

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

**If you bought or leased, directly or indirectly, a new or used Automotive Vehicle or certain automotive parts since April 1998 you should read this notice carefully.  
It may affect your legal rights.**

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

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

**B. WHAT ARE THESE CLASS ACTIONS ABOUT?**

Class actions have been started in Canada claiming that many companies participated in conspiracies to fix the prices of automotive parts sold in Canada and/or sold to manufacturers for installation in Automotive Vehicles<sup>1</sup> sold in Canada.

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

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

This notice is about proposed settlements relating to five automotive parts (see Part E) (the “Relevant Parts”). A description of the Relevant Parts is included in Schedule A hereto.

This notice is also about a proposed distribution of settlement funds in the Automotive Bearings, Electric Powered Steering (EPS) Assemblies, High Intensity Discharge (HID) Ballasts, and Manual Steering Columns actions (see Part K), and the certification of the Braking Systems action against the non-settled Defendants (see Part M).

**D. WHO IS AFFECTED BY THE CLASS ACTIONS?**

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

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

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

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<sup>1</sup> In the Settlement Agreements, Automotive Vehicle is defined as: all passenger cars, sport utility vehicles (SUVs), vans, and light trucks (up to 10,000 lbs).

## E. WHAT SETTLEMENTS HAVE BEEN REACHED IN THE CLASS ACTIONS?

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

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

<b>Settling Defendant</b>	<b>Relevant Part</b>	<b>Settlement Amount</b>
Mitsubishi Heavy Industries, Ltd. and MHI Climate Control, Inc.	Air Conditioning Systems	US\$855,000
AB SKF, SKF USA Inc., SKF Canada Limited, and SKF GmbH.	Automotive Bearings	CDN\$2,100,000
Brose Schließsysteme GmbH & Co. Kommanditgesellschaft and Brose North America.	Door Latches and Closure Systems	US\$375,000
Yamada Manufacturing Co, Ltd. and Yamada North America, Inc.	Manual Steering Columns and EPS Assemblies	US\$294,500

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

## F. SETTLEMENT APPROVAL HEARINGS

The settlements are subject to the approval of the Ontario and/or Quebec Courts (see Schedule “B”). However, in all circumstances, the settlements are national in scope. Even where there is no settlement class specifically for residents of British Columbia or Quebec, residents of those provinces (as well as the other Canadian provinces and territories) are included in the national classes of the actions commenced in Ontario.

The Ontario Court will hold a hearing by video (which you can attend by contacting Class Counsel) to decide whether to approve these settlements on February 13, 2023, at 10:00a.m.

- The Quebec Court will hold a hearing by videoconference (<https://msteams.link/HHRY>)<sup>2</sup> to decide whether to approve some of these settlements on March 8, 2023 at 9:00am.

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<sup>2</sup> The User Guide to join the hearing can be found at the following address: [https://www.justice.gouv.qc.ca/fileadmin/user\\_upload/contenu/documents/Fr\\_\\_français\\_/centredoc/publications/systeme-judiciaire/MJQ\\_Guide\\_Audience\\_Teams-public\\_VF.pdf](https://www.justice.gouv.qc.ca/fileadmin/user_upload/contenu/documents/Fr__français_/centredoc/publications/systeme-judiciaire/MJQ_Guide_Audience_Teams-public_VF.pdf)

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

### **G. HOW CAN I PARTICIPATE IN THE SETTLEMENT APPROVAL HEARING?**

If you are a member of a settlement class, you can present your submissions on, or objections to, the settlements, the proposed distribution protocol in the actions (see Part K below), and/or Class Counsel fees (see part O below) before the Courts, in the manner set out below.

#### **Submissions in writing**

If you want to address the Courts in writing, you must send your written submissions to Class Counsel by email to [autoparts@sotosllp.com](mailto:autoparts@sotosllp.com) and [autopartsclassaction@siskinds.com](mailto:autopartsclassaction@siskinds.com) no later than February 6, 2023.

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

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

#### **Attending in person before the Courts**

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

Some of the settlements are only subject to approval by the Ontario Court. You may attend the Ontario hearing virtually on **February 13, 2023, at 10:00a.m.**, as an observer or to make oral submissions to the Court.

If you wish to attend and/or make oral submissions, please contact Class Counsel no later than February 6, 2023. If you are unable to attend, but wish to make oral submissions to the Ontario Court, please contact Class Counsel at [autopartsclassaction@siskinds.com](mailto:autopartsclassaction@siskinds.com) and Class Counsel will make the necessary arrangements for you to make submissions to the Ontario Court.

Where the settlement is also subject to the approval of the Quebec Court, you may attend the Quebec hearing virtually on March 8, 2023 at 9:00am (<https://msteams.link/HHRY>)<sup>3</sup>. You can attend as an observer or to make oral submissions to the Quebec Court. If you are unable to attend, but wish to make oral submissions to the Quebec Court, please contact Class Counsel at [recours@siskinds.com](mailto:recours@siskinds.com), to the attention of Karim Diallo, and Class Counsel will make the necessary arrangements for you to make submissions to the Quebec Court.

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<sup>3</sup> The User Guide to join the hearing can be found at the following address:  
[https://www.justice.gouv.qc.ca/fileadmin/user\\_upload/contenu/documents/Fr\\_\\_français\\_/centredoc/publications/systeme-judiciaire/MJQ\\_Guide\\_Audience\\_Teams-public\\_VF.pdf](https://www.justice.gouv.qc.ca/fileadmin/user_upload/contenu/documents/Fr__français_/centredoc/publications/systeme-judiciaire/MJQ_Guide_Audience_Teams-public_VF.pdf)

## H. WHAT STEPS SHOULD I TAKE TO PROTECT MY RIGHTS?

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

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

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

Some members of the Door Latches and Closure Systems settlement class can opt-out. Rights to opt-out of the other relevant actions was previously provided and the deadline for opting out has already passed.

In the context of a prior settlement, an opt-out right was provided to persons who purchased Door Latches or new automotive vehicles containing Door Latches between September 1, 2008 to April 21, 2022. Persons who were afforded an opportunity to opt out of the action will not be provided with an additional opportunity.

The Brose settlement contemplates a broader settlement class than the prior settlement in the action. As such, an additional opt-out right will be provided to settlement class members who were not previously provided with an opportunity to opt out of the action and who purchased Door Latches or new automotive vehicles containing Door Latches from January 1, 2004 to September 1, 2008, or who purchased Closure Systems or new automotive vehicles containing Closure Systems from January 1, 2004 to January 4, 2023.

If eligible, you can opt out of the Door Latches and Closure Systems class action by sending a signed letter to Class Counsel, with the following information:

- your full name, current address, and telephone number;
- if you are writing on behalf of a company, the name of the company and your position at the company; and
- a statement saying that you (or the company) want to opt out of the Door Latches and Closure Systems class action.

Requests to opt out of the Door Latches and Closure Systems class action must be post-marked by March 14, 2023.

If you exclude yourself or opt out:

- you will not be eligible to participate in the ongoing class action, and
- you will not receive any money from the class action, but

- you will be able to start or continue your own case against the defendants regarding the claims at issue in the class action.

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

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

No further right to opt out of the Door Latches and Closure Systems class action will be provided.

A parallel class proceeding was commenced in Ontario against other defendants relating to the pricing of Door Latches. The right to opt out applies in that action as well and no further right to opt out will be provided in respect of that action. Information on that action and the companies named as defendants is available on Class Counsel's website at: <https://www.sotosclassactions.com/auto-parts/>.

#### **J. WHAT HAPPENS TO THE MONEY PAID UNDER THE SETTLEMENTS?**

At this stage, the settlement funds (less approved fees and expenses) are being held in interest-bearing trust accounts for the benefit of settlement class members.

The plaintiffs are seeking approval of the method for distributing the aggregate settlement funds from the Automotive Bearings, EPS Assemblies, HID Ballasts, and Manual Steering Columns actions (see section K below). At a later date, the courts will decide how the settlement funds for the other Relevant Parts will be distributed and how you can apply to receive money from these settlements. Watch for another notice at a later time explaining how to claim money from the settlements.

#### **K. PROPOSED DISTRIBUTIONS IN THE AUTOMOTIVE BEARINGS, EPS ASSEMBLIES, HID BALLASTS, AND MANUAL STEERING COLUMNS ACTIONS**

At the settlement approval hearing in Ontario, the Court will be asked to approve a protocol for distributing the aggregate settlement funds of \$21.7 million in the Automotive Bearings, EPS Assemblies, HID Ballasts, and Manual Steering Columns actions, plus accrued interest, less Court-approved legal fees and other expenses.

At the settlement approval hearing in Quebec, the Court will be asked to approve the distribution protocol as it relates to the Automotive Bearings action.

Following the Ontario Court approving the distribution protocol, a motion will be brought before the British Columbia Court to approve the distribution protocol as it relates to the Automotive Bearings action.

A copy of the proposed distribution protocol is available at [www.siskinds.com/autoparts](http://www.siskinds.com/autoparts) or <https://www.sotosclassactions.com/auto-parts/> or from Class Counsel.

The protocol is designed to compensate purchasers of Automotive Bearings, EPS Assemblies, HID Ballasts, and Manual Steering Columns and/or new Automotive Vehicles containing Automotive Bearings, EPS Assemblies, HID Ballasts, and Manual Steering Columns in a manner that generally reflects the anticipated impact of the alleged price-fixing.

The protocol contemplates that the administration will run in tandem with the administration of the Second Omnibus Distribution Protocol (which was previously approved by the requisite Courts) and settlement benefits will be calculated in accordance with the Second Omnibus Distribution Protocol.

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

<b>Class Action</b>	<b>Automakers</b>	<b>Event Period</b>	<b>Post Event Period</b>
Automotive Bearings	Honda/Acura, Nissan/Infiniti, Toyota/Lexus	Jan 1, 2000 to Dec 31, 2013	Jan 1, 2014 to Sept 30, 2016
EPS Assemblies	Honda/Acura, Nissan/Infiniti	Jan 1, 2005 to Sept 30, 2012	Oct 1, 2012 to Sept 30, 2016
HID Ballasts	Honda/Acura, Mazda, Nissan/Infiniti, Toyota/Lexus, Subaru	Jul 1, 1998 to Feb 28, 2010	Mar 1, 2010 to Feb 28, 2014
Manual Steering Columns	Honda/Acura	Sept 22, 2007 to Sept 30, 2012	Oct 1, 2012 to Sept 30, 2016

**No wrongdoing is alleged as against the Automakers listed above. They are not defendants in the class actions. The Automakers were unaware of any alleged price-fixing in respect of any of the automotive parts that they purchased for their automotive vehicles.**

**Distribution to Canadian Automakers**

The following amount will be allocated from the Net Settlement Funds for payment to the Canadian Automakers who purchased at least \$500,000 of the Relevant Part during the Event Period and/or Post Event Period, and whose claim has not otherwise been released by virtue of the parallel U.S. direct purchaser actions and/or private settlement:

<b>Relevant Part / Class Action</b>	<b>Canadian Automaker</b>	<b>Allocation</b>
Automotive Bearings	Honda Canada Inc.	\$120,000
HID Ballasts	Toyota Motor Manufacturing Canada	\$15,000

### **Distribution to Automakers, Dealers and End Users**

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

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

### **Sample Calculation:**

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

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

Plus

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

For a total of \$84,375

Assuming the value of all qualifying Settlement Class Members' Affected Vehicle Purchases totalled \$20 million, this Settlement Class Member would be entitled to 0.42% (\$84,375/\$20 million) of the Net Settlement Funds.

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

- a) claims that are valued at less than \$5 will be held in abeyance pending further distributions in the auto parts class actions. This threshold for payment applies after summing all entitlements pursuant to the Second Omnibus Distribution Protocol, the Electronic Throttle Bodies Distribution Protocol, the Body Sealing, Ceramic Substrates, and Plastic Interior Trim Protocol, and the proposed Distribution Protocol (the "Protocols").
- b) all valid Claims that are valued at or above \$5 will be assigned a minimum value of \$25. The \$25 valuation target is not an estimate of any damages suffered. This minimum valuation applies after summing all entitlements pursuant to the Protocols. For example, if a Settlement Class Member is entitled to \$15 pursuant to the Second Omnibus Distribution Protocol, \$2 pursuant to the Electronic Throttle Bodies Distribution Protocol, and an additional \$6 pursuant to the proposed Distribution Protocol, the Settlement Class Member would receive a \$2 increase, for a total payment of \$25.

#### **L. APPLYING FOR SETTLEMENT FUNDS**

Information about how to apply for the settlement funds will be available in a future notice and will be posted online at: [www.siskinds.com/autoparts](http://www.siskinds.com/autoparts) or <https://www.sotosclassactions.com/auto-parts/>. If you did not receive this notice by mail or email, please register online at: [www.siskinds.com/autoparts](http://www.siskinds.com/autoparts) or by telephone at 1-888-977-9806 to ensure that further notices will be sent to you directly, by mail or email.

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

#### **M. NOTICE OF CERTIFICATION IN BRAKING SYSTEMS CLASS ACTION**

By order dated July 19, 2022, the Braking Systems action was certified against the non-settled Defendants, Continental AG, Continental Automotive GmbH, Continental Automotive Systems, Inc., and Continental Tire Canada, Inc. (formerly known as Continental Automotive Canada, Inc.).

Kate O'Leary Swinkels and Stuart Budd & Sons Ltd. were appointed as the representative plaintiffs on behalf of the Class.

The certified Class definition is:

All Persons in Canada who, during the Class Period,<sup>1</sup> purchased Braking Systems<sup>2, 3</sup> for installation in an Affected Automotive Vehicle<sup>4</sup> or who purchased and/or leased a new Affected Automotive Vehicle containing a Braking System (the "Class Members").



Excluded from the class are the Defendants, their parent companies, subsidiaries, and affiliates, and any person who validly opted out of the action in accordance with the orders of the Ontario or British Columbia Courts.

<sup>1</sup> Class Period means between February 1, 2007, and December 31, 2017.

<sup>2</sup> Braking Systems refers to hydraulic or electronic braking systems. Hydraulic braking systems are automotive systems that transmit brake pedal force to automotive wheel brakes through pressurized fluid contained in brake cylinders. Electronic braking systems are electronically activated automotive braking systems that reduce response and build-up times in brake cylinders.

<sup>3</sup> Braking Systems purchased for repair or replacement in an Affected Automotive Vehicle are excluded from the Class, unless the repair or replacement Braking System was a Genuine or OEM replacement part purchased by a Canadian distributor of an original equipment manufacturer or by an automotive dealer.

<sup>4</sup> Affected Automotive Vehicle means new passenger cars, sport utility vehicles (SUVs), vans, and light trucks (up to 10,000 lbs) manufactured by Bayerische Motoren Werke AG, Daimler AG, and Volkswagen AG and/or their subsidiaries or affiliated companies, under the following brand names: BMW, MINI, Mercedes-Benz, Smart, Volkswagen, and Audi. Affected Automotive Vehicles include, but are not limited to:

Electronic Braking Systems:

Vehicle Models	Year Range
Audi A4	MY14–MY17
Audi A5	MY14–MY17
Audi A6	MY16–MY17
Audi A8	MY16–MY17
Audi Q5	MY14–MY17
Audi Q7	MY14–MY17
Volkswagen Touareg	MY16–MY17
Porsche Cayenne	MY14–MY17

Hydraulic Braking Systems:

Vehicle Models	Year Range
Smart Fortwo	MY08–MY17
Mercedes GLK-Class	MY10–MY15
Mercedes E-Class	MY07–MY17
Mercedes Sprinter	MY10–MY16
Mercedes G-Class	MY07–MY16
Mercedes Sprinter II	MY10–MY16

BMW 1 Series	MY08–MY13
BMW 2 Series	MY14–MY17
BMW 3 Series	MY07–MY17
BMW 4 Series	MY14–MY17
BMW X3	MY07–MY17

To review a copy of the certification order, which includes a list of the certified common issues, visit [www.siskinds.com/autoparts](http://www.siskinds.com/autoparts).

#### **N. WHO ARE THE LAWYERS WORKING ON THESE CLASS ACTIONS AND HOW ARE THEY PAID?**

The following law firms represent members in one or more of the relevant actions.

In Ontario, the law firms of Siskinds LLP and Sotos LLP can be reached at:

Siskinds LLP  
Telephone (toll free): 1-800-461-6166  
Email: [autopartsclassaction@siskinds.com](mailto:autopartsclassaction@siskinds.com)  
Mail: 275 Dundas Street, Unit 1, London,  
ON N6B 3L1  
Attention: Linda Visser / Sylvia Flower

Sotos LLP  
Telephone (toll free): 1-888-977-9806  
Email: [autoparts@sotosllp.com](mailto:autoparts@sotosllp.com)  
Mail: 180 Dundas Street West, Suite 1200,  
Toronto, ON M5G 1Z8  
Attention: Jean-Marc Leclerc

In British Columbia, the law firm of Camp Fiorante Matthews Mogergerman LLP can be reached at:

Telephone: 1-800-689-2322  
Email: [aslevin@cfmlawyers.ca](mailto:aslevin@cfmlawyers.ca)  
Mail: #400 – 856 Homer Street, Vancouver, BC V6B 2W5 Attention: David Jones

In Quebec, the law firm of Siskinds Desmeules s.e.n.c.r.l. can be reached at:

Telephone: 418-694-2009  
Email: [recours@siskinds.com](mailto:recours@siskinds.com)  
Mail: Les promenades du Vieux-Quebec, 43 rue De Buade, bureau 320, Quebec City, QC G1R 4A2  
Attention: Karim Diallo

**As an individual, you do not have to pay the lawyers working on these class actions any money out-of-pocket.** The lawyers will be paid from the money collected in these class actions. The Courts will be asked to decide how much the lawyers will be paid. The lawyers will collectively be asking that the Courts approve legal fees of up to 25% of the settlement funds, plus disbursements and applicable taxes. Additionally, the Ontario Court will be asked to approve honorariums for the representative plaintiffs in Automotive Bearings, EPS Assemblies, HID Ballasts, and Manual Steering Columns actions. If approved, the representative plaintiffs in each case will receive \$200 (except for one representative plaintiff in the EPS Assemblies action, who has not previously received any honorariums. She will receive \$2500). The honorariums are in recognition of their contributions in the advancement of these actions.

Any approved legal fees and honorariums will be paid out of the settlement funds. Class Counsel reserve the right to ask the Courts to allow Class Counsel to use the settlement funds to pay for any future adverse cost awards or future disbursements.

## **O. WHERE CAN I ASK MORE QUESTIONS?**

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

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

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

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

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

## **P. INTERPRETATION**

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

**Schedule “A” – Part Descriptions and Settlement Class Period**

<b>Part</b>	<b>Description</b>	<b>Settlement Class Period</b>
Air Conditioning Systems	Air Conditioning Systems are systems that cool the interior environment of an Automotive Vehicle and are part of an Automotive Vehicle’s thermal system. An Air Conditioning System may include, to the extent included in the relevant request for quotation, compressors, condensers, HVAC units (blower motors, actuators, flaps, evaporators, heater cores, and filters embedded in a plastic housing), control panels, sensors, and associated hoses and pipes.	January 1, 2001 to December 10, 2019
Automotive Bearings <sup>4</sup>	Bearings mean a friction-reducing device installed in new Automotive Vehicles that allows one moving part to glide past another moving part and includes automotive wheel hub unit bearings.	April 20, 1998 to July 9, 2020
Door Latches and Closure Systems	<p>Door latches includes side-door latches and latch minimodules (also known as minimodule latches). Side-door latches secure an automotive door to a vehicle body and may be locked to prevent unauthorized access to a vehicle. Latch minimodules include the side-door latches and all of the related mechanical operating components, including the electric lock function.</p> <p>Closure Systems includes devices to maintain and control access to a vehicle and to reliably open and close a vehicle’s doors, lift-gates, trunks, hoods and door windows in order to protect the vehicle and its occupants. Closure systems encompass various components such as latches, strikers, window systems (including window regulators) and door modules. Latches and strikers are used to secure automotive side and sliding doors, tailgates and trunks. Latches are technologically advanced complex products, whereas strikers are simpler commodity products. Window regulators are manual or electronic window lift assemblies for front and rear door applications in vehicles to automatically raise or lower windows. Depending on the customer's preferences, window regulators may be integrated into door modules or procured on a stand-alone basis. A door module is an assembly of components that operate the door's electronic and mechanical functionalities. It consists of a rubber-sealed carrier, onto which a variety of door components such as the window lift mechanism, the wing mirror electric motor, the wiring, the loud speaker, the door latch inner release cable, a latch and various switches are fitted, forming a “cassette”.</p>	<p>January 1, 2004, to April 21, 2022 (Door Latches)</p> <p>January 1, 2004 to January 4, 2023 (Closure Systems)</p>

<sup>4</sup> Defined as “Bearings” in the settlement agreement

<b>Part</b>	<b>Description</b>	<b>Settlement Class Period</b>
Manual Steering Columns and EPS Assemblies	<p>Manual Steering Columns means the steering column shaft on which an Automotive Vehicle's steering wheel is mounted and by which it is connected with the steering gears.</p> <p>EPS Assemblies means a device in an Automotive Vehicle that links the steering wheel to the tires, and includes the column, intermediate shaft, and electric power steering electric control unit, among other parts, but does not include the steering wheel or tires.</p>	<p>September 1, 2007, to December 2, 2020 (Manual Steering Columns)</p> <p>January 1, 2005 to August 13, 2018 (EPS Assemblies)</p>

### Schedule "B" – Approving Courts

<b>Settling Defendant</b>	<b>Part</b>	<b>Approving Court(s)</b>
Mitsubishi Heavy	Air Conditioning Systems	Ontario*
SKF	Automotive Bearings	Ontario* and Quebec
Brose	Door Latches and Closure Systems	Ontario
Yamada	Manual Steering Columns and EPS Assemblies	Ontario*

\* Following the Ontario Court issuing an approval order, the BC Court will be asked to discontinue the applicable action(s) as against the settling defendants.