

## LEGAL NOTICE

***In re Optical Disk Drive Products Antitrust Litigation***  
United States District Court, Northern District Of California  
Case No. 3:10-MD-2143-RS (MDL 2143)

*If you purchased a new computer with an internal ODD, a stand-alone ODD designed for internal use in a computer, or an ODD designed to be attached externally to a computer while a resident of Arizona, California, District of Columbia, Florida, Hawaii, Kansas, Maine, Massachusetts, Michigan, Minnesota, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, Oregon, Tennessee, Utah, Vermont, West Virginia, or Wisconsin during the period of April 2003 to December 2008 for your own use and not for resale, you may be eligible for benefits from settlements reached in antitrust litigation currently pending in federal court. ODD refers to a DVD-RW, DVD-ROM, or COMBO drive manufactured by one or more Defendants or their alleged conspirators. **For class members to ensure cash payment, you must file a claim online or by mail by August 1, 2017.***

This notice is a summary only. For the precise terms and conditions of the settlement, visit

[www.OpticalDiskDriveAntitrust.com](http://www.OpticalDiskDriveAntitrust.com).

Para una notificación en Español, llamar 1-877-368-9020 o visitar [www.OpticalDiskDriveAntitrust.com](http://www.OpticalDiskDriveAntitrust.com).

### **WHY DID I RECEIVE THIS NOTICE?**

Records indicate that you may be eligible for a payment from three separate settlements reached with: (i) Koninklijke Philips N.V., Lite-On IT Corporation, Philips & Lite-On Digital Solutions Corporation, Philips & Lite-On Digital Solutions U.S.A., Inc. (collectively “PLDS”); (ii) Pioneer Corporation, Pioneer North America, Inc., Pioneer Electronics (USA) Inc., and Pioneer High Fidelity Taiwan Co., Ltd. (collectively “Pioneer”); (iii) TEAC America, Inc.; TEAC Corporation (collectively “TEAC”) in antitrust class action lawsuits pending before Judge Richard Seeborg in federal court.

The Court has ordered notice of settlements with these defendants to the class. The settlements would resolve the Indirect Purchaser Plaintiffs' claims against these defendants. The litigation will continue against the remaining defendants.

This Notice is to inform you of the certification of the Class, the settlements and your rights in the litigation. This Notice is not an expression by the Court of any opinion as to the merits of any of the claims or defenses asserted by either side in this lawsuit.

Read on for more information on your options, including how to claim your cash payment.

### **WHO IS INCLUDED IN THE SETTLEMENTS?**

Individuals and businesses who, as residents of Arizona, California, District of Columbia, Florida, Hawaii, Kansas, Maine, Massachusetts, Michigan, Minnesota, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, Oregon, Tennessee, Utah, Vermont, West Virginia, or Wisconsin that, during the period of April 2003 to December 2008, purchased a new computer with an internal ODD, a stand-alone ODD designed for internal use in a computer, or an ODD designed to be attached externally to a computer for their own use and not for resale. ODD refers to a DVD-RW, DVD-ROM, or COMBO drive manufactured by one or more Defendants or their asserted conspirators. Purchases made directly from an ODD manufacturer and the purchases of Panasonic-branded computers are not included. A list of manufacturers may be found at [www.OpticalDiskDriveAntitrust.com](http://www.OpticalDiskDriveAntitrust.com) or by calling 1-877-368-9020.

### **WHAT DO THE SETTLEMENTS PROVIDE?**

The settlements provide for \$55.5 million in recovery for the class. Specifically:

- The PLDS settlement provides for a \$40 million settlement fund.
- The Pioneer settlement provides for a \$10.5 million settlement fund.
- The TEAC settlement provides for a \$5 million settlement fund.

These settlements are in addition to \$124.5 million already reached with four defendant families (Panasonic, NEC, Sony and HLDS) which have received final approval by the court. Class members are still able to make claims on the original \$124.5 million in settlements.

You can submit a simple online claim form with no proof of purchase required. If final approval is granted to the settlement, Class members who have filed valid and timely claims will receive cash payments distributed electronically. If you are a Class Member with valid and timely claims and would prefer to receive a physical check, please submit a written request by August 1, 2017 to *In re ODD Products Indirect Purchaser Litigation*, PO Box 43424, Providence, RI 02940-3424. IPPs propose to compensate members of the state classes according to a plan of distribution which provides for a pro rata share of the settlement fund based on: (1) the number of ODDs purchased by the class member; and (2) the number of valid claims filed. Any remaining funds may be distributed in a second round to class members, or, depending on the funds remaining, be distributed to the California Attorney General for use in prosecuting consumer and antitrust claims. Under no circumstances will the money go back to the defendants.

## WHO ARE RELEASED

The settlements release Koninklijke Philips N.V., Lite-On IT Corporation, Philips & Lite-On Digital Solutions Corporation, Philips & Lite-On Digital Solutions U.S.A., Inc., Pioneer Corporation, Pioneer North America, Inc., Pioneer Electronics (USA) Inc., Pioneer High Fidelity Taiwan Co., Ltd., Pioneer Digital Design and Manufacturing Company, TEAC America, Inc., and TEAC Corporation from claims made in this litigation.

## YOUR RIGHTS AND OPTIONS

- **Get a Payment**

File a claim online or by mail by August 1, 2017. **The simple online claim form only takes 3-5 minutes for most individuals.** Claims may be submitted online at [www.OpticalDiskDriveAntitrust.com](http://www.OpticalDiskDriveAntitrust.com) or by mail to *In re ODD Products Indirect Purchaser Litigation*, PO Box 43424, Providence, RI 02940-3424.

- **Exclude Yourself**

You can choose to exclude yourself from the PLDS and Pioneer settlements and keep your right to sue the defendants on your own. If you exclude yourself, you cannot receive any benefits from the current settlements. Your written Exclusion Form must set forth your name and a statement that you do not wish to participate in the settlements. You must exclude yourself from each settlement individually (note that you can request exclusion from all settlements or one settlement in particular). All requests for exclusion must be postmarked by July 14, 2017 and sent to *In re ODD Products Indirect Purchaser Litigation*, PO Box 43424, Providence, RI 02940-3424.

- **File an Objection**

You can ask the Court to deny approval by filing an objection. Please note that you cannot ask the Court to order a larger settlement; the Court can only approve or deny the settlement. If the Court denies approval, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

Objections must be in writing and postmarked on or before July 14, 2017. All written objections and supporting papers must (a) clearly identify the case name and number (*In Re Optical Disk Drive Products Antitrust Litigation*, Indirect Purchaser Action, Case No. 3:10-MD-2143), (b) be submitted to the Court either by mailing them to the Class Action Clerk, United States District Court for the Northern District of California, 450 Golden Gate Ave, San Francisco, CA 94102, or by filing them in person at any location of the United States District Court for the Northern District of California, and (c) be filed or postmarked on or before July 14, 2017. Visit [www.OpticalDiskDriveAntitrust.com](http://www.OpticalDiskDriveAntitrust.com) for detailed information on how to object to the settlement.

You may also appear at the Final Approval Hearing, described below, either in person or through your own attorney. If you appear through your own attorney, you are responsible for paying that attorney.

- **Go to a Hearing**

The Court will hold a Final Approval Hearing on September 7, 2017 at 1:30 PM, unless otherwise ordered by the Court, at the United States District Court, 450 Golden Gate Ave, San Francisco, CA, Courtroom 3 – 17th Floor, to consider whether to approve or deny the PLDS and Pioneer settlements and a request for attorneys' fees up to 25 percent of the

Settlement Funds plus costs and expenses. You may appear at the Final Approval Hearing either in person or through your own attorney.

The Hearing may be moved to a different date or time without additional notice, so please check [www.OpticalDiskDriveAntitrust.com](http://www.OpticalDiskDriveAntitrust.com) for any updates and additional information.

### **WHO REPRESENTS ME?**

The Court appointed Hagens Berman Sobol Shapiro LLP to represent the Settlement Class. You may hire your own attorney, if you wish, at your own expense.

### **HOW CAN I GET MORE INFORMATION?**

This notice summarizes the proposed settlement. For the precise terms and conditions of the settlement, please see the settlement agreement available at [www.OpticalDiskDriveAntitrust.com](http://www.OpticalDiskDriveAntitrust.com), by contacting class counsel at Hagens Berman Sobol Shapiro ([odd@hbsslaw.com](mailto:odd@hbsslaw.com)), by accessing the Court docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 450 Golden Gate Ave., San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

For questions about the settlement or the claims process, you may contact the Settlement Administrator at 877-368-9020, via email at [info@opticaldiskdriveantitrust.com](mailto:info@opticaldiskdriveantitrust.com), or visit [www.OpticalDiskDriveAntitrust.com](http://www.OpticalDiskDriveAntitrust.com).

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**