Of Special Master Re Motions For Attorneys' Fees And Other Amounts by Indirect-Purchaser Class Plaintiffs



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2 And State Attorneys General and Special Master's Order Re Procedure For Objecting To  
3 Report And Recommendation Re Attorneys' Fees In Indirect-Purchaser Class Action were  
4 added to the website. Attached hereto as Exhibit K are screen shots of the Court Documents  
5 page from November 13, 2012.

6  
7 13. Through the website, potential Class Members were given the opportunity to  
8 register online to receive updates on future developments of the Settlements, including the  
9 filing of claim forms.

10  
11 14. From February 13, 2012 through November 13, 2012, the website had been  
12 visited over 1,000,000 times and 44,074 potential Class Members have registered online to  
13 receive email updates. Please note that one individual may have visited the site multiple times.

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15 15. On August 10, 2012, Rust electronically sent an email notice to all persons who  
16 had registered online as of August 8, 2012 (42,514) regarding the Final Approval of first group  
17 of settlements and the Preliminary Approval of the second group of settlements. The email  
18 also advised that Class Members could begin submitting claims online or by mail and  
19 informed them of the December 6, 2012 claim deadline. A copy of the email notice is attached  
20 as Exhibit L.

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22 16. On August 31, 2012, Rust sent a second email notice to all persons who had  
23 registered online as of August 28, 2012 informing them they could file a claim and specifying  
24 that registering online for information updates and filing a claim are not the same. A copy of  
25 the email notice is attached as Exhibit M.  
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2 17. On September 28, 2012, Rust sent an email notice to all persons who had  
3 registered online as of September 21, 2012 regarding the posting of the Fee Petitions on the  
4 Settlement website. A copy of the email notice is attached as Exhibit N.

5 18. Beginning February 13, 2012, Rust has maintained a toll-free telephone number  
6 to provide pre-recorded information to callers and to facilitate responses to informational  
7 requests from callers. The toll-free number also gives each caller the option to speak directly  
8 with a live operator. As of November 13, 2012, Rust has received 26,119 calls, within which  
9 7,745 callers requested to speak with a live operator for assistance. Live operators have  
10 spoken to each of the 7,745 callers who requested assistance.  
11

12 19. As the Court is aware, Kinsella Media, LLC (“KM”), a legal notification firm  
13 specializing in the design and implementation of class action notification programs, was  
14 retained to develop the plan to provide the August 8, 2012 Second Notice to Class Members.  
15

16 20. KM’s Second Notice Plan included, in addition to the website, publication of  
17 the Second Short-Form Notice in selected publications throughout the country, and internet  
18 and cable television advertisements. The Affidavit of Katherine Kinsella certifying that the  
19 Second Notice Plan was effectuated in accordance with ¶ 11 of the Second Preliminary  
20 Approval Order is being filed simultaneously herewith.  
21

22 21. Pursuant to ¶ 15 of the Second Preliminary Approval Order, a Request for  
23 Exclusion, to the limited extent permitted, had to be postmarked no later than October 9, 2012.  
24 Rust has not received any exclusions following the Notice of Partial Settlements for AU  
25 Optronics, LG Display and Toshiba that began on August 8, 2012.  
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# **EXHIBIT A**

LCD Indirect Purchaser

Litigation and

Settlements

**CLASS ACTION LAWSUITS**

**AG PARENS PATRIAE ACTIONS**

Last Updated: 08/08/2012

**HOME**

**FILE A CLAIM**

**FREQUENTLY ASKED QUESTIONS**

**CLASS DEFINITIONS**

**DEFENDANTS AND SETTLEMENT**

**AMOUNTS**

**PLAN OF DISTRIBUTION**

**COURT DOCUMENTS**

**NOTICES**

**PRINT A CLAIM FORM**

**REGISTRATION**

**UPDATE ADDRESS**

**CONTACT INFORMATION**

**DOWNLOAD ACROBAT READER**

Adobe Reader is free and is required to view and print documents on this site.

A A A

## Welcome

### **IF YOU BOUGHT A TV, MONITOR, OR NOTEBOOK COMPUTER THAT CONTAINED A LCD FLAT PANEL SCREEN LAWSUITS AND SETTLEMENTS TOTALING ALMOST \$1.1 BILLION MAY AFFECT YOU**

This website provides information about litigation and Settlements benefiting consumers (individuals or businesses) that indirectly purchased an LCD Flat Panel which has been incorporated into a television, monitor or notebook computer. Consumers in 24 states and the District of Columbia may qualify to receive a cash payment for purchases between January 1, 1999 and December 31, 2006.

"INDIRECTLY" means that you purchased an LCD panel in a television, monitor or notebook computer from someone other than the manufacturer of that panel. For example, if you purchased a Samsung LCD television from Best Buy during the Class Period, you made an INDIRECT purchase of the LCD Flat Panel from Defendant Samsung. If you purchased televisions, monitors and notebook computers with LCD Flat Panels INDIRECTLY from the Defendants, this website will provide you with information as it is available.

On July 11, 2012, the Court granted final approval to seven Settlements totaling over \$538 Million. To review the Court's Order click **here**. Additional Settlements have now been reached with the last three Defendants totaling \$543.5 Million and preliminary approval for these three Settlements was granted on July 31, 2012. To review the Settlement Agreements, click **here**. The combined amount of all ten Settlements is almost \$1.1 Billion.

**PLEASE SCROLL DOWN TO VIEW ALL INFORMATION ON THIS PAGE.**

## **ELIGIBLE CLASS MEMBERS MAY NOW FILE A CLAIM**

**CLICK HERE TO SEE IF YOU QUALIFY AND TO SUBMIT A CLAIM TO SHARE IN THE SETTLEMENT PROCEEDS. It is expected that the minimum payment to eligible class members that submit a valid claim will be \$25.00. THE DEADLINE TO SUBMIT A CLAIM IS DECEMBER 6, 2012.**

On August 8, 2012, a Notice was published describing your rights pertaining to the three Settlements to be considered by the Court on November 29, 2012 (the "Fairness Hearing"). An earlier Notice was published on February 13, 2012 which explains your rights and related to the first seven Settlements. With limited exceptions, the February 13, 2012 Notice provided class members an opportunity to request exclusion from the Classes and the Attorneys General Actions. 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. The only remaining rights to request exclusion are for

individuals and businesses that indirectly purchased an 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 of an LCD Flat Panel in addition to an indirect purchase. To view the notices, click [here](#).

IMPORTANT DATES	
Statewide Damages Class Period:	January 1, 1999 - December 31, 2006
Nationwide Injunctive Class Period:	January 1, 1999 - February 13, 2012
Claim Filing Deadline:	December 6, 2012
Exclusion (limited rights): To determine if you are able to exclude yourself, click <a href="#">here</a> and read the Notice at Question 13 on pages 6-7.	October 9, 2012
Objections: You can only object to the AU Optronics, LG Display and Toshiba Settlements.	October 9, 2012
Fairness Hearing:	November 29, 2012 at 3:30 p.m. PST

There are also Settlements and ongoing litigation involving TFT-LCDs purchased DIRECTLY from manufacturers of TFT-LCD panels and products. If you purchased DIRECTLY from the manufacturers, please visit the LCD Direct Purchaser Class website at [www.tftlcdclassaction.com](http://www.tftlcdclassaction.com) for more information.

On July 11, 2012, the Court entered an Order on Plaintiffs' Counsel's Motion for Reimbursement of Expenses, directing counsel to submit copies of the invoices for which reimbursement is requested. The invoices have been submitted to the Court.

**THE DETAILED NOTICES ARE NOW AVAILABLE FOR DOWNLOAD IN SPANISH.**

**LOS AVISOS DETALLADOS ESTÁN DISPONIBLES PARA DESCARGA EN ESPAÑOL.**

**PARA OBTENER COPIAS DE LOS AVISOS DETALLADOS, POR FAVOR HAGA CLICK AQUÍ.**

**DISCLAIMER**

This website is supervised by counsel and the Court and is controlled by Rust Consulting, the Notice Administration firm that handles all aspects of notice and claim processing. This is the only authorized website for this litigation. Please do not rely on other sites that set out different and unauthorized information. If you have any questions, please contact the Notice Administrator.

View the **Privacy Policy**

# **EXHIBIT D**



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

## If You Bought a TV, Monitor or Notebook Computer that Contained an 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 an 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. Attorneys General in eight states 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, Arizona, Arkansas, California, the 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. 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	
<b>SUBMIT A CLAIM</b>	The only way to get a payment.
<b>OBJECT</b>	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.
<b>GO TO THE HEARING</b>	Ask to speak in Court about your opinions.
<b>EXCLUDE YOURSELF</b>	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 an 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.
<b>DO NOTHING</b>	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](http://WWW.LCDCLASS.COM) OR CALL TOLL FREE 1-855-225-1886  
PARA UNA NOTIFICACIÓN EN ESPAÑOL, VISITAR NUESTRO WEBSITE O LLAMAR

## WHAT THIS NOTICE CONTAINS

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3. What are the lawsuits about?	
4. What is a class action?	
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7. Are the Attorneys General involved?	
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9. How much money can I get?	
10. When will I get a payment?	
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17. How will the lawyers be paid?	
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20. Do I have to come to the hearing?	
21. May I speak at the hearing?	
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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 Product Class (*see* [www.tftlcdclassaction.com](http://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](http://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](http://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 an 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 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](http://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 November 29, 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 online at [www.LCDclass.com](http://www.LCDclass.com). If you do not file online, you can also file a claim by mail.

The Claim Form can be found at [www.LCDclass.com](http://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 **December 6, 2012**. If you choose to submit a Claim Form by mail, it must be postmarked by **December 6, 2012**, and mailed to:

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

### **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](http://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 Product Class (*see* [www.tftlcdclassaction.com](http://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 **October 9, 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 and agreeing to injunctive relief (*see* Question 11), 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](http://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 September 7, 2012. The motion(s) will be posted on the website at [www.LCDclass.com](http://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 **October 9, 2012** and mailed to both addresses below:

<b>COURT</b>	<b>NOTICE ADMINISTRATOR</b>
Clerk's Office United States District Court for the District of Northern California 16th 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 3:30 p.m. on **November 29, 2012**, at the United States District Court for the Northern District of California, Courtroom 10, 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102. The hearing

VISIT [WWW.LCDCLASS.COM](http://WWW.LCDCLASS.COM) OR CALL TOLL FREE 1-855-225-1886  
PARA UNA NOTIFICACIÓN EN ESPAÑOL, VISITAR NUESTRO WEBSITE O LLAMAR



may be moved to a different date or time without additional notice, so it is a good idea to check [www.LCDclass.com](http://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 **October 9, 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](http://www.LCDclass.com), or by calling 1-855-225-1886 or writing to LCD Settlements, P.O. Box 8025, Faribault, MN 55021-9425.

# **EXHIBIT E**

# If You Bought a TV, Monitor or Notebook Computer That Contained an 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](http://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](http://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 online or by mail. The deadline to submit a claim is **December 6, 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 **November 29, 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 **October 9, 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 an 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 **October 9, 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](http://www.LCDclass.com)**

**Text: "LCDclass" to 41513** (Text messaging rates may apply)

# **EXHIBIT F**

LCD Indirect Purchaser

Litigation and

Settlements

**CLASS ACTION LAWSUITS**

**AG PARENS PATRIAE ACTIONS**

Last Updated: 08/08/2012

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FILE A CLAIM

FREQUENTLY ASKED QUESTIONS

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PRINT A CLAIM FORM

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## Court Documents

### AU OPTRONICS, LG DISPLAY, TOSHIBA SETTLEMENTS

#### (AUGUST 8, 2012 NOTICE)

On July 31, 2012 the Court preliminarily approved Settlements with AU Optronics, LG Display and Toshiba. The Court documents relating to these three Settlements and their preliminary approval by the Court are provided below.

#### NOTICES

- Notice (new Settlements and Plan of Distribution - English version)
- Notice (new Settlements and Plan of Distribution - Spanish version)
- Summary Publication Notice (new Settlements and Plan of Distribution)

#### PRELIMINARY APPROVAL

- Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, Parens Patriae, and Governmental Entity Settlements, *July 12, 2012*
- Declaration of Adam Miller in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, Parens Patriae, and Governmental Entity Settlements, *July 12, 2012*
- Declaration of Anne E Schneider in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, Parens Patriae, and Governmental Entity Settlements, *July 12, 2012*
- Declaration of Francis Scarpulla in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, Parens Patriae, and Governmental Entity Settlements, *July 12, 2012*

- Declaration of Janet S Netz in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, Parens Patriae, and Governmental Entity Settlements, *July 12, 2012*
- Declaration of Katherine Kinsella in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, Parens Patriae, and Governmental Entity Settlements, *July 12, 2012*
- Order Granting Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements with AUO, LG Display, and Toshiba Defendants, *July 31, 2012*

#### SETTLEMENT AGREEMENTS

- Settlement Agreement-AU Optronics
- Settlement Agreement-LG Display
- Settlement Agreement-Toshiba

### **CHIMEI, CHUNGHWA, EPSON, HANNSTAR, HITACHI, SAMSUNG & SHARP SETTLEMENTS (FEBRUARY 13, 2012 NOTICE)**

On July 11, 2012, the Court finally approved Settlements with Chimei, Chunghwa, Epson, Hannstar, Hitachi, Samsung and Sharp. The court documents relating to these seven Settlements and their final approval by the Court are provided below.

#### NOTICES

- Notice (English version)
- Notice (Spanish version)
- Summary Publication Notice

#### FINAL APPROVAL

- Indirect-Purchaser Plaintiffs' and Settling States' Notice of Exclusions, *May 2, 2012*
- Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Final Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements; Memorandum of Authorities, *May 4, 2012*
- Declaration of Francis O. Scarpulla in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Final Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements, *May 4, 2012*
- Declaration of Anne E. Schneider in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Final Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements, *May 4, 2012*
- Declaration of Katherine Kinsella Regarding Implementation of Notice Program, *May 4, 2012*
- Declaration of Robin M. Niemiec of Rust Consulting, Inc., Notice Administrator, *May 4, 2012*
- [Proposed] Order Granting Final Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements; Final Judgment of Dismissal with Prejudice, *May 4, 2012*
- Indirect-Purchaser Plaintiffs' and Settling States' Joint Response to Objections to Combined Class, *Parens Patriae*, and Governmental Entity Settlements, *May 4, 2012*
- Declaration of Katherine Kinsella Re Objections to Notice, *May 4, 2012*
- Declaration of Patrick B. Clayton in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Response to Objections to Combined Class, *Parens Patriae*, and Governmental Entity Settlements, *May 4, 2012*
- Certificate of Service, *May 4, 2012*
- Order Granting Final Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements; Final Judgment of Dismissal with Prejudice, *July 11, 2012*

#### PRELIMINARY APPROVAL

- Order Granting Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements, *January 26, 2012*

- **Order Approving Revised Forms Of Notice And Resetting Date For Fairness Hearing**, *February 3, 2012*
- **Order Approving Manner And Form Of Parens Patriae Notice By Publication**, *February 6, 2012*

#### SETTLEMENT AGREEMENTS

- **Settlement Agreement-Chimei**
- **Settlement Agreement-Chunghwa**
- **Settlement Agreement-Epson**
- **Settlement Agreement-HannStar**
- **Settlement Agreement-Hitachi**
- **Settlement Agreement-Samsung**
- **Settlement Agreement-Sharp**

#### **ADDITIONAL COURT DOCUMENTS**

#### MOTION FOR INTERIM REIMBURSEMENT OF EXPENSES

- **Indirect Purchaser Plaintiffs' and States Attorneys General's Joint Notice of Motion and Motion for Interim Reimbursement of Expenses**, *March 14, 2012*
- **Declaration of Jack W. Lee In Support of Indirect Purchaser Plaintiffs' and States Attorneys General's Joint Motion for Interim Reimbursement of Expenses** *March 14, 2012*
- **Declaration of Anne E. Schneider in Support of States Attorneys General's Motion for Interim Reimbursement of Certain Expenses** *March 14, 2012*
- **Proposed Order Granting Indirect Purchaser Plaintiffs' and States Attorneys General's Joint Motion for Interim Reimbursement of Expenses** *March 14, 2012*
- **Order Re: Indirect Purchaser Plaintiffs' and States Attorneys' General's Joint Motion for Interim Reimbursement of Expenses**, *July 11, 2012*

#### CLASS CERTIFICATION



- **Order Granting Indirect Purchaser Plaintiffs' Motion For Class Certification; Denying Defendants' Motion To Strike Modified Class Definitions; Granting Motions To Strike Untimely Declarations**, *March 28, 2010*
- **Order Granting In Part And Denying In Part Indirect Purchaser Plaintiffs' Motion To Amend Class Certification Order**, *July 28, 2011*
- **Order Granting Defendants' Motion To Alter Or Amend The Indirect Purchaser Classes**, *January 26, 2012*

#### COMPLAINTS

- **[Class Action] Indirect-Purchaser Plaintiffs' Third Consolidated Amended Complaint - Demand For Jury Trial**, *April 29, 2011*
  - **[California] First Amended Complaint For Damages And Injunctive Relief Based On: (1) Violations Of The Cartwright Act (Bus. & Prof. Code §§ 16720, et seq.) (2) Violations Of The Unfair Competition Act (Bus. & Prof. Code §§ 17200, et seq.) (3) Unjust Enrichment – Demand For Jury Trial**, *March 2, 2011*
  - **[California] Complaint For Damages And Injunctive Relief Based On: (1) Violations Of The Cartwright Act (Bus. & Prof. Code §§ 16720, et seq.) (2) Violations Of The Unfair Competition Act (Bus. & Prof. Code §§ 17200, et seq.) (3) Unjust Enrichment**, filed against Chunghwa Picture Tubes, Ltd. only, *August 29, 2011*
  - **[Florida] Amended Complaint For Damages, Civil Penalties, Injunctive Relief – Demand For Jury Trial**, *April 13, 2011*
  - **[Missouri, Arkansas, Michigan, West Virginia and Wisconsin] First Amended Complaint For Damages, Restitution, Civil Penalties, Injunctive And Other Relief – Jury Trial Demanded**, *April 29, 2011*
  - **[New York] Second Amended Complaint - Demand For Jury Trial**, *February 3, 2012*
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**DISCLAIMER**

This website is supervised by counsel and the Court and is controlled by Rust Consulting, the Notice Administration firm that handles all aspects of notice and claim processing. This is the only authorized website for this litigation. Please do not rely on other sites that set out different and unauthorized information. If you have any questions, please contact the Notice Administrator.

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# **EXHIBIT G**

LCD Indirect Purchaser

Litigation and

Settlements

**CLASS ACTION LAWSUITS**

**AG PARENS PATRIAE ACTIONS**

Last Updated: 08/10/2012

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**NOTICES**

PRINT A CLAIM FORM

REGISTRATION

UPDATE ADDRESS

CONTACT INFORMATION

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## Notices

### **AU OPTRONICS, LG DISPLAY, TOSHIBA SETTLEMENTS**

#### **(AUGUST 8, 2012 NOTICE)**

On July 31, 2012 the Court granted preliminary approval for Settlements with Au Optronics, LG Display and Toshiba. The notices relating to these three Settlements are provided below.

Notice (new Settlements and Plan of Distribution - English version)

Notice (new Settlements and Plan of Distribution - Spanish version)

Summary Publication Notice (new Settlements and Plan of Distribution - English version)

Summary Publication Notice (new Settlements and Plan of Distribution - Spanish version)

### **CHIMEI, CHUNGHWA, EPSON, HANNSTAR, HITACHI, SAMSUNG & SHARP SETTLEMENT**

#### **(FEBRUARY 13, 2012 NOTICE)**

On July 11, 2012, the Court granted final approval for Settlements with Chimei, Chunghwa, Epson, Hannstar, Hitachi, Samsung and Sharp. The Notices relating to these seven Settlements are below.

Notice (English version)

Notice (Spanish version)

Summary Publication Notice

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**DISCLAIMER**

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# **EXHIBIT H**

LCD Indirect Purchaser

Litigation and

Settlements

**CLASS ACTION LAWSUITS**

**AG PARENS PATRIAE ACTIONS**

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## Court Documents

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- Exhibits 110 - 115

#### STATE ATTORNEYS GENERAL FEE REQUEST

- **State Attorneys General Notice of Motion and Joint Motion for Attorneys' Fees and Additional Costs**, *September 7, 2012*
- **Joint Declaration of Lizabeth A. Brady and Anne E. Schneider in Support of State Attorneys General Joint Motion for Fees and Additional Costs**, *September 7, 2012*
- Exhibits to State Attorneys General Notice of Motion and Joint Motion for Attorneys' Fees and Additional Costs and Joint Declaration of Lizabeth A. Brady and Anne E. Schneider in Support of State Attorneys General Joint Motion for Fees and Additional Costs:
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  - **Exhibit 2 Declaration of Lizabeth A. Brady in Support of the State Attorneys General Joint Motion for Attorneys' Fees and Additional Costs**, *September 7, 2012*
  - Exhibit 2A
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**SECOND MOTION FOR INTERIM REIMBURSEMENT OF EXPENSES**

- Indirect Purchaser Plaintiffs' Notice of Motion and Second Motion for Reimbursement of Expenses, *September 7, 2012*
- Declaration of Jack W. Lee in Support of Indirect Purchaser Plaintiffs' Second Motion for Reimbursement of Expenses, *September 7, 2012*
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  - Attachment A-1
  - Attachment A-2a
  - Attachment A-2b
  - Attachment A-2c
  - Attachment A-2d
  - Attachment B

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#### PRELIMINARY APPROVAL

- Order Granting Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements, *January 26, 2012*
- Order Approving Revised Forms Of Notice And Resetting Date For Fairness Hearing, *February 3, 2012*
- Order Approving Manner And Form Of *Parens Patriae* Notice By Publication, *February 6, 2012*

SETTLEMENT AGREEMENTS

- Settlement Agreement-Chimei
- Settlement Agreement-Chunghwa
- Settlement Agreement-Epson
- Settlement Agreement-HannStar
- Settlement Agreement-Hitachi
- Settlement Agreement-Samsung
- Settlement Agreement-Sharp

**FEE PETITIONS AND MOTIONS FOR REIMBURSEMENT OF EXPENSES**CLASS COUNSELS' FEE REQUEST

- Indirect-Purchaser Class Plaintiffs' Notice of Motion and Motion for Attorneys' Fees and Incentive Awards, *September 7, 2012*
- Declaration of Brian T. Fitzpatrick, *September 6, 2012*
- Declaration of Craig C. Corbitt in Support of Indirect-Purchaser Class Plaintiffs' Motion for Attorneys' Fees and Incentive Awards, *September 7, 2012*
- Declaration of Joseph M. Alioto in Support of Plaintiffs' Application for Attorneys' Fees and Incentive Awards, *September 7, 2012*
- Declaration of Richard M. Pearl, *September 7, 2012*
- Compendium of IPP Counsel Declarations in Support of Motion for Attorneys' Fees and Incentive Awards, *September 7, 2012*
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**STATE ATTORNEYS GENERAL FEE REQUEST**

- **State Attorneys General Notice of Motion and Joint Motion for Attorneys' Fees and Additional Costs, September 7, 2012**
- **Joint Declaration of Lizabeth A. Brady and Anne E. Schneider in Support of State Attorneys General Joint Motion for Fees and Additional Costs, September 7, 2012**
- Exhibits to State Attorneys General Notice of Motion and Joint Motion for Attorneys' Fees and Additional Costs and Joint Declaration of Lizabeth A. Brady and Anne E. Schneider in Support of State Attorneys General Joint Motion for Fees and Additional Costs:
  - Exhibits 1A - 1D
  - **Exhibit 2 Declaration of Lizabeth A. Brady in Support of the State Attorneys General Joint Motion for Attorneys' Fees and Additional Costs, September 7, 2012**
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- Exhibit 3 Declaration of Anne E. Schneider in Support of the State Attorneys General Motion for Fees and Additional Costs, *September 7, 2012*
- Exhibit 3A - 3G
- Exhibit 4 Declaration of Kevin Wells in Support of the State Attorneys General Motion for Fees and Additional Costs, *September 7, 2012*
- Exhibit 5 Declaration of Adam Miller in Support of Settling States' Joint Motion for Attorneys' Fees and Costs, *September 7, 2012*
- Exhibits 5A - 5B
- Exhibit 6 Declaration of M. Elizabeth Lippitt in Support of the State Attorneys General Motion for Fees and Additional Costs, *September 7, 2012*
- Exhibits 6A - 6B
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- Exhibits 7A - 7B
- Exhibit 8 Declaration of Gwendolyn J. Cooley in Support of the State Attorneys General Motion for Fees and Additional Costs, *September 7, 2012*
- Exhibits 8A - 8B
- Exhibit 9 Declaration of Douglas L. Davis in Support of the State Attorneys General Motion for Fees and Additional Costs, *September 7, 2012*



- **Corrected State Attorneys General Notice of Motion and Joint Motion for Attorneys' Fees and Additional Costs**, *September 28, 2012*
- **Corrected Joint Declaration of Lizabeth A. Brady and Anne E. Schneider In Support of State Attorneys General Joint Motion for Fees and Additional Costs**, *September 28, 2012*
  - **Exhibit 1-C**
  - **Exhibit 2 Corrected Declaration of Lizabeth A. Brady In Support of The State Attorneys General Joint Motion for Attorneys' Fees and Additional Costs**, *September 28, 2012*
  - **Exhibit 3 Corrected Declaration of Anne E. Schneider In Support of The States Attorneys General Motion for Fees and Costs**, *September 28, 2012*
  - **Exhibit 5 Amended Declaration of Adam Miller In Support of Settling States' Joint Motion for Attorneys' Fees and Costs**, *September 28, 2012*

#### MOTION FOR INTERIM REIMBURSEMENT OF EXPENSES

- **Indirect Purchaser Plaintiffs' and State Attorneys General Joint Notice of Motion and Motion for Interim Reimbursement of Expenses**, *March 14, 2012*
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- **Declaration of Anne E. Schneider in Support of State Attorneys General Motion for Interim Reimbursement of Certain Expenses**, *March 14, 2012*
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  - **Attachment A-1**
  - **Attachment A-2a**

- Attachment A-2b
  - Attachment A-2c
  - Attachment A-2d
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- **Supplemental Declaration of Jack W. Lee in Support of Indirect Purchaser Plaintiffs' and State Attorneys General Joint Motion for Interim Reimbursement of Expenses, July 27, 2012**

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- **Proposed Order Granting Indirect Purchaser Plaintiffs' and State Attorneys General Joint Motion for Interim Reimbursement of Expenses, July 27, 2012**

**SECOND MOTION FOR REIMBURSEMENT OF EXPENSES**

- **Indirect Purchaser Plaintiffs' Notice of Motion and Second Motion for Reimbursement of Expenses, September 7, 2012**

- Declaration of Jack W. Lee in Support of Indirect Purchaser Plaintiffs' Second Motion for Reimbursement of Expenses, *September 7, 2012*
  - Exhibits 1 - 5
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- Proposed Order Granting Indirect Purchaser Plaintiffs' Second Motion for Reimbursement of Expenses

#### ORDER APPOINTING SPECIAL MASTER

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### **ADDITIONAL COURT DOCUMENTS**

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**Competition Act (Bus. & Prof. Code §§ 17200, et seq.) (3) Unjust Enrichment – Demand For Jury Trial, *March 2, 2011***

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- **[New York] Second Amended Complaint - Demand For Jury Trial, *February 3, 2012***

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# **EXHIBIT K**

LCD Indirect Purchaser

Litigation and

Settlements

**CLASS ACTION LAWSUITS**

**AG PARENS PATRIAE ACTIONS**

Last Updated: 10/18/2012

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## Welcome

### Consumers of LCD Flat Screen TVs, Monitors and Laptops

#### Can Share in \$1.1 Billion Settlement Fund

Eligible consumers and businesses in 24 states and the District of Columbia may be able to collect \$25, \$100, \$200 or more by answering a few simple questions about the LCD flat screen TVs, monitors, and laptops they bought from 1999 to 2006.

No receipts or other documents are required for small claims. The deadline to file a claim is December 6, 2012.

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.

Click [here](#) for an overview of the Settlements.



If you would like to print a Claim Form and mail it in, please click [here](#).

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# **EXHIBIT L**

LCD Indirect Purchaser

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**CLASS ACTION LAWSUITS**

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Last Updated: 11/07/2012

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## Court Documents

### AU OPTRONICS, LG DISPLAY, TOSHIBA SETTLEMENTS

#### (AUGUST 8, 2012 NOTICE)

On July 31, 2012 the Court preliminarily approved Settlements with AU Optronics, LG Display and Toshiba. The Court documents relating to these three Settlements and their preliminary approval by the Court are provided below.

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- Declaration of Francis Scarpulla in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, Parens Patriae, and Governmental Entity Settlements, July 12, 2012
- Declaration of Janet S Netz in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, Parens Patriae, and Governmental Entity Settlements, July 12, 2012
- Declaration of Katherine Kinsella in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Preliminary Approval of Combined Class, Parens Patriae, and Governmental Entity Settlements, July 12, 2012
- Order Granting Preliminary Approval of Combined Class, Parens Patriae, and Governmental Entity Settlements with AUO, LG Display, and Toshiba Defendants, July 31, 2012

#### SETTLEMENT AGREEMENTS

- Settlement Agreement-AU Optronics
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### CHIMEI, CHUNGHWA, EPSON, HANNSTAR, HITACHI, SAMSUNG & SHARP SETTLEMENTS

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On July 11, 2012, the Court finally approved Settlements with Chimei, Chunghwa, Epson, Hannstar, Hitachi, Samsung and Sharp. The court documents relating to these seven Settlements and their final approval by the Court are provided below

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- Notice (Spanish version)



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- Declaration of Anne E. Schneider in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Notice of Motion and Motion for Final Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements, *May 4, 2012*
- Declaration of Katherine Kinsella Regarding Implementation of Notice Program, *May 4, 2012*
- Declaration of Robin M. Niemiec of Rust Consulting, Inc., Notice Administrator, *May 4, 2012*
- [Proposed] Order Granting Final Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements; Final Judgment of Dismissal with Prejudice, *May 4, 2012*
- Indirect-Purchaser Plaintiffs' and Settling States' Joint Response to Objections to Combined Class, *Parens Patriae*, and Governmental Entity Settlements, *May 4, 2012*
- Declaration of Katherine Kinsella Re Objections to Notice, *May 4, 2012*
- Declaration of Patrick B. Clayton in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Response to Objections to Combined Class, *Parens Patriae*, and Governmental Entity Settlements, *May 4, 2012*
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- Supplemental Compendium Of IPP Counsel Declarations In Support Of Motion For Attorneys' Fees And Incentive Awards With Exhibits 116-119, *November 6, 2012*

STATE ATTORNEYS GENERAL FEE REQUEST

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  - Exhibits 1A - 1D
  - Exhibit 2 Declaration of Lizabeth A. Brady in Support of the State Attorneys General Joint Motion for Attorneys' Fees and Additional Costs, *September 7, 2012*
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  - Exhibit 3 Declaration of Anne E. Schneider in Support of the State Attorneys General Motion for Fees and Additional Costs, *September 7, 2012*
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  - Exhibit 4 Declaration of Kevin Wells in Support of the State Attorneys General Motion for Fees and Additional Costs, *September 7, 2012*

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#### SECOND MOTION FOR REIMBURSEMENT OF EXPENSES

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- Declaration of Jack W. Lee in Support of Indirect Purchaser Plaintiffs' Second Motion for Reimbursement of Expenses, *September 7, 2012*
- Exhibits 1 - 5
  - Exhibits 6A - 6B
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#### ORDER APPOINTING SPECIAL MASTER

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# **EXHIBIT M**

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Last Updated: 11/13/2012

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## Court Documents

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- Declaration of Patrick B. Clayton in Support of Indirect-Purchaser Plaintiffs' and Settling States' Joint Response to Objections to Combined Class, *Parens Patriae*, and Governmental Entity Settlements, *May 4, 2012*
- Certificate of Service, *May 4, 2012*
- Order Granting Final Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements; Final Judgment of Dismissal with Prejudice, *July 11, 2012*

#### PRELIMINARY APPROVAL

- Order Granting Preliminary Approval of Combined Class, *Parens Patriae*, and Governmental Entity Settlements, *January 26, 2012*
- Order Approving Revised Forms Of Notice And Resetting Date For Fairness Hearing, *February 3, 2012*
- Order Approving Manner And Form Of *Parens Patriae* Notice By Publication, *February 6, 2012*

#### SETTLEMENT AGREEMENTS

- Settlement Agreement-Chimei
- Settlement Agreement-Chunghwa
- Settlement Agreement-Epson
- Settlement Agreement-HannStar
- Settlement Agreement-Hitachi
- Settlement Agreement-Samsung
- Settlement Agreement-Sharp

### **FEE PETITIONS AND MOTIONS FOR REIMBURSEMENT OF EXPENSES**

#### CLASS COUNSELS' FEE REQUEST

- Indirect-Purchaser Class Plaintiffs' Notice of Motion and Motion for Attorneys' Fees and Incentive Awards, *September 7, 2012*
- Declaration of Brian T. Fitzpatrick, *September 6, 2012*
- Declaration of Craig C. Corbitt in Support of Indirect-Purchaser Class Plaintiffs' Motion for Attorneys' Fees and Incentive Awards, *September 7, 2012*



- Declaration of Joseph M. Alioto in Support of Plaintiffs' Application for Attorneys' Fees and Incentive Awards, *September 7, 2012*
- Declaration of Richard M. Pearl, *September 7, 2012*
- Compendium of IPP Counsel Declarations in Support of Motion for Attorneys' Fees and Incentive Awards, *September 7, 2012*
  - Exhibits 1 - 9
  - Exhibits 10 - 19
  - Exhibits 20 - 29
  - Exhibits 30 - 39
  - Exhibits 40 - 49
  - Exhibits 50 - 59
  - Exhibits 60 - 69
  - Exhibits 70 - 79
  - Exhibits 80 - 89
  - Exhibits 90 - 95
  - Exhibits 96 - 99
  - Exhibits 100 - 109
  - Exhibits 110 - 115
- Supplemental Compendium Of IPP Counsel Declarations In Support Of Motion For Attorneys' Fees And Incentive Awards With Exhibits 116-119, *November 6, 2012*

STATE ATTORNEYS GENERAL FEE REQUEST

- State Attorneys General Notice of Motion and Joint Motion for Attorneys' Fees and Additional Costs, *September 7, 2012*
- Joint Declaration of Lizabeth A. Brady and Anne E. Schneider in Support of State Attorneys General Joint Motion for Fees and Additional Costs, *September 7, 2012*
- Exhibits to State Attorneys General Notice of Motion and Joint Motion for Attorneys' Fees and Additional Costs and Joint Declaration of Lizabeth A. Brady and Anne E. Schneider in Support of State Attorneys General Joint Motion for Fees and Additional Costs:
  - Exhibits 1A - 1D
  - Exhibit 2 Declaration of Lizabeth A. Brady in Support of the State Attorneys General Joint Motion for Attorneys' Fees and Additional Costs, *September 7, 2012*
  - Exhibit 2A
  - Exhibit 2B Part 1
  - Exhibit 2B Part 2
  - Exhibit 2B Part 3
  - Exhibit 2B Part 4
  - Exhibit 2B Part 5
  - Exhibit 2B Part 6
  - Exhibit 2B Part 7
  - Exhibit 2B Part 8
  - Exhibit 2C - 2F
  - Exhibit 3 Declaration of Anne E. Schneider in Support of the State Attorneys General Motion for Fees and Additional Costs, *September 7, 2012*
  - Exhibit 3A - 3G
  - Exhibit 4 Declaration of Kevin Wells in Support of the State Attorneys General Motion for Fees and Additional Costs, *September 7, 2012*

- Exhibit 5 Declaration of Adam Miller in Support of Settling States' Joint Motion for Attorneys' Fees and Costs, *September 7, 2012*
- Exhibits 5A - 5B
- Exhibit 6 Declaration of M. Elizabeth Lippitt in Support of the State Attorneys General Motion for Fees and Additional Costs, *September 7, 2012*
- Exhibits 6A - 6B
- Exhibit 7 Declaration of Amy E. McFarlane in Support of the State Attorneys General Joint Motion for Attorneys' Fees and Additional Costs, *September 6, 2012*
- Exhibits 7A - 7B
- Exhibit 8 Declaration of Gwendolyn J. Cooley in Support of the State Attorneys General Motion for Fees and Additional Costs, *September 7, 2012*
- Exhibits 8A - 8B
- Exhibit 9 Declaration of Douglas L. Davis in Support of the State Attorneys General Motion for Fees and Additional Costs, *September 7, 2012*
- Corrected State Attorneys General Notice of Motion and Joint Motion for Attorneys' Fees and Additional Costs, *September 28, 2012*
- Corrected Joint Declaration of Lizabeth A. Brady and Anne E. Schneider In Support of State Attorneys General Joint Motion for Fees and Additional Costs, *September 28, 2012*
  - Exhibit 1-C
  - Exhibit 2 Corrected Declaration of Lizabeth A. Brady In Support of The State Attorneys General Joint Motion for Attorneys' Fees and Additional Costs, *September 28, 2012*
  - Exhibit 3 Corrected Declaration of Anne E. Schneider In Support of The States Attorneys General Motion for Fees and Costs, *September 28, 2012*
  - Exhibit 5 Amended Declaration of Adam Miller In Support of Settling States' Joint Motion for Attorneys' Fees and Costs, *September 28, 2012*

#### MOTION FOR INTERIM REIMBURSEMENT OF EXPENSES

- Indirect Purchaser Plaintiffs' and State Attorneys General Joint Notice of Motion and Motion for Interim Reimbursement of Expenses, *March 14, 2012*
- Declaration of Jack W. Lee In Support of Indirect Purchaser Plaintiffs' and State Attorneys General Joint Motion for Interim Reimbursement of Expenses, *March 14, 2012*
- Declaration of Anne E. Schneider in Support of State Attorneys General Motion for Interim Reimbursement of Certain Expenses, *March 14, 2012*
- Proposed Order Granting Indirect Purchaser Plaintiffs' and State Attorneys General Joint Motion for Interim Reimbursement of Expenses, *March 14, 2012*
- Order Re: Indirect Purchaser Plaintiffs' and State Attorneys General Joint Motion for Interim Reimbursement of Expenses, *July 11, 2012*
- Supplemental Declaration of Anne E. Schneider In Support of Indirect-Purchaser Plaintiffs' and State Attorneys General Motion for Interim Reimbursement of Expenses, *July 26, 2012*
  - Attachment A
  - Attachment A-1
  - Attachment A-2a
  - Attachment A-2b
  - Attachment A-2c
  - Attachment A-2d
  - Attachment B
- Supplemental Declaration of Jack W. Lee in Support of Indirect Purchaser Plaintiffs' and State Attorneys General Joint Motion for Interim Reimbursement of Expenses, *July 27, 2012*
  - Exhibit 1
  - Exhibit 2

- Exhibit 3
  - Exhibit 4
  - Exhibit 5
  - Exhibit 6
  - Exhibit 7
  - Exhibit 8a
  - Exhibit 8a2
  - Exhibit 8b
  - Exhibit 8c
  - Exhibit 8d
  - Exhibit 8e
  - Exhibit 9
- Proposed Order Granting Indirect Purchaser Plaintiffs' and State Attorneys General Joint Motion for Interim Reimbursement of Expenses, *July 27, 2012*

#### SECOND MOTION FOR REIMBURSEMENT OF EXPENSES

- Indirect Purchaser Plaintiffs' Notice of Motion and Second Motion for Reimbursement of Expenses, *September 7, 2012*
- Declaration of Jack W. Lee in Support of Indirect Purchaser Plaintiffs' Second Motion for Reimbursement of Expenses, *September 7, 2012*
- Exhibits 1 - 5
  - Exhibits 6A - 6B
  - Exhibits 6C - 6D
  - Exhibits 7 - 14
- Proposed Order Granting Indirect Purchaser Plaintiffs' Second Motion for Reimbursement of Expenses, *September 7, 2012*

#### ORDER APPOINTING SPECIAL MASTER

- Amended Order Appointing Martin Quinn As Special Master, *August 29, 2012*
- Report And Recommendation Of Special Master Re Motions For Attorneys' Fees And Other Amounts by Indirect-Purchaser Class Plaintiffs And State Attorneys General, *November 9, 2012*
- Special Master's Order Re Procedure For Objecting To Report And Recommendation Re Attorneys' Fees In Indirect-Purchaser Class Action, *November 12, 2012*

### **ADDITIONAL COURT DOCUMENTS**

#### CLASS CERTIFICATION

- Order Granting Indirect Purchaser Plaintiffs' Motion For Class Certification; Denying Defendants' Motion To Strike Modified Class Definitions; Granting Motions To Strike Untimely Declarations, *March 28, 2010*
- Order Granting In Part And Denying In Part Indirect Purchaser Plaintiffs' Motion To Amend Class Certification Order, *July 28, 2011*
- Order Granting Defendants' Motion To Alter Or Amend The Indirect Purchaser Classes, *January 26, 2012*

#### COMPLAINTS

- [Class Action] Indirect-Purchaser Plaintiffs' Third Consolidated Amended Complaint - Demand For Jury Trial, *April 29, 2011*
- [California] First Amended Complaint For Damages And Injunctive Relief Based On: (1) Violations Of The Cartwright Act (Bus. & Prof. Code §§ 16720, et seq.) (2) Violations Of The Unfair

Competition Act (Bus. & Prof. Code §§ 17200, et seq.) (3) Unjust Enrichment – Demand For Jury Trial, *March 2, 2011*

- [California] Complaint For Damages And Injunctive Relief Based On: (1) Violations Of The Cartwright Act (Bus. & Prof. Code §§ 16720, et seq.) (2) Violations Of The Unfair Competition Act (Bus. & Prof. Code §§ 17200, et seq.) (3) Unjust Enrichment, filed against Chunghwa Picture Tubes, Ltd. only, August 29, 2011
- [Florida] Amended Complaint For Damages, Civil Penalties, Injunctive Relief – Demand For Jury Trial, *April 13, 2011*
- [Missouri, Arkansas, Michigan, West Virginia and Wisconsin] First Amended Complaint For Damages, Restitution, Civil Penalties, Injunctive And Other Relief – Jury Trial Demanded, *April 29, 2011*
- [New York] Second Amended Complaint - Demand For Jury Trial, *February 3, 2012*

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**DISCLAIMER**

This website is supervised by counsel and the Court and is controlled by Rust Consulting, the Notice Administration firm that handles all aspects of notice and claim processing. This is the only authorized website for this litigation. Please do not rely on other sites that set out different and unauthorized information. If you have any questions, please contact the Notice Administrator.

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# **EXHIBIT N**

To:  
CC:  
Subject: LCD Settlement Information

[Insert Name],

Records show that you registered online to receive information about the *LCD Indirect Purchaser Litigation and Settlements*.

The Court has already approved Settlements with seven defendants. This notice is to inform you that Settlements have been reached with three more defendants, AU Optronics, LG Display, Toshiba and their U.S. affiliates. There are now ten Settlements totaling approximately \$1.1 billion.

You can [file a claim](#) now to request a payment from all Settlements. You can submit a [claim online](#) or by mail. The deadline to submit a [claim](#) is **December 6, 2012**.

More information about the Settlements, how to file a [claim](#), and your other rights can be found at [www.LCDclass.com](http://www.LCDclass.com) or by calling 1-855-225-1886.

File a Claim/Claim online/Claim:  
<https://lcdclass.com/FileAClaim.aspx>

# **EXHIBIT O**

Dear Claimant,

Thank you for registering online to receive information about the *LCD Indirect Purchaser Litigation and Settlements*. This notice is to remind you that now is the time to file a claim if you have not already.

**Please note – registering online and filing a claim are not the same. You must file a claim in order to receive payment from the settlements.**

There are now ten Settlements totaling approximately \$1.1 billion. It is expected that the minimum payment to eligible class members that submit a valid claim will be \$25.00.

**You can file a claim now to request a payment from all settlements.** You can submit a claim online or by mail. The deadline to submit a claim is **December 6, 2012**.

More information about the Settlements, how to file a claim, and your other rights can be found at [www.LCDclass.com](http://www.LCDclass.com) or by calling 1-855-225-1886.



# **EXHIBIT P**

You are receiving this notice because you requested to be notified by email of developments in the LCD Indirect Purchaser Litigation. On September 7, 2012, Class Counsel and the States Attorneys General filed their motions for fees, costs and expenses incurred in pursuing this case and for awards to the class representatives. The motions are set to be heard by the Court on November 29, 2012 at 3:30 p.m. Any objection to these motions must be filed by October 9, 2012. Copies of the documents relating to the motions are available online for you to review at the Court Documents section of the website:

<https://lcdclass.com/Home.aspx>

Sincerely,

Notice Administrator  
LCD Indirect Purchaser Litigation and Settlements  
[info@LCDClass.com](mailto:info@LCDClass.com)  
1-855-225-1886

# **EXHIBIT Q**

**IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION**  
**OBJECTIONS**

<b>Objection</b>	<b>Name</b>	<b>City</b>	<b>State</b>
16	Douglas R Forman	Babylon	NY
17	Blake L. Harrop Lisa Madigan Robert M. McKenna Brady R. Johnson Jonathan A. Mark	Chicago Seattle	IL WA
18	Cornell Vinegar	Canton	IL
19	Shannon Cashion W. Christopher McDonough Kelly Kress Mark Schulte		MO
20	Andrea Pridham		IL
21	Ira Conner Erwin Luis Mario Santana Stefan Rest	Indian Rocks Beach Miami Rincon	FL FL PR
22	Geri Maxwell Maria Marshall Wayne Marshall Gerri Marshall	Port Hueneme Downey	CA CA
23	Shannon Cashion W Christopher McDonough Kelly Kress Mark Schulte		MO
24	Leveta Chesser Johnny Kessel		
25	Mr. Keena	St. Cloud	FL
26	P.C. Holland	Elk Grove	CA
27	CBC Inc Mary Mathis	Hollywood	FL
28	Margot Bradley	Miami	FL
29	Alex Martinez	Weston	FL