

FILED
3/16/2022 9:00 AM
ERIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2012CH35266
Calendar, 9
17102141

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

)	
THE STATE OF ILLINOIS,)	
by its Attorney General, Kwame Raoul,)	
)	
Plaintiff,)	Hon. Cecilia A. Horan
)	
v.)	
)	No. 12-CH-35266
HITACHI, LTD. et al.,)	
)	
Defendants.)	
)	

Joint Motion for Final Approval of Settlements with all Defendants and Final Distribution of Settlement Funds

Plaintiff, State of Illinois, and Defendants¹ by their attorneys, for the reasons stated in the accompanying memorandum, ask the Court to approve the settlements and the distribution of settlements funds, and to enter the attached proposed Final Approval of Settlements with all Defendants and Final Distribution of Settlement Funds (“Proposed Final Order”).

¹ The Defendants are Koninklijke Philips Electronics N.V (n/k/a Koninklijke Philips, N.V.), Philips Electronics North American Corp. (n/k/a Philips North America LLC) (collectively, “Philips”), LG Electronics, Inc., LG Electronics USA, Inc. (“LG”), Samsung Display Device Co., Ltd., Samsung SDI America, Inc. (collectively, “Samsung SDI”), Hitachi Ltd. and Hitachi Electronic Devices (USA) Inc. (collectively, “Hitachi”), Toshiba Corporation, Toshiba America Electronic Components, Inc. (collectively, “Toshiba”), and Panasonic Corporation, Panasonic Corporation of North America and MT Picture Display, Co. Ltd. (collectively “Panasonic”).

FILED DATE: 3/16/2022 9:00 AM 2012CH35266

Dated: March 16, 2022

THE STATE OF ILLINOIS
By Kwame Raoul,
ATTORNEY GENERAL OF ILLINOIS

By: /s/ Elizabeth L. Maxeiner
Elizabeth L. Maxeiner (#99000)
Chief, Antitrust Bureau
Joseph B. Chervin
AAG, Antitrust Bureau
Paul J. Harper
AAG, Antitrust Bureau
Office of the Illinois Attorney General
100 W. Randolph Street
Chicago, Illinois 60601
773-590-7935
Elizabeth.Maxeiner@ilag.gov
Joseph.Chervin@ilag.gov
Paul.Harper@ilag.gov

Attorneys for Plaintiff State of Illinois

By: /s/ Andrew Rhys Davies
Andrew Rhys Davies
Kendall R. Pauley
ALLEN & OVERY LLP
1221 Avenue of the Americas
New York, New York 10020
Telephone: 212 610 6300
Fax: 212 610 6399
AndrewRhys.Davies@AllenOvery.com
Kendall.Pauley@AllenOvery.com

Meghan E. Tepas
FREEBORN & PETERS LLP
311 S. Wacker Drive, Suite 3000
Chicago, Illinois 60606
Ph.: 312.360.6000
Fx.: 312.360.6520
mtepas@freeborn.com

*Attorneys for Samsung SDI Co., Ltd.
and Samsung SDI America, Inc.*

By: /s/ Nathan P. Eimer

Nathan P. Eimer
Brian Y. Chang
EIMER STAHL LLP
224 South Michigan Avenue
Suite 1100
Chicago, Illinois 60604
Telephone: (312) 660-7600
Firm No. 49152
neimer@eimerstahl.com
bchang@eimerstahl.com

*Attorneys for Defendants LG Electronics, Inc.
and LG Electronics USA, Inc.*

By: /s/ Dan Cummings

Dan Cummings
Alan Madans
ROTHSCHILD, BARRY & MYERS LLP
150 S. Wacker Drive
Suite 3025
Chicago, IL 60606
Telephone: (312) 372-2345
cummings@rbmchicago.com
madans@rbmchicago.com

Christopher M. Curran
Lucius B. Lau
Dana E. Foster
J. Frank Hogue
WHITE & CASE LLP
701 Thirteenth Street, N.W.
Washington, DC 20005
Telephone: (202) 626-3600
ccurran@whitecase.com
alau@whitecase.com
defoster@whitecase.com
fhogue@whitecase.com

*Attorneys for Defendants Toshiba
Corporation and Toshiba America Electronic
Components, Inc.*

By: /s/ Erik T. Koons
David C. Gustman
Jeffery M. Cross
Freeborn & Peters LLP (#71182)
311 S. Wacker Drive, Suite 3000
Chicago, Illinois 60606
(312) 360-6515
(312) 360-6430
dgustman@freeborn.com
jcross@freeborn.com

John M. Taladay
Erik T. Koons
Baker Botts L.L.P.
700 K Street, NW
Washington, DC 20001
(202) 639-7700
john.taladay@bakerbotts.com
erik.koons@bakerbotts.com

*Attorneys for Defendants Koninklijke Philips
N.V. and Philips North America LLC*

By: /s/ James H. Mutchnik
James H. Mutchnik, P.C.
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: jmutchnik@kirkland.com

Eliot A. Adelson
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105
Telephone: (415) 268-7000
Facsimile: (415) 268-7522
Email: eadelson@mofa.com

*Attorneys for Defendants, Hitachi America,
Ltd. and Hitachi Electronic Devices (USA),
Inc.*

By: /s/ James F. Herbison

James F. Herbison
Kevin B. Goldstein
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60622
(312) 558-5600
jherbison@winston.com
kbgoldstein@winston.com

Jeffrey L. Kessler (*pro hac vice*)
Eva W. Cole (*pro hac vice*)
WINSTON & STRAWN LLP
200 Park Avenue
New York, New York 10166-4193
(212) 294-6700
jkessler@winston.com
ewcole@winston.com

David L. Yohai (*pro hac vice*)
Adam C. Hemlock (*pro hac vice*)
David Yolcut (*pro hac vice*)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153-0119
Telephone: (212) 310-8000
Email: david.yohai@weil.com
Email: adam.hemlock@weil.com
Email: david.yolcut@weil.com

*Attorneys for Defendants Panasonic Corporation (f/k/a Matsushita Electronic Industrial Co., Ltd.), Panasonic Corporation of North America, and MT Picture Display Co., Ltd.*²

² MT Picture Display Co., Ltd. has been dissolved and completed final liquidation in Japan on May 23, 2019.