

The Circuit Court of Cook County, Illinois
County Department, Chancery Division

**If You Were an Illinois Resident Who Bought a TV or Monitor Containing a Cathode Ray Tube (CRT) between March 1, 1995 and November 25, 2007,
This Lawsuit And Settlements May Affect You.**

The Circuit Court of Cook County, Illinois, 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.
- There is a lawsuit involving cathode ray tubes ("CRTs") purchased indirectly from the Defendants. "Indirectly" means that you purchased the CRT from someone other than the company that manufactured the component CRT. In most cases, this means that you bought a TV or monitor containing a CRT from a retailer.
- The lawsuit was brought by the Illinois Attorney General on behalf of the State of Illinois and as *parens patriae* on behalf of Illinois consumers (individuals and businesses) as purchasers of TVs and monitors containing a CRT **for their own use and not for resale** indirectly from the Defendants, anytime from March 1, 1995 to November 25, 2007. Defendants deny all of the claims in the lawsuit. *See* Question 5 below for more details about who is eligible to recover money in this lawsuit.
- This notice only relates to the Illinois consumer (individuals and businesses) claims in the lawsuit. If you are a governmental entity, you may not participate in this settlement.
- Settlements totaling over \$36 million have been reached with four Defendant groups (together called the "Settling Defendants") and the lawsuit is continuing against two remaining Defendant groups (the "Non-Settling Defendants"). The Settling Defendants have also agreed to cooperate with the State in the litigation against the Non-Settling Defendants. The ongoing litigation is seeking damages from the Non-Settling Defendants.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT AND SETTLEMENTS	
SUBMIT A CLAIM	Under this option, if you submit a claim by July 12, 2018, you may be entitled to receive a payment. You would give up your rights to sue the Defendants about the claims in this case. Any claims filed after July 12, 2018 will be considered for payment only if settlement funds remain after all valid claims filed by that date have been paid in full.
EXCLUDE YOURSELF	Under this option, you would <u>not</u> be included in the ongoing lawsuits or settlements. You would receive no benefits, but you would retain any rights you currently have to sue the Defendants about the claims in this case.
DO NOTHING	If you do nothing, you will not receive any payment and you will give up your rights to sue the Defendants about the claims in this case.

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Basic Information

1. What is this Notice about?

This Notice is to inform you about the status and partial settlement of ongoing litigation which may affect your rights. You have the right to know about the lawsuit and about your legal rights and options before the Court or the jury decide whether the claims being made against the Defendants on your behalf are correct.

The Court in charge is the Circuit Court of Cook County, Illinois. The case is called *Illinois v. Hitachi Ltd., et al*, No. 12 CH 35266. The Illinois Attorney General is called the Plaintiff, and the companies it sued are called the Defendants (see Question 6 – Who are the Defendant Companies?).

2. What is the lawsuit about?

The lawsuit claims that the Defendants conspired to fix, raise, maintain or stabilize prices of CRTs resulting in overcharges to consumers who bought products containing CRTs. The Defendants deny Plaintiff’s allegations or that

indirect purchasers suffered any overcharge. The Court has not yet decided who is right.

3. What is a Cathode Ray Tube (“CRT”)?

A CRT is a piece of technology used as displays (screens) in televisions and computer monitors. Before LCD, Plasma and LED display technologies became popular, CRTs were the main technology used in these devices.

This is what a CRT monitor looks like:



This is what a CRT television looks like:



4. What is *parens patriae* authority?

The doctrine of *parens patriae* allows the Illinois Attorney General to bring a lawsuit under the antitrust laws on behalf of Illinois residents to recover damages. The Illinois Attorney General may also seek injunctive relief and civil penalties.

5. How do I know if I may recover money in the Illinois Attorney General’s *parens patriae* lawsuit?

Illinois consumers: The Illinois Attorney General is seeking monetary damages incurred by any Illinois resident (person or business) that purchased a CRT television or monitor between March 1, 1995 and November 25, 2007, while residing in Illinois and **for their own use in Illinois and not for resale**. Therefore, if you purchased one or more CRT television or monitor between March 1, 1995 and November 25, 2007 while residing in Illinois (or, if you are a business, while you were headquartered or incorporated in Illinois), you may recover by filing a claim.

You may **not** file a claim if you are:

- An individual who resided outside Illinois when you purchased your CRT television or monitor
- A business that was incorporated and headquartered outside Illinois when you purchased your CRT television or monitor
- An Illinois county, municipality, township or other political subdivision

If you may not file a claim in this lawsuit because of the above criteria, you retain any right you may have to sue the Defendants for monetary relief.

The Illinois Attorney General is also seeking monetary damages on behalf of the State of Illinois, including its state agencies. However, this notice of settlement does not relate to the settlements resolving the State of Illinois’ claims. Illinois state agencies are not eligible to participate in this claims process.

6. Who are the Defendant companies?

The Defendants are manufacturers and/or suppliers of CRTs.

The Settling Defendant companies are:

- Hitachi Ltd., and Hitachi Electronic Devices (USA) Inc. (“Hitachi”)
- LG Electronics, Inc. (“LG”)
- Koninklijke Philips Electronics N.V. and Philips Electronics North American Corp. (“Philips”)
- Samsung Display Device Co., Ltd. and Samsung SDI America, Inc. (“Samsung”)

The Non-Settling Defendant companies are:

- Panasonic Corporation, Panasonic Corp. of North America, and MT Picture Display, Co., Ltd. (“Panasonic”).
- Toshiba Corporation, Toshiba America, Inc., Toshiba America Information Systems Inc., Toshiba America Electronic Components, Inc. (“Toshiba”)

7. Why are there settlements but the lawsuit is continuing?

Settlements have been reached with Hitachi, LG, Philips, and Samsung. The Non-Settling Defendants (Panasonic and Toshiba) have not agreed to settle so the lawsuit continues against them.

Additional money may become available as a result of a trial or a future settlement. If the State later settles with the Non-Settling Defendants, the settlement agreement(s) will be posted on the website, www.illinoisrctsettlement.com. Alternatively, the litigation may be resolved in favor of the Non-Settling Defendants, in which case no additional money would become available. There is no guarantee as to what will happen.

The Settlements’ Benefits

8. What do the settlements provide?

The four Settling Defendants have settled the claims brought on behalf of Illinois businesses and individuals for a total of approximately \$36 million.

Any interest earned will be added to the Settlement Fund. The cost to administer the Settlements as well as the Illinois Attorney General’s fees and costs will come out of the Settlement Fund (see Question 19 - How will the lawyers be paid?).

9. How much money can I get?

The maximum amount you could potentially recover equals three times the actual amount the State alleges you were overcharged for each device containing a CRT—a total of \$20 for a television and \$60 for a monitor. If there is not enough money recovered to pay the maximum amount, your recovery will depend on the number of claims per device submitted by July 12, 2018 and the total recovery. We expect that such a pro rata distribution will allow for at least \$20 per claim and will increase if there are additional settlements or the Illinois Attorney General prevails at trial.

It is possible that any money remaining after claims are paid will be distributed to charities, governmental entities, or other beneficiaries.

In order to receive a payment, you will need to file a valid claim (see Question 11 – How can I get a payment?). The Claim Form provides additional details on how to submit a claim. Further information is available at www.illinoisrctsettlement.com or by calling 1-866-652-8226.

10. When will I get a payment?

No money will be distributed yet. The Plaintiff will pursue the lawsuit against the Non-Settling Defendants and will complete the litigation before any claims are paid. Plaintiff believes that money could be paid by the Non-Settling Defendants through additional settlements or as a result of winning the lawsuit. All funds received in this case will be distributed together at the conclusion of the lawsuit or as ordered by the Court.

How To Get A Payment

11. How can I get a payment?

If you meet the requirements described in Question 5 and you want to participate in the Settlements, you must complete and submit a Claim Form. We urge you to submit a Claim Form online at www.illinoisrctsettlement.com. If you do not

file online, you can also file a paper Claim Form by mail.

The Claim Form can be found at www.illinoisrctsettlement.com or you can obtain a copy by calling, toll free, 1-866-652-8226. If you choose to submit your claim online, you must do so on or before **July 12, 2018**. If you choose to submit a Claim Form by mail, it must be postmarked by **July 12, 2018**, and mailed to:

CRT Illinois Claims
c/o KCC Class Action Services
P.O. Box 404041
Louisville, KY 40233-4041

12. Can I have someone else submit a claim on my behalf?

We will not accept or pay claims filed by someone else on behalf or as an assignee of the person or entity who actually purchased the CRT television or monitor. This means that when you submit your claim, the name and address of the claimant must match the name and address to which the payment is to be sent. If these names and addresses do not match, your claim will be invalid. For individuals, the name of the person verifying the information must match that of the person making the claim. For corporations or other business entities, the individual verifying the information must be a duly authorized officer of the corporation or business entity. Verification provided by anyone else will be treated as an unverified claim and invalidated.

The process of filing a claim is designed to be straightforward. If you have any questions about how to file a claim, you can call the claims administrator at 1-866-652-8226 for assistance.

13. Can I submit an incomplete claim form by the deadline and supply further information later?

No. In order to be a valid claim, your claim form must be complete at the time of filing. You should not leave any part of the claim form blank or include inaccurate information that you intend to update later. If you determine you have made a mistake on your claim form after submitting it, please call the claims administrator at 1-866-652-8226 to address the issue.

Remaining in the Lawsuit

14. What am I giving up if I stay in the lawsuit?

You will give up your right to sue the Defendants on your own for the claims in this case unless you exclude yourself from the lawsuit. You also will be bound by all current and future settlements and directions by the Court relating to the lawsuit.

In return for paying the Settlement amounts, the Settling Defendants (and certain related entities defined in the Settlement Agreements) will be released from all claims relating to the facts underlying this lawsuit, 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 call 1-866-652-8226, or you can of course talk to your own lawyer at your own expense if you have questions about what this means. The Settlement Agreements and the specific releases are available at www.illinoisrctsettlement.com.

Excluding Yourself from the Lawsuit

15. How do I get out of the lawsuit?

To exclude yourself from the lawsuit, you must send a letter (or request for exclusion) by mail stating that you want to be excluded from *Illinois v. Hitachi Ltd., et al.*, No. 12 CH 35266. Your letter or request for exclusion must also include your name, your address, your telephone number and your signature. You must mail your exclusion request no later than **March 12, 2018**, to:

CRT Illinois Indirect Exclusions
c/o KCC Class Action Services
P.O. Box 404041

16. If I don't exclude myself, can I sue for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendants for the claims in this case.

17. If I exclude myself, can I still get benefits from the lawsuit?

No. If you exclude yourself, you will not get any benefit as a result of the Settlements, trial, or judgment in this case.

The Lawyers Representing You

18. Do I have a lawyer representing me?

As noted above, the Illinois Attorney General is representing consumers as *parens patriae* and state agencies in Illinois (see Question 5). You do not have to pay the Illinois Attorney General separately. If you wish to seek the advice of your own lawyer, you may hire one at your own expense.

19. How will the lawyers be paid?

Under the terms of the Settlements, the parties expect that 10% of the Settlement Fund will be awarded to the Illinois Attorney General for fees and costs, including the cost to administer the Settlements.

The Trial

20. When and where will the trial against the Non-Settling Defendants take place?

If the cases are not dismissed or settled, the Plaintiff will have to prove its claims against the Non-Settling Defendants. The trial date has not yet been scheduled.

During the trial, a decision will be reached about whether the Plaintiff or the Non-Settling Defendants are right about the claims in the lawsuit. There is no guarantee that the Plaintiff will win any additional money or benefits for consumers.

21. What is the Plaintiff asking for from the Non-Settling Defendants?

The Plaintiff is asking for money for Illinois consumers and State agencies and for civil penalties.

22. Will I get money after the trials?

If you file a valid claim (see Question 11 - How can I get a payment?), you will receive a portion of the current settlements at a later date. If the Plaintiff obtains additional settlements or prevails at trial, you will receive a portion of those recoveries, in addition to what you are entitled to under the current settlements, up to the estimated actual recoveries discussed above (See Question 9 - How much money can I get?). If you file a valid claim, you will be paid once after the lawsuit is resolved against all Defendants. You will not receive two separate payments. Important information about the case will be posted on the website, www.illinoisrtsettlement.com, as it becomes available.

Get More Information

23. Where can I get more information?

The Notice summarizes the lawsuit and the Settlements. You can get more information about the lawsuit and Settlements at www.illinoisrtsettlement.com, by calling 1-866-652-8226, or writing to Illinois CRT Claims, c/o KCC, P.O. Box 404041, Louisville, KY 40233-4041.