

**Important Notice from the United States District Court
for the Northern District of California about a class action settlement.**

Para una notificación en Español, llamar 1-877-368-9020 o visitar www.DollarsForDiskDrives.com

**Did you buy a computer with an internal or
external disk drive between 2003-2008?**

**If YES, your legal rights may be affected by a
series of class action settlements.**

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

This Notice provides a summary of the lawsuit, recent changes to Class Counsel's request for attorneys' fees, and an extended deadline to object to the request for attorneys' fees. To obtain additional details concerning the Settlements, please read this entire Notice and other relevant documents available at www.DollarsForDiskDrives.com, carefully.

The following rights and options - and deadlines to exercise them - have changed, as explained in this Notice.

YOUR LEGAL RIGHTS AND OPTIONS		
YOU MAY:		DUE DATE:
DO NOTHING NOW	You will be included in the settlements with all Settling Defendants. If you previously filed a claim in the settlements, you may receive a portion of the settlement fund pursuant to the Court-approved Settlement Distribution Plan.	N/A
OBJECT TO THE REQUEST FOR ATTORNEYS' FEES	You can write to the Court explaining why you disagree with Class Counsels' request for attorneys' fees.	April 30, 2021

The amount of the settlements: Plaintiffs have obtained settlements totaling **\$205 million** on behalf of the classes. The Court has previously approved these settlements. The time to claim part of these settlements based on your purchases has expired. This notice is to allow the class an opportunity to object or comment on class counsel's request for attorneys' fees.

What is this case about? This class action alleges that these defendants, manufacturers of optical disk drives (ODDs), conspired to stabilize the pricing of ODDs during the period of April 2003 to December 2008. ODDs were popular in the 1990s and 2000s for storing data, music, and other multimedia files. They were sold both inside computers and as standalone devices.

Who are the defendants? The defendants in this case are Koninklijke Philips N.V., Lite-On IT Corporation, Philips & Lite-On Digital Solutions Corporation, Philips & Lite-On Digital Solutions U.S.A., Inc., Pioneer Corporation, Pioneer North America, Inc., Pioneer Electronics (USA) Inc., Pioneer High Fidelity Taiwan Co., Ltd., TEAC America, Inc.; TEAC Corporation, Samsung Electronics Co., Ltd., Toshiba Corporation, and Toshiba Samsung Storage Technology Corporation.

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Why are you sending me this notice? The sole purpose of this notice is to inform you of Class Counsels' renewed request for attorneys' fees. If you already submitted a valid claim for one of the settlements in this case, you do not need to submit another one. You will receive an automatic payment. If you have not yet filed a claim, the claims period is now closed and new claims cannot be accepted. If you previously submitted a valid request to be excluded from these settlements, then your legal rights will not be affected. The deadline to request exclusion from the settlements has passed and new exclusion requests cannot be accepted.

Who is included in the class? You are included in these settlements if:

- You purchased a new computer with an ODD, or a standalone ODD designed to be used in a computer or attached to a computer.
- You were a resident of one of the following states when you made the purchase: Arizona, California, District of Columbia, Florida, Hawaii, Kansas, Maine, Massachusetts, Michigan, Minnesota, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, Oregon, Tennessee, Utah, Vermont, West Virginia, or Wisconsin.
- You made the purchase between April 2003 and December 2008.
- The ODD was a DVD-RW, DVD-ROM, or COMBO drive.
- You did not make the purchase directly from one of the defendants.

This notice is a summary only. For a full description of the settlement and related court documents, please visit www.DollarsForDiskDrives.com.

Who represents me? The Court appointed Hagens Berman Sobol Shapiro LLP (Class Counsel) to represent the Settlement Classes. You may hire your own attorney, if you wish, at your own expense.

How will the lawyers be paid and how much? As compensation for litigating this case since 2009, Class Counsel is requesting an award of \$47.78 million in fees, which represents 23.3% of the combined \$205 million Settlement Fund. Class Counsel is not requesting reimbursement of over \$5 million in costs and expenses expended by Class Counsel in pursuing this litigation. Class Counsel has filed a motion for attorneys' fees detailing the time spent on this ten-year old litigation, including their detailed time records. They are all available on the settlement website.

Previously, the Court awarded \$47.78 million in attorneys' fees and \$5,073,042.92 in reimbursement for expenses. The Ninth Circuit Court of Appeals remanded this award for a more complete explanation from the district court and more detailed findings on the reasons for the award.

Why do the lawyers deserve to be paid? Class Counsel has litigated this case on behalf of the indirect purchaser class – you – for ten years. Throughout those ten years, Class Counsel litigated this case on a contingency basis – if they lost, they would not be paid. Class Counsel paid all of the expenses on behalf of the class out of their own funds. These expenses included retaining two renowned economists to testify on behalf of the class.

Class Counsel expended an enormous amount of effort on behalf of the class. For example, Class Counsel subpoenaed data from 100 entities to measure pass-through of overcharges from the cartel to class members, without which class members would have no recoverable damages. These pass-through analyses captured 278 million ODD Products, one of the largest datasets of computer data ever collected.

At the outset of the litigation Class Counsel, ten years ago, submitted a bid to the original Court which would have allowed Class Counsel to recover only \$25.855 million in attorneys' fees. The Court of Appeals has now instructed the District Court to use this bid as “the starting point for determining a reasonable fee.”

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Class Counsel believes that a number of factors support an increase in their fee award from the original bid. Antitrust cases are complex, unpredictable, and highly risky to prosecute on a contingency basis. With no assurance of recovery, Class Counsel expended over 84,000 hours litigating this case over ten years, with attorneys' fees (a lodestar) of over \$30 million. Class Counsel dedicated multiple lawyers to this case nearly full-time for many years. In total, over 40 attorneys and staff at Hagens Berman worked on this case over a decade, forgoing many other business opportunities. You can read Class Counsel's renewed motion and the reasons for the requested upward variance at www.DollarsForDiskDrives.com.

YOUR RIGHTS AND OPTIONS

- **File an Objection**

You can ask the Court to deny Class Counsel's renewed request for attorney fees or to award a lesser amount.

Objections must be in writing and postmarked on or before **April 30, 2021**. All written objections and supporting papers must (a) clearly identify the case name and number (*In Re Optical Disk Drive Products Antitrust Litigation*, Indirect Purchaser Action, Case No. 3:10-MD-2143), (b) be submitted to the Court either by mailing them to the Class Action Clerk, United States District Court for the Northern District of California, 450 Golden Gate Ave, San Francisco, CA 94102, or by filing them in person at any location of the United States District Court for the Northern District of California, and (c) be filed or postmarked on or before **April 30, 2021**. Visit www.DollarsForDiskDrives.com for detailed information on how to object to the renewed request for attorneys' fees.

- **Go to a Hearing**

The Court may hold a Hearing on Class Counsel's renewed request for attorneys' fees. If it does, it will take place at the United States District Court, 450 Golden Gate Ave, San Francisco, CA, Courtroom 3 – 17th Floor, or, via a videoconferencing platform. If the Court orders such a hearing, Class Counsel will post the time and date of the hearing on the settlement website, so please check www.DollarsForDiskDrives.com for updates and additional information.

**PLEASE DO NOT CONTACT THE COURT, THE COURT CLERK'S OFFICE,
DEFENDANTS OR THEIR COUNSEL REGARDING THIS NOTICE**

Dated: March 1, 2021

By Order of the Court, United States District Court, Northern District of California

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