

**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: WINDSHIELD WIPERS	2:13-cv-00902-MOB-MKM
THIS DOCUMENT RELATES TO: AUTOMOBILE DEALER ACTIONS	

**PROPOSED / PENDING COURT APPROVAL
DISTRIBUTION/ALLOCATION PLAN
WINDSHIELD WIPERS SETTLEMENTS**

This distribution / allocation plan (“Allocation Plan”) will be applied to the automobile dealership settlements in the Windshield Wipers 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 Windshield Wipers 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 Windshield Wipers 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**;
- Windshield Wipers (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 Windshield Wipers (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 Windshield Wipers 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
Acura	ILX	2012
Acura	ILX	2013
Acura	ILX	2014
Acura	ILX	2015
Acura	ILX	2016
Acura	ILX	2017
Acura	MDX	2007
Acura	MDX	2013
Acura	MDX	2014
Acura	MDX	2015
Acura	MDX	2016
Acura	MDX	2017
Acura	RDX	2012
Acura	RDX	2013
Acura	RDX	2014
Acura	RDX	2015
Acura	RDX	2016
Acura	RDX	2017
Acura	ZDX	2009
Acura	ZDX	2010
Acura	ZDX	2011

Car Make	Car Model	Model Year
Acura	ZDX	2012
Acura	ZDX	2013
Chrysler	Pacifica	2004
Chrysler	Pacifica	2005
Chrysler	Pacifica	2006
Chrysler	Pacifica	2007
Dodge	Neon	2000
Dodge	Neon	2001
Dodge	Neon	2002
Dodge	Neon	2003
Dodge	Neon	2004
Dodge	Neon	2005
Honda	Accord	2000
Honda	Accord	2001
Honda	Accord	2002
Honda	Accord	2003
Honda	Accord	2004
Honda	Accord	2005
Honda	Accord	2006
Honda	Accord	2007
Honda	Accord	2008

Car Make	Car Model	Model Year
Honda	Accord	2009
Honda	Accord	2010
Honda	Accord	2011
Honda	Accord	2012
Honda	Accord	2013
Honda	Accord	2014
Honda	Accord	2015
Honda	Accord	2016
Honda	Accord	2017
Honda	Civic	2000
Honda	Civic	2001
Honda	Civic	2002
Honda	Civic	2003
Honda	Civic	2004
Honda	Civic	2005
Honda	Civic	2006
Honda	Civic	2007
Honda	Civic	2008
Honda	Civic	2009
Honda	Civic	2010
Honda	Civic	2011
Honda	Civic	2012
Honda	Civic	2013
Honda	Civic	2014
Honda	Civic	2015
Honda	CR-V	2001
Honda	CR-V	2002
Honda	CR-V	2003
Honda	CR-V	2004
Honda	CR-V	2005
Honda	CR-V	2006
Honda	CR-V	2007
Honda	CR-V	2008
Honda	CR-V	2009
Honda	CR-V	2010
Honda	CR-V	2011
Honda	CR-V	2012

Car Make	Car Model	Model Year
Honda	CR-V	2013
Honda	CR-V	2014
Honda	CR-V	2015
Honda	CR-V	2016
Honda	CR-Z	2010
Honda	Fit	2005
Honda	Fit	2006
Honda	Fit	2007
Honda	Fit	2008
Honda	Fit	2009
Honda	Fit	2010
Honda	Fit	2011
Honda	Fit	2012
Honda	Fit	2013
Honda	Fit	2014
Honda	Fit	2015
Honda	Fit	2016
Honda	Fit	2017
Honda	Insight	2009
Honda	Odyssey	2004
Honda	Odyssey	2005
Honda	Odyssey	2006
Honda	Odyssey	2007
Honda	Odyssey	2008
Honda	Odyssey	2009
Honda	Odyssey	2010
Honda	Odyssey	2012
Honda	Odyssey	2013
Honda	Odyssey	2014
Honda	Odyssey	2015
Honda	Odyssey	2016
Honda	S2000	2003
Honda	S2000	2004
Honda	S2000	2005
Honda	S2000	2006
Honda	S2000	2007
Honda	S2000	2008

Car Make	Car Model	Model Year
Honda	S2000	2009
Hyundai	Veloster	2012
Hyundai	Veloster	2013
Hyundai	Veloster	2014
Hyundai	Veloster	2015
Hyundai	Veloster	2016
Infiniti	EX	2007
Infiniti	EX	2008
Infiniti	EX	2009
Infiniti	EX	2010
Infiniti	EX	2011
Infiniti	EX	2012
Infiniti	FX	2007
Infiniti	FX	2008
Infiniti	FX	2009
Infiniti	FX	2010
Infiniti	FX	2011
Infiniti	FX	2012
Infiniti	G	2007
Infiniti	G	2008
Infiniti	G	2009
Infiniti	G	2010
Infiniti	G	2011
Infiniti	G	2012
Infiniti	M	2007
Infiniti	M	2008
Infiniti	M	2009
Infiniti	M	2010
Infiniti	M	2011
Infiniti	M	2012
Infiniti	QX56	2004
Infiniti	QX56	2005
Infiniti	QX56	2006
Infiniti	QX56	2007
Infiniti	QX56	2008
Infiniti	QX56	2009
Infiniti	QX56	2010

Car Make	Car Model	Model Year
Mazda	3	2011
Mazda	6	2011
Mazda	CX5	2011
Mitsubishi	Mirage	2014
Mitsubishi	Mirage	2015
Mitsubishi	Outlander	2003
Mitsubishi	Outlander	2004
Mitsubishi	Outlander	2005
Mitsubishi	Outlander	2006
Mitsubishi	Outlander	2007
Mitsubishi	Outlander	2008
Mitsubishi	Outlander	2009
Mitsubishi	Outlander	2010
Mitsubishi	Outlander	2011
Mitsubishi	Outlander	2012
Mitsubishi	Outlander	2013
Mitsubishi	Outlander	2014
Mitsubishi	Outlander	2015
Nissan	350Z	2008
Nissan	Altima	2006
Nissan	Altima	2007
Nissan	Altima	2008
Nissan	Altima	2009
Nissan	Altima	2010
Nissan	Altima	2011
Nissan	Altima	2012
Nissan	Altima Coupe	2007
Nissan	Altima Coupe	2008
Nissan	Altima Coupe	2009
Nissan	Altima Coupe	2010
Nissan	Altima Coupe	2011
Nissan	Altima Coupe	2012
Nissan	Altima Coupe	2013
Nissan	Armada	2003
Nissan	Armada	2004
Nissan	Armada	2005
Nissan	Armada	2006

Car Make	Car Model	Model Year
Nissan	Armada	2007
Nissan	Armada	2008
Nissan	Armada	2009
Nissan	Armada	2010
Nissan	Armada	2011
Nissan	Armada	2012
Nissan	Armada	2013
Nissan	Armada	2014
Nissan	Armada	2015
Nissan	Cube	2009
Nissan	Cube	2010
Nissan	Cube	2011
Nissan	Cube	2012
Nissan	Cube	2013
Nissan	Cube	2014
Nissan	Frontier	2004
Nissan	Frontier	2005
Nissan	Frontier	2006
Nissan	Frontier	2007
Nissan	Frontier	2008
Nissan	Frontier	2009
Nissan	Frontier	2010
Nissan	Frontier	2011
Nissan	Frontier	2012
Nissan	Frontier	2013
Nissan	Frontier	2014
Nissan	Frontier	2015
Nissan	Frontier	2016
Nissan	Frontier	2017
Nissan	Leaf	2010
Nissan	Maxima	2008
Nissan	Maxima	2009
Nissan	Maxima	2010
Nissan	Maxima	2011
Nissan	Maxima	2012
Nissan	Maxima	2013
Nissan	Maxima	2014

Car Make	Car Model	Model Year
Nissan	Maxima	2015
Nissan	Murano	2003
Nissan	Murano	2004
Nissan	Murano	2005
Nissan	Murano	2006
Nissan	Murano	2007
Nissan	Murano	2008
Nissan	Murano	2009
Nissan	Murano	2010
Nissan	Murano	2011
Nissan	Murano	2012
Nissan	Murano	2013
Nissan	Murano	2014
Nissan	Murano	2015
Nissan	NV-Series	2011
Nissan	NV-Series	2012
Nissan	NV-Series	2013
Nissan	NV-Series	2014
Nissan	NV-Series	2015
Nissan	NV-Series	2016
Nissan	NV-Series	2017
Nissan	Pathfinder	2003
Nissan	Pathfinder	2004
Nissan	Pathfinder	2005
Nissan	Pathfinder	2006
Nissan	Pathfinder	2007
Nissan	Pathfinder	2008
Nissan	Pathfinder	2009
Nissan	Pathfinder	2010
Nissan	Pathfinder	2011
Nissan	Pathfinder	2012
Nissan	Quest	2011
Nissan	Quest	2012
Nissan	Quest	2013
Nissan	Quest	2014
Nissan	Quest	2015
Nissan	Rogue	2007

Car Make	Car Model	Model Year
Nissan	Rogue	2008
Nissan	Rogue	2009
Nissan	Rogue	2010
Nissan	Rogue	2011
Nissan	Rogue	2012
Nissan	Rogue	2013
Nissan	Rogue	2014
Nissan	Rogue	2015
Nissan	Titan	2003
Nissan	Titan	2004
Nissan	Titan	2005
Nissan	Titan	2006
Nissan	Titan	2007
Nissan	Titan	2008
Nissan	Titan	2009
Nissan	Titan	2010
Nissan	Titan	2011
Nissan	Titan	2012
Nissan	Titan	2013
Nissan	Titan	2014
Nissan	Titan	2015
Nissan	X Terra	2005
Nissan	X Terra	2006
Nissan	X Terra	2007
Nissan	X Terra	2008
Nissan	X Terra	2009
Nissan	X Terra	2010
Nissan	X Terra	2011
Nissan	X Terra	2012
Nissan	X Terra	2013
Nissan	X Terra	2014
Nissan	X Terra	2015
Scion	FR-S	2013
Subaru	BRZ	2012
Subaru	BRZ	2013
Subaru	BRZ	2014
Subaru	BRZ	2015

Car Make	Car Model	Model Year
Subaru	Forester	2002
Subaru	Forester	2003
Subaru	Forester	2004
Subaru	Forester	2005
Subaru	Forester	2006
Subaru	Forester	2007
Subaru	Forester	2008
Subaru	Impreza	2001
Subaru	Impreza	2002
Subaru	Impreza	2003
Subaru	Impreza	2004
Subaru	Impreza	2005
Subaru	Impreza	2006
Subaru	Impreza	2007
Subaru	Impreza	2011
Subaru	Impreza	2012
Subaru	Impreza	2013
Subaru	Impreza	2014
Subaru	Impreza	2015
Subaru	Legacy	2004
Subaru	Legacy	2005
Subaru	Legacy	2006
Subaru	Legacy	2007
Subaru	Legacy	2008
Subaru	Legacy	2009
Subaru	Legacy	2010
Subaru	Legacy	2011
Subaru	Legacy	2012
Subaru	Legacy	2013
Subaru	Legacy	2014
Subaru	Outback	2009
Subaru	Outback	2010
Subaru	Outback	2011
Subaru	Outback	2012
Subaru	Outback	2013
Subaru	Outback	2014
Subaru	XV Crosstrek	2013

Car Make	Car Model	Model Year
Subaru	XV Crosstrek	2014
Subaru	XV Crosstrek	2015
Suzuki	Equator	2008
Suzuki	Equator	2009
Suzuki	Equator	2010
Suzuki	Equator	2011
Suzuki	Equator	2012
Suzuki	Grand Vitara	2005
Suzuki	SX4	2006
Toyota	86	2016
Toyota	Avalon	2004
Toyota	Avalon	2005
Toyota	Avalon	2006
Toyota	Avalon	2007
Toyota	Avalon	2008
Toyota	Avalon	2009
Toyota	Avalon	2010
Toyota	Avalon	2011
Toyota	Avalon	2012
Toyota	Camry	2003
Toyota	Camry	2004
Toyota	Camry	2005
Toyota	Camry	2006
Toyota	Camry	2007
Toyota	Camry	2008
Toyota	Camry	2009
Toyota	Camry	2010
Toyota	Camry	2011
Toyota	Camry	2012
Toyota	Camry	2013

Car Make	Car Model	Model Year
Toyota	Camry	2014
Toyota	Camry	2015
Toyota	Camry	2016
Toyota	Camry	2017
Toyota	Corolla	2002
Toyota	Corolla	2003
Toyota	Corolla	2004
Toyota	Corolla	2005
Toyota	Corolla	2006
Toyota	Corolla	2007
Toyota	Corolla	2008
Toyota	Corolla	2009
Toyota	Corolla	2010
Toyota	Corolla	2011
Toyota	Corolla	2012
Toyota	Corolla	2013
Toyota	Corolla	2014
Toyota	Corolla	2015
Toyota	Corolla Hatchback	2006
Toyota	Yaris	2006
Toyota	Yaris	2007
Toyota	Yaris	2009
Toyota	Yaris	2010
Toyota	Yaris	2011
Toyota	Yaris	2012
Toyota	Yaris	2013
Toyota	Yaris	2014
Toyota	Yaris	2015

In addition, with regard to the Isuzu Elf F-Series Truck, to the extent any such Model Year 2000 vehicle was purchased for resale by an automobile dealership, and not a separate truck franchisee associated with an automobile dealership, from January 1, 2000 to January 31, 2009, such dealership will also be assigned 100 points for each such vehicle. 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, 2000 to September 29, 2017 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
Acura	ILX
Acura	MDX
Acura	RDX
Hyundai	Elantra
Hyundai	Veloster
Infiniti	EX
Infiniti	FX
Infiniti	G
Infiniti	M

Car Make	Car Model
Infiniti	Q70
Kia	Optima
Kia	Rio
Mitsubishi	Lancer
Mitsubishi	Mirage
Mitsubishi	Outlander
Nissan	Altima
Nissan	Armada
Nissan	Cube

Car Make	Car Model
Nissan	Maxima
Nissan	Murano
Nissan	Pathfinder
Nissan	Rogue
Nissan	X Terra
Suzuki	Kizashi
Suzuki	Vitara
Toyota	Corolla

Any other models from the manufacturers listed in the two charts above, that were purchased from January 1, 2000 to September 29, 2017, will be assigned 35 points. All other vehicles purchased from January 1, 2000 to September 29, 2017 will be assigned 20 points.