

If you purchased Dynamic Random Access Memory (“DRAM”) or products containing DRAM between April 1, 1999 and June 30, 2002, your rights could be affected by the proposed class action settlements.

The Class Actions

Plaintiffs claim that Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung Electronics America, Inc and Samsung Electronics Canada Inc. (“Samsung”) and Hynix Semiconductor Inc, Hynix Semiconductor America Inc. and Hynix Semiconductor Manufacturing America, Inc. (“Hynix”) and numerous other DRAM manufacturers and distributors conspired to fix the prices for DRAM or products which contain DRAM in Canada. DRAM is a type of memory commonly used in computers and communication devices.

The Samsung and Hynix Settlements

Although Samsung and Hynix deny liability, they have each reached a settlement with the plaintiffs, subject to approval of the courts in British Columbia, Ontario and Québec. Samsung will pay \$22,600,000 and Hynix will pay \$15,600,000 for the benefit of the settlement class members and they will each provide cooperation that will assist with prosecuting the ongoing actions against the non-settling defendants in exchange for a full release of claims against them and their related entities.

Certification/Authorization as Class Proceedings for Settlement Purposes

The courts in British Columbia, Ontario and Québec have certified/authorized the class actions as class proceedings against Samsung and Hynix for settlement purposes only.

Settlement Class Members

Residents of Canada or the United States at the time of purchase and/or at the time of notice who purchased DRAM or products which contained DRAM in Canada between April 1, 1999 and June 30, 2002 are settlement class members, unless you are a defendant or related party, previously excluded yourself from the class actions prior to June 2, 2012 or settled or extinguished your claims in the U.S. Settlements or U.S. Litigation.

Opting Out of the Class Actions

The deadline for opting out of or excluding oneself from the DRAM class actions has passed.

Settlement Approval Hearings

Hearings to consider approval of the Samsung and Hynix settlements will be heard by the British Columbia Court in the City of Vancouver on **June 27, 2013** at 9:00 a.m., the Ontario Court in the City of Toronto on **July 16, 2013** at 9:30 a.m., and the Québec Court in the city of Montreal on **June 25, 2013** at 2:00 p.m. in room 2.08. Settlement class members will be bound by the terms of the Samsung and Hynix settlement agreements, if approved by the courts.

If you wish to comment on or object to the Samsung or Hynix settlements, you must do so in writing before **June 21, 2013**.

Distribution of Settlement Funds

The settlement funds will be held in trust for the benefit of the settlement class members at this time. The Plaintiffs and Class Counsel are currently developing a method for distributing the settlement funds to settlement class members. The courts will be asked to approve the distribution and claims process at a later time on notice to the settlement class members. Settlement class members should retain all proofs of DRAM products purchased and monitor the websites below.

FOR INFORMATION on the settlements, the approval hearings or on how to comment on or object to the settlements go to:

English: www.cfmlawyers.ca/dram

Français: www.recourscollectif.info/fr/dossiers/dram

Email: dram@cfmlawyers.ca

Call: 1-800-689-2322

Settlement class members should monitor the above websites for updated information on the class actions and the future claims process.

Inquiries should not be directed to the court.

