
**NOTICE OF CERTIFICATION/AUTHORIZATION AND SETTLEMENT APPROVAL HEARINGS IN THE
CANADIAN OPTICAL DISK DRIVES LITIGATION**

If you bought Optical Disc Drives (“ODD”) or products containing ODD in Canada between January 1, 2000 and December 31, 2010, you may be affected by class action settlements.

1. WHAT IS A CLASS ACTION?

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

2. WHAT ARE THESE CLASS ACTIONS ABOUT?

Class actions lawsuits were commenced in Ontario, British Columbia and Quebec alleging that the defendants illegally conspired to fix the prices of ODD (collectively, the “ODD Proceedings”). The cases include Canadian residents in all provinces and territories who were affected by the alleged conspiracy. The ODD Proceedings ask that the Courts require these companies to return any extra money that they may have received due to this alleged conspiracy.

3. 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 being released from the case.

The following defendants agreed to settle the ODD Proceedings in exchange for a full release of the claims against them and their related entities relating to the alleged price-fixing of ODD:

- TEAC Corporation, TEAC America, Inc. and TEAC Canada, Ltd. (“TEAC”) for \$500,000 USD;
- NEC Corporation and NEC Canada, Inc. (“NEC”) for \$730,000 CDN; and
- Hitachi-LG Data Storage, Inc. and Hitachi-LG Data Storage Korea, Inc. (“HLDS”) for \$8,123,940 CDN. This settlement also releases the defendants, Hitachi, Ltd., Hitachi Canada, Ltd., Hitachi America Ltd., LG Electronics Inc., LG Electronics Canada, Inc., and LG Electronics USA, Inc.

TEAC, NEC and HLDS also agreed to provide cooperation to the plaintiffs in pursuing the ODD Proceedings against the remaining defendants. TEAC, NEC and HLDS do not admit any liability, wrongdoing or fault.

The TEAC, NEC and HLDS settlements will only become effective if they are approved by the British Columbia, Ontario and Quebec Courts. The approval hearings will take place in the British Columbia Court in the City of Vancouver on May 14, 2018 at 9 a.m., the Ontario Court in the City of London on April 23, 2018 at 9:30 a.m. and in the Quebec Court in the City of

Montreal on May 4, 2018 at 9:30 a.m., in room 2.08. The Courts will decide whether the settlements are fair, reasonable, and in the best interests of settlement class members.

4. WHO IS AFFECTED BY THE CLASS ACTIONS?

The ODD Proceedings were certified or authorized as class proceedings as against TEAC, NEC and HLDS for the purposes of implementing the settlement agreements.

The settlement classes include persons in Canada who purchased ODD and/or ODD Products between January 1, 2000 and December 31, 2010. The defendants and certain entities related to the defendants are excluded from each of the settlement classes.

- An “**ODD**” is any device which reads and/or writes data from and to an optical disk, including but not limited to, CD-ROMs, CD-recordable/rewritable, DVD-ROM, DVD-recordable/rewritable, Blu-Ray, Blu-Ray-recordable/rewritable, and HD DVD, as well as Super Multi-Drives, other combination drives, and optical disk drives designed to be attached externally to computers or other devices.
- An “**ODD Product**” is a product incorporating ODD, including but not limited to desktop computers, mobile/laptop computers, video game consoles, CD players/recorders, DVD players/recorders and Blu-Ray disc players/recorders.

5. WHAT STEPS SHOULD I TAKE NOW?

If you want to be a member of the ODD Proceedings, you do not need to do anything. However, there are two steps you should take to protect your legal rights:

1. Keep records of any purchases of ODDs or ODD Products from January 1, 2000 through December 31, 2010. Records include invoices, receipts and bank or loan statements.
2. Register online at www.siskinds.com/odd/ to receive updates about the ODD Proceedings.

Settlement class members who do not oppose the proposed settlements need not appear at the settlement approval hearings or take any other action at this time.

If you want to tell the Court what you think about the proposed settlements or speak to the Court at the hearings listed above, you must send your written submissions to the appropriate Class Counsel at the addresses listed below, postmarked no later than March 16, 2018. Class Counsel will forward all such submissions to the appropriate Court. All filed written submissions will be considered by the appropriate Court. If you do not file a written submission by March 16, 2018, you may not be entitled to participate in the settlement approval hearings.

If you want to attend the hearings, please contact Class Counsel for additional details.

6. WHAT HAPPENS TO THE MONEY PAID UNDER THE SETTLEMENT?

The TEAC, NEC and HLDS settlement funds (minus approved fees and expenses) will be held in an interest-bearing trust account. At a later date, the Court will decide how the settlement funds will be distributed and how you can apply to receive money from these settlements. Watch for another notice explaining how to claim money from the settlements. Register online at www.siskinds.com/odd/ to ensure that you are sent this notice by email or direct mail.

7. WHAT IS THE STATUS OF THE CONTESTED LITIGATION?

The contested litigation is continuing against the following defendants:

- Sony Corporation, Sony Optiarc, Inc., Sony Optiarc America Inc., Sony of Canada Ltd. and Sony Electronics, Inc. (“Sony”);
- Toshiba Corporation, Toshiba Samsung Storage Technology Corporation, Toshiba Samsung Storage Technology Korea Corporation, Toshiba of Canada Limited and Toshiba America Information Systems, Inc. (“Toshiba”);
- Samsung Electronics Co., Ltd., Samsung Electronics Canada Inc. and Samsung Electronics America, Inc. (“Samsung”);
- Koninlijke Philips Electronics N.V., Lite-On It Corporation of Taiwan, Philips & Lite-On Digital Solutions Corporation, Philips & Lite-On Digital Solutions USA, Inc. and Philips Electronics Ltd. (“Philips”);
- Quanta Storage, Inc. and Quanta Storage America, Inc. (“Quanta”);
- Panasonic Corporation, Panasonic Corporation of North America and Panasonic Canada Inc. (“Panasonic”);
- BenQ Corporation, BenQ America Corporation and BenQ Canada Corp. (“BenQ”); and
- Pioneer Corporation, Pioneer North America, Inc., Pioneer Electronics (USA) Inc., Pioneer High Fidelity Taiwan Co., Ltd. and Pioneer Electronics Of Canada Inc. (“Pioneer”).

The British Columbia class action was certified on behalf of residents of British Columbia. The Defendants appealed the certification decision to the British Columbia Court of Appeal. The certification decision was upheld on appeal. The Defendants are seeking leave to appeal to the Supreme Court of Canada.

This means that, subject to the outcome of any appeal to the Supreme Court of Canada, the British Columbia action can proceed as a class action and the common issues (as defined in the British Columbia certification order) will be determined in a single proceeding on behalf of members of the following subclasses:

The British Columbia “Non-Umbrella Purchaser Subclass” is defined as:

All persons resident in British Columbia who purchased optical disc drives (“ODD”) manufactured or supplied by the defendants in this action, or products that contain ODD (“ODD Products”) in which the ODD was manufactured or supplied by the defendants in this action, in the period from January 1, 2004 through January 1, 2010.

The British Columbia “Umbrella Purchaser Subclass” is defined as:

All persons resident in British Columbia who purchased optical disc drives (“ODD”) that were not manufactured or supplied by the defendants in this action, or products that contain ODD (“ODD Products”) in which the ODD was not manufactured or supplied by the defendants in this action, in the period from January 1, 2004 through January 1, 2010.

ODDs mean CD-ROM, CD-R/RW, DVD-ROM, DVD-R/RW, Blu-Ray, Blu-Ray R/RW, and HD DVD.

ODD Products mean computers, video game consoles and ODDs that are designed to be attached externally to devices such as computers.

The plaintiff in the Ontario action will be seeking to certify the Ontario action on behalf of a national class, excluding British Columbia residents.

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

If you do not want to be a member of the ODD Proceedings, you can exclude yourself from the ODD Proceedings (“**opt-out**”) 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;
- a statement saying that you (or the company) want to opt-out of the ODD Proceedings; and
- to the extent that it is reasonably available, the aggregate purchase price you paid for ODD and/or ODD Products purchased in Canada during the Class Period, less any rebates, delivery or shipping charges, taxes, and any other form of discounts. If this information is not reasonably available, please provide a good faith estimate and the basis of your estimate.

Requests to opt-out of the proceedings must be post-marked by April 15, 2018.

Residents of Quebec must also send their opt-out letter to the Clerk of the Superior Court of Quebec, before the time limit for doing so has expired.

If you exclude yourself or opt-out:

- you will not be eligible to participate in the ongoing ODD Proceedings, and
- you will not receive any money from this class action, but
- you will be able to start 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 bound by these settlements and any future settlements in the ODD Proceedings,
- you will be eligible to participate in the ongoing ODD Proceedings, and
- you may receive money from this class action, but
- you will not be able to start your own case against the defendants regarding the claims at issue in the class action.

This is your only chance to exclude yourself or opt out of the ODD Proceedings.

9. WHO ARE THE LAWYERS WORKING ON THESE CLASS ACTIONS AND HOW ARE THEY PAID?

The law firm of Camp Fiorante Matthews Mogerman represents the Settlement Class in British Columbia.

CAMP FIORANTE MATTHEWS MOGERMAN

Telephone: 1-800-689-2322

Email: oddclassaction@cfmlawyers.ca

Mail: 4th Floor, 856 Homer Street, Vancouver, BC V6B 2W5, Attention: Reidar Mogerman

The law firm of Siskinds LLP represents the Settlement Class in Ontario and in all provinces other than British Columbia or Quebec:

SISKINDS LLP

Telephone (toll free): 1-800-461-6166 ext. 2286

Email: oddclassaction@siskinds.com

Mail: 680 Waterloo Street, London, ON N6A 3V8 Attention: Charles Wright

The law firm of Consumer Law Group Inc. represents the Settlement Class in Quebec.

CONSUMER LAW GROUP INC.

Telephone: 514-266-7863

Email: jorenstein@clg.org

Mail: 1030 rue Berri, Suite 102, Montreal, QC, H2L 4C3, Attention: Jeff Orenstein

As an individual, you do not have to pay the lawyers working on the ODD Proceedings any money. The lawyers will be paid from the money collected in the ODD Proceedings. 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. Any approved legal fees 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 costs award or future disbursements. At a later date, Class Counsel will ask the Courts to approve the distribution of the remaining settlement funds to settlement class members.

10. WHERE CAN I ASK MORE QUESTIONS

This notice contains only a summary of the TEAC, NEC and HLDS settlements. To review the complete settlement agreements, visit www.siskinds.com/odd/. If you have questions that are not answered online at www.siskinds.com/odd/, please contact Class Counsel.

To receive future notices and updates regarding the class actions and any future settlements, register online at www.siskinds.com/odd/.

11. INTERPRETATION

This notice contains a summary of some of the terms of the TEAC, NEC and HLDS settlement agreements. If there is a conflict between the provisions of this notice and the TEAC, NEC and HLDS settlement agreements, the terms of the TEAC, NEC and HLDS settlement agreements shall prevail.