

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION	Master File No. 12-md-02311 Honorable Marianne O. Battani
In Re: CERAMIC SUBSTRATES	2:13-cv-03802-MOB-MKM
THIS DOCUMENT RELATES TO: ALL AUTOMOBILE DEALER ACTIONS	

**PROPOSED / PENDING COURT APPROVAL
DISTRIBUTION/ALLOCATION PLAN
CERAMIC SUBSTRATES SETTLEMENTS**

This distribution / allocation plan (“Allocation Plan”) will be applied to the automobile dealership settlements in the Ceramic Substrates case. The Allocation Plan includes, to the extent practicable, allowances based on *pro rata* distributions and utilizes a “weighted” point system that recognizes instances of alleged coordinated activity. The principles applied here will be applied to settlements benefitting automobile dealerships for other automobile parts cases in this litigation. Each parts case will have its own plan of distribution / allocation.

Settlement Coverage:

The Allocation Plan will allocate the net proceeds of each of the approved Ceramic Substrates Settlements to:

- (1) Dealers who purchased vehicle models that were subject to alleged coordinated activity on bids for component parts;
- (2) Dealers who purchased subsequent vehicle models that were subject to alleged coordinated activity on bids for component parts;
- (3) Dealers who purchased vehicles whose manufacturers experienced multiple instances of alleged coordinated activity on bids for component parts;
- (4) Dealers who purchased other vehicles;
- (5) Dealers who purchased component parts subject to allegedly coordinated activity; and
- (6) A reserve fund for future allocations and distributions to eligible Settlement Class members.

This Allocation Plan is subject to court approval and may be revised or modified with Court approval if new relevant information becomes available. In addition, there may be supplements and additions to the list of vehicles appended hereto, without Court approval.

Payments will take into account, to the extent practicable, the number and type of new vehicles and covered component parts that a dealership purchased during the periods set forth in the Settlement Class definitions. While the make and model of some vehicles subject to the allegedly coordinated activity has been determined by Settlement Class Counsel, all of the data and information regarding affected models and years has not yet been made available to Settlement Class Counsel. As additional model or make information becomes available, the specific vehicles subject to allegedly coordinated activity and their model years will be assigned to a point class. As such, the initial reserve fund in the Ceramic Substrates settlements will be 20% of the total funds to be distributed. The percentage of reserve funds in each of the future settlements may vary. In the event and to the extent that the reserve fund is not needed to cover payments described above, any funds remaining in the reserve fund after future allocations will be paid to eligible dealerships based on their *pro rata* share of the settlement funds and the eligible claims filed.

Only new vehicles purchased are eligible for inclusion. Used and pre-owned vehicles that a dealer has purchased at any time will not be included in the allocation.

Weighted Point Allocations:

Allocations will be determined on a *pro rata* basis using a “weighted” value for each new covered vehicle that dealers purchased during the relevant time periods:

- Each vehicle in a model year as to which there was alleged coordinated activity for a part used in that model will be assigned **100 points**;
- Each vehicle in the subsequent three model years of a vehicle as to which there was alleged coordinated activity for a part used in that model will be assigned **75 points**;
- Each vehicle whose OEM and model was subject to instances of alleged coordinated activity on bids for parts will be assigned **50 points**;
- Each vehicle whose OEM was subject to instances of alleged coordinated activity on bids for parts will be assigned **35 points**;
- Other vehicles not covered by the preceding paragraphs will be assigned **20 points**;
- Ceramic Substrates (parts only) purchased will be assigned **10 points**;
- **Alternatively**, class members may choose to have the Settlement Administrator apply a formula through which the number of replacement Ceramic Substrates (parts only) will be equal to 10% of the total number of covered vehicles that the dealer purchased, and each of those will be allocated **7 points**, in lieu of determining and proving the actual number of Ceramic Substrates purchased. (This percentage will be adjusted and disclosed with each proposed settlement.)

Important Note: Each claimant that submits a valid claim and purchased the vehicles in the states listed in the settlement documents will receive a **minimum payment of \$350**, which will be drawn from the various settlement funds. The maximum payment will depend on the application of the principles of allocation and the total amount of each settlement fund, after expenses.

More details about the anticipated distribution of the settlement funds are available in the papers filed with the Court in support of settlement approval, which are available on the settlement website, www.AutoDealerSettlement.com. In order to receive a payment, you need to file a valid claim. The settlement web site and claim form provide additional details about how to submit your claim. Further information is available at www.AutoDealerSettlement.com or by calling the Settlement Administrator at 1-888-565-3171.

Vehicle Allocation charts follow. The allocation information provided was not compiled or approved by Settling Defendants and is not to be construed as evidence or an admission against any Settling Defendants that they participated in coordinated activities with respect to the listed vehicles and manufacturers.

The following models will be assigned 100 points for each vehicle purchased from the model year listed:

Car Make	Car Model	Model Year
Cadillac	CTS	2005
Chevrolet	Cobalt	2006
Chevrolet	Colorado	2003
Chevrolet	Colorado	2004
Chevrolet	Colorado	2005
Chevrolet	Colorado	2006
Chevrolet	Corvette	2004
Chevrolet	Corvette	2005
Chevrolet	Corvette	2006
Chevrolet	Malibu	2004
Chevrolet	Malibu	2005
Chevrolet	Malibu	2006
GMC	Canyon	2003
GMC	Canyon	2004
GMC	Canyon	2005
GMC	Canyon	2006
Hummer	H3	2003

Car Make	Car Model	Model Year
Hummer	H3	2004
Hummer	H3	2005
Hummer	H3	2006
Isuzu	Rodeo	2004
Mitsubishi	Eclipse	2005
Pontiac	G5	2006
Pontiac	G6	2006
Pontiac	Grand Am	2004
Pontiac	Grand Am	2005
Pontiac	Grand Am	2006
Subaru	Forester	2012
Subaru	BRZ	2012
Subaru	Legacy	2005
Subaru	Legacy	2010
Subaru	Legacy	2014
Subaru	Impreza	2012

Vehicle models identified in the list above that are purchased within three model years after the listed year of a particular model will be assigned 75 points.

Vehicle models identified in the list below purchased from January 1, 1998 to July 14, 2016 will receive 50 points. Class Counsel are working to determine a more precise definition for the models and the model years listed below. If additional information is obtained, this list may be revised.

Car Make	Car Model	Model Year
Cadillac	"CTS	
Cadillac	CTS-V	
Chevrolet	Cobalt	
Chevrolet	Colorado	
Chevrolet	Corvette	
Chevrolet	HHR	
Chevrolet	Impala	
Chevrolet	Malibu	
Chevrolet	Monte Carlo	
Fiat		2004
Fiat		2005
Fiat		2006
GMC	Canyon	
Infiniti	FX	
Infiniti	G35	
Infiniti	JX	
Infiniti	M	
Infiniti	QX56	
Infiniti	QX60	
Infiniti	QX70	
Isuzu		2004
Isuzu		2005
Isuzu		2006
Mitsubishi	Galant	
Mitsubishi	Lancer	

Car Make	Car Model	Model Year
Mitsubishi	Outlander	
Mitsubishi	Outlander Sport	
Nissan	370Z	
Nissan	Altima	
Nissan	Armada	
Nissan	Maxima	
Nissan	Murano	
Nissan	Pathfinder	
Nissan	Rogue Sport	
Nissan	Titan	
Nissan	Versa	
Pontiac	G5	
Pontiac	G6	
Pontiac	Grand Am	
Saab		2003
Saab		2004
Saab		2005
Saab		2006
Saturn	Ion	
Saturn		2004
Saturn		2005
Saturn		2006
Suzuki	Aerio	
Suzuki		2005
Toyota	Camry PZEV	

Any other models from the manufacturers listed in the two charts above, or from Ford, that were purchased from January 1, 1998 to July 14, 2016, will be assigned 35 points. All other vehicles purchased from January 1, 1998 to July 14, 2016 will be assigned 20 points.