

**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: SPARK PLUGS; OXYGEN SENSORS	2:13-cv-03002-MOB-MKM 2:13-cv-03102-MOB-MKM
THIS DOCUMENT RELATES TO:  ALL AUTOMOBILE DEALER ACTIONS	

**PROPOSED / PENDING COURT APPROVAL  
DISTRIBUTION/ALLOCATION PLAN  
SPARK PLUGS AND OXYGEN SENSORS SETTLEMENTS**

This distribution / allocation plan (“Allocation Plan”) will be applied to the automobile dealership settlements in the Spark Plugs and Oxygen Sensors 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 Spark Plugs and Oxygen Sensors 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 Spark Plugs and Oxygen Sensors 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**;
- Spark Plugs and Oxygen Sensors (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 Spark Plugs and Oxygen Sensors (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 Spark Plugs and Oxygen Sensors 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](http://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](http://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(s)
Acura	MDX	2007
Acura	MDX	2009
Acura	RDX	2008
Acura	TL	2004
Acura	TL	2009
Buick	Encore	2013
Buick	Encore	2014
Buick	Encore	2015
Buick	Encore	2016
Buick	LaCrosse	2012
Buick	LaCrosse	2013
Buick	LaCrosse	2014
Buick	LaCrosse	2015
Buick	LaCrosse	2016
Buick	Lucerne	2006
Buick	Lucerne	2009
Buick	Regal	2011
Buick	Regal	2012
Buick	Regal	2013
Buick	Regal	2014
Buick	Regal	2015
Buick	Regal	2016
Cadillac	ATS	2013
Cadillac	ATS	2014

Car Make	Car Model	Model Year(s)
Cadillac	ATS	2015
Cadillac	ATS	2016
Cadillac	Catera	2001
Cadillac	CT6	2016
Cadillac	CTS	2006
Cadillac	CTS	2009
Cadillac	CTS	2010
Cadillac	CTS	2011
Cadillac	CTS	2012
Cadillac	CTS	2013
Cadillac	CTS	2014
Cadillac	CTS	2015
Cadillac	CTS	2016
Cadillac	SRX	2012
Cadillac	SRX	2013
Cadillac	SRX	2014
Cadillac	SRX	2015
Cadillac	SRX	2016
Cadillac	XTS	2013
Cadillac	XTS	2014
Cadillac	XTS	2015
Cadillac	XTS	2016
Chevrolet	Aveo	2009
Chevrolet	Aveo	2010

Car Make	Car Model	Model Year(s)
Chevrolet	Aveo	2010
Chevrolet	Aveo	2011
Chevrolet	Camaro	2012
Chevrolet	Camaro	2013
Chevrolet	Camaro	2014
Chevrolet	Camaro	2015
Chevrolet	Camaro	2016
Chevrolet	Caprice	2012
Chevrolet	Caprice	2013
Chevrolet	Caprice	2014
Chevrolet	Caprice	2015
Chevrolet	Caprice	2016
Chevrolet	Captiva	2012
Chevrolet	Captiva	2013
Chevrolet	Cobalt	2008
Chevrolet	Cobalt	2009
Chevrolet	Cobalt	2010
Chevrolet	Colorado	2015
Chevrolet	Colorado	2016
Chevrolet	Cruze	2011
Chevrolet	Cruze	2012
Chevrolet	Cruze	2013
Chevrolet	Cruze	2014
Chevrolet	Cruze	2015
Chevrolet	Cruze	2016
Chevrolet	Equinox	2012
Chevrolet	Equinox	2013
Chevrolet	Equinox	2014
Chevrolet	Equinox	2015
Chevrolet	Equinox	2016
Chevrolet	HHR	2008
Chevrolet	HHR	2009
Chevrolet	HHR	2010
Chevrolet	Impala	2012
Chevrolet	Impala	2013
Chevrolet	Impala	2014
Chevrolet	Impala	2015
Chevrolet	Impala	2016
Chevrolet	Malibu	2006

Car Make	Car Model	Model Year(s)
Chevrolet	Malibu	2009
Chevrolet	Malibu	2012
Chevrolet	Malibu	2013
Chevrolet	Silverado	2006
Chevrolet	Sonic	2012
Chevrolet	Sonic	2013
Chevrolet	Volt	2011
Chevrolet	Volt	2012
Chevrolet	Volt	2013
Chevrolet	Volt	2014
Chevrolet	Volt	2015
Chevrolet	Volt	2016
Chevrolet	Silverado	2009
Chrysler	Aspen	2008
Chrysler	Aspen	2009
Chrysler	Crossfire	2003
Chrysler	Crossfire	2004
Chrysler	Crossfire	2005
Chrysler	Crossfire	2006
Chrysler	Crossfire	2007
Chrysler	Crossfire	2008
Chrysler	Pacifica	2005
Chrysler	Pacifica	2006
Chrysler	Pacifica	2007
Chrysler	Sebring	2008
Chrysler	Sebring	2009
Chrysler	Sebring	2010
Chrysler	Town & Country	2003
Chrysler	Town & Country	2004
Chrysler	Town & Country	2005
Chrysler	Town & Country	2006
Chrysler	Town & Country	2007
Chrysler	Town & Country	2008
Chrysler	Town & Country	2009
Chrysler	Town & Country	2010
Chrysler	Voyager	2003
Chrysler	Voyager	2004
Dodge	Avenger	2009
Dodge	Avenger	2010

Car Make	Car Model	Model Year(s)
Dodge	Caliber	2008
Dodge	Caliber	2009
Dodge	Caliber	2010
Dodge	Caravan	2003
Dodge	Caravan	2004
Dodge	Caravan	2005
Dodge	Caravan	2006
Dodge	Caravan	2007
Dodge	Caravan	2008
Dodge	Caravan	2009
Dodge	Caravan	2010
Dodge	Dakota	2008
Dodge	Dakota	2009
Dodge	Durango	2008
Dodge	Durango	2009
Dodge	Durango	2011
Dodge	Durango	2012
Dodge	Durango	2013
Dodge	Durango	2014
Dodge	Journey	2010
Dodge	Ram	2008
Dodge	Ram	2009
Dodge	Ram	2010
Dodge	Ram	2011
Ford	Crown Victoria	2011
Ford	E Series	2011
Ford	E Series	2012
Ford	E Series	2013
Ford	E Series	2014
Ford	E Series	2015
Ford	E Series	2016
Ford	Edge	2011
Ford	Edge	2012
Ford	Edge	2013
Ford	Edge	2014
Ford	Edge	2015
Ford	Edge	2016
Ford	Expedition	2011
Ford	Expedition	2012

Car Make	Car Model	Model Year(s)
Ford	Expedition	2013
Ford	Expedition	2014
Ford	Explorer	2011
Ford	Explorer	2012
Ford	Explorer	2013
Ford	Explorer	2014
Ford	Explorer	2015
Ford	Explorer	2016
Ford	F Series Super Duty*	2011
Ford	F Series Super Duty*	2012
Ford	F Series Super Duty*	2013
Ford	F Series Super Duty*	2014
Ford	F Series Super Duty*	2015
Ford	F Series Super Duty*	2016
Ford	F150	2011
Ford	F150	2012
Ford	F150	2013
Ford	F150	2014
Ford	F150	2015
Ford	F150	2016
Ford	Fiesta	2011
Ford	Fiesta	2012
Ford	Fiesta	2013
Ford	Fiesta	2014
Ford	Fiesta	2015
Ford	Fiesta	2016
Ford	Flex	2011
Ford	Flex	2012
Ford	Flex	2013
Ford	Flex	2014
Ford	Flex	2015
Ford	Flex	2016
Ford	Focus	2011
Ford	Focus	2012
Ford	Focus	2013
Ford	Focus	2014
Ford	Focus	2015
Ford	Focus	2016
Ford	Fusion	2011

Car Make	Car Model	Model Year(s)
Ford	Fusion	2012
Ford	Ranger	2011
Ford	Shelby Mustang	2011
Ford	Shelby Mustang	2012
Ford	Shelby Mustang	2013
Ford	Shelby Mustang	2014
Ford	Shelby Mustang	2015
Ford	Taurus	2011
Ford	Taurus	2012
Ford	Taurus	2013
Ford	Taurus	2014
Ford	Taurus	2015
Ford	Taurus	2016
GMC	Acadia	2012
GMC	Acadia	2013
GMC	Acadia	2014
GMC	Acadia	2015
GMC	Acadia	2016
GMC	Canyon	2015
GMC	Canyon	2016
GMC	Terrain	2012
GMC	Terrain	2013
GMC	Terrain	2014
GMC	Terrain	2015
GMC	Terrain	2016
Honda	Accord	2003
Honda	Accord	2008
Honda	Civic	2006
Honda	Civic	2011
Honda	CR-V	2008
Honda	CR-V	2009
Honda	CR-Z	2011
Honda	Fit	2008
Hummer	H3	2006
Hummer	H3	2009
Jeep	Commander	2008
Jeep	Commander	2009
Jeep	Commander	2010
Jeep	Compass	2008

Car Make	Car Model	Model Year(s)
Jeep	Compass	2009
Jeep	Compass	2010
Jeep	Grand Cherokee	2008
Jeep	Grand Cherokee	2009
Jeep	Grand Cherokee	2010
Jeep	Grand Cherokee	2011
Jeep	Grand Cherokee	2012
Jeep	Grand Cherokee	2013
Jeep	Grand Cherokee	2014
Jeep	Patriot	2008
Jeep	Patriot	2009
Jeep	Patriot	2010
Jeep	Wrangler	2008
Jeep	Wrangler	2009
Jeep	Wrangler	2010
Lincoln	LS	2000
Lincoln	LS	2001
Lincoln	LS	2002
Lincoln	LS	2003
Lincoln	LS	2004
Lincoln	LS	2005
Lincoln	LS	2006
Lincoln	MKX	2011
Lincoln	MKX	2012
Lincoln	Navigator	2011
Lincoln	Navigator	2012
Lincoln	Navigator	2013
Lincoln	Navigator	2014
Lincoln	Town Car	2011
Mazda	MX-5	2011
Mazda	MX-5	2012
Mazda	MX-5	2013
Mazda	MX-5	2014
Mazda	MX-5	2015
Mazda	CX7	2011
Mazda	CX7	2012
Mercedes Benz	C Class	2001
Mercedes Benz	C Class	2002
Mercedes Benz	C Class	2003

Car Make	Car Model	Model Year(s)
Mercedes Benz	C Class	2004
Mercedes Benz	C Class	2005
Mercedes Benz	C Class	2006
Mercedes Benz	C Class	2007
Mercedes Benz	C Class	2008
Mercedes Benz	C Class	2009
Mercedes Benz	C Class	2010
Mercedes Benz	CL	2001
Mercedes Benz	CL	2002
Mercedes Benz	CL	2003
Mercedes Benz	CL	2004
Mercedes Benz	CL	2005
Mercedes Benz	CL	2006
Mercedes Benz	CL	2008
Mercedes Benz	CL	2009
Mercedes Benz	CL	2010
Mercedes Benz	CLK	2001
Mercedes Benz	CLK	2002
Mercedes Benz	CLK	2003
Mercedes Benz	CLK	2004
Mercedes Benz	CLK	2005
Mercedes Benz	CLK	2006
Mercedes Benz	CLK	2007
Mercedes Benz	CLK	2008
Mercedes Benz	CLK	2009
Mercedes Benz	CLS	2004
Mercedes Benz	CLS	2005
Mercedes Benz	CLS	2006
Mercedes Benz	CLS	2007
Mercedes Benz	CLS	2008
Mercedes Benz	CLS	2009
Mercedes Benz	CLS	2010
Mercedes Benz	E Class	2001
Mercedes Benz	E Class	2002
Mercedes Benz	E Class	2003
Mercedes Benz	E Class	2004
Mercedes Benz	E Class	2005
Mercedes Benz	E Class	2006
Mercedes Benz	E Class	2007

Car Make	Car Model	Model Year(s)
Mercedes Benz	E Class	2008
Mercedes Benz	E Class	2009
Mercedes Benz	E Class	2010
Mercedes Benz	G Class	2001
Mercedes Benz	G Class	2002
Mercedes Benz	G Class	2003
Mercedes Benz	G Class	2004
Mercedes Benz	G Class	2005
Mercedes Benz	G Class	2006
Mercedes Benz	G Class	2007
Mercedes Benz	G Class	2008
Mercedes Benz	G Class	2009
Mercedes Benz	G Class	2010
Mercedes Benz	G Class	2011
Mercedes Benz	GLK	2006
Mercedes Benz	GLK	2007
Mercedes Benz	GLK	2010
Mercedes Benz	M Class	2001
Mercedes Benz	M Class	2002
Mercedes Benz	M Class	2003
Mercedes Benz	M Class	2004
Mercedes Benz	M Class	2005
Mercedes Benz	M Class	2006
Mercedes Benz	ML	2006
Mercedes Benz	ML	2007
Mercedes Benz	ML	2008
Mercedes Benz	ML	2009
Mercedes Benz	ML	2010
Mercedes Benz	R Class	2006
Mercedes Benz	R Class	2007
Mercedes Benz	R Class	2008
Mercedes Benz	R Class	2009
Mercedes Benz	R Class	2010
Mercedes Benz	S Class	2001
Mercedes Benz	S Class	2002
Mercedes Benz	S Class	2003
Mercedes Benz	S Class	2004
Mercedes Benz	S Class	2005
Mercedes Benz	S Class	2006

Car Make	Car Model	Model Year(s)
Mercedes Benz	S Class	2007
Mercedes Benz	S Class	2008
Mercedes Benz	S Class	2009
Mercedes Benz	S Class	2010
Mercedes Benz	SL	2002
Mercedes Benz	SL	2003
Mercedes Benz	SL	2004
Mercedes Benz	SL	2005
Mercedes Benz	SL	2006
Mercedes Benz	SL	2007
Mercedes Benz	SL	2008
Mercedes Benz	SL	2009
Mercedes Benz	SLK	2001
Mercedes Benz	SLK	2002
Mercedes Benz	SLK	2003
Mercedes Benz	SLK	2004
Mercedes Benz	SLK	2005
Mercedes Benz	SLK	2006
Mercedes Benz	SLK	2007
Mercedes Benz	SLK	2008
Mercedes Benz	SLK	2009
Mercedes Benz	SLK	2010
Mercedes Benz	Sprinter	2003
Mercedes Benz	Sprinter	2004
Mercedes Benz	Sprinter	2005
Mercedes Benz	Sprinter	2006
Mercury	Grand Marquis	2011
Nissan	Juke	2009
Pontiac	G6	2006
Pontiac	G6	2009
Pontiac	Solstice	2007
Pontiac	Solstice	2008

Car Make	Car Model	Model Year(s)
Pontiac	Solstice	2009
Pontiac	Solstice	2010
Saab	9-3	2011
Saab	9-5	2001
Saab	9-5	2002
Saab	9-5	2003
Saab	9-5	2004
Saab	9-5	2010
Saab	9-5	2011
Saturn	Aura	2006
Saturn	Aura	2009
Saturn	L Series	2001
Saturn	L Series	2002
Saturn	L Series	2003
Saturn	L Series	2004
Saturn	L Series	2005
Saturn	Sky Red	2007
Saturn	Sky Red	2008
Saturn	Sky Red	2009
Saturn	Sky Red	2010
Saturn	Vue	2003
Saturn	Vue	2004
Subaru	Forester	2012
Subaru	Impreza	2007
Subaru	Impreza	2011
Subaru	Legacy	2009
Subaru	Legacy	2010
Toyota	Corolla	2006
Toyota	Sequoia	2005
Toyota	Tundra	2005
Toyota	Yaris	2006

\*Ford F Series pickup trucks on this list will be included only to the extent that they were sold by a franchised Ford Motor Company automobile dealer. 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.



Vehicles 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	Model Year(s)
Buick	LaCrosse	
Chevrolet	Equinox	
GMC	Terrain	
Hyundai	Genesis	
Hyundai	Sonata	
Hyundai	Azera	
Land Rover	LR2	
Lincoln	LS	
Mazda	3	
Mazda	6	
Mazda	MPV	
Mazda	CX-5	
Mitsubishi	Colt	
Mitsubishi	Lancer	
Mitsubishi	Outlander	
Nissan	350Z	
Nissan	370Z	
Nissan	Altima	
Nissan	Versa	
Ram		2010

Car Make	Car Model	Model Year(s)
Ram		2011
Ram		2012
Ram		2013
Ram		2014
Subaru	Legacy	
Suzuki	Grand Vitara	
Suzuki	Kizashi	
Suzuki	SX4	
Suzuki	Vitara	
Toyota	Corolla	
Toyota	Prius	
Toyota	Yaris	
Volvo	C70	
Volvo	S60	
Volvo	S80	
Volvo	V70	
Volvo	XC60	
Volvo	XC70	
Volvo	XC90	

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

Car Make
Ford
Honda
Hyundai

Car Make
Land Rover
Mazda
Mitsubishi

Car Make
Subaru
Toyota
Volkswagen

All other vehicles purchased from January 1, 2000 to September 29, 2017 will be assigned 20 points.