

**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: Ignition Coils

2:13-cv-01402-MOB-MKM

THIS DOCUMENT RELATES TO:

Automobile Dealership Actions

**PROPOSED / PENDING COURT APPROVAL
DISTRIBUTION/ALLOCATION PLAN
IGNITION COILS SETTLEMENTS**

This distribution / allocation plan (“Allocation Plan”) will be applied to the automobile dealership settlements in the Ignition Coils 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 Ignition Coils 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 Ignition Coils settlements will be 15% 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**.
- Ignition Coils (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 Ignition Coils (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 Ignition Coils 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](tel: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 models listed in Table 1 will be assigned 100 points for each vehicle purchased from the model year listed:

Table 1

Car Make	Car Model	Model Year
Buick	LaCrosse	2009
Buick	LaCrosse	2010
Buick	LaCrosse Super	2009
Buick	Lucerne	2008
Cadillac	CTS	2010
Cadillac	CTS	2012
Cadillac	CTS-V	2009
Cadillac	Escalade	2009
Cadillac	Escalade Hybrid	2009
Cadillac	SRS	2012
Cadillac	STS	2012
Chevrolet	Avalanche	2009
Chevrolet	Cobalt	2009
Chevrolet	Cobalt	2010
Chevrolet	Colorado	2009
Chevrolet	Corvette	2009
Chevrolet	Corvette Z06	2009
Chevrolet	Corvette ZR1	2009
Chevrolet	Impala	2008
Chevrolet	Impala SS	2009
Chevrolet	Malibu	2008
Chevrolet	Malibu	2009
Chevrolet	Malibu	2010
Chevrolet	Montana	2008
Chevrolet	Monte Carlo	2008
Chevrolet	Sierra	2009
Chevrolet	Silverado	2009
Chevrolet	Silverado	2010
Chevrolet	Silverado HD	2009
Chevrolet	Silverado Hybrid	2009
Chevrolet	Sonic	2012
Chevrolet	Suburban	2009
Chevrolet	Tahoe	2010
Chevrolet	Tahoe Hybrid	2009
Chevrolet	Trailblazer SS	2009

Car Make	Car Model	Model Year
Chevrolet	Impala	2010
Chevrolet	Sonic	2012
Ford	Taurus X	2007
GMC	Envoy Denali	2009
GMC	Sierra Hybrid	2009
GMC	Yukon	2009
GMC	Yukon Hybrid	2009
Honda	Accord	2003
Honda	Accord	2008
Honda	Civic	2003
Honda	Civic	2006
Honda	Civic	2010
Honda	Pilot	2006
Honda	Pilot	2008
Hummer	H3	2009
Hummer	H2	2009
Hyundai	Sonata	2014
Lincoln	MKZ	2007
Pontiac	G5	2009
Pontiac	G6	2008
Pontiac	G6	2009
Pontiac	G6	2010
Pontiac	G8 GT	2009
Pontiac	Solstice	2009
Saab	9-7X Aero	2009
Saturn	Aura	2008
Saturn	Relay	2008
Saturn	Skye	2009
Saturn	Vue	2008
Saturn	Vue	2009
Scion	FR-S	2012
Subaru	BRZ	2012
Subaru	Legacy	2009
Toyota	BRZ	2012

Vehicle models identified in Table 1 that are purchased within three model years of the last listed year of a particular model, will be assigned 75 points.

Vehicle makes or models identified in Table 2 purchased from January 1, 2000 to July 15, 2019 will receive 50 points. Class Counsel are working to determine a more precise definition for the makes and models listed below. If additional information is obtained, this list may be revised.

Table 2

Car Make	Car Model	Model Year
Buick		2002
Buick		2004
Buick		2010
Buick		2012
Cadillac		2002
Cadillac		2004
Cadillac		2010
Cadillac		2012
Chevrolet		2002
Chevrolet		2004
Chevrolet		2010
Chevrolet		2012
Daewoo		2002
Daewoo		2004
Fiat	500	
Ford		2007
GMC	Sierra	
GMC	Yukon	
GMC		2002
GMC		2004
GMC		2012
GMC	Yukon XL	
GMC		2010
Honda	Fit	
Hummer		2002
Hummer		2004
Hummer		2010
Hyundai	Accent	
Hyundai	Elantra	

Car Make	Car Model	Model Year
Hyundai	Sonata	
Jaguar	Vanden Plas	
Jaguar	XJ8	
Jaguar	XJR	
Kia	Forte	
Kia	Optima	
Kia	Rio	
Kia	Rondo	
Kia	Santa Fe	
Kia	Sedona	
Lexus	LS35	
Mazda	Mazda6	
Mazda		2007
Oldsmobile		2002
Oldsmobile		2004
Pontiac		2002
Pontiac		2004
Pontiac		2010
Saab		2002
Saab		2004
Saab		2010
Saturn		2002
Saturn		2004
Saturn		2010
Scion	iM	
Suzuki	Grand Vitara	
Suzuki	Kizashi	
Suzuki	SX4	

Car Make	Car Model	Model Year
Toyota	Avalon	
Toyota	Camry	
Toyota	Corolla	
Toyota	Corolla iM	

Car Make	Car Model	Model Year
Toyota	Highlander	
Toyota	Sienna	
Toyota	Yaris	

Vehicle makes identified in Table 3 purchased from January 1, 2000 to July 15, 2019 will receive 35 points. Class Counsel are working to determine a more precise definition for the makes listed below. If additional information is obtained, this list may be revised.

Table 3

Car Make
Audi
Buick
Cadillac
Chevrolet

Car Make
Chrysler
Ford
GMC
Honda

Car Make
Hummer
Isuzu
Mazda
Mitsubishi

Car Make
Subaru
Suzuki
Toyota
Volkswagen

All other vehicles purchased from January 1, 2000 to July 15, 2019 will be assigned 20 points.