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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

STATE OF OREGON, ex rel. Ellen
Rosenblum, Attorney General,

Plaintiff,

v.

LG ELECTRONICS, INC., a foreign
corporation; LG ELECTRONICS U.S.A, a
Delaware corporation; KONINKLIJKE
PHILIPS ELECTRONICS N.V., a/k/a
ROYAL PHILIPS ELECTRONICS N.V., a
foreign corporation; PHILIPS
ELECTRONICS NORTH AMERICA
CORPORATION, a Delaware corporation;
PHILIPS ELECTRONICS INDUSTRIES
(TAIWAN), LTD, a foreign corporation;
PHILIPS DA AMAZONIA INDUSTRIA
ELECTRONICA LTDA, a foreign
corporation; LP DISPLAYS
INTERNATIONAL, LTD. f/k/a/ LG PHILIPS
DISPLAYS, a foreign corporation; ORION
ELECTRIC COMPANY, a foreign
corporation; DAEWOO ELECTRONICS
COMPANY, LTD., a foreign corporation;
DAEWOO-ORION SOCIÉTÉ ANONYME, a
foreign corporation; PT TOSUMMIT
ELECTRONIC DEVICES, a foreign
corporation; SAMSUNG ELECTRONICS
CO., LTD., a foreign corporation; SAMSUNG
ELECTRONICS AMERICA, INC., a New
York Corporation; SAMSUNG SDI CO.,
LTD. f/k/a SAMSUNG DISPLAY DEVICE
CO., LTD., a foreign corporation; SAMSUNG
SDI AMERICA INC., a California
corporation; SAMSUNG SDI MEXICO S.A.

Case No.: 1208 10246

**CORRECTED DECLARATION OF
TIM D. NORD IN SUPPORT OF
MOTION FOR APPROVAL OF
SETTLEMENTS, NOTICE AND
ENTRY OF LIMITED JUDGMENTS**

1 DE C.V., a foreign corporation; SAMSUNG
2 SDI BRASIL LTDA., a foreign corporation;
3 SHENZHEN SAMSUNG SDI CO., LTD., a
4 foreign corporation; TIANJIN SAMSUNG
5 SDI CO., LTD., a foreign corporation;
6 SAMSUNG SDI (MALAYSIA) SDN. BHD.,
7 a foreign corporation; TOSHIBA
8 CORPORATION, a foreign corporation;
9 TOSHIBA AMERICA, INC., a Delaware
10 corporation; TOSHIBA AMERICA
11 ELECTRONIC COMPONENTS, INC., a
12 California corporation; TOSHIBA AMERICA
13 INFORMATION SYSTEMS, INC., a
14 California corporation; TOSHIBA DISPLAY
15 DEVICES (THAILAND) COMPANY, LTD.
16 ("TDDT"), a foreign corporation; MT
17 PICTURE DISPLAY CO. LTD., a foreign
18 corporation; PANASONIC CORPORATION,
19 a foreign corporation; PANASONIC
20 CORPORATION OF NORTH AMERICA, a
21 Delaware corporation; HITACHI, LTD., a
22 foreign corporation; HITACHI DISPLAYS,
23 LTD., a foreign corporation; HITACHI
24 ELECTRONIC DEVICES (USA), INC., a
25 Delaware corporation; HITACHI AMERICA,
LTD., a New York corporation, HITACHI
ASIA, LTD., a foreign corporation;

Defendants.

I, Tim D. Nord, declare as follows:

1. I am an attorney licensed to practice in the State of Oregon and am an Assistant Attorney General for the State of Oregon, in which capacity I serve as Special Counsel for the Oregon Attorney General. In this capacity I represent the State of Oregon in this action. I make this declaration in support of the State of Oregon's Motion for Approval of Settlements and Notice. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would testify competently to them.

1 2. I have been a practicing attorney for over 25 years and have been handling
2 antitrust matters as antitrust counsel for the Oregon Attorney General's office for 12 years.

3 3. I participated in all negotiations that have resulted in the settlements that are
4 now pending the Court's approval. Joining Oregon's litigation team were counsel from the
5 law firm of Haglund and Kelley, all of whom have had substantial experience in both
6 antitrust and complex litigation. All of the settlement agreements referenced herein are the
7 result of arm's-length negotiations conducted by counsel experienced in antitrust class
8 actions.

9 4. Prior to filing suit in this Court, the State of Oregon engaged in extensive
10 pre-litigation discovery independently and with other states, utilizing investigative
11 subpoena authority and reviewing documents produced by Chunghwa Picture Tubes and
12 which were available as a result of the CRT MDL (In re: Cathode Ray Tube Antitrust
13 Litigation MDL No. 1917). After initiating this litigation in 2012, the State of Oregon
14 engaged in discovery and prosecuted state law antitrust claims against the respective
15 defendants as more fully explained in the Declaration of Michael G. Neff in Support of
16 Motion for Approval of Settlements ("Neff Declaration").

17 5. Prior to commencing this litigation in 2012, the Oregon Attorney General
18 entered into a settlement agreement with Chunghwa Pictures Tubes, Ltd (Chunghwa). This
19 settlement did not require judicial approval. As part of this settlement, Chunghwa paid
20 \$21,146.00 to the state of Oregon and agreed to provide additional substantial cooperation
21 to Oregon -- including providing percipient witnesses at trial -- to assist prosecution of the
22 case against other CRT cartel participants. The \$21,146.00 paid by Chunghwa as
23 reimbursement for attorney fees and expenses was deposited into Oregon's antitrust and
24 consumer protection account pursuant to ORS 180.095 for use in accordance with the laws
25 governing the account. The funds received from Chunghwa will be taken into account as
part of the Attorney General's fee application.

1 6. Chunghwa provided substantial pre-filing cooperation to Oregon and to date
2 has cooperated as agreed to by the terms of the Oregon/Chunghwa settlement agreement.

3 7. The State of Oregon brought this enforcement action, asserting violations of
4 Oregon state law which give rise to civil penalties. Oregon also made damages and unjust
5 enrichment claims based on purchases made by state governmental entities and for Oregon
6 natural persons. Those claims were brought under Oregon's authority to sue on behalf of
7 the state and parens patriae authority under applicable state laws.

8 8. As described in greater detail in the Neff Declaration, Oregon has entered
9 into settlements with the defendants representing three of the six corporate defendant
10 groups identified in Oregon's Complaint. I participated in the settlement negotiations that
11 resulted in each of the settlements now pending Court approval. As to these three
12 corporate defendant groups, these settlements resolve all of the claims the Attorney
13 General has brought including claims for civil penalties, damages from state agency
14 purchases and parens patriae redress claims, and injunctive relief. Each settlement has
15 been determined to be reasonable and was authorized and approved by the Oregon
16 Attorney General.

17 9. The Oregon Department of Justice maintains two websites ("AG websites")
18 at www.doj.state.or.us/consumer/pages/lcd_antitrust_litigation.aspx and
19 www.OregonScreenSettlements.com to keep Oregonians apprised of the results of this
20 litigation. My office will update the AG websites to inform Oregonians of the settlement
21 approval process.

22 10. Oregon has prepared a draft notice of the action and settlements ("Notice")
23 for natural persons that will be posted on the AG websites. A form of this Notice will be
24 published in every major paper in Oregon on multiple days, as well as in newspaper
25 publications found in each respective county in Oregon. The notice will direct readers to
the AG websites. A copy of the Notice is attached hereto as Exhibit A. This notice and
the AG websites will advise Oregon natural persons of: (a) information about the ongoing

1 litigation and the deadline to elect exclusion; (b) the amount of the settlements if approved
2 by the Court; (c) the process for opting out of the litigation and settlements; and (d) initial
3 information about the process for filing a claim and later distribution of settlement
4 proceeds.

5 11. Oregon has experienced providing similar notices in the Dynamic Random
6 Access Memory (DRAM) Antitrust Litigation (MDL No. 1486) and the TFT-LCD (Flat
7 Panel) Antitrust Litigation (MDL No. 1827). As a result of the notices provided as part of
8 these previous consumer cases, Oregon's consumer database has grown substantially. For
9 consumers who have provided contact information for this database, notice will be sent to
10 these contact addresses or e-mails.

11 12. Following final approval of judgments of dismissal as to all the Defendants
12 in the CRT case, I anticipate the Court will provide for an award of administrative costs
13 and attorneys' fees and costs, and then provide for the division of remaining settlement
14 funds into separate "natural person" and "state" damages pots based upon information
15 from Oregon's expert. Monies allocated to the "state" pot will be directed to the Oregon
16 General Fund.

17 13. The Attorney General intends to distribute the "natural person" pot pro rata
18 based upon actual products purchased and estimated overcharge amounts as calculated by
19 Oregon's expert. Payments to Oregon natural persons will be based upon a schedule of
20 minimum and maximum payments, and natural person will not be required to provide
21 documentation for the first two items claimed. The Attorney General anticipates
22 requesting discretion to take reasonable additional steps to maximize disbursement of
23 funds to natural persons with any residual amount distributed to the Oregon Department of
24 Justice Protection and Education Revolving Account.

25 14. Additional notice will be provided during this claims process. The Attorney
General has contracted with Garden City, Inc. to serve as notice and claims administrator.
In addition to publication, it is anticipated that notice during the claims process will

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include radio, television and on-line media. As part of the final distribution process the court will be provided with a detailed plan of notice from Garden City setting out this process in detail.

I declare under penalty of perjury pursuant to the laws of the state of Oregon that the forgoing statements of fact are true and correct.

Executed this 4th day October 2016, in Portland, Oregon.

s/Tim D. Nord
Tim D. Nord

LEGAL NOTICE

If You Bought a TV or Computer Monitor That Contained a Cathode Ray Tube (“CRT”), During the Years 1995 through 2007, You May be Affected by This Litigation and Benefits from a Settlement.

Please read this notice carefully as your legal rights are affected whether you act or do not act.

PARA UNA NOTIFICACIÓN EN ESPAÑOL, LLAMAR O VISITAR NUESTRO WEBSITE.

The Oregon Attorney General filed a lawsuit against certain manufacturers of Cathode Ray Tubes (“CRTs”). The lawsuit alleges that CRT manufacturers illegally agreed upon the pricing of CRTs. The Attorney General filed this action in her law enforcement capacity and on behalf of the State of Oregon and Oregon natural persons and sought equitable relief, restitution, civil penalties and injunctive relief.

Oregon has settled with ___ defendants for a total of \$_____ (“Settlement Fund”). The State of Oregon and Oregon natural persons may be entitled to a portion of the Settlement Fund. “Oregon natural persons” means a human, not a business.

Who Is Included?

The State of Oregon and Oregon natural persons who indirectly purchased at any time during the years 1995 to 2007, for their own use and not for resale, CRTs incorporated in TVs or computer monitors. An indirect purchaser is someone that purchased products containing a CRT from someone other than the company that manufactured the CRT component, such as from an electronics retailer or a device manufacturer other than one of the Defendants.

What Are My Rights And Options?

Exclude yourself: Oregon natural persons have the right to exclude themselves from this action. The State of Oregon cannot be excluded. If you opt out, you will not be legally bound by the litigation or these settlements, but you will not get any money or other benefits from this action or these settlements. You will retain any rights you currently have, if any. Please note that under Oregon law, authority to bring antitrust actions for indirect purchaser claims, like this action, was limited to actions by the Attorney General until January 1, 2010.

To opt-out, complete the opt-out registration online at www.OregonScreenSettlement.com or send a written letter stating that you want to be excluded from the case: *State of Oregon, ex rel Ellen F. Rosenblum v. LG Electronics, Inc. et al.*, Multnomah County Circuit Court case no. CV 120810246. The letter must include the case name, your name, address, telephone number, and signature. The letter must be **postmarked on or before Month __, 2016**, and mailed to: Oregon CRT Settlement, c/o GCG, P.O. Box 10240, Dublin, Ohio 43017-5740.

File a claim: Only Oregon natural persons need to file a claim to obtain benefits from these settlements. Claims can be completed online or by mailing the claim form, available for download at www.OregonScreenSettlement.com, to the Settlement Administrator. The Court has not set a deadline for filing claims, as the case has not concluded.

Do nothing: If you do nothing, you will continue to be represented by the Oregon Attorney General in the action. You will be bound by the terms of the settlements, and will release Defendants and related entities from any claims you may have relating to the allegations in this lawsuit. Oregon natural persons that do not file a claim will not be entitled to any benefits in this matter and will be bound by the terms of the settlement.

Who Represents Me?

The Attorney General of Oregon represents the State and Oregon natural persons. You do not have to pay the Attorney General. The Attorney General will request the Court approve attorney fees and litigation costs from the Settlement Fund. Additional costs to administer the Settlements will also come out of the Settlement Fund. If you want to be represented by your own lawyer, and have that lawyer appear in Court for you, you must exclude yourself and hire an attorney at your own expense.

How Do I Get More Information?

This Notice summarizes the lawsuits and the Settlements. You can get more information about the lawsuits and Settlements, the claims process or obtain a claim form at www.OregonScreenSettlement.com, by calling 1-877-940-7791, or writing to: Oregon CRT Settlement, c/o GCG, P.O. Box 10240, Dublin, Ohio 43017-5740.

1-877-940-7791

www.OregonScreenSettlement.com

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of October, 2016, I served the foregoing

**CORRECTED DECLARATION OF TIM D. NORD IN SUPPORT OF MOTION
FOR APPROVAL OF SETTLEMENTS, NOTICE AND ENTRY OF LIMITED
JUDGMENTS, on the following:**

<p>STOEL RIVES LLP TIMOTHY W. SNIDER 900 SW Fifth Avenue, Suite 2600 Portland, Oregon 97204 Email: twsnider@stoel.com Telephone: (503) 224-3380 Facsimile: (503) 220-2480</p>	<p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p>
<p>WEIL, GOTSHAL & MANGES LLP DAVID L. YOHAI ADAM C. HEMLOCK DAVID YOLKUT KEVIN GOLDSTEIN 767 Fifth Avenue New York, New York 10153-0119 Email: david.yohai@weil.com Email: adam.hemlock@weil.com Email: david.yolkut@weil.com Email: kevin.goldstein@weil.com</p>	<p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p>
<p>WINSTON & STRAWN LLP JEFFREY L. KESSLER EVA W. COLE MOLLY M. DONOVAN 200 Park Avenue New York, New York 10166 Email: jkessler@winston.com Email: ewcole@winston.com Email: mmdonovan@winston.com</p>	<p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p>
<p><i>Attorneys for Defendants Panasonic Corporation; Panasonic Corporation of North America; and MT Picture Display Co., Ltd.</i></p>	

<p>1 2 ANGELI UNGAR LAW GROUP, LLC 3 DAVID H. ANGELI 4 KRISTEN L. TRANETZKI 5 121 SW Morrison Street, Ste. 400 6 Portland OR 97204 7 Email: david@angelilaw.com 8 Email: Kristen@angelilaw.com</p> <p>9 KIRKLAND & ELLIS PC 10 JAMES MUTCHNIK 11 KATE WHEATON 12 300 North LaSalle 13 Chicago, IL 60654 14 james.mutchnik@kirkland.com; kate.wheaton@kirkland.com;</p> <p>15 KIRKLAND & ELLIS LLP 16 Eliot Adelson 17 555 California Street 18 San Francisco, CA 94104 19 Email: eliot.adelson@kirkland.com</p> <p>20 <i>Attorneys for Defendants Hitachi, Ltd., Hitachi 21 Asia, Ltd., Hitachi Displays, Ltd., Hitachi 22 Electronic Devices (USA), Inc.</i></p>	<p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p> <p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p> <p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p>
<p>23 BAKER BOTTS, LLP 24 JOHN M. TALADAY 25 ERIK KOONS TIFFANY GELOTT The Warner 1299 Pennsylvania Ave., NW Washington DC 20004-2400 E-mail: john.taladay@bakerbotts.com E-mail: erik.koons@bakerbotts.com Email: tiffany.gelott@bakerbotts.com</p> <p>CASE & DUSTERHOFF, LLP JAMES D. CASE The 9800 Professional Building 9800 SW Beaverton-Hillsdale Hwy., Suite 200 Beaverton, OR 97007 E-mail: jcase@case-dusterhoff.com Telephone: (503) 641-7222 Facsimile: (503) 643-6522</p> <p><i>Attorneys for Philips Electronics North America Corp. (PENAC)</i></p>	<p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p> <p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p>

<p>1</p> <p>2 TONKON TORP, LLP SCOTT G. SEIDMAN 3 ANNA SORTUN 1600 Pioneer Tower 4 888 SW Fifth Avenue Portland OR 97204 5 Email: scott.seidman@tonkon.com Email: anna.sortun@tonkon.com</p> <p>6 WHITE & CASE LLP 7 DANA E. FOSTER LUCIUS B. LAU 8 701 Thirteenth Street, NW Washington DC 20005 9 Email: dfoster@whitecase.com Email: alau@whitecase.com</p> <p>10 <i>Attorneys for Defendants Toshiba Corporation</i> 11 <i>and Toshiba America Electronic Components, Inc.</i></p>	<p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p> <p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p>
<p>12 LARKINS VACURA LLP CHRISTOPHER J. KAYSER 13 CODY HOESLY 621 SW Morrison Street, Ste. 1450 14 Portland OR 97205 Email: cjkayser@larkinsvacura.com 15 Email: choesly@larkinsvacura.com</p> <p>16 MUNGER TOLLES & OLSON, LLP MIRIAM KIM 17 LAURA SULLIVAN CATHLEEN HARTGE 18 KYLE W. MACH 560 Mission Street San Francisco, CA 94105 19 Email: Miriam.Kim@mto.com Email: Laura.Sullivan@mto.com 20 Email: kyle.mach@mto.com Email: Cathleen.Hartge@mto.com</p> <p>21 MUNGER TOLLES & OLSON, LLP 22 JONATHAN E. ALTMAN BILL TEMKO 23 355 S. Grand Ave., 35th Floor Los Angeles, CA 90071 24 E-mail: jonathan.altman@mto.com E-mail: William.Temko@mto.com 25 Telephone: 213-683-9100</p> <p><i>Attorneys for Defendants LG Electronics, Inc.</i> <i>and LG Electronics, U.S.A.</i></p>	<p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p> <p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p> <p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p>

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<p>LANE POWELL PC MILO PETRANOVICH PETER D. HAWKES 601 SW Second Ave., Suite 2100 Portland, OR 97204-3158 E-mail: petranovichm@lanepowell.com E-mail: hawkesp@lanepowell.com E-mail: Pettingerk@lanepowell.com; docketing-pdx@lanepowell.com Telephone: (503) 778-2100 Facsimile: (503) 778-2200</p> <p>SHEPPARD, MULLIN, RICHTER & HAMPTON LLP MICHAEL W. SCARBOROUGH DYLAN BALLARD JAMES McGINNIS LEO CASERIA Four Embarcadero Center, 17th Floor San Francisco, California 94111-4109 Email: mscarborough@sheppardmullin.com Email: dballard@sheppardmullin.com Email: jmcGinnis@sheppardmullin.com Email: Lcaseria@sheppardmullin.com Telephone: 415-434-9100 Facsimile: 415-434-3947</p> <p><i>Attorneys for Defendants Samsung SDI Co., Ltd.; Samsung SDI America, Inc.; Samsung SDI Mexico S.A. de C.V.; Samsung SDI Brasil Ltda.; Shenzhen Samsung SDI Co., Ltd.; Tianjin Samsung SDI Co., Ltd.; and Samsung SDI (Malaysia) Sdn. Bhd.</i></p>	<p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p> <p><input type="checkbox"/> By hand delivery <input type="checkbox"/> By first-class mail* <input checked="" type="checkbox"/> By email <input type="checkbox"/> By overnight mail <input type="checkbox"/> By facsimile Fax # _____</p>
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*With first-class postage prepaid and deposited in Portland, Oregon.

s/ Michael G. Neff
Michael E. Haglund, OSB No. 772030
Michael K. Kelley, OSB 853782
Michael G. Neff, OSB 925360
Attorneys for Plaintiff