

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO**

**IN RE OPTICAL DISK DRIVE  
ANTITRUST LITIGATION**

**Case No. 3:10-MD-2143-RS  
MDL No. 2143**

**THIS DOCUMENT RELATES TO:  
ALL INDIRECT-PURCHASER ACTIONS**


**MODIFICATION TO SETTLEMENT AGREEMENT BETWEEN PIONEER AND  
INDIRECT PURCHASER PLAINTIFFS**

1. This is a modification to the Settlement Agreement (“Agreement”) made and entered into the \_\_\_th day of July, 2017, by and between Pioneer Corporation; Pioneer North America, Inc; Pioneer Electronics (USA) Inc.; Pioneer High Fidelity Taiwan Co., Ltd.; and Pioneer Digital Design and Manufacturing Company (collectively “Pioneer” or “Settling Defendants”), on the one hand, and the indirect-purchaser plaintiff class representatives (“Plaintiffs”), both individually and on behalf of a settlement class of indirect purchasers of Optical Disk Drives, on the other.

2. Paragraph 18(a) of the Agreement is modified to permit use of an additional US \$85,000 of the Settlement Fund towards notice to the Class and the costs of administration of the Settlement Fund. The US \$85,000 in notice and administration expenses are not recoverable if this settlement does not become final but only to the extent such funds are actually expended for notice and administration costs.

3. Each of the undersigned attorneys represents that he or she is fully authorized to enter into the terms and conditions of, and to execute, this Agreement.

Dated: July 25 2017

By:   
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Dated: July 24, 2017

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