

**NOTICE OF CERTIFICATION/AUTHORIZATION AND SETTLEMENT APPROVAL
HEARINGS REGARDING A SETTLEMENT AGREEMENT WITH SAMSUNG
IN THE MATTER OF SRAM (STATIC RANDOM ACCESS MEMORY) CLASS
ACTION LITIGATION**

READ THIS NOTICE CAREFULLY. IT MAY AFFECT YOUR LEGAL RIGHTS.

TO: All persons in Canada who purchased Static Random Access Memory (“SRAM”) or products containing SRAM, between January 1, 1998 through December 31, 2005, except for the defendants or parties related to a defendant (“Settlement Class”).

NATURE OF LAWSUITS

SRAM is a type of memory commonly used in computers, mobile phones and other hand held communication devices.

Class action proceedings were commenced in Ontario (Court File No. CV-08-0035836800CP, London), British Columbia (Court File No. S-070350, Vancouver Registry), and Quebec (Court File No. 200-06-000083-074, District of Quebec) alleging that the defendants, conspired to fix prices in the market for SRAM or products which contained SRAM in Canada (collectively the "SRAM Proceedings").

The plaintiffs on behalf of themselves and the classes are claiming damages from the defendants for unlawfully conspiring to fix, maintain or increase the price of SRAM. The defendants include: Samsung Electronics Co. Ltd., Samsung Semiconductor, Inc., Samsung Electronics Canada Inc., Hynix Semiconductor, Inc., Hynix Semiconductor America, Inc., Micron Technology, Inc., Micron Semiconductor Canada, Micron Semiconductor Products, Inc., Cypress Semiconductor Corporation, Cypress Semiconductor, Inc., Etron Technology America, Inc., Mitsubishi Electric Corporation, Mitsubishi Electric Sales Canada Inc., Mitsubishi

Electric & Electronics USA, Inc., Renesas Electronics Corporation *fka* Renesas Technology Corporation, Renesas Electronics Canada Limited *fka* Renesas Technology Canada Limited, Renesas Electronics America Inc. *fka* Renesas Technology America, Inc., NEC Corporation, NEC Electronics America, Inc., Toshiba Corporation, Toshiba Du Canada Ltée., Toshiba of Canada Limited, Toshiba America Corporation and Toshiba America Electronic Components, Inc.

In the fall of 2012, the British Columbia, Ontario and Quebec courts certified or authorized the SRAM Proceedings for settlement purposes only against the defendants Micron Semiconductor Canada and Micron Semiconductor Products, Inc. (“Micron”). In February 2013, the courts approved the settlement agreement of \$300,000 CDN between the plaintiffs and Micron in the SRAM Proceedings.

SAMSUNG SETTLEMENT

A settlement has now been reached in the SRAM Proceedings with Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., and Samsung Electronics Canada Inc. (“Samsung”), subject to approval by the three courts. Pursuant to the settlement, Samsung has agreed to pay \$1,500,000 CDN and to provide cooperation to the plaintiffs in pursuing the SRAM Proceedings against the remaining defendants in exchange for a full release of claims against it and its related entities relating to the pricing of SRAM or products containing SRAM. The settlement represents a resolution of disputed claims. Samsung does not admit any wrongdoing or liability.

In order to implement the Samsung settlement, the courts in Ontario, British Columbia and Quebec have certified/authorized the SRAM Proceedings as against Samsung for the purposes of settlement only. The Samsung settlement will only become effective if it is approved by the

three courts. If it is not approved, the certification/authorization will be revoked. The litigation is continuing against the remaining defendants. The courts have not taken any position as to the merits of the claims or defences asserted by either side.

SAMSUNG SETTLEMENT APPROVAL HEARINGS

Motions to approve the Samsung settlement will be heard by the Ontario Court in the City of Toronto on November 27, 2013 at 10:00 a.m., the British Columbia Court in the City of Vancouver on November 4, 2013 at 9:00 a.m., and the Quebec Court in Quebec City on October 16, 2013 at 9:30 a.m. At these settlement approval hearings, the Ontario, British Columbia and Quebec courts will determine whether the Samsung settlement is fair, reasonable, and in the best interests of the Settlement Class and the amount to be paid to class counsel for fees and disbursements. Class counsel will collectively request that legal fees of 25% of the Samsung settlement funds and 25% of the earlier Micron settlement funds, plus disbursements and applicable taxes be approved by the courts and paid out of the Samsung settlement funds and the Micron settlement funds.

SETTLEMENT CLASS MEMBERS

You are a member of the Settlement Class if you are a resident of Canada who bought SRAM or products containing SRAM during the period January 1, 1998 through December 31, 2005 unless you are a defendant or a party related to a defendant. The deadline for opting out of the SRAM Class Proceedings (or excluding oneself) has passed. No one opted out of the Settlement Class. Settlement Class members are bound by the terms of the Samsung settlement agreement (if approved by the courts).

Members of the Settlement Class who do not oppose the proposed settlement need not appear at the settlement approval hearings or take any other action at this time.

OBJECTING TO THE SAMSUNG SETTLEMENT

Members of the Settlement Class are entitled to file written submissions and/or appear and comment on or object to the Samsung settlement at the appropriate settlement approval hearing. Settlement Class members who wish to comment on or object to the Samsung settlement or to the fees being sought by class counsel, you must submit a written submission by mail or email to the appropriate class counsel at the address listed below postmarked no later than October 7, 2013. The written submission must state the nature of any comments or objections, and whether the Settlement Class Member intends to appear at the appropriate settlement approval hearing. Class counsel will forward all such submissions to the appropriate court. All timely written submissions will be considered by the appropriate court. If you do not submit a written submission by the relevant deadline, you might not be entitled to participate, through oral submissions or otherwise, in the settlement approval hearings.

DISTRIBUTION OF SETTLEMENT FUNDS

The settlement funds, less any fees, disbursement and applicable taxes, as approved by the courts, will be held in trust for the benefit of the Settlement Class members at this time. The courts will be asked to approve a distribution and claims process at a later time.

Members of the Settlement Class may be required to submit a claim in a future claims process, so you should retain all records of your SRAM purchases during the period January 1, 1998 through December 31, 2005 and monitor the website www.cfmlawyers.com.

CLASS COUNSEL

The law firm of Camp Fiorante Matthews Mogerman which represents the Settlement Class in British Columbia can be reached at:

Telephone: 604-689-7555

Email: SRAMSettlement@cfmlawyers.ca

Mail: #400 - 856 Homer Street, Vancouver, BC V6B 2W5 Attention: J.J. Camp

The law firm of Siskinds Desmeules s.e.n.c.r.l. which represents the Settlement Class of individuals and corporations of 50 or less employees in Quebec can be reached at:

Telephone: 418-694-2009

Email: simon.hebert@siskindsdesmeules.com

Mail: Les promenades du Vieux-Quebec, 43 rue De Buade, bureau 320, Quebec City, QC G1R 4A2 Attention: Me Simon Hebert.

The law firms of Sutts, Strosberg LLP and Siskinds LLP which represent the Settlement Class in all provinces other than British Columbia or Quebec, as well as corporations of more than 50 employees in Quebec can be reached as follows:

Sutts, Strosberg LLP:

Telephone (toll free): 1-800-229-5323 ext. 8296

Email: hpeterson@strosbergco.com

Mail: 600-251 Goyeau Street, Windsor, ON N9A 6V4 Attention:
Heather Rumble Peterson

ADDITIONAL INFORMATION

This notice contains only a summary of the Samsung settlement. Members of the Settlement Class are encouraged to review the complete Samsung settlement agreement, which is available

online at www.cfmlawyers.ca. If you have questions that are not answered online at www.cfmlawyers.ca, please contact class counsel. **INQUIRIES SHOULD NOT BE DIRECTED TO THE COURTS.**

Updates and copies of important court filings will be posted online at www.cfmlawyers.ca.

INTERPRETATION

This notice contains a summary of some of the terms of the Samsung settlement agreement. If there is a conflict between the provisions of this notice and the Samsung settlement agreement and/or the certification/authorization orders, the terms of the Samsung settlement agreement and/or the orders shall prevail.

This notice has been approved by the Ontario, British Columbia and Quebec courts.