

**NOTICE OF CERTIFICATION FOR SETTLEMENT PURPOSES
AND SETTLEMENT APPROVAL HEARING
IN THE CANADIAN AUTO PARTS PRICE-FIXING CLASS ACTIONS**

**If you bought or leased a new or used vehicle, or certain automotive parts, since
January 1, 1999, you should read this notice carefully.
It may affect your legal rights.**

A. What is a class action?

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

B. WHAT ARE THESE CLASS ACTIONS ABOUT?

Class actions have been started in Canada which claim that many companies participated in conspiracies to fix the prices of automotive parts sold in Canada.

This notice is about the **Automotive Wire Harness Systems** and **Occupant Safety Systems** price-fixing class actions. An Automotive Wire Harness System is the electrical distribution system in a vehicle. See www.classaction.ca/autoparts/Wire-Harness-Systems for a full definition of an Automotive Wire Harness System and all of its component parts. Occupant Safety Systems include automotive seatbelts, steering wheels, airbags and safety electronic systems which control airbag deployment. All vehicles contain an Automotive Wire Harness System and an Occupant Safety System.

The Automotive Wire Harness Systems and Occupant Safety Systems class actions were started in BC, Ontario and Quebec, but the cases include Canadian residents in all provinces and territories who were affected by the conspiracy. These class actions claim that the companies that sell Automotive Wire Harness Systems and Occupant Safety Systems, and the executives that work at those companies, were involved in a conspiracy to illegally increase the prices of these products. These class actions ask that the Court require these companies to return any extra money that they may have received due to this alleged conspiracy.

C. WHO IS AFFECTED BY THE CLASS ACTIONS?

The class actions are about Automotive Wire Harness Systems and Occupant Safety Systems installed in all vehicles. The class actions are also about all purchased or leased vehicles containing Automotive Wire Harness Systems and new purchased or leased vehicles containing Occupant Safety Systems.

Automotive Wire Harness System Class Action:

You are affected by the Automotive Wire Harness System class action and a "member" of the settlement class if you are a person in Canada who between January 1, 1999 and December 4, 2014:

- purchased or leased a new or used vehicle in Canada;
- purchased a new or used vehicle for import into Canada; or
- purchased an Automotive Wire Harness System (or a component of one) in Canada.

Occupant Safety Systems Class Action:

You are affected by the Occupant Safety Systems class action and a "member" of the settlement class if you are a person in Canada who between January 1, 2003 and December 4, 2014:

- purchased or leased a new vehicle in Canada;
- purchased a new vehicle for import into Canada; or
- purchased an Occupant Safety System (or a component of one) in Canada.

D. WHAT SETTLEMENTS HAVE BEEN REACHED IN THE CLASS ACTIONS?

A settlement is when a defendant agrees to pay money to the members of the class action in exchange for being released from the case.

Settlements have been reached with two sets of defendants:

- Lear Corporation (“Lear”) and Kyungshin-Lear Sales and Engineering, LLC (“K-L Sales”) in the Automotive Wire Harness Systems action; and
- TRW Automotive Holdings Corp., TRW Automotive Inc., and TRW Deutschland Holding GmbH (“TRW”) in the Occupant Safety Systems action.

Lear and K-L Sales have agreed to pay, in total, CDN\$612,500 to members of this class action, in exchange for a full release of claims against them relating to the pricing of Automotive Wire Harness Systems. The Automotive Wire Harness Systems class action has been certified against Lear and K-L Sales for settlement purposes.

TRW has agreed to pay CDN\$850,000 to members of this class action, in exchange for a full release of claims against them relating to the pricing of Occupant Safety Systems. The Occupant Safety Systems class action has been certified against TRW for settlement purposes.

Lear, K-L Sales and TRW have agreed to provide cooperation to the plaintiffs in pursuing the class actions against the remaining defendants in the Automotive Wire Harness Systems and Occupant Safety Systems actions, respectively. Lear, K-L Sales and TRW do not admit any liability, wrongdoing or fault.

The Courts will decide whether to approve these settlements in the Ontario Court in the City of Toronto on March 10, 2015 at 10:00 a.m., the British Columbia Court in the City of Vancouver on March 23, 2015 at 9:00 a.m., and the Quebec Court in the City of Quebec on April 16, 2015 at 9:30 a.m. The Courts will decide whether the settlements are fair, reasonable, and in the best interests of settlement class members.

E. WHAT DO I NEED TO DO?

If you want to be a member of these class actions, you do not need to do anything. However, there are two steps that you should take to protect your legal rights:

1. You should keep records of any purchases or leases of all vehicles or automotive parts for installation in all vehicles from January 1999 onward. With respect to Occupant Safety Systems, you should keep records of any purchases of Occupant Safety Systems (or components of them). Records include invoices, receipts and bank or loan statements.
2. You should register online at www.classaction.ca/autoparts to receive updates about these class actions and the other auto parts price-fixing class actions.

If you want to tell the Court what you think about the proposed settlements or speak to the Court at the hearings listed above, you must send a letter to class counsel at the address listed below, postmarked no later than February 27, 2015.

You may (but do not need to) attend the settlement approval hearings. If you wish to attend the hearings, please contact class counsel for additional details.

F. WHAT HAPPENS TO THE MONEY PAID UNDER THE SETTLEMENTS?

At this stage, the settlement funds (minus approved fees and expenses) will be held in an interest-bearing trust account.

At a later date, the Court will decide how the settlement funds will be distributed and how you can apply to receive money from these settlements. Watch for another notice explaining how to claim money from the settlements.

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

If you do not want to be a member of these class actions, you can exclude yourself from the class action ("opt-out") by sending a signed letter to Class Counsel, with the following information:

- your full name, current address and telephone number;
- if you are writing on behalf of a company, the name of the company and your position at the company;
- a statement saying that you (or the company) want to opt-out of the Automotive Wire Harness Systems class action and/or the Occupant Safety Systems class action.
- your reason for opting out.

Requests to opt-out of the proceedings must be post-marked by February 20, 2015.

If you exclude yourself or opt-out:

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

If you do nothing, and so do not exclude yourself or opt-out:

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

This is your only chance to exclude yourself or opt-out of the Automotive Wire Harness Systems or Occupant Safety Systems class actions.

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

The law firms of Siskinds^{LLP} and Sotos LLP represent members of these class actions in Ontario, and in provinces other than British Columbia or Quebec, as well as corporations of more than 50 employees in Quebec.

Siskinds^{LLP} can be reached at:

Telephone (toll free): 1-800-461-6166 ext. 2446

Email: autoparts@siskinds.com

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

Sotos LLP can be reached at:

Telephone (toll free): 1-888-977-9806

Email: autoparts@sotosllp.com

Mail: 180 Dundas Street West, Suite 1200, Toronto, ON M5G 1Z8 Attention: Jean-Marc Leclerc

The law firm of Camp Fiorante Matthews Mogerman represents members of this class action in British Columbia. British Columbia Class Counsel can be reached at:

Telephone: 1-800-689-2322

Email: aslevin@cfmlawyers.ca

Mail: #400 - 856 Homer Street, Vancouver, BC V6B 2W5 Attention: Sharon Matthews, Q.C.

The law firm of Siskinds Desmeules s.e.n.c.r.l. represents individuals and corporations of 50 or less employees who are members of this class action in Quebec. Quebec Class Counsel can be reached at:

Telephone: 418-694-2009

Email: recours@siskindsdesmeules.com

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

As an individual, you do not have to pay the lawyers working on these class actions any money. The lawyers will be paid from the money collected in these class actions. The Courts will be asked to decide how much the lawyers will be paid.

The lawyers will collectively be asking that the Courts approve legal fees of up to 25% of the Lear, K-L Sales and TRW settlement funds, plus disbursements and applicable taxes. Any approved legal fees will be paid out of the settlement funds. Class counsel reserve the right to ask the Courts to allow Class Counsel to use the settlement funds to pay for any future adverse costs award or future disbursements. At a later date, class counsel will ask the Courts to approve the distribution of the remaining settlement funds.

I. WHERE CAN I ASK MORE QUESTIONS?

For more information, please visit www.classaction.ca/autoparts. If you have questions that are not answered online, please contact Class Counsel at the numbers listed above.

To receive future notices and updates regarding the auto parts class actions and any future settlements, register online at www.classaction.ca/autoparts.

J. INTERPRETATION

This notice contains a summary of some of the terms of the Lear, K-L Sales and TRW settlement agreements. If there is a conflict between the provisions of this notice and the settlement agreements, the terms of the settlement agreements shall prevail.

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