

If you paid or reimbursed others for the purchase of certain
Aftermarket Automotive Sheet Metal Products between January 1, 2003 and September 7, 2015,
you may be entitled to a cash payment from partial class action settlements.

*A federal district court authorized this Notice. This is not junk mail,
an advertisement, or a solicitation from a lawyer.*

- Settlements have been reached with Tong Yang Industry Co., Ltd., as successor-in-interest to Taiwan Kai Yih Industrial Co., Ltd., and TYG Products, L.P. (collectively, “Tong Yang Defendants”), Gordon Auto Body Parts Co., Ltd. (the “Gordon Defendant,” or together with the Tong Yang Defendants, the “Settling Defendants”) in a class action lawsuit about whether they, together with Jui Li Enterprise Co., Ltd., Auto Parts Industrial, Ltd., and Cornerstone Auto Parts, LLC (the “Non-Settling Defendants”), violated state and federal antitrust laws and other state laws by agreeing to fix prices and limit the supply of Aftermarket Automotive Sheet Metal (“AMSM”) Products.
- Tong Yang Defendants have agreed to pay USD \$6.7 million and the Gordon Defendant has agreed to pay USD \$2.5 million in settlement of the claims against them. Due to a requirement of Taiwan law that applies to the fund because it will originate from a Taiwan bank account, twenty percent will be withheld as taxes, resulting in deposits in the amount of USD \$5.36 million and USD \$2.0 million (the “Settlement Fund”) in an escrow account in the United States.
- This Settlement includes all third-party payors who indirectly paid or reimbursed others for the purchase of AMSM Products for end use and not sale or resale, purchased anywhere in the United States between January 1, 2003 and September 7, 2015 (“Settlement Class members”).
- AMSM Products are defined as any and all aftermarket automotive products made of any kind of sheet metal, including, but not limited to, hoods, doors, bumpers, fenders, bonnets, floor panels, trunk assemblies, trunk lids, tailgates, roof panels, and reinforcement parts. Original equipment manufacturer (OEM) parts are not aftermarket automotive products and therefore are not included.

YOUR LEGAL RIGHTS AND OPTIONS	
SUBMIT A CLAIM FORM	This is the only way you can get a payment from these Settlements <u>and</u> any future settlements or judgments. If you submit a Claim Form, you are choosing to stay in the Class. You will be bound by these Settlements, as well as the outcome of the litigation against Non-Settling Defendants.
EXCLUDE YOURSELF FROM THE CLASS	If you decide to exclude yourself, you are choosing to remove yourself from the Settlements and the litigation against Non-Settling Defendants. This means that (1) you will <u>not</u> be bound by the Settlements or the outcome of the litigation against Non-Settling Defendants; and (2) you will not be eligible to receive a payment from these Settlements or any future settlements or judgments.
OBJECT TO THE SETTLEMENTS	You may tell the Court that you do not agree with the Settlements or some part of them. You may provide reasons why you feel they should not be approved.
GO TO THE FINAL APPROVAL HEARINGS	You may ask the Court for permission for you or your attorney to speak about your objection at the final approval hearings.
DO NOTHING	If you do nothing, you will not receive a cash payment from these Settlements <u>or</u> any future settlements or judgments in the litigation. In addition, you will be bound by the release provided in these Settlements as well as the outcome of the litigation against Non-Settling Defendants.

- These rights and options—and the deadlines to exercise them—are explained in this Notice. For complete details, view the Settlement Agreements, available at www.aftermarketsheetmetalindirectpurchaser settlement.com, or call 1-866-858-6088.
- The Court in charge of this case still has to decide whether to approve these Settlements. If the Court denies approval of one or both Settlements, that Settlement Agreement will be null and void and the litigation will continue with that Defendant and any Non-Settling Defendants.

BASIC INFORMATION

1. Why is this Notice being provided?

The Court directed that this Notice be sent because you have a right to know about the pendency of the class action lawsuit, the proposed Settlements with the Tong Yang Defendants and the Gordon Defendant, and about all of your options before the Court decides whether to grant final approval to the Settlements. If the Court approves the Settlements, and after objections or appeals, if any, are resolved, the Claims Administrator appointed by the Court will make the payments that the Settlements allow. This Notice explains the lawsuit, the Settlements, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the consolidated cases is the United States District Court for the Eastern District of Wisconsin. The cases are known as *Fireman's Fund Insurance Co. v. Jui Li Enterprise Co., Ltd. et al.*, 2:13-cv-00987 (E.D. Wis.), and *National Trucking Financial Reclamation Services, LLC v. Jui Li Enterprise Co., Ltd. et al.*, 2:14-cv-01061 (E.D. Wis.), which were consolidated with the lead case *Fond du Lac Bumper Exchange Inc. v. Jui Li Enterprise Co. Ltd., et al.*, 2:09-cv-00852 (E.D. Wis.) (the "Action"). The companies leading the Action on behalf of third-party payors, Fireman's Fund Insurance Company and National Trucking Financial Reclamation Services, LLC, are called Plaintiffs. The parties they sued, Tong Yang Industry Co., Ltd., as successor-in-interest to Taiwan Kai Yih Industrial Co., Ltd.; TYG Products L.P.; Jui Li Enterprise Co., Ltd.; Gordon Auto Body Parts Co., Ltd.; Auto Parts Industrial, Ltd.; and Cornerstone Auto Parts, LLC, are called Defendants.

2. What is this lawsuit about?

Plaintiffs allege that beginning on January 1, 2003, Defendants violated federal and state antitrust laws and other state laws by agreeing to fix prices and limit supply for AMSM Products. Defendants have denied and continue to deny each and all of the claims and contentions made in the Action, as well as all charges of wrongdoing or liability against them.

3. What is a class action?

In a class action, one or more people called Representative Plaintiffs (in this case, Fireman's Fund Insurance Company and National Trucking Financial Reclamation Services, LLC) sue on behalf of individuals or entities that have similar claims. Together, these individuals and entities are called a Class or Class members. One Court and one judge—in this case, United States District Judge Lynn Adelman—resolves the issues for all Class members, except for those who exclude themselves from the Class.

4. Why is there a Settlement?

The Court did not decide in favor of Plaintiffs or Settling Defendants. Instead, Plaintiffs and Settling Defendants negotiated Settlements that allow both sides to avoid the risks and cost of lengthy and uncertain litigation and the uncertainty of a trial and appeals. It also allows Settlement Class members to be compensated without further delay. Representative Plaintiffs and their attorneys think the Settlements are best for all Settlement Class members.

WHO IS INCLUDED IN THE SETTLEMENTS?

5. How do I know if I am part of the Settlements and the Action?

You are part of these Settlements as a Settlement Class member if you fit the following description:

All third-party payors who indirectly paid or reimbursed others for the purchase of Aftermarket Automotive Sheet Metal Products for end use and not sale or resale, purchased anywhere in the United States between January 1, 2003 and September 7, 2015.

6. Are there exceptions to being included in the Class?

Yes. Excluded from the Class are Defendants and their parents, subsidiaries, and affiliates; all governmental entities; and any judicial officer presiding over the Action and the members of his/her immediate family and judicial staff.

7. I am still not sure if I am included.

If you are still not sure whether you are included, you can call Class Counsel or visit www.aftermarketsheetmetalindirectpurchasersettlement.com for more information; or, you can complete and submit a Claim Form to see if you qualify for a payment.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What do the Settlements provide?

Tong Yang Defendants have agreed to pay USD \$6.7 million in cash which, after Taiwan taxes, will net USD \$5.36 million in a United States escrow account. The Gordon Defendant has agreed to pay USD \$2.5 million in cash which, after Taiwan taxes, will net USD \$2.0 million in a United States escrow account. Settling Defendants have also agreed to help Representative Plaintiffs pursue and advance their claims against Non-Settling Defendants.

9. Why is there a deduction for Taiwan taxes?

The Settlement Fund amounts originate from Taiwan, which is the location of the principal Settling Defendants. According to Taiwan tax advisors, under Taiwan law, the settlement amount paid to the payee of funds (the Class) is subject to a withholding tax of 20% of the funds and the payors (the Tong Yang Defendants and Gordon Defendant) are required to make that deduction before the funds leave Taiwan. The Settling Defendants are obligated to produce proof of this tax withholding pursuant to the Settlement Agreements. Settling Defendants have agreed to work with the lawyers representing the Class to attempt to obtain a refund of these taxes (estimated to be USD \$1,740,000). If a refund is obtained, it will be added to the Settlement Fund escrow account.

YOUR PAYMENT AMOUNT—THE PLAN OF ALLOCATION

10. How will payment amounts be determined?

Before making payments to Settlement Class members, the USD \$7.36 million Settlement Fund will first be used to pay for the costs of notice, claims administration, attorneys' fees, costs, and expenses, and incentive awards (collectively "Administration Costs/Fees"). Each Settlement Class member that submits a valid Claim Form will receive a *pro rata* share of the Net Settlement Fund based on their volume of qualifying AMSM Product purchases as compared to the total volume of all Settlement Class members' qualifying AMSM Product purchases.

Distributions will be made to qualifying Settlement Class members after all claims have been processed and after the Court has finally approved the Settlements. If there is a balance remaining in the Settlement Fund after the initial payment distribution (due to tax refunds, uncashed checks or other reasons), and (1) that balance is at least a net amount of \$5.00 per claiming Settlement Class member who cashed their check over the cost of issuing said second distribution, each Settlement Class member who cashed their initial distribution check will receive an additional *pro rata* distribution of the balance, or if (2) that balance is less than said \$5.00, the balance will remain in the Settlement Fund until additional settlements are reached or judgments are entered. If, at the end of the litigation, an amount remains in the Settlement Fund that prorates to less than \$5.00 to each claiming Settlement Class member who cashed their checks, said amount will be paid to a not-for-profit organization, the efforts of which are directed at protecting competition, subject to prior Court approval.

HOW YOU GET A PAYMENT—SUBMITTING A CLAIM FORM

11. How do I get a payment?

To qualify for a payment from these Settlements and any future settlements or judgments in this Action, you must complete and submit a Claim Form by **February 26, 2016**. Claim Forms are available at www.aftermarketsheetmetalindirectpurchasersettlement.com, by calling 1-866-858-6088 or by writing to the AMSM Indirect Settlement Claims Administrator, at P.O. Box 43376, Providence, RI 02940-3376. Follow all of the Claim Form instructions and include the required supporting documentation. Claim Forms may be submitted online or sent to the Claims Administrator via U.S. Mail.

12. When will I get my payment?

The Court will hold Final Approval Hearings at 11:00 a.m. C.S.T. on January 14, 2016 to decide whether to approve the Settlements. If the Court approves the Settlements, there may be appeals. It is always uncertain whether any appeals made can be resolved favorably, and resolving them can take time, perhaps more than a year. It also takes time for all the Claim Forms to be processed. Depending on the number of claims submitted, and whether any appeals are filed, the Claims Administrator *could* distribute payments as early as nine months to a year after the Final Approval Hearing. Please be patient.

13. What am I giving up to get a payment or stay in the Class?

Unless you exclude yourself, you are staying in the Class. This means that you will no longer be able to sue, continue to sue, or be part of any other lawsuit against *any* of Defendants about the same issues that have or could have been asserted in this Action. As a member of the Class, your claims against Non-Settling Defendants will continue to be litigated as part of the class action lawsuit. If there is a settlement or favorable resolution of the claims against Non-Settling Defendants in the future, you may participate in the benefits. Staying in the Class also means that all of the Court's orders will apply to you and legally bind you and you will be bound by the provision of "Released Claims" (*see* next question).

14. What are the Released Claims?

"Released Claims" collectively means any and all claims, demands, actions, suits, causes of action, whether class, individual, or otherwise in nature (whether or not any Settlement Class member has objected to the Settlement or makes a claim upon or participates in the Settlement Fund), whether directly, representatively, derivatively or in any other capacity that Class members, or each of them, ever had, now has, or hereafter can, shall, or may have on account of, related to, or in any way arising out of, any and all known and unknown, foreseen and unforeseen, suspected or unsuspected injuries, damages, and the consequences thereof in any way arising out of or relating in any way to any act or omission of Releasees (or any of them) concerning the pricing, production, development, or sale of AMSM Products from January 1, 2003 through September 7, 2015, claims based on the conduct alleged and causes of action asserted or that could have been asserted, in complaints filed in the Action by Fireman's Fund Insurance Company and National Trucking Financial Reclamation Services, LLC, including but not limited to federal claims under the Sherman Act and state law claims under the laws of Arkansas, Arizona, California, Florida, Iowa, Kansas, Massachusetts, Michigan, Minnesota, Nebraska, New Mexico, New York, North Carolina, North Dakota, Oregon, South Dakota, Tennessee, and Wisconsin, including without limitation, any claims arising under any federal or state antitrust, unjust enrichment, unfair competition, trade practice, statutory or common law, or consumer protection law (to the extent that a consumer protection claim would be based on allegation of an antitrust or unfair competition violation).

"Releasees" refers to the Settling Defendants, and all of their respective past and present, direct and indirect, parents, subsidiaries, related entities and affiliates; the predecessors, successors and assigns of the Settling Defendants; and each and all of the present and former principals, partners, officers, directors, investors, supervisors, employees, representatives, insurers, attorneys, heirs, executors, administrators, and assigns of each.

EXCLUDING YOURSELF FROM THE CLASS

15. How do I get out of the Class?

To exclude yourself from these Settlements and Action against Non-Settling Defendants, you must send a letter by mail, proper postage prepaid, stating that you want to be excluded from *Fireman's Fund Insurance Co. v. Jui Li Enterprise Co., Ltd. et al.*, 2:13-cv-00987 (E.D. Wis.), and *National Trucking Financial Reclamation Services, LLC v. Jui Li Enterprise Co., Ltd. et al.*, 2:14-cv-01061 (E.D. Wis.), consolidated with *Fond du Lac Bumper Exchange Inc. v. Jui Li Enterprise Co. Ltd., et al.*, 2:09-cv-00852 (E.D. Wis.). Your letter must include your name, address, telephone number, and your signature. You must mail your exclusion request postmarked no later than **December 15, 2015** to:

AMSM Indirect Settlement Claims Administrator
JFT—EXCLUSIONS
c/o KCC Class Action Services
75 Rowland Blvd., Suite 250
Novato, CA 94945

You cannot stay in the Class in these Settlements and remove yourself from the litigation against Non-Settling Defendants, or vice versa.

16. If I do not exclude myself, can I sue Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to separately sue *any* and *all* Defendants for the claims that these Settlements resolve and for any claims relating to the issues in this Action.

17. If I exclude myself, can I get money from these Settlements or any future settlements or favorable judgments?

No. If you exclude yourself, do not send in a Claim Form to ask for any money. Once you exclude yourself, you are no longer eligible for any payments. If you submit an exclusion request and a Claim Form, your claim will be denied.

THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

Yes. The Court appointed Ben Barnow of Barnow and Associates, P.C., Michael L. Roberts of Roberts Law Firm, Daniel R. Karon of Karon LLC, Melissa H. Maxman of Cozen O'Connor P.C., and Derek G. Howard of Minami Tamaki LLP to represent you and other Class members. These lawyers are called Co-Lead Settlement Class Counsel. These lawyers and their firms are experienced in handling similar cases. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

19. How will Co-Lead Settlement Class Counsel be paid?

All Settlement Class member payments, notice costs, costs of claims administration, and attorneys' fees, costs, expenses, and Representative Plaintiff incentive awards shall be paid from the Settlement Fund. The costs of notice, claims administration, attorneys' fees, costs, and expenses, and incentive awards (collectively "Administration Costs/Fees") shall be deducted prior to the distribution of the remainder of the Escrow Account. Co-Lead Settlement Class Counsel intend to seek approval of the Court for payment from the Settlement Fund of (1) attorneys' fees in the amount of \$3,066,667 (i.e., one-third of the \$9,200,000 Settlement Fund), (2) reimbursement of reasonable costs and expenses, and (3) incentive awards for each Representative Plaintiff in the amount of \$20,000.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the Settlements or some part of them.

20. How do I tell the Court that I do not like the Settlements?

If you are a Settlement Class member, you can object to the Settlements if you do not like them or a portion of them. You can give reasons why you think the Court should not approve the Settlements. The Court will consider your views before making a decision. To object, you must, as stated below, file with the Court and serve on Class Counsel and counsel for Settling Defendants a written filing saying that you object to the Tong Yang Settlement and/or Gordon Settlement in *Fireman's Fund Insurance Co. v. Jui Li Enterprise Co., Ltd. et al.*, 2:13-cv-00987 (E.D. Wis.), and *National Trucking Financial Reclamation Services, LLC v. Jui Li Enterprise Co., Ltd. et al.*, 2:14-cv-01061 (E.D. Wis.), consolidated with *Fond du Lac Bumper Exchange Inc. v. Jui Li Enterprise Co. Ltd., et al.*, 2:09-cv-00852 (E.D. Wis.).

Your objection must include:

- 1) your full name, address, and telephone number;
- 2) evidence or other information showing you are a Settlement Class member;
- 3) the reasons why you object to the Tong Yang Settlement or Gordon Settlement, including any documents supporting your objection;
- 4) the name and address of your attorney, if you have retained one;
- 5) a statement indicating whether you or your attorney plan to appear at the Final Approval Hearings;
- 6) your signature or the signature of your attorney or other authorized representative (including documentation proving representation);
- 7) a list of any and all other cases in which you (directly or through counsel) or your counsel (on behalf of any person or entity) has filed an objection to any proposed class action settlement, or has been a named plaintiff in any class action or served as lead plaintiff class counsel, including the case name, court, and docket number for each; and
- 8) a list of any and all persons you intend to call to testify at the Final Approval Hearings in support of your objection.

Your objection must be filed with the Clerk of the United States District Court for the Eastern District of Wisconsin, 517 East Wisconsin Avenue, Milwaukee, WI, 53202 by **December 15, 2015**. You must also mail copies of your objection to Class Counsel and Counsel for Settling Defendants postmarked no later than **December 15, 2015**, at the address below.

Class Counsel:

Ben Barnow
Barnow and Associates, P.C.
One North LaSalle Street, Suite 4600
Chicago, IL 60602

Counsel for Settling Defendants:

Yi-Chin Ho
Latham & Watkins
355 South Grand Avenue
Los Angeles, CA 90071

21. What is the difference between objecting and excluding myself from the Settlements?

Objecting is telling the Court that you do not like something about the proposed Settlements. Excluding yourself is telling the Court that you (1) do not want to be part of the Class in these Settlements and (2) you do not want to remain part of the Action. If you exclude yourself, you have no basis to object or file a claim because the Settlements and Action no longer apply to you.

THE COURT'S FINAL APPROVAL HEARINGS

The Court will hold hearings to decide whether to approve the Settlements. You may attend and you may ask to speak, but you do not have to.

22. When and where will the Court decide whether to approve the Settlement?

The Court will hold Final Approval Hearings at 11:00 a.m. C.S.T. on January 14, 2016, at the United States District Court for the Eastern District of Wisconsin, Courtroom 390, 517 East Wisconsin Avenue, Milwaukee, WI, 53202. At these hearings, the Court will consider whether the Settlements are fair, reasonable, and adequate. The Court will take into consideration any properly filed written objections and may also listen to people who have asked to speak at the hearings (*see* Question 24). The Court will also decide whether to approve the Plan of Allocation, the payment of fees, costs, and expenses to Co-Lead Settlement Class Counsel, and the incentive awards to the Representative Plaintiffs.

23. Do I have to come to the Final Approval Hearings?

No. Co-Lead Settlement Class Counsel will answer any questions the Court may have. But, you are welcome to come at your own expense. If you send an objection, you do not have to come to Court to talk about it. You may also hire your own lawyer to attend, at your own expense, but you are not required to do so.

24. May I speak at the Final Approval Hearings?

Yes, you may ask the Court for permission to speak at the Final Approval Hearings. To do so, you must follow the instructions provided in Question 20 above. You cannot speak at the hearings if you exclude yourself from the Class.

IF YOU DO NOTHING

25. What happens if I do nothing?

If you do nothing, you will not receive a payment from these Settlements or any future settlements or judgments in this litigation. If the Court approves the Settlements, you will be bound by the Released Claims provision and the outcome of the Action with Non-Settling Defendants. This means, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against *any* of the Defendants about the issues resolved by these Settlements and included in the Action.

GETTING MORE INFORMATION

26. Are more details about the Settlements and Action available?

Yes. This Notice summarizes the proposed Settlements and Action. More details are in the Settlement Agreements and Class Action Complaint, which are available at www.aftermarketsheetmetalindirectpurchasersettlement.com or by writing to the AMSM Indirect Settlement Claims Administrator, P.O. Box 43376, Providence, RI 02940-3376.

27. How do I get more information?

Go to www.aftermarketsheetmetalindirectpurchasersettlement.com and register your name and address to receive future notices in the mail as there might be future settlements or judgments in this litigation. You may also call 1-866-858-6088, or write to AMSM Indirect Settlement Claims Administrator, P.O. Box 43376, Providence, RI 02940-3376.

***Please do not call the Court or the Clerk of the Court for additional information.
They cannot answer any questions regarding these Settlements or the Action.***

DATED: AUGUST 14, 2015

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN