

**DISTRIBUTION PROTOCOL OF SETTLEMENT FUNDS IN THE CANADIAN
AUTO PARTS PRICE-FIXING CLASS ACTIONS**

**(Automotive Access Mechanisms, Automotive Steel Tubes,
Power Window Switches, and Valve Timing Control Devices)**

1. The procedures set forth herein are intended to govern the administration of the settlement agreements entered into in the following automotive price-fixing class actions:
 - (a) Automotive Access Mechanisms;
 - (b) Automotive Steel Tubes;
 - (c) Power Window Switches; and
 - (d) Valve Timing Control Devices.

2. The administration shall be completed in conjunction with the Amended Second Omnibus Distribution Protocol, attached hereto as Schedule “A”. Settlement payments will be calculated in accordance with the Amended Second Omnibus Distribution Protocol. Settlement Class Members who file claims under the Amended Second Omnibus Distribution Protocol will be automatically considered for compensation under this Distribution Protocol. There will be no separate claims or appeal process for this Distribution Protocol.

3. For the purposes of this Distribution Protocol, the following definitions apply:
 - (a) *Affected Vehicle* means the following new passenger cars, sport utility vehicles, vans, and light trucks (up to 10,000 lbs) purchased and/or leased during the “Event Period” or “Post Event Period”, as set out in the chart below:

Class Action	Brands	Event Period	Post Event Period
Automotive Access Mechanisms	Nissan/Infiniti	Jan 1, 2002 to Sept 30, 2011	Oct 1 2011 to Sept 30, 2015
Automotive Steel Tubes	Nissan/Infiniti	Dec 1, 2003 to Dec 31, 2008	Jan 1, 2009 to Dec 31, 2008
	Toyota/Lexus, Subaru	Jan 1, 2007 to Dec 31, 2007	Jan 1, 2008 to Dec 31, 2011
	Mazda	Jan 1, 2005 to Dec 31, 2007	Jan 1, 2008 to Dec 31, 2011
Power Window Switches	Honda/Acura	Jun 1, 2003 to Feb 28, 2013	Mar 1, 2013 to Sept 30, 2016
Valve Timing Control Devices	General Motors (Buick/Cadillac/Chevrolet/Daewoo/GMC/Hummer/Isuzu/Oldsmobile/Pontiac/Saab/Saturn), Nissan/Infiniti, Volvo, BMW/Mini Cooper	Sept 1 2000 to Feb 28, 2010	Mar 1 2010 to Feb 28, 2014

(b) *Automakers* means:

Class Action	Automakers
Automotive Access Mechanisms	Nissan/Infiniti
Automotive Steel Tubes	Nissan/Infiniti, Toyota/Lexus, Subaru, Mazda
Power Window Switches	Honda/Acura
Valve Timing Control Devices	General Motors (Buick/Cadillac/Chevrolet/Daewoo/GMC/Hummer/Isuzu/Oldsmobile/Pontiac/Saab/Saturn), Nissan/Infiniti, Volvo, BMW/Mini Cooper

(c) *Canadian Automakers* means:

Class Action	Canadian Automakers
Automotive Access Mechanisms	N/A
Automotive Steel Tubes	N/A
Power Window Switches	N/A
Valve Timing Control Devices	General Motors of Canada Ltd.

Calculation of Payments

Canadian Automakers

4. The following amounts 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:

Relevant Part / Class Action	Canadian Automaker	Allocation
Valve Timing Control Devices	General Motors of Canada Ltd.	\$15,000

Automaker Production Orders

5. The Automakers were previously ordered to produce certain customer information to the Claims Administrator, RicePoint Administration Inc., for the purposes of providing notice and claims administration in other actions related to alleged price-fixing of automotive parts. The Plaintiffs will seek orders from the Courts, as applicable, authorizing the Claims Administrator to use such information for the purposes facilitating the claims administration process pursuant to this protocol.