

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

Case No. 4:13-md-02420 YGR (DMR)

MDL No. 2420

This Documents Relates to:

DECLARATION OF CAMERON R. AZARI,
ESQ., ON IMPLEMENTATION AND
ADEQUACY OF CLASS NOTICE
PROGRAM

ALL INDIRECT PURCHASER
ACTIONS

I, Cameron R. Azari, Esq., hereby declare and state as follows:

1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.
2. I am a nationally recognized expert in the field of legal notice and I have served as an expert in dozens of federal and state cases involving class action notice plans.
3. I am the Director of Legal Notice for Hilsoft Notifications (“Hilsoft”), a firm that specializes in designing, developing, analyzing and implementing large-scale, un-biased, legal notification plans. Hilsoft is a business unit of Epiq Class Action & Claims Solutions, Inc. (“Epiq”). In June 2018 Epiq completed an acquisition of Garden City Group (“GCG”). Epiq and GCG have merged as one company, now Epiq. Under my direction, Hilsoft serves as the expert

1 legal notice consulting firm for both entities now, continuing through the completion of the
2 merger.

3 4. I have been directly and personally involved in all of the notice planning and
4 implementation here, including analysis of the individual notice options and the media audience
5 data, determining the most effective mixture of media required to reach the greatest practicable
6 number of Settlement Class Members and implementation of the Notice Program (or “Notice
7 Plan”). The facts in this declaration are based on what I personally know, as well as information
8 provided to me in the ordinary course of my business by my colleagues at Hilsoft, GCG and
9 EPIQ.

10 5. This declaration describes the implementation of the Settlement Notice Plan
11 (“Notice Plan” or “Plan”) designed by Hilsoft for *In Re Lithium Ion Batteries Antitrust Litigation*,
12 Case No. 4:13-md-02420 YGR (DMR), MDL No. 2420. In the “*Declaration of Cameron R.*
13 *Azari, Esq. Regarding Proposed Class Notice Program*,” dated January 24, 2019, I detailed
14 Hilsoft’s class action notice experience and attached Hilsoft’s curriculum vitae. I also provided
15 my educational and professional experience relating to class actions and my ability to render
16 opinions on overall adequacy of notice programs.

17 6. On March 11, 2019, the Court approved the Notice Plan as designed by Hilsoft
18 and appointed Epiq to serve as the Settlement Notice Administrator in the Order Directing Notice
19 to the Class Regarding the SDI, Tokin, Toshiba & Panasonic Settlements (“Order”). In the Order,
20 the Court certified the following Settlement Class:

21 [A]ll persons and entities who, as residents of the United States and
22 during the period from January 1, 2000 through May 31, 2011,
23 indirectly purchased new for their own use and not for resale one of the
24 following products which contained a lithium-ion cylindrical battery
25 manufactured by one or more defendants or their coconspirators: (i) a
26 portable computer; (ii) a power tool; (iii) a camcorder; or (iv) a
27 replacement battery for any of these products. Excluded from the class
28 are any purchases of Panasonic-branded computers. Also excluded
from the class are any federal, state, or local governmental entities, any
judicial officers presiding over this action, members of their immediate
families and judicial staffs, and any juror assigned to this action, but
included in the class are all non-federal and non-state governmental
entities in California.

7. After the Court's preliminary approval of the Settlement, we began to implement the Notice Program and this declaration details its successful implementation. This declaration will detail the notice activities undertaken and explain how and why the Notice Plan was comprehensive and well-suited to the Settlement Class. This declaration will also discuss the administration activity to date. The facts in this declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues from Hilsoft and Epiq, who worked with us to implement the notification effort.

OVERVIEW

8. This declaration will describe the implementation of the Settlement Notice Plan ("Notice Plan," "Plan," or "Notice Program") and notices (the "Notice" or "Notices") for the Settlements with defendants Samsung SDI Co., Ltd. and Samsung SDI America, Inc. (collectively, "SDI"); TOKIN Corporation ("TOKIN"); Toshiba Corporation ("Toshiba"); and Panasonic Corporation, Panasonic Corporation of North America, SANYO Electric Co., Ltd., and SANYO North America Corporation ("Panasonic") (collectively, the "Settling Defendants") in the United States District Court for the Northern District of California. The Settling Defendants agreed to Settlements to resolve claims that they allegedly conspired to fix the price of lithium-ion cylindrical battery cells. This alleged conspiracy potentially caused individuals and businesses to pay more for the following products which contained lithium-ion cylindrical batteries: (i) portable computers; (ii) power tools; (iii) camcorders; or (iv) a replacement battery for any of these products. This Notice Plan followed the notice efforts implemented for the prior settlements in this matter.

9. The media portion of the Notice Plan outlined below was targeted to Adults 25 years of age and older who purchased portable computers, power tools, camcorders, or replacement batteries. The individual notice effort was supplemented by a comprehensive media campaign.

10. In my opinion, the Notice Plan as designed reached the greatest practicable number of Settlement Class Members through the use of individual notice and paid and earned media. Media was selected to both provide broad notice to potential Settlement Class Members

1 and to target notice to Settlement Class Members most likely to file a Claim. In my opinion, the
 2 Notice Plan was the best notice practicable under the circumstances of this case and met the
 3 requirements of due process, including its “desire to actually inform” requirement.¹

4 **NOTICE PLAN DETAIL**

5 11. Federal Rule of Civil Procedure 23 directs that the best notice practicable under
 6 the circumstances must include “individual notice to all members who can be identified through
 7 reasonable effort.”² The Notice Program here satisfied this requirement. An Email Notice was
 8 sent to all available email addresses for Settlement Class Members.

9 12. To guide the selection of measured media in reaching unknown members of the
 10 Class, the Notice Plan has a primary target audience of: Adults 25 years of age and older who
 11 purchased portable computers, power tools, camcorders, or replacement batteries. Adults 25
 12 years of age and older were chosen as the target because the end of the Class Period was more
 13 than seven years ago.

14 13. The combined measured individual notice, broadcast media and online banner
 15 notice reached approximately 87% of Adults 25 years of age and older who purchased portable
 16 computers, power tools, camcorders, or replacement batteries, an average of 3.5 times each. In
 17 my experience, the reach and frequency of the Notice Plan is consistent with other court-approved
 18 notice programs in settlements of similar magnitude, is consistent with the reach of prior
 19 settlement notice efforts implemented in this litigation, and was designed to meet due process
 20 requirements.

21 **NOTICE PLAN** 22 **Individual Notice**

23 14. Individual notice consisted of an Email Notice sent to known Settlement Class
 24 Members via email. Settlement Class Member data was provided to GCG/Epiq as follows:

26 ¹ “But when notice is a person’s due, process which is a mere gesture is not due process. The
 27 means employed must be such as one desirous of actually informing the absentee might
 28 reasonably adopt to accomplish it. The reasonableness and hence the constitutional validity of
 any chosen method may be defended on the ground that it is in itself reasonably certain to inform
 those affected” *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315 (1950).

² Fed. R. Civ. P. 23(c)(2)(B).

15. **Dell**: On April 2, 2019, GCG/Epiq received 9,028,671 Settlement Class Member records with an email address.

16. **Frys**: On April 2, 2019, GCG/Epiq received 188,413 Settlement Class Members records with an email address.

17. **HP**: On April 2, 2019, GCG/Epiq received 5,828,123 Settlement Class Member records with an email address.

18. **Other**: On April 3, 2019, GCG/Epiq received 40 Settlement Class Member records from Settlement Class Members that reached out to Class Counsel.

19. **Newegg**: On April 4, 2019, GCG/Epiq received 3,215,941 Settlement Class Member records with an email address.

20. **Office Max**: On April 4, 2019, GCG/Epiq received 2,692,397 Settlement Class Member records with an email address.

21. For all sources, GCG/Epiq received 20,953,585 total records, which resulted in 16,250,194 Settlement Class Member records after duplicates were removed. Subsequently, internet service providers (“ISPs”) associated with each email address were contacted to identify email addresses that no longer existed or were not valid since some of the email addresses were quite old. This process identified 7,189,075 invalid email addresses, which resulted in 9,061,119 email addresses to receive individual notice.

NOTICE PLAN
Individual Notice – Email

22. Beginning on April 5, 2019, GCG/Epiq sent an Email Notice to 9,061,119 potential Settlement Class Members for whom a facially valid email address was available. The Email Notice was created using an embedded HTML text format. This format provided text that is easy to read without graphics, tables, images, and other elements that would increase the likelihood that the message could be blocked by Internet Service Providers (ISPs) and/or SPAM filters. The emails were sent using a server known to the major email providers as one not used to send bulk “SPAM” or “junk” email blasts. Also, the emails were sent in small groups so as to not be erroneously flagged as a bulk junk email blast. Each Email Notice was transmitted with a

1 unique message identifier. If the receiving email server could not deliver the message, a “bounce
2 code” was returned along with the unique message identifier. For any Email Notice for which a
3 bounce code was received indicating that the message was undeliverable, at least two additional
4 attempts were made to deliver the Email Notice.

5 23. The Email Notice included the website address of the existing case website
6 (www.ReverseTheCharge.com). By accessing the website, recipients are able to easily file an
7 online Claim, access a full Long-Form Notice, the Settlement Agreements, a paper Claim Form,
8 and other information about the Settlement. A copy of the Email Notice is included as

9 **Attachment 1.**

10 24. After completion of the initial Email Notice effort, Epiq received back 1,190,600
11 undeliverable emails.

12 25. As of June 3, 2019, Epiq has sent Email Notices to 9,061,119 Settlement Class
13 Members’ email addresses, with Notice to 7,870,519 unique Settlement Class Members currently
14 known to be deliverable, which is an 86.9% deliverable rate. Email Notice was sent to all
15 potential class members for whom Epiq had valid email addresses, irrespective of whether those
16 individuals previously submitted claims.

17 26. Additionally, a copy of the Long-Form Notice and Claim Form was mailed to all
18 persons who request one via the toll-free phone number or by mail. As of June 3, 2019, 84 Long
19 Form Notices and Claim Forms have been mailed as a result of requests via the toll-free phone
20 number. The Long-Form Notice is also available to download or print at the website. A copy of
21 the Long-Form Notice (in both English and Spanish) and the Claim Form are included as

22 **Attachment 2.**

23 **Television**

24 27. A well-crafted broadcast television advertisement can be extremely effective in
25 reaching almost any demographic. Television ads provided timely notice to potential Settlement
26 Class Members in their homes. 15-second, 30-second and 60-second TV spots were purchased
27 nationwide on cable stations covering a variety of networks such as History, The Weather
28

Channel, A&E, Syfy, and/or Lifetime. In total, 74 spots aired from April 3, 2019 to April 16, 2019³.

28. A variety of dayparts (morning, daytime, syndicated day/prime access/early fringe, early news, and prime/syndicated prime) were used to increase reach among persons with different viewing habits. A copy of the television story board and screenshots are included as **Attachment 3**.

Digital Banner Notice

29. The Notice Plan includes digital banner advertisements targeted specifically to Settlement Class Members. The Banner Notice provided the Class with additional opportunities to be apprised of the Settlement and their rights.

30. Banner advertisements appeared on *Google's DoubleClick Network* and *Oath/Verizon Ad Network* (formerly *Yahoo! Ad Network*) in English and Spanish. These banner advertisements appeared on a rotating schedule in multiple ad sizes across desktop and mobile devices.

31. Banner advertisements were also displayed on *Facebook*, *Instagram*, and *Twitter*. These sites represent the leading group of social network sites in the United States. On *Facebook*, when a user logs into their account they are presented with their homepage. Banners appeared in their newsfeed for desktop and mobile notice as well as in the right hand column next to the newsfeed for desktop. Notices on *Instagram* and *Twitter* appeared in a user's feed alongside other posts and tweets. *Facebook* and *Instagram* also included a Lead Form ad (also referred to as an Auto Email Notice). These banner advertisements appeared on a rotating schedule in custom ad sizes across desktop and mobile devices.

32. A summary of the Digital Banner Notice effort is as follows:

<i>Network/Property</i>	<i>Banner Size</i>	<i>Run Dates</i>	<i>Click-Throughs</i>	<i>Est. Impressions</i>
<i>Google DoubleClick & Oath Ad Network</i>	300x250; 728x90; 970x250; 300 x	4/3/19 – 5/14/19	145,391	468,809,829

³ A few stations did not accept our ad creative; therefore, total spots are slightly less than the original estimation. This change did not affect the overall reach of the campaign.

	600			
<i>Facebook, Instagram, & Twitter</i>	Custom	4/3/19 – 5/14/19	25,220	63,591,790
<i>TOTAL</i>			170,611	532,401,619

33. Combined, approximately 532.4 million adult impressions were generated by these Banner Notices from April 3, 2019 to May 14, 2019. Clicking on the Banner Notice brought the reader to the case website where they could easily click on the existing “Claim Your Cash” button to file an online claim and obtain other detailed information about the case. Examples of the Banner Notices are included as **Attachment 4**.

Digital Video Notice

34. Digital video advertisements provided an opportunity to utilize the television notice across digital channels to reach Settlement Class Members as they browsed online. 15-second and 30-second Video Notices appeared on: *Facebook, Instagram* and *Twitter*. Video notices ran across desktop and mobile devices and appeared in users’ feeds alongside posts and tweets on desktop and within users’ feeds on mobile.

35. Additionally, 30-second Video Notices appeared on YouTube as TrueView In-Stream skippable advertisements. Behavior targeting was used to identify users that have shown an interest in products related to lithium-ion cylindrical batteries. We utilized the advanced targeting algorithms of YouTube to remarket and develop “look-alike audiences” (look-alike audiences are individuals that share similar traits to those that visit the case website). Once identified, those users had the opportunity to view the video notice on YouTube. Similar to look-alike targeting, those users who visited the case website, but did not file a claim were also segmented and targeted on YouTube.

36. A summary of the Digital Video Notice effort is as follows:

<i>Network/Property</i>	<i>Video Length</i>	<i>Run Dates</i>	<i>Click-Throughs</i>	<i>Impressions</i>
<i>Facebook, Instagram & Twitter</i>	:15 & :30	4/3/19 – 5/14/19	20,801	40,471,757
<i>YouTube</i>	:30	4/3/19 – 5/14/19	4,061	17,656,795
<i>TOTAL</i>			24,862	58,128,552

37. Combined, approximately 58.1 million adult impressions were generated by these Video Notices from April 3, 2019 to May 14, 2019. Clicking on the call-to-action overlay ad took the viewer to the case website where they could obtain detailed information about the case.

Targeted Digital Media

38. In addition to traditional digital targeting, we also incorporated a hyper-targeted strategy. Behavioral, context and select placement strategies were used to reach Settlement Class Members online.

39. Behavioral targeting uses a person's online patterns that relate to consumer electronics, cordless power tools, replacement batteries, and other related topics to identify and serve them an ad as they navigate the internet. Contextual targeting places ads alongside online articles, blogs, and content that specifically contain keywords and phrases in line with lithium-ion cylindrical battery products. Select placement of Notices on specific websites likely to be effective in providing notice to Settlement Class Members affected by the Settlement. This included consumer electronics sites as well as premier news, sports, weather, and entertainment websites. All sites that performed well were segmented for increased presence, which resulted in premium placement across desktop and mobile platforms.

Placing Notices to Be Highly Visible

40. The Notices were designed to be highly visible and noticeable. Since not all placements are equal, extra care was taken to place Notices in positions to generate visibility among potential Settlement Class Members.

41. TV spots were targeted to a variety of shows and genres to ensure broad reach across the target audience.

42. In digital, placement was sought above the fold⁴ on the websites when available. *Facebook* advertisements appeared both in the newsfeed and on the right-hand side of the user's news feed on computers and within the newsfeed on mobile.

⁴ The term "above the fold" refers to the portion of a website that can be viewed by a visitor, typically without the need to scroll down the page.

Sponsored Internet Search Listings

43. To help Settlement Class Members locate the case website, sponsored search listings were acquired on *Google*. When search engine visitors search on common keyword combinations such as, “Battery Powered Tools,” “Battery Settlement” or “Lithium Batteries” the sponsored search listing is generally displayed at the top of the page prior to the search results or in the upper right hand column. The Sponsored Search Listings ran from April 3, 2019 through May 28, 2019. The sponsored search listings were displayed 3,972,843 times, which resulted in 8,886 clicks that displayed the case website. A complete list of the sponsored search keyword combinations is included as **Attachment 5**. An example of the sponsored search listing as displayed on the search engine is included as **Attachment 6**.

Informational Release

44. To build additional reach and extend exposures, on April 3, 2019, a party-neutral Informational Release was issued to approximately 15,000 media outlets, including newspapers, magazines, national wire services, television, radio and online media in all 50 states. The Informational Release in Spanish was also issued to the Hispanic newswire. The Hispanic newswire reaches over 7,000 U.S. Hispanic media contacts including online placement of approximately 100 Hispanic websites nationally. The Informational Release was also distributed to approximately 495 media contacts in the Consumer Electronics industry. The Informational Release served a valuable role by providing additional notice exposures beyond that which was provided by the paid media. The Informational Release included the toll-free number and case website address. A copy of the Information Release (in both English and Spanish) as it was distributed is included as **Attachment 7**.

Case Website, Toll-free Telephone Number and Postal Mailing Address

45. A dedicated website (www.ReverseTheCharge.com) was already created for the previous Settlements in this matter. On April 4, 2019, the website was updated with information about these latest Settlements, including dates and deadlines associated with the Settlements, all other features of the case website remain the same. Visitors to the homepage are presented with the prominent “Claim Your Cash” link to easily file an online claim. Class members have been

1 able to use this link to file online claims at all times that my firm has maintained this website,
2 including between May 17 and May 26, 2019. Settlement Class Members are able to obtain
3 detailed information about the case and review documents for this Settlement. As with the prior
4 settlements, these documents include the full Long-Form Notice (in English and Spanish), the
5 Settlement Agreements, the Preliminary Approval Order, and other documents. Answers to
6 Frequently Asked Questions (FAQs) were also updated as appropriate. The notice procedures are
7 available on the website.

8 46. The case website address was displayed prominently on all Notice documents.
9 The Banner Notices linked directly to the case website. As of June 3, 2019, there have been
10 319,866 website visitor sessions, with 500,119 page views.

11 47. The existing toll-free phone number (1-855-730-8645) has continued to be used to
12 allow Settlement Class Members to call for additional information, listen to answers to FAQs and
13 request that a Long Form Notice and a Claim Form be mailed to them. The toll-free number was
14 displayed prominently in the Notice documents as appropriate. This automated system is
15 available 24 hours per day, 7 days per week. As of June 3, 2019, the toll-free number has handled
16 616 calls representing 1,730 minutes of use.

17 48. A post office box was also established for the Settlement, to allow Settlement
18 Class Members to contact the claims administrator by mail with any specific requests or
19 questions.

20 **Claim Filing**

21 49. The deadline for Settlement Class Members to submit a claim is July 19, 2019. As
22 of June 3, 2019, GCG/Epiq has received 51,961 Claim Forms as a result of this latest Settlement
23 notice effort. (37 paper Claim Forms and 51,924 web Claim Forms). This is in addition to the
24 973,488 claims already filed over the course of the previous settlements in the litigation. Claims
25 processing is ongoing and will continue through the claim filing deadline.

26 50. The current plan for claims processing is as follows. After the claims period is
27 closed, any outreach requested by the parties to review the validity of claims is complete and the
28 Court approves the settlement (which may take several months, pending appeals and Court

1 availability), an email will be sent to the account on file of class members who have filed timely
2 claims. The email will provide instructions on how to receive payments electronically via
3 PayPal, Google Wallet, Amazon Balance, and other popular methods. Epiq also will mail
4 physical checks to Settlement Class Members who have requested to receive compensation in that
5 manner.

6 51. The current, provisional, estimate of the average payment per device to class
7 members from the non-Sony settlements is a nationwide average of \$1.43 per device.

8 **Exclusion Requests and Objections**

9 52. The deadline for Settlement Class Members to request exclusion from the
10 settlement or to object to the settlement was May 28, 2019. As of June 3, 2019, GCG/Epiq has
11 received ten requests for exclusion from the settlement. A report listing the exclusion requests is
12 included as **Attachment 8**. As of June 11, 2019, I am aware of three objections to the settlement.

13 **CONCLUSION**

14 53. In class action notice planning, execution, and analysis, we are guided by due
15 process considerations under the United States Constitution, by federal and local rules and
16 statutes, and further by case law pertaining to notice. This framework directs that the notice
17 program be designed to reach the greatest practicable number of potential class members and, in a
18 settlement class action notice situation such as this, that the notice or notice program itself not
19 limit knowledge of the availability of benefits—nor the ability to exercise other options—to class
20 members in any way. In my opinion, all of these requirements have been met in this case.

21 54. As described above, the Notice Plan effectively provided a combined measured
22 individual notice, broadcast media, social media and online banner notice effort, which reached
23 approximately 87% of all Adults 25 years of age and older who purchased power tools,
24 camcorders, or laptop/notebook computers, an average of 3.5 times each. Many courts have
25 accepted and understood that anything over a 70% percent reach is more than adequate. In 2010,
26 the Federal Judicial Center issued a Judges' Class Action Notice and Claims Process Checklist
27 and Plain Language Guide. This Guide states that, "the lynchpin in an objective determination of
28

1 the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high
2 percentage of the class. It is reasonable to reach between 70–95%.”

3 55. The Notice Plan schedule afforded enough time to provide full and proper notice
4 to Settlement Class Members before any opt-out, objection or claim filing deadline.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed on June
6 11th, 2019.

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8 _____
9 Cameron R. Azari, Esq.
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Attachment 1

From: DoNotReply @LegalClaimsAdmin.com <donotreply@legalclaimsadmin.com>
Sent:
To:
Subject: Important Notice About a Class Action Settlement

LEGAL NOTICE

If You Bought Electronics Such as a Portable Computer, Power Tool, Camcorder and/or Other Items Containing a Lithium Ion Cylindrical Battery Since 2000 You Could Get Money From More Than \$113 Million in Settlements

**Claims can be filed online at ReverseTheCharge.com
Filing a claim only takes a few minutes**

Samsung SDI Co., Ltd. and Samsung SDI America, Inc. (“SDI”); TOKIN Corporation (“TOKIN”); Toshiba Corporation (“Toshiba”); and Panasonic Corporation, Panasonic Corporation of North America, SANYO Electric Co., Ltd., and SANYO North America Corporation (“Panasonic”) (together, the “Settling Defendants”) have agreed to \$49 million in settlements resolving claims that they allegedly fixed the price of cylindrical Lithium-Ion Batteries, causing individuals and businesses to pay more for products like portable computers, power tools, camcorders or replacement batteries for any of these products. Other Defendants in this case have also settled, and the Court has granted final approval for those settlements. The total amount of all settlements is over \$113 million. A more detailed notice, which includes additional information about the settlements, is available at www.reversethecharge.com.

Am I Included?

You may be included in the Class if, as a resident of the United States and during the period from January 1, 2000 through May 31, 2011, you purchased new, for your own use and not for resale, one of the following products: (i) a portable computer; (ii) a power tool; (iii) a camcorder; or (iv) a replacement battery for any of these products. The product must have been purchased from someone other than the Lithium-Ion Battery manufacturer, such as a retail store.

What Do The Settlements Provide?

The SDI, TOKIN, Toshiba, and Panasonic Settlements provide for the payment of \$49 million to the Class. Previously, the Court approved settlements with other defendant companies for a total of \$64.45 million.

After deducting Court-approved attorneys’ fees, service awards, notice and administration costs, and litigation expenses, the remaining Settlement Fund from the Settling Defendants will be divided into two funds, a Repealer Fund and a Non-Repealer Fund. The Repealer Fund (90% of the remaining Settlement Fund) will be available for distribution to Class Members who are residents of the following “Repealer” States: Alabama, Arizona, Arkansas, California, District of Columbia, Florida, Hawaii, Illinois, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, South Dakota, Tennessee, Utah, Vermont, West Virginia,

and Wisconsin. All other states and/or jurisdictions are “Non-Repealer” States. The Non-Repealer Fund (10% of the remaining Settlement Fund) will be available for distribution to Class Members who are residents of Non-Repealer States. However, the plan for distributing the Settlement Funds is not final and may be changed by the Court after considering any and all objections by class members. If the Court determines that further changes to the allocation of the Settlement Funds between the Repealer and Non-Repealer Fund are appropriate, those changes will be posted on the settlement website.

How Can I Get A Payment And How Much Will I Receive?

Money from all settlements in this case will be distributed together on a per-Class Member basis, but the amount you receive from each settlement will depend on a Court-approved plan of allocation. To make a claim and receive payment, you need to file a valid claim form online or by mail by July 19, 2019. **The simple claim form only takes 3-5 minutes for most individuals to complete.** Claims may be submitted online at www.reversethecharge.com or by mail to Lithium Batteries Indirect Purchaser Settlements, c/o Epiq, P.O. Box 10194, Dublin, OH 43017-3194. The same products are not covered by all of the settlements, so filling out the claim form as accurately and completely as possible helps ensure that you receive your correct share of the settlements.

What Are My Rights?

Even if you do nothing, you will be bound by the Court’s decisions concerning these settlements. To keep your rights to sue the Settling Defendants regarding Lithium Ion Batteries, you must exclude yourself from the Class in writing by **May 28, 2019**. If you stay in the Class, you may object to the settlements with Settling Defendants in writing by **May 28, 2019**. The settlements, along with details on how to exclude yourself from or object to settlements with Settling Defendants, are available at www.reversethecharge.com.

The Court will hold a Final Fairness Hearing at 2:00 p.m. on July 16, 2019, at the United States Courthouse, 1301 Clay Street, Courtroom 1, 4th Floor, Oakland, CA 94612, to consider whether to approve the settlements with Settling Defendants. Class Counsel will also request at the hearing attorneys’ fees of up to 30% plus interest of the total settlement funds (inclusive of all settlements to date), plus reimbursement of costs and expenses, for investigating the facts, litigating the case, and negotiating the settlements. Class Counsel also will request service awards for Class representatives, in the amount of \$10,000 for each individual Class representative and \$25,000 for each governmental entity Class representative, for the work they have undertaken on behalf of the Class. You or your own attorney may appear and speak at the hearing to comment on the settlements with Settling Defendants and/or on any request for attorneys’ fees, service awards for Class representatives, or reimbursement of costs and expenses at your own expense, but you are not required to appear. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check the website for additional information. Please do not contact the Court about this case.

If you wish to UNSUBSCRIBE from future email messages from the Claims Administrator with regard to this Settlement, please click on this [link](#).

Attachment 2

If You Bought Electronics Such as a Portable Computer, Power Tool, Camcorder, and/or Other Items Containing a Lithium Ion Cylindrical Battery Since 2000

You Could Get Money From More Than \$113 Million in Settlements

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

- Please read this Notice and the Settlements carefully. Your legal rights may be affected whether you act or don't act. This Notice summarizes the proposed Settlements.
- **The following rights and options – and deadlines to exercise them – are explained in this Notice.**

YOUR LEGAL RIGHTS AND OPTIONS		
<u>YOU MAY:</u>		<u>DUE DATE:</u>
EXCLUDE YOURSELF	If you exclude yourself, you will keep any rights you currently have to sue SDI, Toshiba, TOKIN, and Panasonic ("Settling Defendants") about the claims in this case. You will not be included in the Settlements and will receive no benefits from the Settlements with Settling Defendants.	May 28, 2019
DO NOTHING NOW	You will be included in the Settlements with Settling Defendants and eligible to submit a claim for a payment (if you qualify). You will give up your rights to sue the Settling Defendants about the claims in this case.	
OBJECT TO THE SETTLEMENTS	You can write to the Court explaining why you disagree with the Settlements with Settling Defendants or any request for attorneys' fees (only if you do not exclude yourself).	May 28, 2019
SUBMIT A CLAIM FOR PAYMENT	Complete the claim form for payment available online at www.reversethecharge.com and submit it online or by mail (if you qualify for the Settlements).	July 19, 2019
GO TO THE HEARING	Speak in Court about your opinion of the Settlements with Settling Defendants or requested fees. The date of the hearing may change without further notice to the class, so please check www.reversethecharge.com or the Court's PACER site (https://ecf.cand.uscourts.gov) to confirm that the date has not been changed.	July 16, 2019
REGISTER ON THE WEBSITE	The best way to receive updates about the lawsuit.	

- The Settlements and related court papers are available at www.reversethecharge.com, or by contacting class counsel. You can also access the Settlements and supporting motions for a fee through the Court's docket in person or electronically. To access the Court's docket (Case No. 4:13-md-2420) in person, visit the office of the Clerk of the Court for the United States District Court for the Northern District of California, 1301 Clay Street, Suite 400S, Oakland, CA 94612, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays. To access the Court's docket electronically through the Court's Public Access to Court Electronic Records (PACER) system, go to <https://ecf.cand.uscourts.gov>, which allows you to register for and log in to PACER. Once you have logged in to PACER, go to "Query," enter Case Number 4:13-md-2420, and click "Run Query" to access the Court's docket. PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.
- A class action lawsuit has been brought on behalf of consumers, businesses and California local governments who bought the following products that contained Lithium-Ion Cylindrical Batteries, a type of Lithium-Ion Battery ("Li-Ion Battery"): (i) portable computers; (ii) power tools; (iii) camcorders; or (iv) replacement batteries for any of these products. This case is only on behalf of consumers and others who bought the devices to use them, usually from retailers. It is not on behalf of companies like retailers who bought the devices to re-sell them to consumers.
- Plaintiffs claim that Defendants (listed below) and co-conspirators conspired to fix, raise, maintain, or stabilize the prices of cylindrical Lithium Ion Battery Cells ("Li-Ion Cells"). Plaintiffs further claim that purchasers of the products

listed above containing Lithium-Ion Cylindrical Batteries ("Li-Ion Cylindrical Batteries") overpaid for these devices because of the conspiracy. Defendants deny Plaintiffs' claims.

- Settlements were previously reached with LG Chem, Ltd. and LG Chem America, Inc. ("LG Chem"); Hitachi Maxell Ltd. and Maxell Corporation of America ("Hitachi Maxell"); NEC Corporation ("NEC"); and Sony Corporation, Sony Energy Devices Corporation, and Sony Electronics Inc. ("Sony").
- Settlements have now been reached with Samsung SDI Co., Ltd. and Samsung SDI America, Inc. ("SDI"); TOKIN Corporation ("TOKIN"); Toshiba Corporation ("Toshiba"); and Panasonic Corporation, Panasonic Corporation of North America, SANYO Electric Co., Ltd., and SANYO North America Corporation ("Panasonic") (together, the "Settling Defendants"). There are no remaining Defendants.
- The Court still has to decide whether to finally approve the Settlements with Settling Defendants. Payments will be made only (1) if the Court approves the Settlements and after any appeals are resolved, and (2) after the Court approves a Distribution Plan to distribute the Settlement Fund minus expenses, any Court-approved attorneys' fees, and service awards ("Net Settlement Funds") to Class Members.

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BASIC INFORMATION**1. What Is This Notice About?**

This Notice is to inform you about Settlements reached in this case, before the Court decides whether to finally approve the Settlements with Settling Defendants. This Notice explains the lawsuit, the Settlements, and your legal rights. The Court is the United States District Court for the Northern District of California. This case is titled *In re Lithium Ion Batteries Antitrust Litigation – All Indirect Purchaser Actions*, MDL No. 2420. The people who sued are called the “Plaintiffs.” The companies they sued are called the “Defendants.”

2. What Is This Lawsuit About?

The lawsuit alleges that Defendants and co-conspirators conspired to raise and fix the prices of cylindrical Li-Ion Cells for over ten years, resulting in overcharges to consumers and others who bought portable computers, camcorders, and power tools containing Li-Ion Cylindrical Batteries. The complaint describes how the Defendants and co-conspirators allegedly violated the U.S. and state antitrust, unfair competition, and consumer protection laws by agreeing to fix prices and restrict output of these cells by, among other things, face-to-face meetings and other communications, customer allocation, and the use of trade associations. Defendants deny Plaintiffs' allegations. The Court has not decided who is right.

3. Why Are There Settlements?

The last four groups of Defendants have now agreed to settle the lawsuit – SDI, TOKIN, Toshiba, and Panasonic. Previously, notice was provided about settlements reached with LG Chem, Hitachi Maxell, NEC, and Sony. In paragraph 8, below, there is information about how to get benefits from the settlements.

4. What Are Li-Ion Cells, Li-Ion Packs, Li-Ion Batteries, Cylindrical Li-Ion Batteries, And Finished Products?

For purposes of the Settlements:

- "Lithium Ion Battery Cell(s)" or "Li-Ion Cells" means cylindrical, prismatic, or polymer cells used for the storage of power that is rechargeable and uses lithium ion technology.
- "Lithium Ion Battery Pack(s)" or "Li-Ion Packs" means Lithium Ion Battery Cells that have been assembled into packs, regardless of the number of Lithium Ion Cells contained in such packs.
- "Lithium Ion Battery" or "Li-Ion Battery" means a Lithium Ion Battery Cell or Lithium Ion Battery Pack.
- "Lithium Ion Cylindrical Battery" or "Li-Ion Cylindrical Battery" means a cylindrical-type Lithium Ion Battery Cell or cylindrical-type Lithium Ion Battery Pack.
- "Finished Product" means any product and/or electronic device that contains a Lithium Ion Battery, including but not limited to laptop PCs, notebook PCs, netbook computers, tablet computers, mobile phones, smart phones, cameras, camcorders, digital video cameras, digital audio players, and power tools.

5. Why Is This A Class Action?

In a class action, one or more people called the "Class representatives" sue on behalf of themselves and other people with similar claims. All of these people together are the "Class" or "Class Members." In a class action, one court may resolve the issues for all Class Members, except for those who exclude themselves from the class.

THE SETTLEMENTS

6. How Do I Know If I May Be Included In The Class Or If My Rights Are Affected?

The Class includes all persons and entities who, as United States residents, from January 1, 2000 to May 31, 2011, purchased new, for their own use and not for resale, one of the following products: (i) a portable computer; (ii) a power tool; (iii) a camcorder; or (iv) a replacement battery for any of these products. The product must have been purchased from someone other than the Li-Ion Battery manufacturer, such as a retail store.

The specific definition of who is included in the Class is set forth in the Settlement Agreements. The Settlement Agreements, and the related Complaints, are accessible on the website www.reversethecharge.com. Payments to Class Members may be made only: (1) if the Court approves the Settlements and after any appeals are resolved, and (2) pursuant to a Court-ordered settlement Distribution Plan that deducts expenses, attorneys' fees, and service awards. The Court will determine the amount, if any, that each Class Member will receive.

Even if you are not in the Settlement Class, your rights may be affected if you bought a Finished Product establishing your membership in the Sony Settlement Class, and did not exclude yourself from it. The Sony Settlement Class has more members than the present Settlement Class because it covers more devices, including cell phones. As explained below, the attorneys will now submit a claim for fees, part of which may be paid from the Sony settlement fund. If you are a member of the Sony Settlement Class you may object to that fee request just like members of the SDI, TOKIN, Toshiba and Panasonic Settlement Class.

7. What Do The Settlements Provide?

The total amount of the Settlement Funds from the SDI, TOKIN, Toshiba, and Panasonic Settlements is \$49 million. After deducting Court-approved attorneys' fees, service awards, notice and administration costs, and litigation expenses, the remaining Settlement Fund will be divided into two funds, a Repealer Fund and a Non-Repealer Fund. The Repealer Fund (90% of the remaining Settlement Fund) will be available for distribution to Class Members who are residents of the following Repealer States: Alabama, Arizona, Arkansas, California, District of Columbia, Florida, Hawaii, Illinois, Iowa,

Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, South Dakota, Tennessee, Utah, Vermont, West Virginia, and Wisconsin. All other states and/or jurisdictions are “Non-Repealer” States. The Non-Repealer Fund (10% of the remaining Settlement Fund) will be available for distribution to Class Members who are residents of Non-Repealer States. However, the plan for distributing the Settlement Funds is not final and may be changed by the Court after considering any and all objections by Class Members. If the Court determines that further changes to the allocation of the Settlement Funds between the Repealer and Non-Repealer Fund are appropriate, those changes will be posted on the settlement website (www.reversethecharge.com), which also provides more details about the Settlements).

HOW TO GET BENEFITS FROM THE SETTLEMENTS

8. How Much Money Can I Get And How Do I Make A Claim?

Money from all settlements in this case will be distributed together on a per-Class Member basis, but the amount you receive from each settlement will depend on a Court-approved plan of allocation.

SDI, TOKIN, Toshiba, and Panasonic Settlements: The claim form will allow Class Members to state the number of devices they had that are subject to the settlement. Every Class Member who files a valid claim against the Repealer or Non-Repealer fund will receive the same amount per device as other people who file claims with that fund. The amount available for distribution will be affected by any awards made by the Court against the funds for attorneys’ fees, reimbursement of costs, or service awards for the Class representatives. How much each Class Member receives will also depend on the number of claims made from Repealer and Non-Repealer states and a balancing of the cost of distribution with the amount to be distributed to each Class Member.

Any remaining balance after the Settlement Funds are distributed will be redistributed to Class Members or, if redistribution is too costly compared with the amount of the remaining balance, such funds will escheat to federal or state governments. No money will return to the Settling Defendants once the Court finally approves the Settlements.

LG Chem, Hitachi Maxell, NEC, and Sony Settlements: Notice was provided about settlements reached with LG Chem, Hitachi Maxell, and NEC for \$44.95 million, and with Sony for \$19.5 million. Information about those settlements is available at www.reversethecharge.com. If you already made a claim on those settlements you do not need to make a new claim on the SDI, TOKIN, Toshiba, and Panasonic settlements. Your old claim will be automatically applied to the new settlements. If you have not yet made a claim on these settlements, you may do so now via the same process. These settlements do not differentiate between people who live in different states. Everyone who submits a valid claim will receive the same amount per device.

Although the Court granted final approval to these settlements with LG Chem, Hitachi Maxell, NEC, and Sony, approval of the settlements is currently being appealed, and claims cannot be paid until the appeals are resolved. If there is any balance remaining following distribution of the funds in those settlements to Class Members and money is not able to be reasonably redistributed to Class Members, remaining funds will escheat to federal or state governments. No money will return to the Settling Defendants once the Court finally approves the Settlements.

To make a claim and receive payment, you need to file a valid claim form online or by mail by July 19, 2019. **The simple claim form only takes 3-5 minutes for most individuals to complete.** Claims may be submitted online at www.reversethecharge.com or by mail to Lithium Batteries Indirect Purchaser Settlements, c/o Epiq, P.O. Box 10194, Dublin, OH 43017-3194. The same products are not covered by all of the settlements, so filling out the claim form as accurately and completely as possible helps ensure that you receive your correct share of the Settlements.

9. How And When Will I Get A Payment?

If final approval is granted to the Settlements with Settling Defendants, Class Members who have filed valid and timely claims will receive cash payments and may receive them distributed directly into an online account. Such accounts may include accounts with Amazon, PayPal, or Google Wallet, among others. If you are a Class Member with valid and timely claims and prefer to receive a physical check, please submit a written request by July 19, 2019 to Lithium Batteries Indirect Purchaser Settlements, c/o Epiq, P.O. Box 10194, Dublin, OH 43017-3194.

The timing of the distribution will be requested by Plaintiffs’ lawyers and approved by the Court. It may not occur until the Settlements are final, and after resolution of any appeals. All Settlement Funds that remain after payment of the Court-ordered attorneys’ fees, service awards, costs, and expenses will be distributed within 45 days of the final judgment (which includes resolution of any appeals), unless modified by the Court.

REMAINING IN THE CLASS

10. What Happens If I Remain In The Class?

To submit a claim you must remain in the class. In return for receiving monetary and/or nonmonetary benefits of the Settlement Agreements, you will give up your right to sue the Settling Defendants based on claims relating to the alleged conduct pertaining to any indirect purchase of cylindrical, prismatic, or polymer battery cells or packs (including cylindrical,

prismatic, or polymer battery cells or packs contained in finished products). You also will be bound by any decisions by the Court relating to the Settlements. The Settlement Agreements describe the released claims in detail, so read them carefully because those releases will be binding. If you have any questions, you can talk with Class Counsel for free, or you can talk with your own lawyer (at your own expense). The Settlement Agreements are available at www.reversethecharge.com.

EXCLUDING YOURSELF FROM THE CLASS

11. How Do I Get Out Of The Class?

To exclude yourself from the Class, you must send a letter by mail stating that you want to be excluded from *In re Lithium Ion Batteries Antitrust Litigation – All Indirect Purchaser Actions*, MDL No. 2420, Indirect Purchaser Settlements. Your letter must also include:

- Your name, address, and telephone number;
- A statement saying that you want to be excluded from *In re Lithium Ion Batteries Antitrust Litigation – All Indirect Purchaser Actions*, MDL No. 2420, Indirect Purchaser Settlements; and
- Your signature.

You must mail your exclusion request postmarked no later than May 28, 2019, to:

Lithium Batteries Indirect Purchaser Settlements
EXCLUSIONS
c/o Epiq
P.O. Box 10194
Dublin, OH 43017-3194

12. 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 Settling Defendants for the claims being released in this case.

13. If I Exclude Myself, Can I Still Get Money Benefits?

No. If you exclude yourself from the Settlement Class, you may not submit a claim and will not receive any money from the Settlements.

THE LAWYERS REPRESENTING YOU

14. Do I Have A Lawyer Representing Me?

The Court has appointed the following lawyers as Class Counsel to represent you and all other members of the Class:

Adam J. Zapala, Esq.
Cotchett, Pitre & McCarthy, LLP
840 Malcolm Road, Suite 200
Burlingame, CA 94010
batteries@cpmlegal.com

Shana E. Scarlett, Esq.
Hagens Berman Sobol Shapiro
LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
batteries@hbsslaw.com

Brendan P. Glackin, Esq.
Lief Cabraser Heimann
& Bernstein, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
lithiumbatteries@lchb.com

You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

15. How Will The Lawyers And Class Representatives Be Paid?

At the Final Fairness Hearing, Class Counsel will ask the Court to reimburse them for certain fees, costs, and expenses. At the Final Fairness Hearing, or at a later date, Class Counsel will ask the Court for attorneys' fees in the amount of \$34,035,000 (inclusive of \$4,495,000 already awarded by the Court) plus interest, which is 30% plus interest of the \$113.45 million aggregate amount from settlements with all defendants. Attorneys' fees will be awarded proportionally from the funds of each prior settlement, including the \$64.45 million in settlements (from Sony, LG Chem, Hitachi Maxell, and NEC) previously approved by the Court. Class Counsel will also request reimbursement of costs incurred through final approval, not to exceed \$6,850,000 (inclusive of the \$860,188.50 already awarded by the Court). Any payment to the attorneys requires Court approval, and the Court may award less than the requested amounts.

At the Final Fairness Hearing, Class Counsel will ask the Court to provide service awards to the Class representatives, in the amount of \$10,000 for each individual Class representative and \$25,000 for each governmental entity Class representative, for the work they have undertaken on behalf of the Class. Any service award requires Court approval, and the Court may award less than the requested amounts.

The attorneys' fees, costs, expenses, and service awards that the Court orders, plus the costs to administer the Settlements, will be paid from the Settlement Fund.

Class Counsel's motion for fees, costs, expenses, and service awards will be filed on or around April 23, 2019, and available at www.reversethecharge.com shortly thereafter. The motion will be posted on the website 35 days before the deadline for requests for exclusion or objections to the Settlements, and you will have an opportunity to comment on the motion. Any member of any of the settlement classes in this case may do so.

OBJECTING TO THE SETTLEMENTS

16. How Do I Object To Or Comment On The Settlements?

You can ask the Court to deny final approval of the Settlements with Settling Defendants by filing an objection. You can't ask the Court to change the Settlements; the Court can only approve or reject the Settlements. 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. If you exclude yourself from the Class, you can't object to the Settlements.

Any objection to the proposed Settlements with Settling Defendants must be in writing. If you file a timely written objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney. All written objections and supporting papers must:

- Specify your name, address, and telephone number;
- Clearly identify the case name, number, and settlement (*In re Lithium Ion Batteries Antitrust Litigation – All Indirect Purchaser Actions*, MDL No. 2420, Indirect Purchaser Settlements);
- Be submitted to the Court either by mailing it to the Clerk of the Court, United States District Court for the Northern District of California, 1301 Clay Street, Suite 400S, Oakland, CA 94612, or by filing them in person at any location of the United States District Court for the Northern District of California; and
- Be filed or postmarked on or before May 28, 2019.

17. What Is The Difference Between Excluding Myself From The Class And Objecting To The Settlements?

If you exclude yourself from the Class, you are telling the Court that you do not want to participate in the Settlements. Therefore, you will not be eligible to receive any benefits from the Settlements, and you will not be able to object to the Settlements. Objecting to a Settlement means telling the Court that you do not like something about the Settlements. You are still eligible to receive a settlement payment if you object.

THE FINAL FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Settlements with Settling Defendants and any requests by Class Counsel for fees, costs, expenses, and Class representative service awards. You may attend and you may ask to speak, but you do not have to do so.

18. When And Where Will The Court Decide Whether To Approve The Settlements?

The Court will hold a Final Fairness Hearing at 2:00 p.m. on July 16, 2019, at the United States Courthouse, 1301 Clay Street, Courtroom 1, 4th Floor, Oakland, CA 94612. The hearing may be moved to a different date or time without additional notice, so check the Court's PACER site, www.reversethecharge.com, or call 1-855-730-8645 to confirm the date has not been changed. At this hearing, the Court will consider whether the Settlements are fair, reasonable, and adequate. If there are objections or comments, the Court will consider them at that time and may listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Class Counsel or whether and how much to provide in service awards to Class representatives. At or after the hearing, the Court will decide whether to approve the Settlements.

19. Do I Have To Attend The Hearing?

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend at your expense. If you send an objection or comment, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also hire your own lawyer at your own expense to attend on your behalf, but you are not required to do so.

20. May I Speak At The Hearing?

If you send an objection or comment on the Settlements, you may have the right to speak at the Final Fairness Hearing as determined by the Court. You cannot speak at the hearing if you exclude yourself from the Class.

GET MORE INFORMATION

21. How Do I Get More Information?

This Notice summarizes the Settlements. More details are in the Settlement Agreements. You can get copies of the Settlement Agreements and more information about the Settlements at www.reversethecharge.com. You also may write with questions to Lithium Batteries Indirect Purchaser Settlements, c/o Epiq, P.O. Box 10194, Dublin, OH 43017-3194 or call the toll-free number 1-855-730-8645. You should also register at the website to be directly notified of the terms of the Distribution Plan of the Settlement Fund and other information concerning this case.

**DO NOT CONTACT THE COURT, THE OFFICE OF THE CLERK OF THE COURT,
DEFENDANTS OR THEIR COUNSEL REGARDING THIS NOTICE**

Dated: April 5, 2019

By Order of the Court
United States District Court
Northern District of California

Si usted compró artículos electrónicos como una computadora portátil, herramienta eléctrica, videocámara y/u otros artículos que contengan una batería cilíndrica de iones de litio desde el año 2000

Podría recibir dinero en conciliaciones desde más de \$113 millones

Un tribunal federal autorizó este aviso. No se trata del ofrecimiento de un abogado.

- Tenga a bien leer atentamente el aviso y las conciliaciones. Independientemente de que usted actúe o no, sus derechos legales podrían verse afectados. Este Aviso resume las propuestas de Conciliación.
- Los siguientes derechos y opciones, así como las fechas límite para ejercerlos, se explican en este Aviso.

SUS OPCIONES Y DERECHOS LEGALES		
USTED PUEDE:		FECHA DE VENCIMIENTO:
EXCLUIRSE	Si usted se excluye, mantendrá todo derecho que ya tenga para demandar a SDI, Toshiba, Tokin y Panasonic ("Demandados en Conciliación") sobre los reclamos en este caso. Usted no será incluido(a) en las Conciliaciones y no recibirá ningún beneficio de las Conciliaciones con los Demandados en Conciliación.	28 de mayo de 2019.
NO HACER NADA AHORA	Se le incluirá en las Conciliaciones con los Demandados en Conciliación y será elegible para presentar un reclamo para recibir pago (si es que usted cualifica). Usted renunciará a su derecho de demandar a los Demandados en Conciliación en relación con los reclamos en este caso.	
OBJETAR LAS CONCILIACIONES	Puede escribir al Tribunal para explicar por qué no está de acuerdo con las Conciliaciones con los Demandados en Conciliación o cualquier solicitud de honorarios de abogado (solamente si usted no se excluye).	28 de mayo de 2019.
PRESENTAR UN RECLAMO PARA RECIBIR PAGO	Complete el formulario de reclamo para recibir un pago disponible en www.reversethecharge.com y envíelo en línea o por correo (si cualifica para las Conciliaciones).	19 de julio de 2019.
ASISTIR A LA AUDIENCIA	Manifieste al Tribunal su opinión sobre las Conciliaciones con los Demandados en Conciliación o sobre los honorarios solicitados. La fecha de la audiencia puede ser modificada sin mayor aviso al grupo, de modo que le instamos revisar www.reversethecharge.com o el sitio PACER del Tribunal (https://ecf.cand.uscourts.gov) para confirmar que la fecha no haya sido modificada.	16 de julio de 2019.
REGISTRARSE EN EL SITIO WEB	La mejor manera de recibir actualizaciones sobre la demanda.	

- Las Conciliaciones y los papeles del tribunal relacionados se encuentran disponibles en www.reversethecharge.com, o al contactar al abogado del grupo demandante. Además usted puede acceder a las Conciliaciones y a las mociones de apoyo al hacer un pago con el expediente del Tribunal de forma personal o electrónica. Para acceder al expediente del Tribunal (Caso n.º 4:13-md-2420) en persona, visite la oficina del secretario de Tribunal para el Tribunal de Distrito de los Estados Unidos para el Distrito norte de California, 1301 Clay Street, Suite 400S, Oakland, CA 94612, entre las 9:00 a.m. y las 4:00 p.m., de lunes a viernes, a exclusión de los feriados de Tribunal. Para acceder al expediente del Tribunal de forma electrónica a través del Acceso público al sistema de registros electrónicos del Tribunal (Public Access to Court Electronic Records, PACER), visite <https://ecf.cand.uscourts.gov>, el cual le permite registrarse e ingresar a PACER. Una vez que haya ingresado a PACER, diríjase a "Query" (Consultar) ingrese el número de caso 4:13-md-2420 y haga clic en "Run Query" (Hacer consulta) para acceder al expediente del Tribunal. POR FAVOR, NO LLAME POR TELÉFONO AL TRIBUNAL O LA OFICINA DEL SECRETARIO DEL TRIBUNAL PARA INFORMARSE ACERCA DE LA PRESENTE CONCILIACIÓN O EL PROCESO DE RECLAMO.
- Se ha ejecutado una demanda colectiva en representación de los consumidores, empresas y gobiernos locales en California que compraron los siguientes productos que contenían Baterías cilíndricas con iones de litio, un tipo de batería de ion de litio ("Batería de ion de litio"): (i) computadoras portátiles; (ii) herramientas eléctricas (iii) videocámaras; o (iv) baterías de repuesto para cualquiera de estos productos. Este caso solamente es en

¿TIENE ALGUNA PREGUNTA? VISITE WWW.REVERSETHECHARGE.COM O LLAME AL 1-855-730-8645

representación de los consumidores y otros que compraron los dispositivos para usarlos, usualmente de minoristas. No es en representación de empresas como minoristas que compraron los dispositivos para su reventa a consumidores.

- Los Demandantes afirman que los Demandados (nombrados abajo) y los co-conspiradores conspiraron para arreglar, aumentar, mantener o estabilizar los precios de Celdas de Baterías cilíndricas de ion de litio ("Celdas de ion de litio"). Los Demandantes además afirman que los compradores de los productos nombrados abajo que contienen Baterías cilíndricas de iones de litio ("Baterías cilíndricas de ion de litio") pagaron de más por estos dispositivos debido a esta conspiración. Los Demandados niegan las declaraciones de los Demandantes.
- Anteriormente se habían acordado Conciliaciones con LG Chem, Ltd. y LG Chem America, Inc. ("LG Chem"); Hitachi Maxell Ltd. y Maxell Corporation of America ("Hitachi Maxell"); NEC Corporation ("NEC"); y Sony Corporation, Sony Energy Devices Corporation, y Sony Electronics Inc. ("Sony").
- En la actualidad se ha llegado a Conciliaciones con Samsung SDI Co., Ltd. y Samsung SDI America, Inc. ("SDI"); TOKIN Corporation ("TOKIN"); Toshiba Corporation ("Toshiba"); y Panasonic Corporation, Panasonic Corporation of North America, SANYO Electric Co., Ltd., y SANYO North America Corporation ("Panasonic") (colectivamente, los "Demandados en Conciliación"). No existen más Demandados.
- El Tribunal aún debe decidir si aprueba definitivamente las Conciliaciones con los Demandados en Conciliación. Los pagos solamente se realizarán (1) si el Tribunal aprueba las Conciliaciones y luego de que se haya resuelto toda apelación, y (2) luego de que el Tribunal apruebe un Plan de Distribución para distribuir el Fondo de Conciliación menos los gastos, todo honorario de abogado aprobado por el Tribunal y adjudicaciones de servicio ("Fondos Netos de Conciliación") a los Miembros del Grupo.

QUÉ CONTIENE ESTE AVISO

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INFORMACIÓN BÁSICA

1. ¿De qué se trata este Aviso?

Este Aviso es para informarle sobre las Conciliaciones alcanzadas en este caso, antes de que el Tribunal decida si aprobará finalmente las Conciliaciones con los Demandados en Conciliación. Este Aviso le explica la demanda, las Conciliaciones y sus derechos legales. El Tribunal es el Tribunal del Distrito de los Estados Unidos para el Distrito Norte de California. Este caso se titula *In re Litigación antimonopolio de Baterías de ion de litio; Todas las acciones indirectas del comprador*, MDL No. 2420. A las personas que iniciaron el juicio se las conoce como las "Demandantes". Las empresas a las que demandaron se denominan "Demandados".

2. ¿De qué se trata esta Demanda?

La demanda manifiesta que los Demandados y los co-conspiradores conspiraron para aumentar y arreglar los precios de Celdas cilíndricas de ion de litio por más de diez años, lo cual resultó en sobrecargos hacia los consumidores y otros que compraron computadores portátiles, videocámaras y herramientas eléctricas que contenían Baterías cilíndricas de ion de litio. El reclamo describe como los Demandados y los co-conspiradores supuestamente violaron las leyes federales antimonopolio, de competencia desigual y protección al consumidor de los Estados Unidos acordando arreglar los precios y restringir la salida de estas celdas a través de, entre otras, reuniones presenciales y otras comunicaciones, reparto de clientes y el uso de asociaciones comerciales. Los Demandados niegan las declaraciones de los Demandantes. El Tribunal no ha decidido quién tiene la razón.

3. ¿Por qué se ha llegado a estas Conciliaciones?

Los últimos cuatro grupos de Demandados actualmente han acordado resolver la demanda; SDI, TOKIN, Toshiba y Panasonic. Anteriormente, se entregó aviso sobre las conciliaciones alcanzadas con LG Chem, Hitachi Maxell, NEC y Sony. En el párrafo 8, a continuación, se encuentra la información sobre cómo recibir beneficios de las conciliaciones.

4. ¿Qué son las Celdas de ion de litio, Paquetes de ion de litio, Baterías de ion de litio, Baterías cilíndricas de ion de litio y los Productos finales?

Para fines de las Conciliaciones:

- Las “Celdas de Baterías de ion de litio” o “Celdas de ion de litio” hacen referencia a celdas cilíndricas, prismáticas o poliméricas utilizadas para el almacenamiento de energía que es recargable y utiliza tecnología de iones de litio.
- Los “Paquetes de batería de ion de litio” o “Paquetes de ion de litio” hacen referencia a Celdas de batería de ion de litio que han sido ensambladas en paquetes, independientemente de la cantidad de Celdas de ion de litio contenidas en dichos paquetes.
- La “Batería de ion de litio” o “Batería litio-ion” hacen referencia a una Celda de batería de ion de litio o a un Paquete de batería de ion de litio.
- La “Batería cilíndrica de ion de litio” o “Batería cilíndrica litio-ion” hacen referencia a una Celda de batería de ion de litio de tipo cilíndrico o a un Paquete de batería de ion de litio de tipo cilíndrico.
- El “Producto final” hace referencia a cualquier producto y/o dispositivo electrónico que contenga una Batería de ion de litio, incluyendo, entre otros, computadoras portátiles, notebooks, computadoras notebook, computadoras tablet, teléfonos celulares, teléfonos inteligentes, cámaras, videocámaras, cámaras de video digitales, reproductores de audio digitales y herramientas eléctricas.

5. ¿Por qué es esta una demanda colectiva?

En una demanda colectiva, una o más personas, conocidas como los “Representantes del grupo de demandantes”, presentan una demanda en representación de ellos mismos y otras personas que tienen reclamaciones similares. Todas estas personas conforman un “Grupo” o son “Miembros del Grupo”. En una demanda colectiva, un tribunal puede resolver los asuntos para todos los Miembros del grupo de demandantes, excepto para quienes se hayan excluido del grupo de demandantes.

LAS CONCILIACIONES**6. ¿Cómo se si puedo incluirme en el grupo de demandantes o si mis derechos se ven afectados?**

El Grupo demandante incluye a todas las personas y entidades que, como residentes de los Estados Unidos, que desde el 1 de enero de 2000 hasta el 31 de mayo de 2011 compraron nuevos, para su propio uso, y no para su reventa, uno de los siguientes productos: (i) una computadora portátil; (ii) una herramienta eléctrica; (iii) una videocámara; o (iv) una batería de repuesto para cualquiera de estos productos. El producto debe haber sido comprado de alguien que no sea el fabricante de Baterías de ion de litio, como por ejemplo, una tienda minorista.

La definición específica de quién está incluido en el Grupo demandante se establece en los Acuerdos de Conciliación. Los Acuerdos de Conciliación, y las Reclamaciones relacionadas, se encuentran accesibles en el sitio web www.reversethecharge.com. Los pagos a los Miembros de la Demanda se realizarán solamente: (1) si el Tribunal aprueba las Conciliaciones y luego de que se hayan resuelto todas las apelaciones, y (2) en virtud de un Plan de Distribución de conciliación ordenado por el Tribunal que deduzca gastos, honorarios de abogados y adjudicaciones de servicio. El Tribunal determinará la cantidad, si hubiere, que recibirá cada Miembro del Grupo.

Incluso si usted no se encuentra en el Grupo de Conciliación, sus derechos pueden estar afectados si compró un Producto Final declarando su membresía en el Grupo de Conciliación de Sony, y no habiéndose excluido de este. El Grupo de Conciliación de Sony tiene más miembros que el actual Grupo de Conciliación porque cubre más

dispositivos, incluyendo teléfonos celulares. Según se explica a continuación, los abogados ahora presentarán una demanda por honorarios, de cuya parte se podrá pagar con el fondo de conciliación de Sony. Si es un miembro del Grupo de Conciliación de Sony, puede objetarse a la solicitud de pago de la misma forma que lo hicieron miembros del Grupo de Conciliación de SDI, TOKIN, Toshiba y Panasonic.

7. ¿Qué establecen las Conciliaciones?

El monto total de los Fondos de Conciliación de las Conciliaciones de SDI, TOKIN, Toshiba y Panasonic es de \$49 millones. Luego de deducir los honorarios de abogados, adjudicaciones de servicio, costos de administración y aviso, y gastos de litigación aprobados por el Tribunal, el Fondo de Conciliación restante será dividido en dos fondos, un Fondo Derogador y un Fondo No-Derogador. El Fondo Derogador (90% del Fondo de Conciliación restante) estará disponible para su distribución a los Miembros del Grupo que sean residentes de los siguientes Estados Derogadores. Alabama, Arizona, Arkansas, California, District of Columbia, Florida, Hawái, Illinois, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Misisipi, Missouri, Nebraska, Nevada, Nueva Hampshire, Nuevo México, Nueva York, Carolina del Norte, Dakota del Norte, Oregón, Dakota del Sur, Tennessee, Utah, Vermont, Virginia Occidental y Wisconsin. Todos los otros estados y/o jurisdicciones son Estados "No-Derogadores". El Fondo No-Derogador (10% del Fondo de Conciliación restante) estará disponible para su distribución a Miembros del Grupo que sean residentes de los Estados No-Derogadores. Sin embargo, el plan para la distribución de los Fondos de Conciliación no es definitivo y puede ser modificado por el Tribunal luego de considerar toda objeción de parte de los Miembros del Grupo. Si el Tribunal determina que mayores modificaciones a la distribución de los Fondos de Conciliación entre el Fondo Derogador y No-Derogador son apropiadas, esos cambios serán publicados en el sitio web de la conciliación (www.reversethecharge.com), el cual además proporciona más información sobre las Conciliaciones.

CÓMO OBTENER BENEFICIOS DE LAS CONCILIACIONES

8. ¿Cuánto dinero puedo recibir y cómo presento un reclamo?

El dinero de todas las conciliaciones en este caso será distribuido según cada Miembro del Grupo, pero la cantidad que usted reciba de cada conciliación dependerá de un plan de distribución aprobado por el Tribunal.

Conciliaciones de SDI, TOKIN, Toshiba y Panasonic: El formulario de reclamo permitirá a los Miembros del Grupo declarar la cantidad de dispositivos que tenían y que están sujetos a la conciliación. Cada Miembro del Grupo que presente un reclamo válido para el Fondo Derogador o No-Derogador recibirá la misma cantidad por dispositivo que las otras personas que presenten reclamos para ese fondo. La cantidad disponible para distribución estará afectada por toda adjudicación hecha por el Tribunal contra los fondos para honorarios de abogados, reembolso de gastos, o adjudicaciones de servicios para los representantes del Grupo demandante. Cuánto recibe cada Miembro del Grupo también dependerá de la cantidad de reclamos hechos desde los estados Derogadores y No-Derogadores y un ajuste del costo de distribución con la cantidad a distribuir a cada Miembro del Grupo demandante.

Todo saldo restante luego de la distribución de los Fondos de Conciliación será redistribuido a los Miembros del Grupo o, si la redistribución es demasiado costosa en comparación con la cantidad del saldo restante, dichos fondos serán confiscados para gobiernos estatales o federales. Ninguna cantidad de dinero será devuelta a los Demandados en Conciliación una vez que el Tribunal haya aprobado las Conciliaciones.

Conciliaciones de LG Chem, Hitachi Maxell, NEC y Sony: Se entregó aviso sobre las conciliaciones alcanzadas con LG Chem, Hitachi Maxell y Nec por \$44.95 millones, y con Sony por \$19.5 millones. La información sobre estas conciliaciones se encuentra disponible en www.reversethecharge.com. Si usted ya realizó un reclamo sobre esas conciliaciones no necesita realizar un reclamo nuevo sobre las conciliaciones de SDI, TOKIN, Toshiba y Panasonic. Su reclamo antiguo será presentado de forma automática para las nuevas conciliaciones. Si todavía no ha realizado un reclamo sobre estas conciliaciones, puede hacerlo ahora a través del mismo proceso. Estas conciliaciones no se diferencian entre personas que viven en estados diferentes. Toda persona que presente un reclamo válido recibirá la misma cantidad por dispositivo.

Si bien el Tribunal otorgó una aprobación definitiva sobre estas conciliaciones con LG Chem, Hitachi Maxell, NEC y Sony, la aprobación de las conciliaciones actualmente se encuentra bajo apelaciones, y los reclamos no pueden ser pagados hasta que las apelaciones hayan sido resueltas. Si hubiere cualquier saldo restante luego de la distribución de los fondos en dichas conciliaciones a los Miembros del Grupo y si no es posible distribuir el dinero de forma razonable a los Miembros del Grupo, los fondos restantes serán confiscados para gobiernos estatales o federales. Ninguna cantidad de dinero será devuelta a los Demandados en Conciliación una vez que el Tribunal haya aprobado las Conciliaciones.

Para realizar un reclamo o recibir un pago, es necesario que usted presente un formulario de reclamo válido en línea o por correo antes del 19 de julio de 2019. **El formulario de reclamo es simple y solamente toma 3-5 minutos para que la mayoría de los individuos lo completen.** Los reclamos pueden ser enviados en línea en www.reversethecharge.com o por correo a Lithium Batteries Indirect Purchaser Settlements, c/o Epiq, P.O. Box 10194, Dublin, OH 43017-3194. Los mismos productos no están cubiertos por todas las conciliaciones, de modo que completar el formulario de reclamo de la forma más exacta y completa posible ayuda a asegurar que reciba su porción correcta de las Conciliaciones.

9. ¿Cómo y cuándo puedo obtener un pago?

Si la aprobación definitiva es otorgada para las Conciliaciones con los Demandados en Conciliación, los Miembros del Grupo que hayan presentado reclamos oportunos y válidos recibirán pago en efectivo y podrán recibirlos por distribución directa a una cuenta en línea. Dichas cuentas pueden incluir cuentas con Amazon, PayPal o Google Wallet, entre otras. Si usted es un Miembro del Grupo con reclamos oportunos y válidos y prefiere recibir un cheque físico, envíe una solicitud escrita antes del 19 de julio de 2019 a Lithium Batteries Indirect Purchaser Settlements, c/o Epiq, P.O. Box 10194, Dublin, OH 43017-3194.

El plazo de la distribución será solicitado por los abogados de los Demandantes y aprobado por el Tribunal. Es posible que no suceda hasta que las Conciliaciones sean definitivas, y luego de la resolución de toda apelación. Todos los Fondos de la Conciliación que queden restantes luego del pago de los honorarios de abogados, adjudicaciones de servicios, gastos y costes ordenados por el Tribunal serán distribuidos dentro de 45 días luego del juicio final (el cual incluye la resolución de toda apelación), a menos que el Tribunal lo modifique.

PERMANECER EN EL GRUPO**10. ¿Qué sucede si permanezco en el Grupo?**

Para presentar un reclamo usted debe permanecer en el grupo demandante. A cambio de recibir beneficios monetarios y/o no monetarios de los Acuerdos de Conciliación, usted renunciará a su derecho de demandar a los Demandados en Conciliación con base en los reclamos relacionados a la supuesta conducta correspondiente a cualquier compra indirecta de celdas o paquetes de baterías cilíndricas, prismáticas o poliméricas (lo que incluye, celdas o paquetes de baterías cilíndricas, prismáticas o poliméricas contenidas en productos finales). Además, usted quedará sujeto a toda decisión tomada por el Tribunal con relación a las Conciliaciones. Los Acuerdos de Conciliación describen los reclamos exonerados en detalle, por lo cual sírvase leerlos cuidadosamente pues esas exoneraciones serán vinculantes. Si tiene alguna duda, puede comunicarse con el Abogado del Grupo sin costo, o puede comunicarse con su propio abogado (bajo sus propios costos). Los Acuerdos de Conciliación se encuentran disponibles en www.reversethecharge.com.

EXCLUIRSE DEL GRUPO DE DEMANDANTES**11. ¿Cómo puedo salir del grupo de demandantes?**

Para excluirse del Grupo, usted debe enviar una carta por correo declarando que desea excluirse de la *In re Litigación antimonopolio de Baterías de ion de litio; todas las acciones de comprador indirecto*, MDL No. 2420, Conciliaciones del comprador indirecto. Su carta además debe incluir:

- su nombre, dirección y número de teléfono;
- una declaración indicando que quiere excluirse de la *In re Litigación antimonopolio de Baterías de ion de litio; todas las acciones de comprador indirecto*, MDL No. 2420, Conciliaciones del comprador indirecto; y
- su firma.

Debe enviar su solicitud de exclusión por correo, con franqueo postal, a más tardar el 28 de mayo de 2019, a:

Conciliaciones de comprador indirecto de Baterías de litio
EXCLUSIONES
c/o Epiq
P.O. Box 10194
Dublin, OH 43017-3194

12. Si no me excluyo, ¿puedo demandar por lo mismo en el futuro?

No. A menos que se excluya, usted renuncia a todo derecho de presentar una demanda contra los Demandados en Conciliación por los reclamos que este caso resuelve.

13. Si me excluyo, ¿aún puedo recibir beneficios en dinero?

No. Si usted se excluye del Grupo de Conciliación, no podrá presentar un reclamo y no recibirá ningún dinero de las Conciliaciones.

ABOGADOS QUE LO REPRESENTAN

14. ¿Tengo un abogado que me represente?

El Tribunal designó a los siguientes abogados como Abogados del Grupo de demandantes para representar a usted y a todos los otros miembros del Grupo:

Adam J. Zapala, Esq. Cotchett, Pitre & McCarthy, LLP 840 Malcolm Road, Suite 200 Burlingame, CA 94010 batteries@cpmlegal.com	Shana E. Scarlett, Esq. Hagens Berman Sobol Shapiro LLP 715 Hearst Avenue, Suite 202 Berkeley, CA 94710 batteries@hbsslaw.com	Brendan P. Glackin, Esq. Lief Cabraser Heimann & Bernstein, LLP 275 Battery Street, 29 th Floor San Francisco, CA 94111 lithiumbatteries@lchb.com
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No se le cobrará por los servicios de estos abogados. Si deseara ser representado por su propio abogado, puede contratar a uno por su propia cuenta y cargo.

15. ¿Cómo se les pagará a los abogados y a los Representantes del grupo de demandantes?

Durante la Audiencia Imparcial Final, el Abogado del grupo de demandante le pedirá al Tribunal que se les reembolse por ciertos pagos, costos y gastos. Durante la Audiencia Imparcial Final, o en una fecha posterior, el Abogado del grupo de demandantes solicitará al Tribunal por honorarios de abogados que se cifran en \$34,035,000 (con \$4,495,000 ya adjudicados por el Tribunal) más interés, el cual es el 30 % más interés del monto total de \$113.45 millones de las conciliaciones con todos los demandados. Los honorarios de los abogados serán adjudicados de forma proporcional de los fondos de cada conciliación previa, incluidos los \$64.45 millones en conciliaciones (de Sony, LG Chem, Hitachi Maxell y NEC) previamente aprobadas por el Tribunal. El Abogado del Grupo demandante también hará solicitud de reembolso de costos incurridos durante la aprobación final, que no excederán los \$6,850,000 (con \$860,188.50 ya adjudicados por el Tribunal). Todo pago dirigido a abogados requiere la aprobación del Tribunal, y el tribunal puede adjudicar cantidades inferiores a las solicitadas.

En la Audiencia Imparcial Final, el Abogado del grupo de demandantes le pedirá al Tribunal que entregue adjudicaciones de servicio a los representantes del Grupo de demandantes, cifrados en \$10,000 por cada representante del Grupo y \$25,000 por cada representante de Grupo de entidad gubernamental, por el trabajo que han realizado en nombre del Grupo. Toda adjudicación de servicio requiere la aprobación del Tribunal, y el Tribunal puede adjudicar cantidades inferiores a las solicitadas.

Los honorarios de abogados, costos, gastos y adjudicaciones de servicio que el Tribunal ordene, más los costos de administración de las Conciliaciones, serán pagados del Fondo de Conciliación.

La petición del Abogado del grupo de demandantes por honorarios, costos, gastos y adjudicaciones de servicios serán presentados el 23 de abril de 2019 o en una fecha cercana, y estará disponible en www.reversethecharge.com poco después. La petición será publicada en el sitio web 35 días antes del plazo final para solicitudes de exclusiones u objeciones a las Conciliaciones, y tendrá una oportunidad de realizar comentarios sobre la petición. Cualquier miembro de cualquiera de las demandas para conciliación en este caso puede hacerlo.

OBJETAR LAS CONCILIACIONES

16. ¿Cómo hago objeciones o comentarios sobre las Conciliaciones?

Usted puede solicitarle al Tribunal que no haga lugar a la aprobación final de las Conciliaciones con los Demandados en Conciliación presentando una objeción. No puede pedirle al Tribunal que cambie las Conciliaciones; el Tribunal solamente puede aprobar o rechazar las Conciliaciones. Si el Tribunal rechaza la aprobación, no se repartirán pagos de conciliaciones y la demanda continuará. Si eso es lo que usted desea que pase, debe objetar. No puede presentar objeciones a las Conciliaciones si se excluye del grupo de demandantes.

Toda objeción a las Conciliaciones propuestas con los Demandados en Conciliación debe ser por escrito. Si presenta una objeción escrita en forma oportuna, puede presentarse (pero no está obligado a hacerlo) en la Audiencia Final de Aprobación, en persona o representado por su propio abogado. Si usted se presenta a través de su propio abogado, usted es responsable del pago de honorarios y la contratación de ese abogado. Todas las objeciones por escrito y los documentos de apoyo deben:

- especificar su nombre, dirección y número de teléfono;
- de forma clara identificar el nombre, número y conciliación del caso *In re Litigación antimonopolio de Baterías de ion de litio; todas las acciones de comprador indirecto*, MDL No. 2420, Conciliaciones del comprador indirecto);
- presentarse ante el Tribunal, ya sea por correo al Secretario del Tribunal para el Tribunal de Distrito de los Estados Unidos para el Distrito Norte de California, 1301 Clay Street, Suite 400S, Oakland, CA 94612, o presentarse en persona en cualquier sede del Tribunal de Distrito de los Estados Unidos para el Distrito Norte de California; y
- debe presentarse o contar con franqueo postal anterior al 28 de mayo de 2019.

¿TIENE ALGUNA PREGUNTA? VISITE WWW.REVERSETHECHARGE.COM O LLAME AL 1-855-730-8645

17. ¿Cuál es la diferencia entre objetar a las conciliaciones y excluirme del grupo demandante?

Si se excluye del Grupo demandante, usted le dice al Tribunal que no desea participar en las Conciliaciones. Por lo tanto, no será elegible para recibir ningún beneficio de las Conciliaciones, y no podrá hacer objeciones a las Conciliaciones. Objetar a una Conciliación es decirle al Tribunal que no le gusta algo sobre las Conciliaciones. Si usted objeta, aún es elegible para recibir el pago de conciliación.

LA AUDIENCIA IMPARCIAL FINAL

El Tribunal celebrará una audiencia para decidir si aprobar las Conciliaciones con los Demandados en Conciliación y toda solicitud realizada por Abogados de grupo demandante para el pago de honorarios, costos, gastos y adjudicaciones de servicio de representantes del Grupo demandante. Puede asistir y pedir la palabra, pero no es obligatorio que lo haga.

18. ¿Cuándo y dónde decidirá el Tribunal si aprueba las Conciliaciones?

El Tribunal celebrará una Audiencia Imparcial Final a las 2:00 p.m. del 16 de julio de 2019, en el Tribunal de los Estados Unidos 1301 Clay Street, Courtroom 1, 4th Floor, Oakland, CA 94612. La audiencia puede trasladarse a una fecha u horario distinto sin aviso adicional, por lo tanto revise el sitio PACER del Tribunal, www.reversethecharge.com, o llame al 1-855-730-8645 para confirmar que la fecha no haya sido modificada. En esta audiencia, el Tribunal considerará si las Conciliaciones son justas, razonables y adecuadas. Si no existen objeciones o comentarios, el Tribunal en ese momento considerará dichas pruebas y escuchará a los testigos que hayan solicitado hablar en la audiencia. El Tribunal además puede decidir cuánto pagar al Abogado del Grupo demandante o si pagar, o bien cuánto entregar en adjudicaciones de servicio a los representantes del Grupo demandante. En la audiencia, o después de ella, el Tribunal decidirá si aprueba o no las Conciliaciones.

19. ¿Debo asistir a la audiencia?

No. Los Abogados del Grupo demandante responderán todas las preguntas que el Tribunal pueda tener. Sin embargo usted puede presentarse por su propia cuenta y cargo. Si presenta una objeción, no tiene que presentarse en el Tribunal para hablar sobre ella. Siempre que haya enviado su objeción por escrito a tiempo, el Tribunal la tendrá en cuenta. Además, usted puede contratar su propio abogado por su propia cuenta y cargo para asistir en su representación a la audiencia, pero no tendrán la obligación de hacerlo.

20. ¿Puedo tomar la palabra en la audiencia?

Si usted envía una objeción o comentario sobre las Conciliaciones, puede tener el derecho a tomar la palabra en la Audiencia Imparcial Final según lo determine el Tribunal. No puede tomar la palabra en la audiencia si se excluyó del Grupo.

PARA INFORMACIÓN ADICIONAL

21. ¿Cómo puedo obtener más información?

Este Aviso resume las Conciliaciones. Los Acuerdos de Conciliación contienen más detalles. Puede obtener copias de los Acuerdos de Conciliación y mayor información sobre las Conciliaciones en www.reversethecharge.com. Además puede escribir con preguntas a Conciliaciones de Comprador Indirecto de Baterías de Litio, c/o Epiq, P.O. Box 10194, Dublin, OH 43017-3194 o llamar al número 1-855-730-8645 libre de costo. También debe registrarse en el sitio web para ser notificado directamente sobre los términos del Plan de Distribución del Fondo de Conciliación y otra información concerniente a este caso.

**NO CONTACTE AL TRIBUNAL, LA OFICINA DEL SECRETARIO DEL TRIBUNAL,
A LOS DEMANDADOS O A SU ABOGADO RESPECTO A ESTE AVISO**

Fechado: 5 de abril de 2019

Por orden del Tribunal
United States District Court
Distrito Norte de California

**Must be
Postmarked
No Later Than
July 19, 2019**

Lithium Batteries Indirect Purchaser Settlements
c/o Epiq
PO Box 10194
Dublin, OH 43017-3194

ION



Claim Number:

Control Number:

**Bought a Portable Computer, Mobile or
Smart Phone, Power Tool, Camera,
Camcorder, Digital Audio Player, or
Replacement Battery?**

In re Lithium Ion Batteries Antitrust Litigation – All Indirect Purchaser Actions

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
Case No. 13-MD-02420 YGR (DMR), MDL No. 2420**

CLAIM FORM

Must be Submitted Online or Postmarked No Later Than July 19, 2019.

GENERAL INSTRUCTIONS

To receive a settlement payment, you must accurately complete this Claim Form and submit it by July 19, 2019. Claim Forms may be submitted online at www.reversethecharge.com or mailed to the Claims Administrator at Lithium Batteries Indirect Purchaser Settlements, c/o Epiq, PO Box 10194 Dublin, OH 43017-3194. Go to www.reversethecharge.com to learn more about the settlements, your rights, and how claims will be calculated and paid.

This Claim Form should be submitted only if, as a resident of the United States and during the period from January 1, 2000 through May 31, 2011, you purchased new for your own use and not for resale one of the following products which contained a lithium-ion battery: laptop PCs; notebook PCs; netbook computers; tablet computers; mobile phones; smart phones; cameras; camcorders; digital video cameras; digital audio players; power tools; or a replacement battery for any of these products. The product must have been purchased from someone other than the manufacturer, such as a retail store.

You do not need to submit proof of your purchase(s) with your Claim Form. For questions about completing or submitting your claim, call the Claims Administrator at (855) 730-8645.

First Name: M.I.: Last Name:

Business Name:

Person To Contact If There Are Questions Regarding This Claim:

Primary Address:

Primary Address Continued:

City: _____ State: _____ Zip: _____

Foreign Province: Foreign Postal Code: Foreign Country Name/Abbreviation:

Email Address:

-

Select the Employee Size of Business: ☐ 1-10 ☐ 11-50 ☐ 50 plus

**PART 2: PURCHASE INFORMATION**

For questions about completing or submitting your claim, call the Claims Administrator at 1 (855) 730-8645.

Provide the total number of products containing a lithium-ion battery or a replacement battery for one of those products purchased between January 1, 2000 and May 31, 2011. For example, if you bought 3 laptop PCs, write "3" in the corresponding space.

Product Type	Number Purchased	State of Residence at Time of Purchase
Laptop PC (or replacement battery for Laptop PC)		
Notebook PC (or replacement battery for Notebook PC)		
Netbook Computer (or replacement battery for Netbook Computer)		
Tablet Computer (or replacement battery for Tablet Computer)		
Mobile Phone (or replacement battery for Mobile Phone)		
Smart Phone (or replacement battery for Smart Phone)		
Camera (or replacement battery for Camera)		
Camcorder (or replacement battery for Camcorder)		
Digital Video Camera (or replacement battery for Digital Video Camera)		
Digital Audio Player (or replacement battery for Digital Audio Player)		
Power Tool (or replacement battery for Power Tool)		

PART 3: SIGN AND DATE CLAIM FORM

By signing below, I (we) affirm that the information provided in this Claim Form is true and correct.

Signature

Dated

Print Name

Title (if you are filling out this form for a business)

REMINDER LIST

Please make sure that you:

1. Sign and date the Claim Form;
2. Keep a copy of the completed Claim Form for your records;
3. Retain your proof of purchase documentation until your claim is closed. You will be notified if you are required to provide this Documentation; and
4. Submit your Claim Form no later than July 19, 2019, online at www.reversethecharge.com or by mail to Lithium Batteries Indirect Purchaser Settlements, c/o Epiq, PO Box 10194, Dublin, OH 43017-3194. If you desire an acknowledgment of receipt of your claim form please send it Certified Mail, Return Receipt Requested.

**Claim Forms must be electronically submitted no later than July 19, 2019
or postmarked no later than July 19, 2019.**

Questions? Visit www.reversethecharge.com or call, toll-free, 1 (855) 730-8645

Attachment 3

Lithium ION Battery
15 Second TV Spot

 DID YOU BUY A LAPTOP, CORDLESS POWER TOOL, CAMCORDER, AND/OR OTHER ITEMS CONTAINING A LITHIUM ION CYLINDRICAL BATTERY FROM JANUARY 1, 2000 – MAY 31, 2011  ReverseTheCharge.com 1-855-730-8645 OFF CAMERA NARRATOR: If you purchased certain electronics containing a lithium ion cylindrical battery from January 1, 2000 – May 31, 2011,	 YOU MAY BE ELIGIBLE FOR A PAYMENT FROM A SETTLEMENT  ReverseTheCharge.com 1-855-730-8645 you may be eligible for a payment from a settlement.	 FOR COMPLETE DETAILS, VISIT www.ReverseTheCharge.com OR CALL 1-855-730-8645  ReverseTheCharge.com 1-855-730-8645 For complete details, visit www.ReverseThe Charge.com or call 1-855-730-8645.
--	--	--

**Lithium Ion Battery
30 Second TV Spot**

 DID YOU BUY A LAPTOP, CORDLESS POWER TOOL, CAMCORDER, AND/OR OTHER ITEMS CONTAINING A LITHIUM ION CYLINDRICAL BATTERY FROM JANUARY 1, 2000 – MAY 31, 2011  ReverseTheCharge.com 1-855-730-8645	 YOU MAY BE ELIGIBLE FOR A PAYMENT FROM A SETTLEMENT  ReverseTheCharge.com 1-855-730-8645
OFF CAMERA NARRATOR: If you purchased certain electronics such as portable computers, power tools or camcorders containing a lithium ion cylindrical battery from January 1, 2000 – May 31, 2011,	you may be eligible for a payment from a settlement.



If you think you're eligible, you must submit a claim by July 19, 2019.



For complete details, visit [www.ReverseThe Charge.com](http://www.ReverseTheCharge.com) or call 1-855-730-8645. Again, that's www.ReverseTheCharge.com or call 1-855-730-8645.

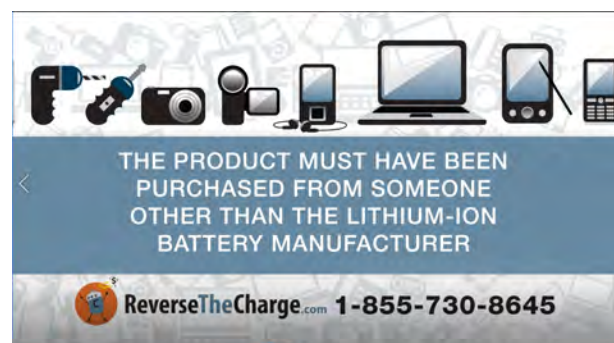
Lithium Ion Battery
60 Second TV Spot



OFF CAMERA NARRATOR: If you purchased certain new electronics such as portable computers, mobile phones, digital audio players, power tools, camcorders or other items containing a lithium ion cylindrical battery, or if you purchased a replacement battery for any of these products from January 1, 2000 through May 31, 2011,



you may have overpaid and could be eligible for a payment from more than \$113 million in settlements.



The product must have been purchased from someone other than the Lithium-Ion Battery manufacturer, such as a retail store.



A Fairness Hearing will be held on July 16, 2019 to decide whether to approve these settlements.



If you think you're eligible, you must submit a claim either online or by mail by July 19, 2019.



For complete details, visit [www.ReverseThe Charge.com](http://www.ReverseTheCharge.com) or call 1-855-730-8645. Again, that's www.ReverseTheCharge.com or call 1-855-730-8645.

15 Second Screenshots

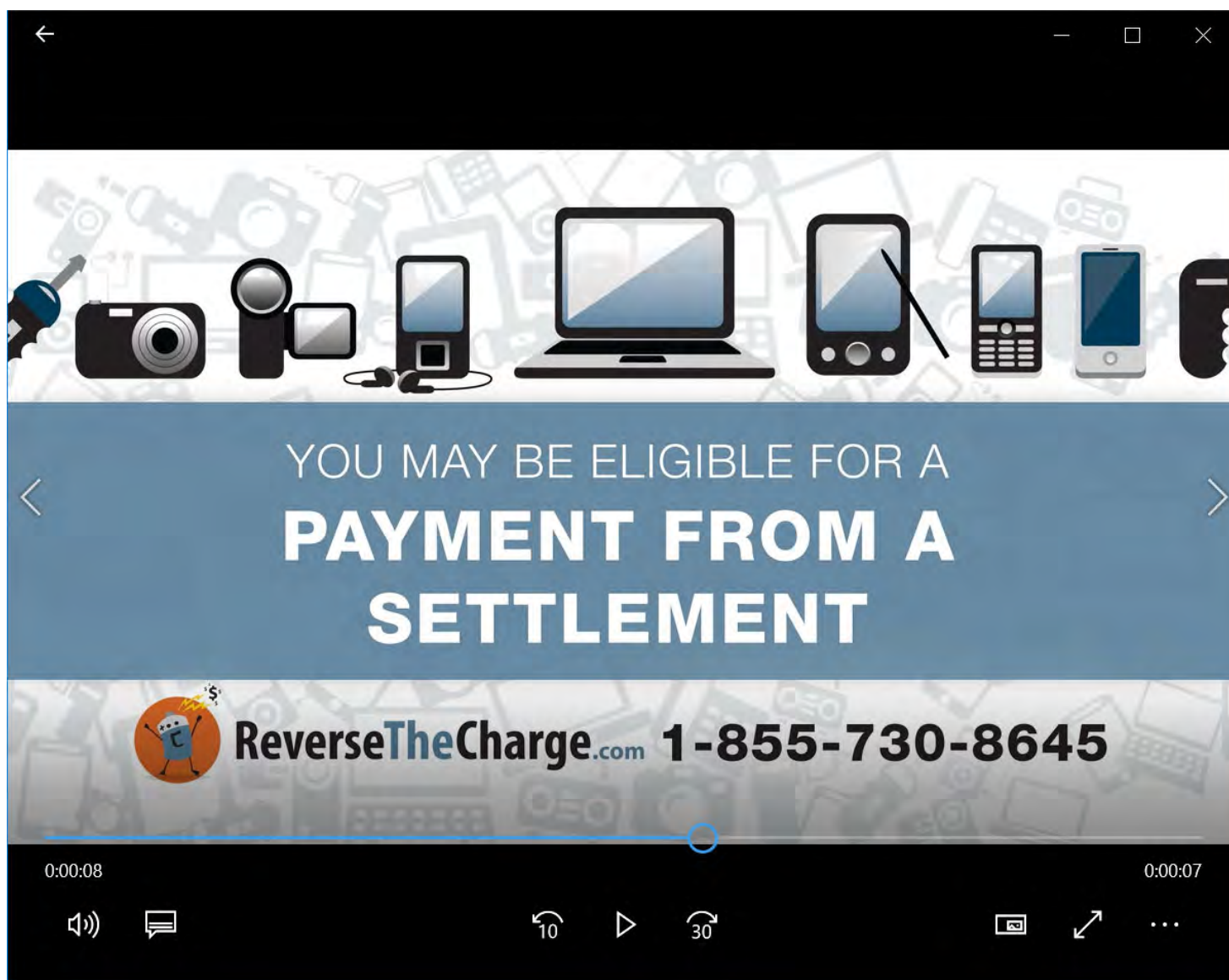
The screenshot shows a video player interface. At the top, there is a black bar with navigation icons (back, close, and a square icon). Below this is a banner image featuring various electronic devices and tools, including a laptop, several smartphones, a cordless power drill, a screwdriver, a camcorder, and a camera. The background of the banner is a collage of faint icons related to electronics and tools.

Below the banner, a blue semi-transparent box contains the following text:

DID YOU BUY A LAPTOP, CORDLESS
POWER TOOL, CAMCORDER, AND/OR
OTHER ITEMS CONTAINING A
LITHIUM ION CYLINDRICAL BATTERY FROM
JANUARY 1, 2000 – MAY 31, 2011

Below the blue box, there is a logo for ReverseTheCharge.com, which features a stylized robot character with a dollar sign above its head. To the right of the logo, the text "ReverseTheCharge.com" is displayed in a blue and black font, followed by the phone number "1-855-730-8645" in a large, bold, black font.

At the bottom of the video player, there is a black bar containing a progress bar with a blue circle indicating the current position. The time "0:00:02" is shown on the left, and "0:00:13" is shown on the right. Below the progress bar are several control icons: a speaker icon for volume, a speech bubble icon for subtitles, a circular arrow icon for 10-second rewind, a play button icon, a circular arrow icon for 30-second fast forward, a picture-in-picture icon, a full-screen icon, and a three-dot menu icon.



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YOU MAY BE ELIGIBLE FOR A
**PAYMENT FROM A
SETTLEMENT**

 **ReverseTheCharge.com** **1-855-730-8645**

0:00:08 0:00:07

🔊 💬 ↺ 10 ▶ ↻ 30 📺 ↗ ⋮

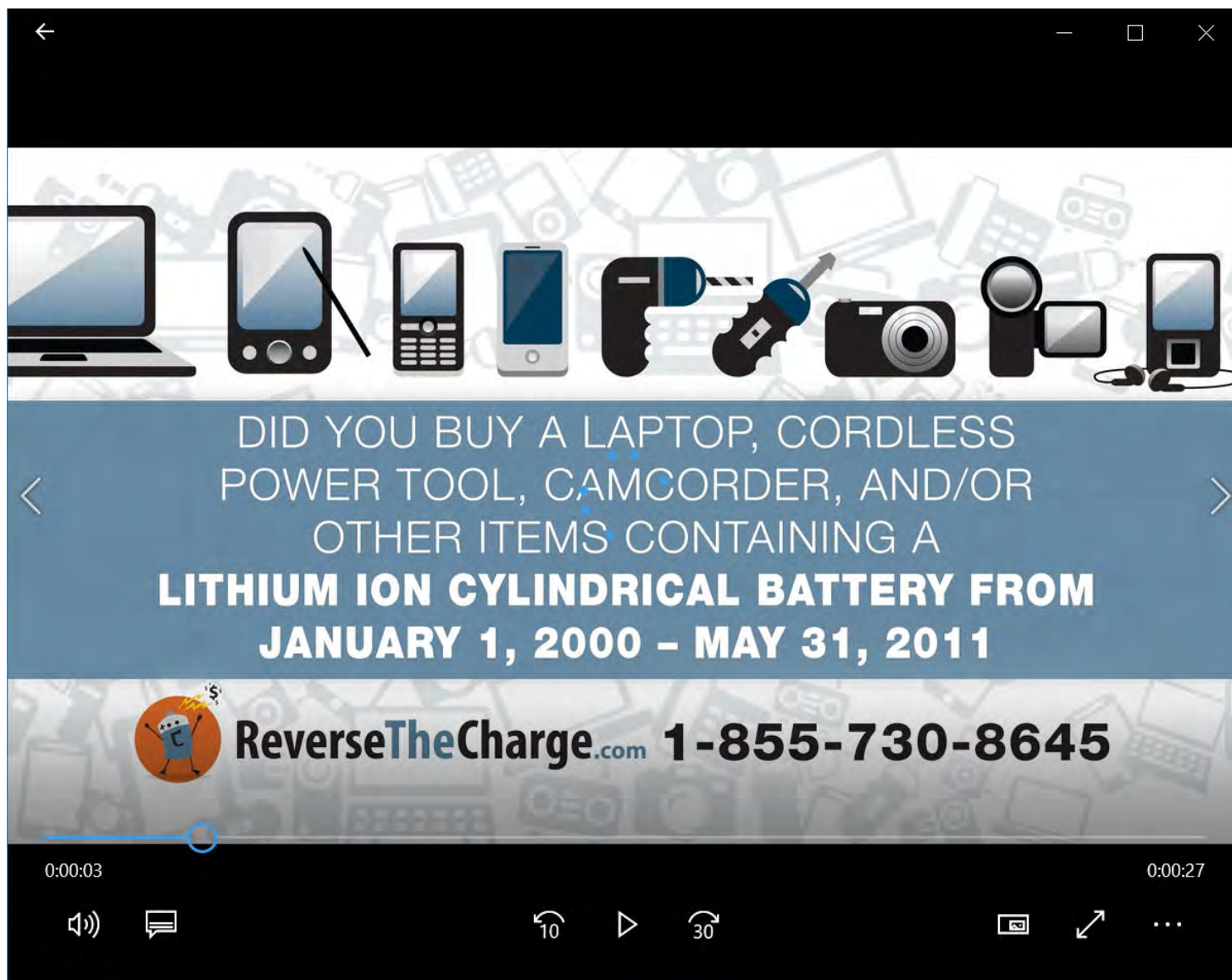
FOR COMPLETE DETAILS, VISIT
www.ReverseTheCharge.com
OR CALL ***1-855-730-8645***

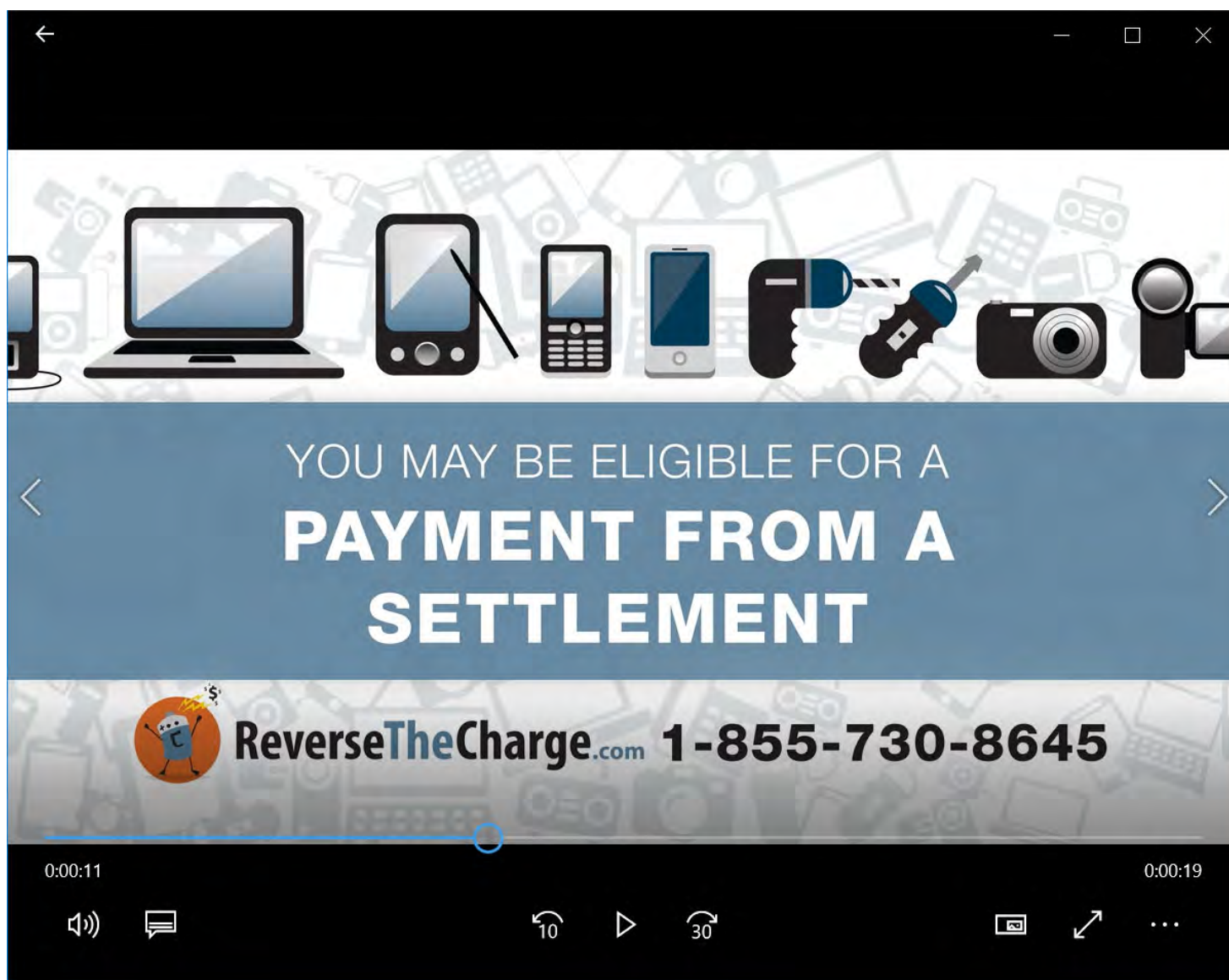
 **ReverseTheCharge.com** **1-855-730-8645**

0:00:10 0:00:05

Volume icon Comment icon 10s Play button 30s Full screen icon Share icon Menu icon

30 Second Screenshots





The video player interface includes a black top bar with navigation icons (back, close, and a square icon). The video content features a row of electronic devices (laptop, tablet, smartphone, flip phone, digital camera, and video camera) against a background of various electronic components. A blue banner with white text reads: "YOU MAY BE ELIGIBLE FOR A **PAYMENT FROM A SETTLEMENT**". Below this, the ReverseTheCharge.com logo (a blue robot with a dollar sign) is shown next to the text "ReverseTheCharge.com" and the phone number "1-855-730-8645". The video progress bar shows a current time of 0:00:11 and a total duration of 0:00:19. The bottom control bar includes icons for volume, subtitles, 10-second rewind, play/pause, 30-second fast forward, full screen, and a share menu.

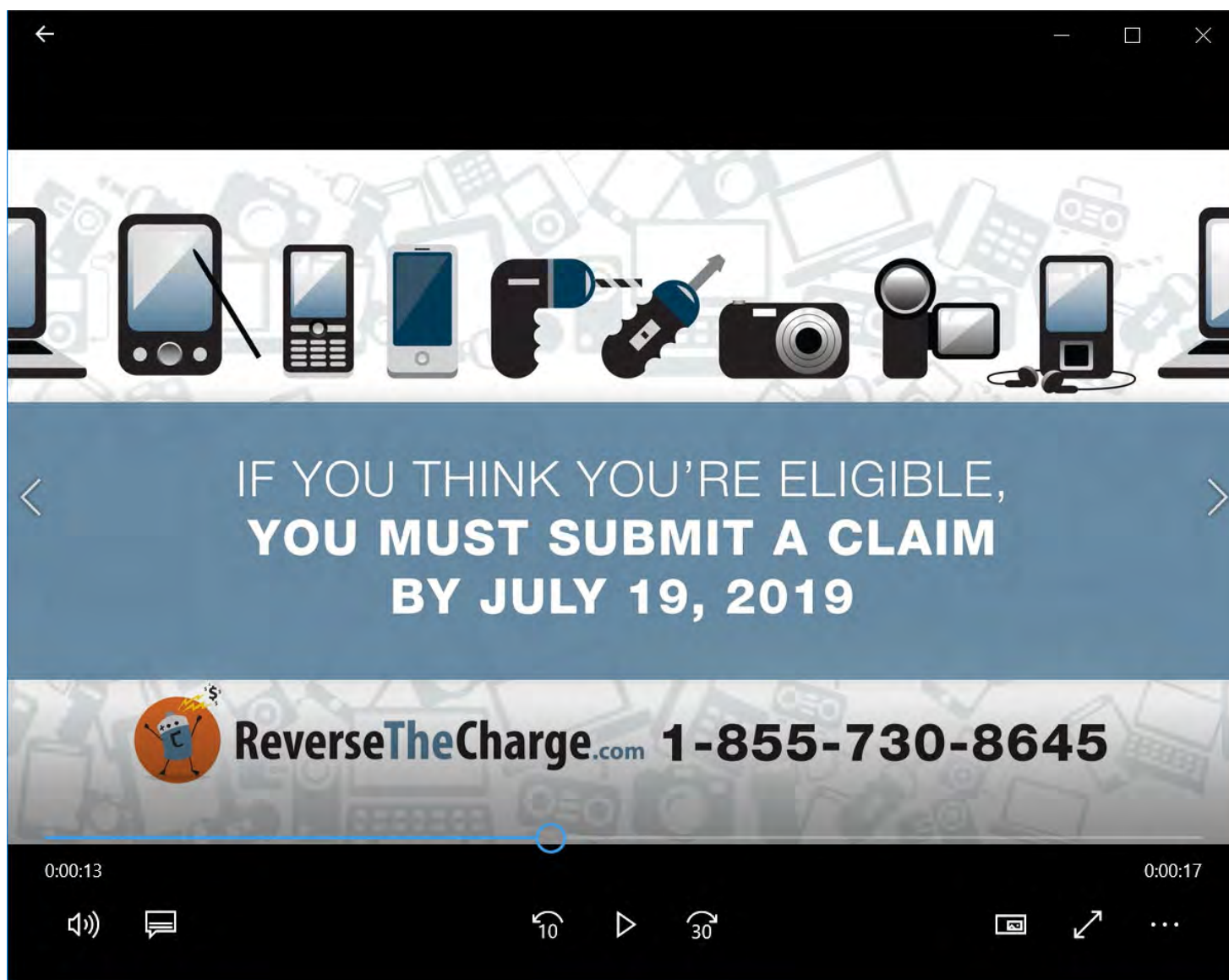
← — □ ×

YOU MAY BE ELIGIBLE FOR A
PAYMENT FROM A SETTLEMENT

 **ReverseTheCharge.com** **1-855-730-8645**

0:00:11 0:00:19

🔊 🗨️ ⏮️ 10 ⏸️ ⏭️ 30 🖥️ ↗️ ⋮



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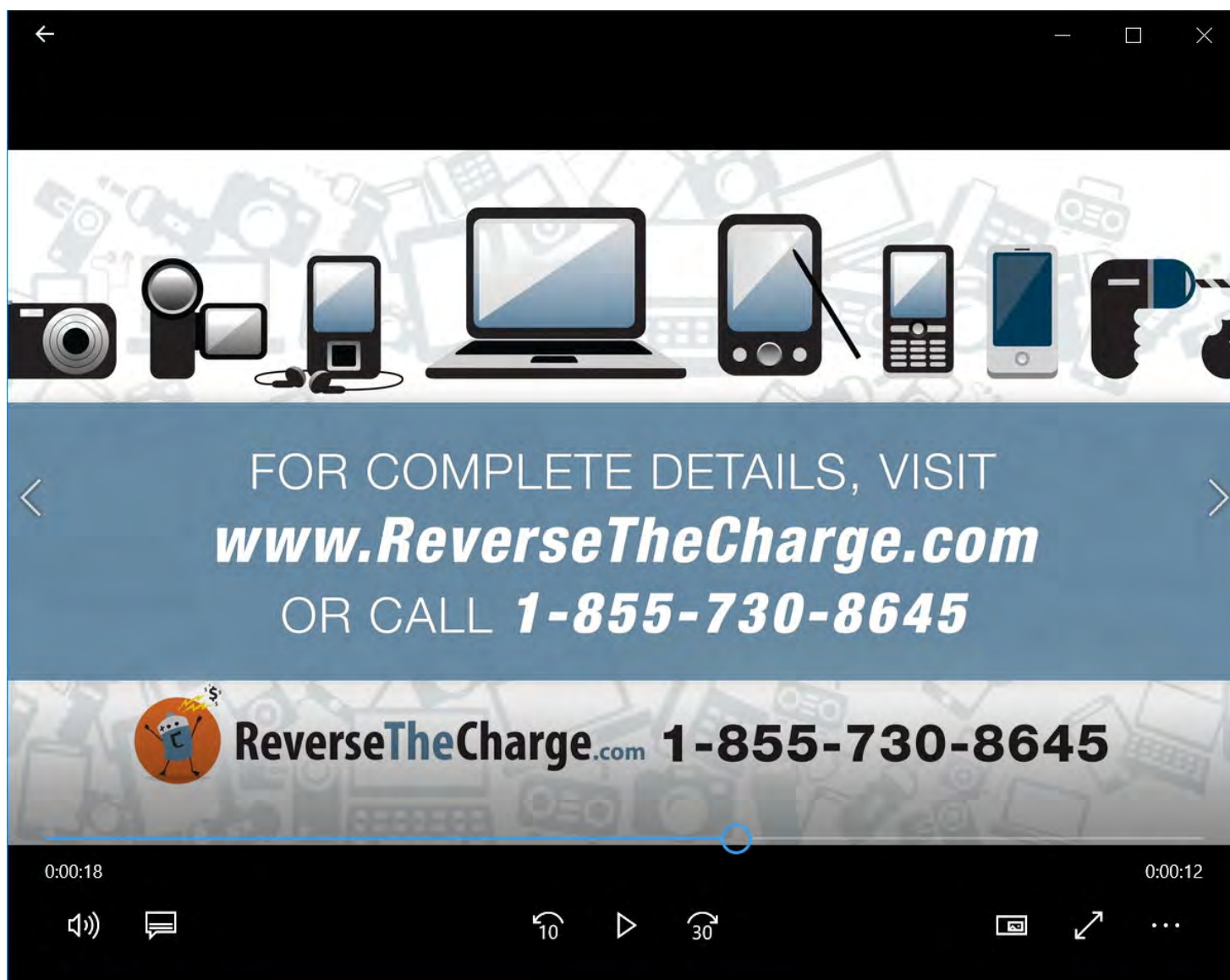
IF YOU THINK YOU'RE ELIGIBLE,
YOU MUST SUBMIT A CLAIM
BY JULY 19, 2019

< >

 **ReverseTheCharge.com** **1-855-730-8645**

0:00:13 0:00:17

🔊 💬 ↺ 10 ▶ ↻ 30 🖼️ ↗ ⋮



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FOR COMPLETE DETAILS, VISIT
www.ReverseTheCharge.com
OR CALL ***1-855-730-8645***

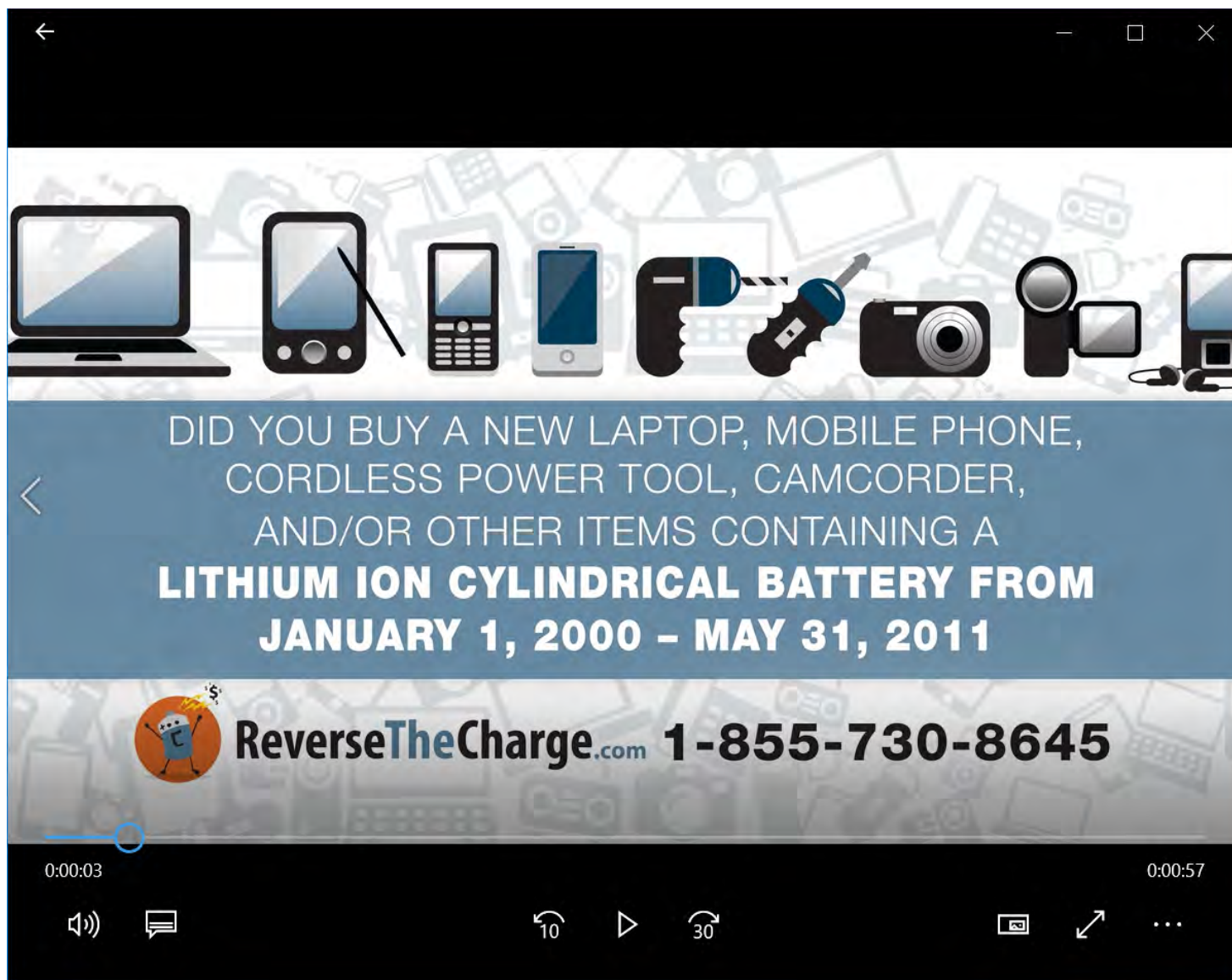
< >

 **ReverseTheCharge.com 1-855-730-8645**

0:00:18 0:00:12

🔊 💬 ⏮️ 10 ⏩ 30 📺 ↗️ ⋮

60 Second Screenshots



The screenshot shows a video player interface. At the top, there is a navigation bar with a back arrow on the left and window controls (minimize, maximize, close) on the right. Below this is a banner image featuring various electronic devices and tools: a laptop, two smartphones, a cordless power drill, a camera, and a camcorder. The background of the banner is a collage of similar items. Overlaid on the banner is a blue semi-transparent box containing white text. The text reads: "DID YOU BUY A NEW LAPTOP, MOBILE PHONE, CORDLESS POWER TOOL, CAMCORDER, AND/OR OTHER ITEMS CONTAINING A **LITHIUM ION CYLINDRICAL BATTERY FROM JANUARY 1, 2000 – MAY 31, 2011**". Below the text box is a logo for ReverseTheCharge.com, which is a stylized orange robot head with a dollar sign and a lightning bolt. To the right of the logo is the text "ReverseTheCharge.com" and the phone number "1-855-730-8645". At the bottom of the video player, there is a progress bar with a blue playhead at the 0:00:03 mark. The total duration of the video is 0:00:57. Below the progress bar are several control icons: a speaker icon for volume, a speech bubble icon for subtitles, a circular arrow icon for 10-second rewind, a play button icon, a circular arrow icon for 30-second fast forward, a full screen icon, a share icon, and a menu icon (three dots).

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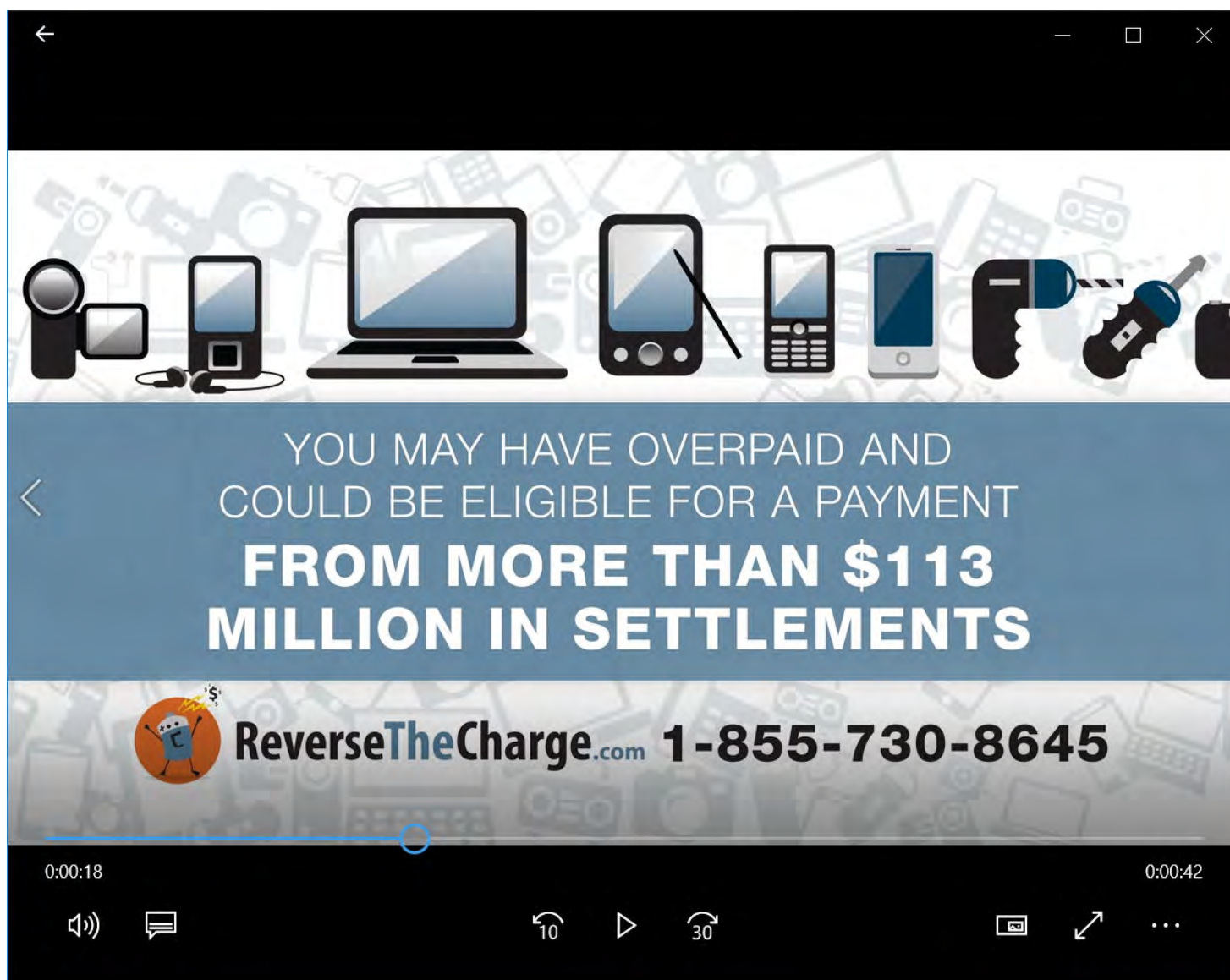
DID YOU BUY A NEW LAPTOP, MOBILE PHONE,
CORDLESS POWER TOOL, CAMCORDER,
AND/OR OTHER ITEMS CONTAINING A
**LITHIUM ION CYLINDRICAL BATTERY FROM
JANUARY 1, 2000 – MAY 31, 2011**

<

 **ReverseTheCharge.com** **1-855-730-8645**

0:00:03 0:00:57

🔊 🗣️ ⏮️ 10 ⏪ 30 ⏩ 🖥️ ↗️ ⋮



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< YOU MAY HAVE OVERPAID AND
COULD BE ELIGIBLE FOR A PAYMENT
**FROM MORE THAN \$113
MILLION IN SETTLEMENTS**



ReverseTheCharge.com **1-855-730-8645**

0:00:18 0:00:42

🔊 💬 ↺ 10 ▶ ↻ 30 🖼️ ↗ ⋮



←

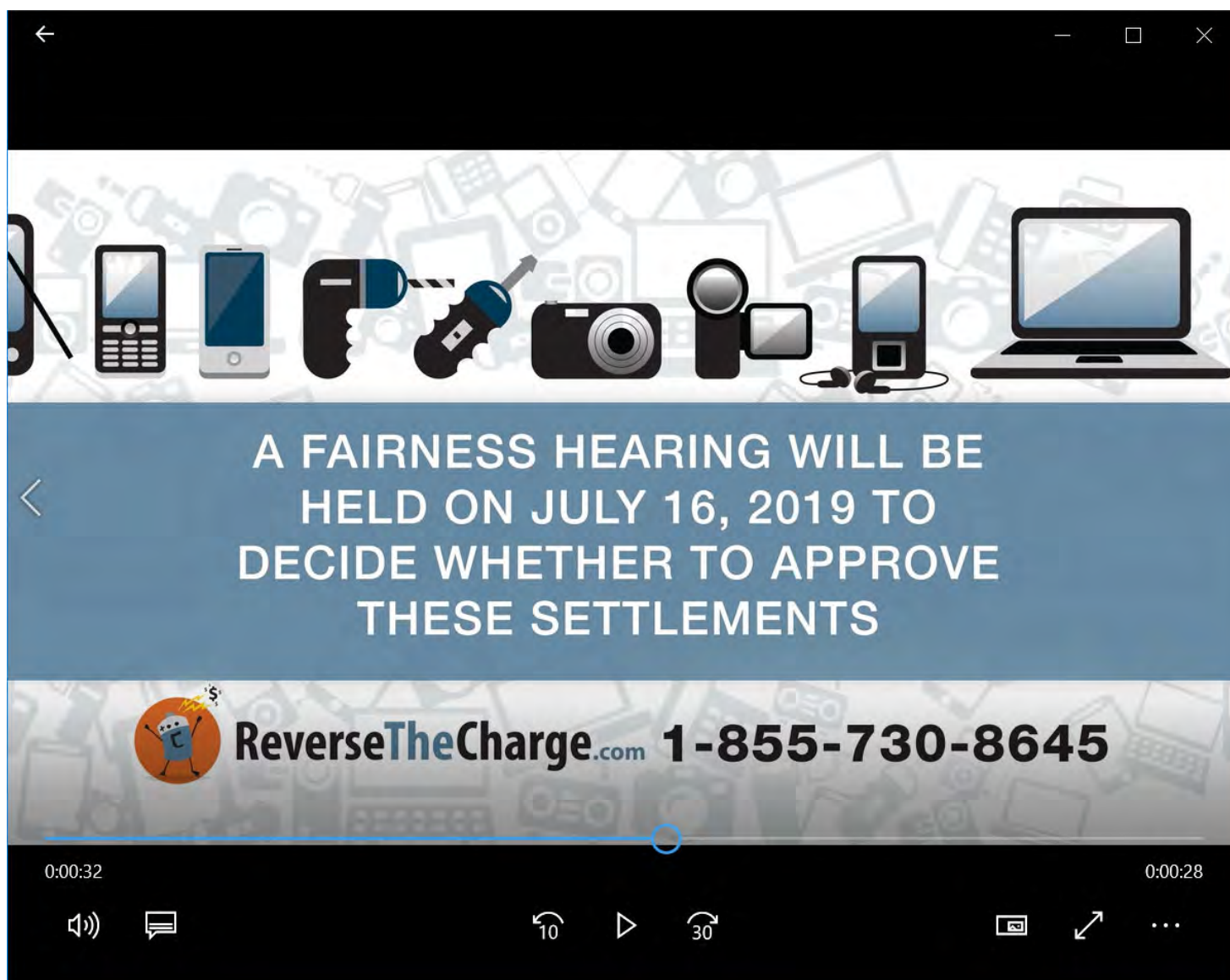
THE PRODUCT MUST HAVE BEEN
PURCHASED FROM SOMEONE
OTHER THAN THE LITHIUM-ION
BATTERY MANUFACTURER

 **ReverseTheCharge.com** **1-855-730-8645**

0:00:25 0:00:35

⏮ 10 ⏪ ⏩ 30 ⏭

🔊 🗨️ 🖼️ ↗️ ⋮

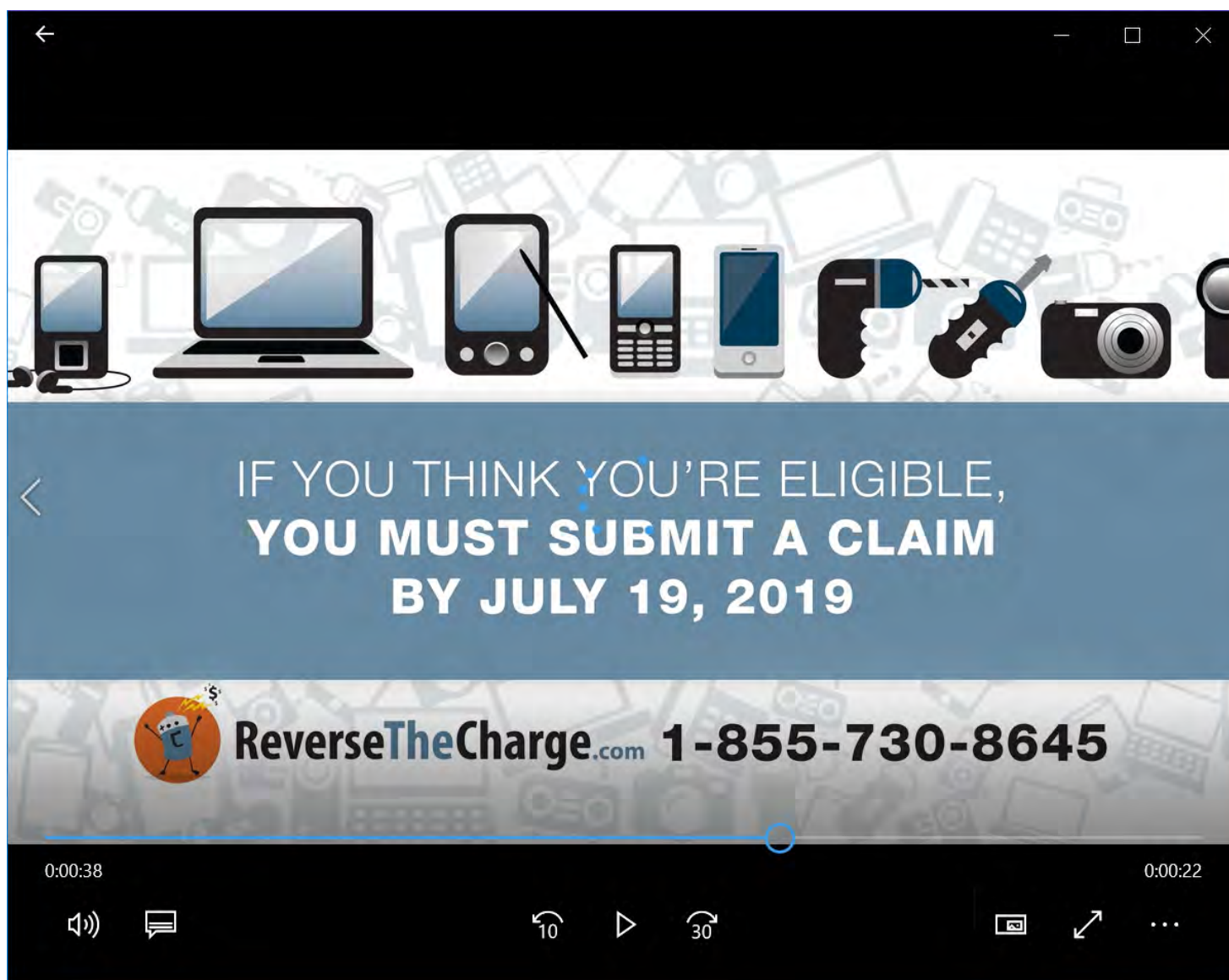


A FAIRNESS HEARING WILL BE
HELD ON JULY 16, 2019 TO
DECIDE WHETHER TO APPROVE
THESE SETTLEMENTS

 **ReverseTheCharge.com** **1-855-730-8645**

0:00:32 0:00:28

Speaker icon Comment icon 10 30 Full screen Share More options

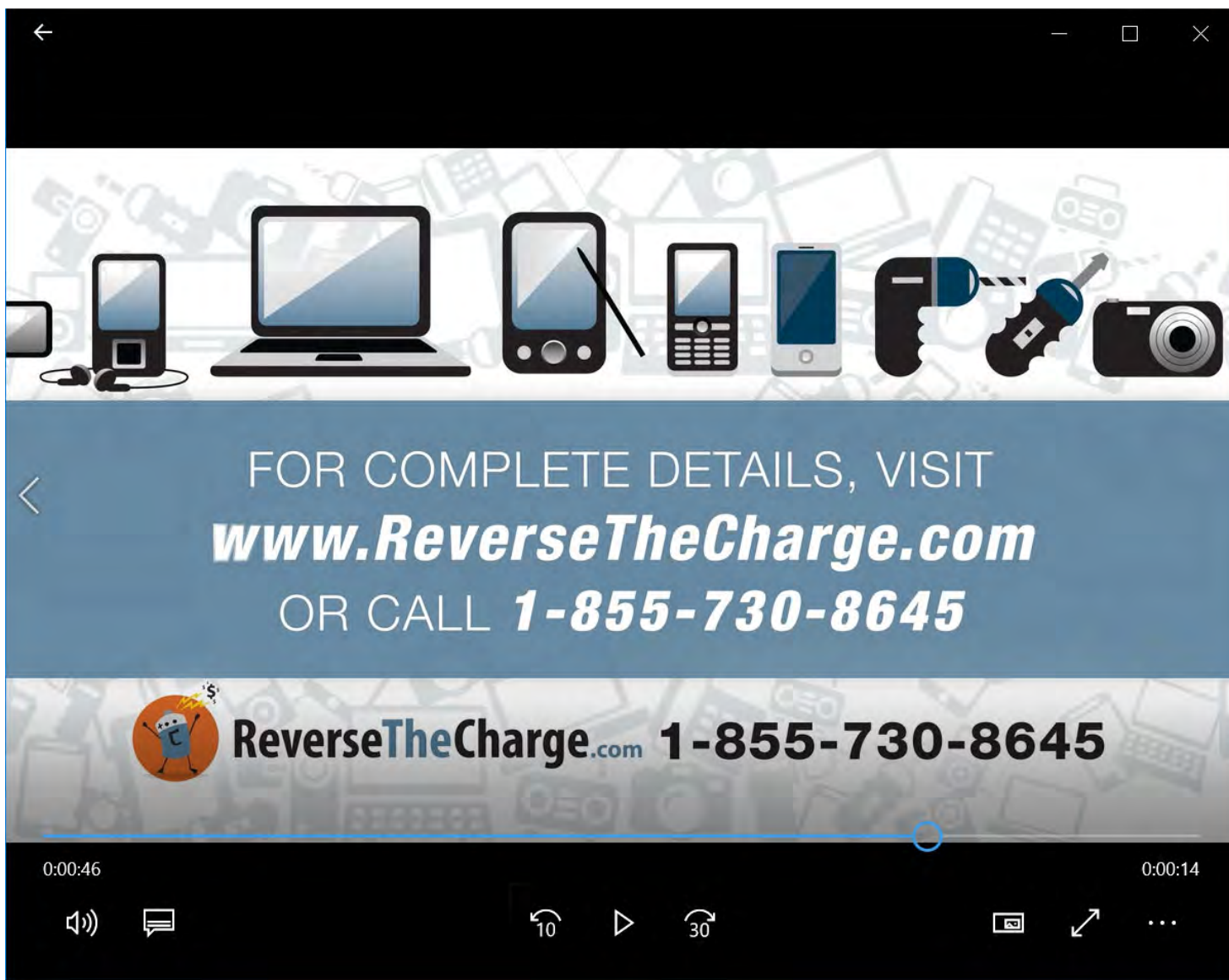


IF YOU THINK YOU'RE ELIGIBLE,
**YOU MUST SUBMIT A CLAIM
BY JULY 19, 2019**

 **ReverseTheCharge.com** **1-855-730-8645**

0:00:38 0:00:22

Speaker icon, Comment icon, 10s rewind, Play, 30s fast forward, Full screen, Share, More options



FOR COMPLETE DETAILS, VISIT
www.ReverseTheCharge.com
OR CALL **1-855-730-8645**

 **ReverseTheCharge.com** **1-855-730-8645**

0:00:46 0:00:14

Speaker icon, Comment icon, 10s rewind, Play, 30s fast forward, Full screen, Share, More options

Attachment 4



Reviews

How To

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TVs

Laptops

Photography

Deals

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Pro

Quicken Loans[®] URGES AMERICANS TO SWITCH TO A 15-YEAR FIXED

If you owe less than \$726,525, you may be shocked by how much Quicken Loans could reduce your total mortgage payments. Try this radically simple mortgage experience and see if you can lock a low rate that will never rise.

SELECT YOUR MORTGAGE BALANCE:

\$50k-\$100k

\$100k-\$150k

\$150k-\$200k

\$200k-\$250k

\$250k+

CALCULATE NEW HOUSE PAYMENT



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NMLS #3030

TRENDING

Buying Guides

Apple AirPods

Best Laptops

Best Phones

Best TVs

BRANDS

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buying guides

LATEST UPDATES



Best turntables 2019: the best record players for any budget

By Lewis Leong 3 hours ago

BUYING GUIDE Whether you're a vinyl veteran or just starting out, we've got a list of the best turntables for you.



Best cheap headphones: your guide to the best budget headphones in 2019

By Nick Pino 3 days ago

BUYING GUIDE Want a decent pair of

Advertisement

Did you buy a laptop, cordless power tool, camcorder, and/or other items since 2000?



You could get money from a \$113 Million lithium-ion battery antitrust settlement.

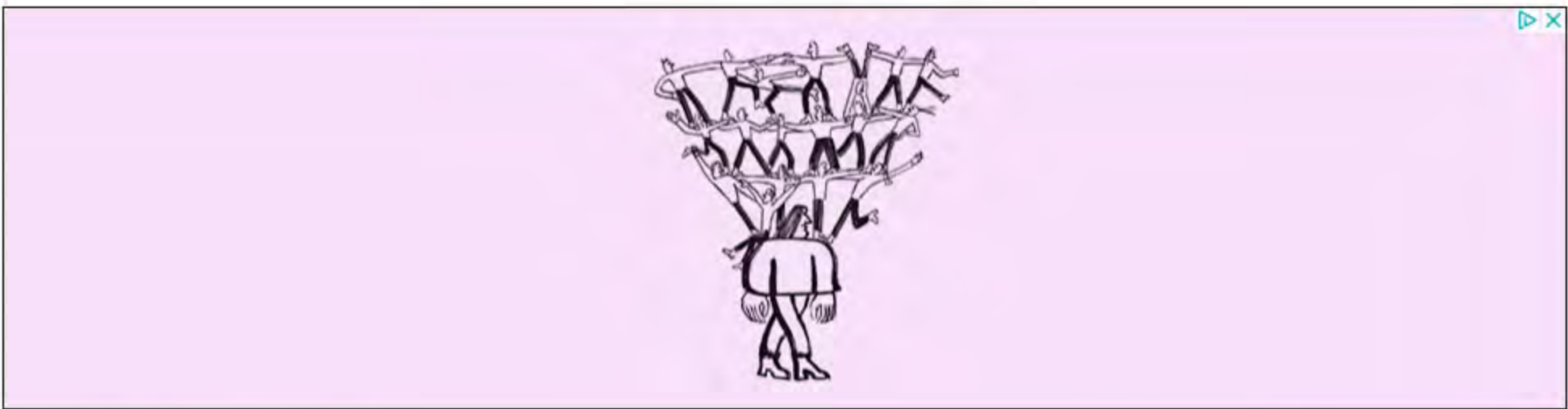


ReverseTheCharge.com

Best Web Hosting Providers for 2019



BEST PRODUCTS **REVIEWS** NEWS VIDEO HOW TO SMART HOME CARS DEALS DOWNLOAD



TOP CATEGORIES

-  **Appliances**
-  **Audio**
Best Home Audio
-  **Cameras**
Best Cameras
-  **Cars**
Visit Roadshow
-  **Desktops**
Best Desktops
-  **Headphones**
Best Headphones
-  **Laptops**
Best Laptops
-  **Networking**
Best Routers
-  **Phones**
Best Phones
-  **Printers**
Best Printers

LATEST STORIES



Audio-only smart doorbell is a bit too simple

The \$80 Audio Doorbell seems like a great deal at first glance, but you'll need a separate Arlo camera to stream live video.

BY MEGAN WOLLERTON | 2 HOURS AGO
★★★★☆



Did you buy a laptop, cordless power tool, camcorder, and/or other items since 2000?



You could get money from a \$113 Million lithium-ion battery antitrust settlement.



TOP ROUNDUPS



Did you buy a laptop, cordless power tool, camcorder, and/or other items since 2000? You could get money from a \$113 Million lithium-ion battery antitrust settlement.



ReverseTheCharge.com

Future Oppo phones could have a crazy design we've never seen before

BGR Andy Meek, BGR News - April 4, 2019



One of the hot trends in smartphone design these days is to give users more screen real estate by taking the traditional smartphone form factor and making it foldable. We've covered everything from book-like foldable screens a la the Samsung Galaxy Fold — which can double as a phone or a phablet-sized device depending on if it's folded or open — to screens that curl up closed from the bottom to produce a second smaller screen, bendable screens and a whole lot of

GMC
SOUTHERN BUICK GREENBRIER
WHERE IT'S ALL ABOUT YOU.

2019 GMC SIERRA 2500HD

[CLICK FOR PRICE](#) [VIEW ALL INVENTORY](#)

What to Read Next



Samsung's Galaxy Fold will be available on EE, and here's how to pre-order it

Digital Spy



Did you buy a laptop, cordless power tool, camcorder, and/or other items since 2000?

You could get money from a \$113 Million lithium-ion battery antitrust settlement.

ReverseTheCharge.com

Technology

DEALBOOK | MARKETS | ECONOMY | ENERGY | MEDIA | TECHNOLOGY | PERSONAL TECH | ENTREPRENEURSHIP | YOUR MONEY



CAYCE CLIFFORD FOR THE NEW YORK TIMES

TECH FIX

Apple AirPods Review: The Perfect Earbuds, Except They Don't Last

Sleek and convenient, Apple's wireless earbuds are an engineering marvel. But they are difficult and expensive to maintain.

1d ago · By BRIAN X. CHEN



JESSICA PETTWAY FOR THE NEW YORK TIMES

Drug Sites Upend Doctor-Patient Relations: 'It's Restaurant-Menu Medicine'

A new wave of websites turns physicians into mere gatekeepers for popular lifestyle drugs, increasing public health risks, experts say. The sites say they ease connections with doctors.

1d ago · By NATASHA SINGER and KATIE THOMAS

A.I. Experts Question Amazon's Facial-Recognition Technology

At least 25 prominent researchers are calling on the company to stop selling the technology to law enforcement agencies, citing concerns that it has built-in biases.

21h ago · By CADE METZ and NATASHA SINGER



TECH WE'RE USING

From Bubble Memory to Hot Spots and a Fly Rod

David E. Sanger, a national security correspondent, recounts his gear from the computers in use when he joined The Times in 1982 to his overloaded backpack now.

1d ago · By DAVID E. SANGER





TECNOLOGÍA

Un extractor de leche que se esconde en el sostén y un robot que duerme a los niños: inventos innovadores de la feria CES 2019

Los más recientes inventos, convertidos en productos listos para salir al mercado, son revelados en la Feria de Electrónica de Consumo (CES por sus siglas en inglés). Es la mayor exhibición de productos tecnológicos del mundo y se celebra cada año en Las Vegas, Nevada.



INTERNET

Investigan un apagón de CenturyLink que provocó fallos en el servicio del 911

Clientes reportaron alteraciones en el sistema de emergencias del 911 desde Nueva York a California, así como en partes del estado de Washington, Missouri, Idaho y Arizona. La compañía CenturyLink aseguró que el apagón no se debe a un ataque cibernético.



TECNOLOGÍA

¿Qué hubo detrás del cambio en Instagram que hizo que por una hora sus usuarios entraran en pánico?

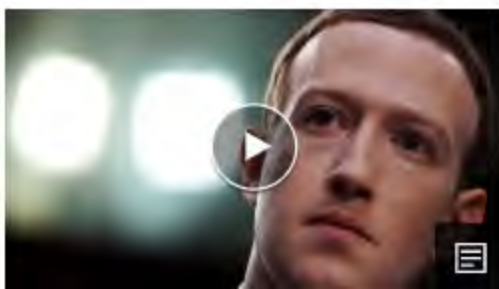
Cuando en la mañana de este jueves los millones de usuario de esta red social la abrieron en sus teléfonos se dieron cuenta de que algo fundamental había cambiado. Los voceros de la red social explicaron que se trató de un error, una prueba que se salió de las manos.



TECNOLOGÍA

A 30 pies bajo la superficie de Los Ángeles: Elon Musk muestra su prototipo de túnel futurista

El director ejecutivo de Tesla mostró a periodistas su proyecto de transporte subterráneo en un recorrido de 1.14 millas, a bordo de un vehículo eléctrico. Su sueño es desarrollar una red de túneles que ayuden a descongestionar el tráfico automotor de las grandes ciudades.



TECNOLOGÍA

Facebook dice que un virus permitió a apps acceder a las fotos de al menos 6.8 millones de usuarios de la red social

El problema ocurrió entre el 13 y el 25 de septiembre. En un comunicado, Facebook aseguró que el problema está resuelto, pero que trabajan junto a los

PUBLICIDAD

¿Compró una computadora portátil, un aparato eléctrico inalámbrico, una videocámara u otros artículos desde el año 2000?



Podría recibir dinero de un acuerdo conciliatorio antimonopolio de baterías de iones de litio por \$113 millones.



ReverseTheCharge.com



EL NACIONAL

05 ABRIL 2019 12:32H



POLÍTICA

ECONOMÍA

SUCESOS

MUNDO

DEPORTES

ENTRETENIMIENTO

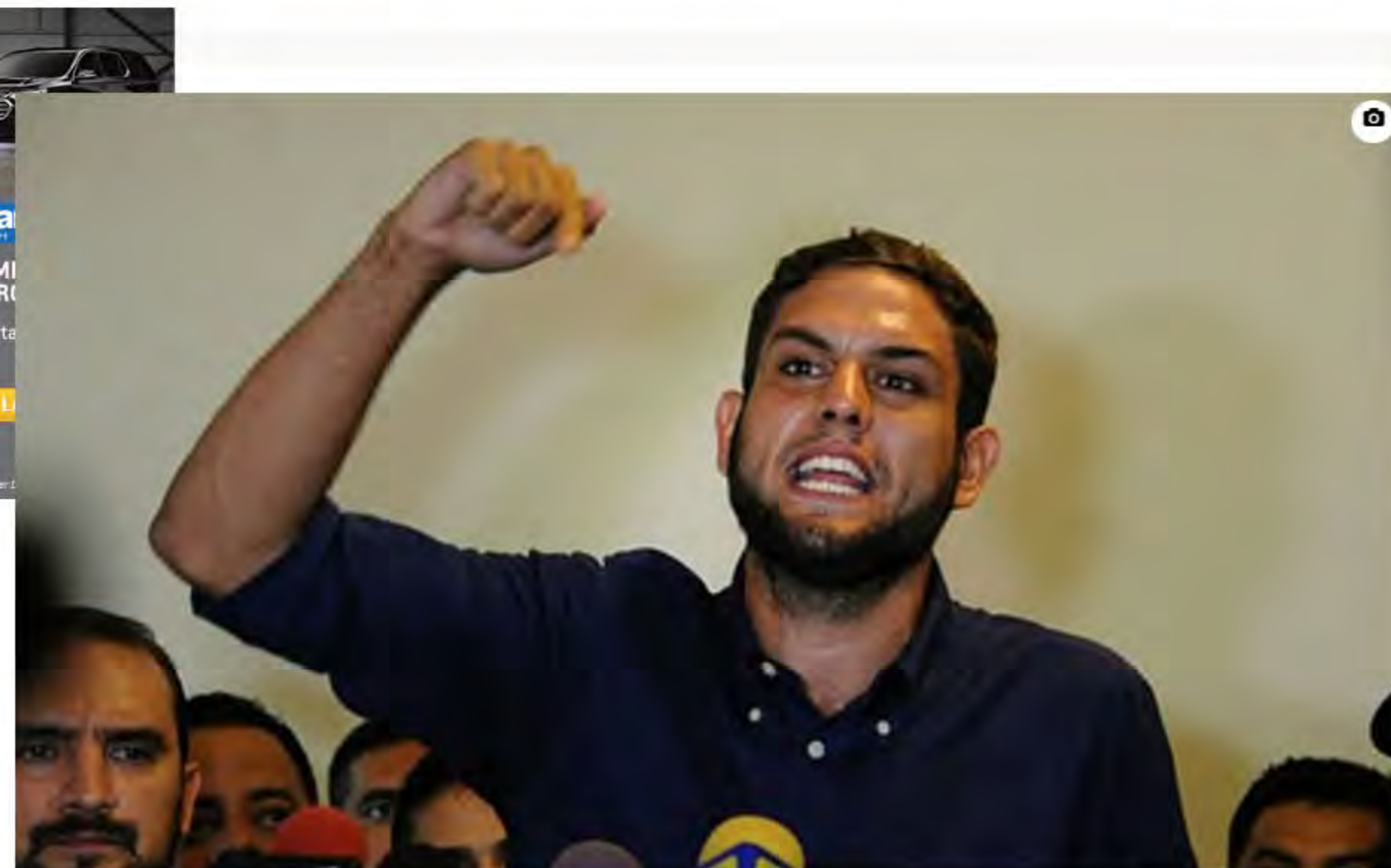
OPINIÓN

SOCIEDAD

DIÁSPORA

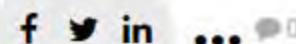
REPORTE YA

MULTIMEDIA



Trasladaron a Juan Requesens al tribunal para audiencia preliminar

El abogado del parlamentario informó en el momento en que salían de la sede del Sebin en El Helicoide



¿Compró una computadora portátil, un aparato eléctrico inalámbrico, una videocámara u otros artículos desde el año 2000?

Podría recibir dinero de un acuerdo conciliatorio antimonopolio de baterías de iones de litio por \$113 millones.

ReverseTheCharge.com

ÚLTIMO MINUTO



12:22

EE UU revocó visado de la fiscal jefe c Penal Internacional



12:20

Fundanca: 100 niños murieron en Ca pio meses por crisis de salud





¿Compró una computadora portátil, un aparato eléctrico inalámbrico, una videocámara u otros artículos desde el año 2000?

Podría recibir dinero de un acuerdo conciliatorio antimonopolio de baterías de iones de litio por \$113 millones.

	LALIGA 123	PREMIER LEAGUE	BUNDESLIGA	LIGUE 1	LIGA PC Ver todo >
Resultados:	15:00 GoIT	15:00 Movistar Liga De Ca...	14:30 Movistar Liga De Ca...	14:45 #Vamos	15:30
Todos	Tenerife - Sporting -	Southampton - Liverpool -	Mainz 05 - Friburgo -	Girondins Bur... - O. Marsella -	Oporto - Boavista -
	1:2.3 -X:3 -2:3.3 APOSTAR	1:9 -X:5.25 -2:1.35 APOSTAR	1:2.15 -X:3.55 -2:3. APOSTAR	1:3.6 -X:3.3 -2:2.15 APOSTAR	1:1.166 -X:6.5 -2:1.9 AF



49



REAL MADRID

El United se abre a negociar por Pogba para 'pescar' en el Madrid

JOSÉ FÉLIX DÍAZ

251



REAL MADRID

Zidane: "No tengo decidido quién quiero que se vaya"

MIGUEL ÁNGEL LARA MADRID

139



TENIS

La dura crítica de Federer contra las camisetas modernas de Nike

75



Vota y opina

El ranking definitivo de los 25 mejores jugadores del mundo: sólo un madridista en el top 10



No entiende que el Bayern pague 80 millones

"Me duele el estómago con el traspaso de Lucas Hernández"



¿Compró una computadora portátil, un aparato eléctrico inalámbrico, una videocámara u otros artículos desde el año 2000?



Podría recibir dinero de un acuerdo conciliatorio antimonopolio de baterías de iones de litio por \$113 millones.



ReverseTheCharge.com

Publicidad



Tecnología » Clix | Ciencia y Espacio | Guía de regalos



Tecnología

Síguenos



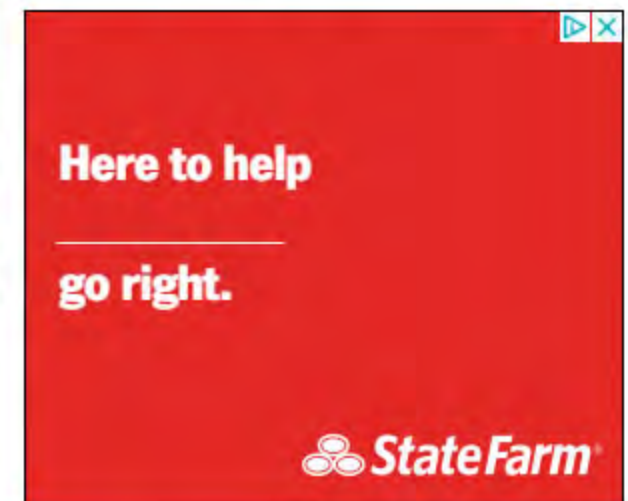
MÉXICO

Mundial de robótica: 76 equipos de México

En pocos días comienza en Estados Unidos el concurso mundial de robótica FIRST (por sus siglas en inglés: For Inspiration and Recognition of Science and Technology) que este año reunirá a más de 3.700 equipos de 33 países. México ha celebrado tres concursos eliminatorios en diferentes ciudades del país, y 76 equipos mexicanos participarán. Los alumnos del Tecnológico de Monterrey obtuvieron la mitad de los pases.



Video destacado La discriminación virtual aumentó 1.000% en Argentina



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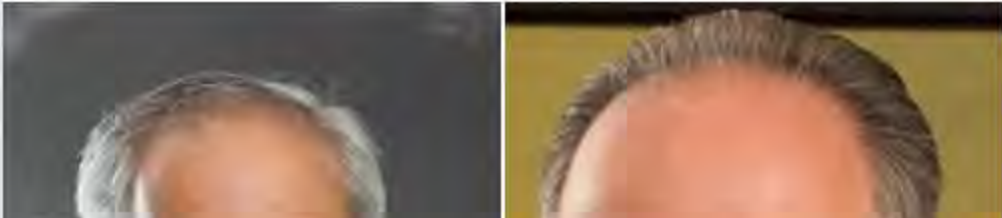
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<https://www.morithhock.com/.../04/Construction-Alert-April-1....>

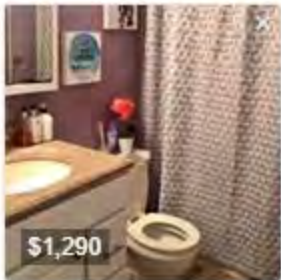


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Smithtown Toyota

Published by Michael Lee [?] · April 1 at 1:54 PM ·

another happy customer. John and Mike D at your service.



Get More Likes, Comments and Shares

Boost this post for \$30 to reach up to 19,000 people.

444

78

People Reached

Engagements

Boost Post

Terry Spirito, Kim Berdan and 7 others

1 Comment 2 Shares

Like

Comment

Share

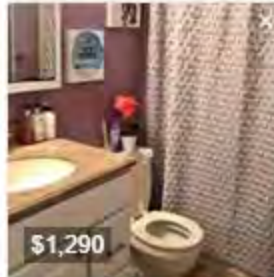
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Did you purchase any of these before 2011?

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Consumers who purchased a laptop, power tool, camcorder or other items may be included.

Neuro Alert

16 hrs ·

Neuro Alert is proud of Ryan Conant, CNIM. Ryan volunteered with the Butterfly Foundation on their recent mission to the Dominican Republic on February 11-15. "The experience was incredibly rewarding that I was able to use my talent by positively impacting children's futures who would otherwise not be able to receive this kind of treatment. I am very blessed that Neuro Alert recognized how important giving back is, and that they sponsored me for this trip."

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Consumers who purchased a laptop, power tool,
camcorder or other items may be included.



Did you purchase any of these before 2011?

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Attachment 5

Keywords (will target plural and singular)

Reverse the charge
Lithium Ion Cylindrical Battery
Lithium Battery
Ion Battery
Replacement Battery
Replacement Lithium ION Battery
Battery Settlement
Lithium Settlement
Ion Settlement
Indirect purchaser
Lithium class member
Battery class member
Payout from battery settlement
Average price Lithium battery
Average price Ion battery
Overpaid for batteries
Overpaid for Lithium batteries
Overpaid for Ion batteries
Battery Powered Tools
Portable computer
Laptop PC
Notebook PC
Netbook computer
Camcorder
Mobile phone
Smart phone
Tablet
Digital audio player
Camera
Cordless power tools
Lithium Ion powered product
Battery manufacturers
Samsung SDI Co., Ltd.
Samsung SDI America
TOKIN Corporation
Toshiba Corporation
Panasonic Corporation
LG Chem, Ltd.
LG Chem America, Inc.

Attachment 6



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Legal Notice | Lithium Ion Battery Settlement | reversethecharge.com

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Consumers who purchased a laptop, power tool, camcorder or other items may be included. Make A Claim.

Reverse The Charge | Lithium Ion Batteries Antitrust Litigation

<https://www.reversethecharge.com/> ▼

... buy a laptop, cordless power tool, camcorder, and/or other items since 2000? You could get money from a \$64.45 million lithium-ion **battery** antitrust **settlement**.

FAQs

Frequently Asked Questions on
Reverse The Charge.

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You Probably Qualify for This \$45M Lithium-Ion Battery Settlement

<https://www.thepennyhoarder.com/deals/...settlements/lithium-ion-battery-settlement/> ▼

Have you ever bought an electronic device containing a lithium-ion **battery**? ... This class-action lawsuit alleges that several **battery** manufacturers fixed their cylindrical lithium-ion **battery** cells' prices. "Individuals and businesses may have paid more for certain products which ...

Skin Brush Battery Settlement Website

www.skinbrushbatterysettlement.com/ ▼

This Notice explains the lawsuit, the **Settlement**, and your legal rights. The **Settlement** would extend the original manufacturer's warranty coverage for **Battery**.



reverse the charge

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Lithium Ion Battery Settlement | \$113 Million For Distribution

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Consumers who purchased a laptop, power tool, camcorder or other items could be eligible. Make A Claim.

Reverse The Charge | Lithium Ion Batteries Antitrust Litigation

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Did you buy a laptop, cordless power tool, camcorder, and/or other items since 2000?

You could get money from a \$64.45 million lithium-ion battery antitrust ...

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How much will my payment be?

How much will my payment be? on Reverse The Charge | This ...

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Claim Form on Reverse The Charge.

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★ ★ ★ ☆ ☆ Rating: 2.7 - 14 votes

Attachment 7

If You Bought Electronics Such as a Portable Computer, Power Tool, Camcorder and/or Other Items Containing a Lithium Ion Cylindrical Battery Since 2000 You Could Get Money From More Than \$113 Million in Settlements

English ▼

NEWS PROVIDED BY

Hagens Berman Sobol Shapiro LLP →

Apr 03, 2019, 09:00 ET

OAKLAND, Calif., April 3, 2019 /PRNewswire/ -- The following statement is being issued by Hagens Berman Sobol Shapiro LLP regarding *In re Lithium ION Batteries Antitrust Litigation*.

Samsung SDI Co., Ltd. and Samsung SDI America, Inc. ("SDI"); TOKIN Corporation ("TOKIN"); Toshiba Corporation ("Toshiba"); and Panasonic Corporation, Panasonic Corporation of North America, SANYO Electric Co., Ltd., and SANYO North America Corporation ("Panasonic") (together, the "Settling Defendants") have agreed to settlements resolving claims that they allegedly fixed the price of cylindrical Lithium-Ion Batteries. This may have caused individuals and businesses to pay more for products that contained Lithium-Ion Cylindrical Batteries. Including previously Court-approved settlements with LG Chem, Ltd. and LG Chem America, Inc. ("LG Chem"); Hitachi Maxell Ltd. and Maxell Corporation of America ("Hitachi Maxell"); NEC Corporation ("NEC"); and Sony Corporation, Sony Energy Devices Corporation, and Sony Electronics Inc. ("Sony"), the settlements with all Lithium-Ion Battery manufacturers now total over \$113 million.

Additional information about the settlements is available at www.reversecharge.com or by calling 1-855-730-8645.

Am I Included?

You may be included in the Class if, as a resident of the United States and during the period from January 1, 2000 through May 31, 2011, you purchased new, for your own use and not for resale, one of the following products: (i) laptop PC, notebook PC or netbook computer; (ii) mobile phone, smart phone, tablet, digital audio player or camera; (iii) camcorder; (iv) power tool; or (v) replacement battery for any of these products. The product must have been purchased from someone other than the Lithium-Ion Battery manufacturer, such as a retail store.

How can I get a payment and how much will I receive?

Money from all settlements in this case will be distributed together on a per-Class Member basis, but the amount you receive from each settlement will depend on a Court-approved plan of allocation.

SDI, TOKIN, Toshiba, and Panasonic Settlements: The claim form will allow Class Members to state the number of devices they purchased that are subject to the settlement. Every Class Member who files a valid claim will receive money based on the number of qualifying devices purchased and the Class Member's state of residence. The amount available for distribution will be affected by any awards made by the Court against the funds for attorneys' fees, reimbursement of costs, or service awards for the Class representatives. How much each Class Member receives will also depend on the number of claims made and a balancing of the cost of distribution with the amount to be distributed to each Class Member.

Any remaining balance after the Settlement Funds are distributed will be redistributed to Class Members or, if redistribution is too costly compared with the amount of the remaining balance, such funds will escheat to federal or state governments.

Case 4:13-md-02420-YGR Document 2501-9 Filed 06/11/19 Page 77 of 84
LG Chem, Hitachi Maxell, NEC, and Sony Settlements: Notice was provided about settlements reached with LG Chem, Hitachi Maxell, and NEC for \$44.95 million, and with Sony for \$19.5 million. If you already made a claim on these settlements you do not need to make a new claim on the SDI, TOKIN, Toshiba, and Panasonic settlements. Your old claim will be automatically applied to the new settlements. If you have not yet made a claim on these settlements, you may do so now via the same process. These settlements do not differentiate between people who live in different states. Everyone who submits a valid claim will receive the same amount per device.

Although the Court granted final approval to settlements with LG Chem, Hitachi Maxell, NEC, and Sony, approval of the settlements is currently being appealed, and claims cannot be paid until the appeals are resolved. If there is any balance remaining following distribution of the funds in those settlements to Class Members and money is not able to be reasonably redistributed to Class Members, remaining funds will escheat to federal or state governments.

In both settlements, no money will return to the Settling Defendants once the Court finally approves the settlements. To make a claim and receive payment, you need to file a valid claim form online or by mail by July 19, 2019. **The simple claim form only takes 3-5 minutes for most individuals to complete.** Claims may be submitted online at www.reversethecharge.com or by mail to Lithium Batteries Indirect Purchaser Settlements, c/o Epiq, P.O. Box 10194, Dublin, OH 43017-3194. The same products are not covered by all of the settlements, so filling out the claim form as accurately and completely as possible helps ensure that you receive your correct share of the settlements.

What are my rights?

Even if you do nothing, you will be bound by the Court's decisions concerning these settlements. To keep your rights to sue the Settling Defendants regarding Lithium Ion Batteries, you must exclude yourself from the Class in writing by May 28, 2019. If you stay in the Class, you may object to the settlements with Settling Defendants in writing by May 28, 2019. The settlements, along with details on how to exclude yourself from or object to settlements with Settling Defendants, are available at www.reversethecharge.com.

The Court will hold a Final Fairness Hearing at 2:00 p.m. on July 16, 2019, at the United States Courthouse, 1301 Clay Street, Courtroom 1, 4th Floor, Oakland, CA 94612, to consider whether to approve the settlements. Class Counsel will also request at the hearing attorneys' fees of up to 30% plus interest of the total settlement funds (inclusive of all settlements to date), plus reimbursement of costs and expenses, for investigating the facts, litigating the case, and negotiating the settlements. Class Counsel also will request service awards for Class representatives, in the amount of \$10,000 for each individual Class representative and \$25,000 for each governmental entity Class representative, for the work they have undertaken on behalf of the Class. You or your own attorney may appear and speak at the hearing to comment on the settlements with Settling Defendants and/or on any request for attorneys' fees, service awards for Class representatives, or reimbursement of costs and expenses at your own expense, but you are not required to appear. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check the website for additional information. Please do not contact the Court about this case.

Source: United States District Court for the Northern District of California

SOURCE Hagens Berman Sobol Shapiro LLP

Si usted compró electrónica, por ejemplo, una computadora portátil, una herramienta eléctrica, una cámara de video y/o cualquier otro artículo que contenga una batería cilíndrica de iones de litio desde el año 2000, podría recibir dinero de más de US\$ 113 millones en acuerdos

USA - español ▼

NEWS PROVIDED BY

Hagens Berman Sobol Shapiro LLP →

Apr 03, 2019, 09:00 ET

OAKLAND, California, 3 de abril de 2019 /PRNewswire-HISPANIC PR WIRE/ -- Hagens Berman Sobol Shapiro LLP da a conocer la siguiente declaración en relación con la demanda *In re Lithium ION Batteries Antitrust Litigation*.

Samsung SDI Co., Ltd. y Samsung SDI America, Inc. ("SDI"); TOKIN Corporation ("TOKIN"); Toshiba Corporation ("Toshiba"); y Panasonic Corporation, Panasonic Corporation of North America, SANYO Electric Co., Ltd. y SANYO North America Corporation ("Panasonic") (colectivamente, los "demandados en conciliación"), han aceptado acuerdos que resuelven afirmaciones según las cuales presuntamente fijaron el precio de baterías cilíndricas de iones de litio. Esto puede haber hecho que las personas y empresas pagaran más por productos que contenían baterías cilíndricas de iones de litio. Los acuerdos con todos los fabricantes de baterías de iones de litio totalizan ahora más de US\$ 113 millones, incluidos los acuerdos previamente aprobados por el

Tribunal con LG Chem, Ltd. y LG Chem America, Inc. ("LG Chem"); Hitachi Maxell Ltd. y Maxell Corporation of America ("Hitachi Maxell"); NEC Corporation ("NEC"); y Sony Corporation, Sony Energy Devices Corporation y Sony Electronics Inc. ("Sony").

Hay información adicional acerca de los acuerdos disponible en www.reversethecharge.com.

¿Estoy incluido?

Usted puede estar incluido en la Clase si, como residente en los Estados Unidos y durante el período comprendido entre el 1 de enero de 2000 y el 31 de mayo de 2011, usted compró uno de los siguientes productos nuevos para uso personal y no para reventa: (i) PC portátil tipo "laptop", PC portátil tipo "notebook" o "netbook"; (ii) teléfono móvil, teléfono inteligente, tableta, reproductor de audio o cámara digital; (iii) cámara de video; (iv) herramienta eléctrica; o (v) batería de reemplazo para cualquiera de estos productos. El producto debe haber sido comprado a cualquiera que no sea fabricante de baterías de iones de litio, por ejemplo, una tienda minorista.

¿Cómo puedo recibir un pago y cuánto recibiré?

El dinero de todos los acuerdos de este caso se distribuirá simultáneamente a cada miembro de la Clase, pero el monto que usted reciba de cada acuerdo dependerá de un plan de adjudicación aprobado por el Tribunal.

Acuerdos con SDI, TOKIN, Toshiba y Panasonic: El formulario de reclamación permitirá a los miembros de la Clase declarar el número de dispositivos sujetos al acuerdo que compraron. Cada miembro de la Clase que presente una reclamación válida recibirá dinero basándose en la cantidad de dispositivos admitidos comprados y el estado de residencia del miembro de la Clase. El monto disponible para distribución se verá afectado por cualquier compensación hecha por el Tribunal sobre los fondos para honorarios de abogados, reembolso de gastos o compensaciones por servicios para los representantes de la Clase. El monto que recibirá cada miembro de la Clase dependerá también de la cantidad de reclamaciones hechas y de un balanceo del costo de distribución con el monto a distribuir entre los miembros de la Clase.

Todo saldo restante después de la distribución de los Fondos de los Acuerdos se redistribuirá entre los miembros de la Clase o, si la redistribución es demasiado costosa en relación con el monto total del saldo restante, dichos fondos se confiscarán para el gobierno federal o estatal.

Acuerdos con LG Chem, Hitachi Maxell, NEC y Sony: Se notificó sobre acuerdos alcanzados con LG Chem, Hitachi Maxell y NEC por US\$ 44.95 millones, y con Sony por US\$ 19.5 millones. Si usted ya presentó una reclamación sobre estos acuerdos, no necesita hacer una nueva reclamación sobre los acuerdos con SDI, TOKIN, Toshiba y Panasonic. Su reclamación anterior se aplicará de manera automática a los nuevos acuerdos. Si usted no ha presentado aún una reclamación sobre estos acuerdos, puede hacerlo ahora mediante el mismo proceso. Estos acuerdos no hacen diferencias entre personas que viven en diferentes estados. Toda persona que presente una reclamación válida recibirá el mismo monto por dispositivo.

Aunque el Tribunal otorgó la aprobación final a acuerdos con LG Chem, Hitachi Maxell, NEC y Sony, la aprobación de los acuerdos está actualmente en apelación y las reclamaciones no pueden pagarse hasta que las apelaciones se resuelvan. Si queda algún saldo restante después de la distribución de los fondos de esos acuerdos entre los miembros de la Clase y el dinero no puede redistribuirse de manera razonable entre dichos miembros de la Clase, los fondos remanentes se confiscarán para el gobierno federal o estatal.

En ambos acuerdos, no se devolverá dinero a los demandados en conciliación una vez que el Tribunal apruebe finalmente los acuerdos. Para hacer una reclamación y recibir un pago, usted debe presentar un formulario de reclamación válido en línea o por correo electrónico a más tardar el 19 de julio de 2019. **Completar el formulario de reclamación simple solo requiere entre 3 y 5 minutos para la mayoría de las personas.** Las reclamaciones pueden presentarse en Internet en www.reversethecharge.com o por correo electrónico a Lithium Batteries Indirect Purchaser Settlements, c/o Epiq, P.O. Box 10194, Dublin, OH 43017-3194. Los mismos productos no están cubiertos por la totalidad de los acuerdos, de modo que completar el formulario de reclamación de la manera más exacta y completa posible ayudará a asegurar que usted reciba la parte correcta que le corresponde.

¿Cuáles son mis derechos?

Aunque usted no haga nada, estará sujeto a las decisiones del Tribunal respecto de estos acuerdos. Para conservar su derecho a litigar contra los demandados en conciliación en relación con las baterías de iones de litio, usted deberá excluirse de la Clase por escrito a más tardar el 28 de mayo de 2019. Si permanece en la Clase, puede objetar los acuerdos con los demandados en conciliación por escrito a más tardar el 28 de mayo de 2019. Los acuerdos, junto con detalles sobre cómo excluirse u objetar los acuerdos con los demandados en conciliación, están disponibles en www.reversethecharge.com.

Para considerar si aprueba los acuerdos, el Tribunal celebrará una Audiencia de Equidad Definitiva el 16 de julio de 2019 a las 2:00 p.m. en el United States Courthouse (Palacio de Justicia de los Estados Unidos), 1301 Clay Street, sala 1, 4o. piso, Oakland, CA 94612. El abogado de la Clase solicitará también en la audiencia honorarios legales de hasta el 30% más intereses de los fondos totales de los acuerdos (incluidos todos los acuerdos hasta la fecha), más el reembolso de costos y gastos, por la investigación de los hechos, el litigio y la negociación de los acuerdos. El abogado de la Clase solicitará también compensaciones por servicios para los representantes de la Clase, en la cantidad de US\$ 10,000 por cada representante individual de la Clase y US\$ 25,000 por cada representante de la Clase de entidad gubernamental, por el trabajo realizado en representación de la Clase. Usted o su abogado pueden presentarse y hablar en la audiencia para hacer observaciones sobre los acuerdos con los demandados en conciliación y/o sobre cualquier solicitud de honorarios de abogados, compensaciones por servicios para los representantes de la Clase o reembolso de gastos y costos por su propia cuenta, pero su presentación no es obligatoria. La fecha o la hora de la audiencia pueden modificarse sin notificación adicional, de manera que es conveniente consultar el sitio web para más información. Por favor no se comunique con el Tribunal en relación con este caso.

Fuente: United States District Court for the Northern District of California

FUENTE Hagens Berman Sobol Shapiro LLP

SOURCE Hagens Berman Sobol Shapiro LLP

Attachment 8

Exclusion Report

Epiq Id	Name	City	State
92	KAREN BELSKY	ALAMO	CA
141	JAMES CLAYBURN	FOLSOM	CA
93	DELL INC	ATLANTA	GA
101	CHRIS GILES	CHANDLER	AZ
143	HOME DEPOT USA INC	ATLANTA	GA
97	MELANESE JEAN PAYNE	MAGNOLIA	TX
96	NIGEL DAVID PAYNE	MAGNOLIA	TX
99	MELISSA SMIDT	ROCHESTER	MN
98	ROMAN SMIRNOV	LA JOLLA	CA
100	JOSUE VILLESICA	KATY	TX