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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

Case No.: 1208 10246

**[PROPOSED] ORDER GRANTING  
APPROVAL OF PLAINTIFF STATE  
OF OREGON'S SETTLEMENTS  
WITH HITACHI, PANASONIC, AND  
LG DEFENDANTS NOTICE AND  
ENTRY OF LIMITED JUDGMENT  
OF DISMISSAL AS TO SETTLING  
DEFENDANTS**

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

Defendants.

The Oregon Attorney General has brought before this Court four matters for review and approval: (1) three separate proposed settlement agreements ("Proposed Settlements") which the Oregon Attorney General believes are reasonable and in the best interests of Oregon and its citizens; (2) a proposed plan for providing notice of the action and these settlements ("Notice Plan") to Oregon natural persons that indirectly purchased Cathode Ray Tubes (CRT) during the period 1995 through 2007 which were incorporated into computer monitors and televisions ("CRT Products") sold in Oregon; (3) a preliminary

plan for distribution of the settlement proceeds which together with the Notice Plan afford

1 Oregon natural persons “[A] reasonable opportunity to secure an appropriate portion of  
2 net monetary relief.” ORS 646.780(5)(a); and (4) a proposed limited judgment of dismissal  
3 with prejudice as to the Settling Defendants as further defined herein.

4 The Proposed Settlements presented by the Oregon Attorney General are with the  
5 Hitachi, Panasonic, and LG Electronics defendants (as identified in the Proposed  
6 Settlements, and inclusive of related entities identified in the Proposed Settlements)  
7 (collectively “Settling Defendants”). The Court has reviewed the Proposed Settlements  
8 and the State of Oregon’s Motion for Approval of Settlements with the Hitachi, Panasonic,  
9 and LG Electronics Defendants (“Motion for Approval”) and supporting declarations.  
10 After carefully considering all papers filed and proceedings held herein and otherwise  
11 being fully informed in the premises:  
12

13 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:  
14

- 15 1. The Proposed Settlements are approved pursuant to ORS 646.775(3).
- 16 2. The Court finds that the terms of the Proposed Settlements fall within the  
17 range of reasonableness for approval.
- 18 3. The Court finds that the notice by publication, as proposed by Oregon,  
19 would not deny due process of law to any natural person and constitutes valid, due, and  
20 sufficient notice. The Court finds that the proposed Notice Plan and forms of notice  
21 comport with the due process of law and are proper under 646.775(2) and (3).
- 22 4. Within 15 days of this Order, the Oregon Attorney General is directed to  
23 cause notice substantially in the form of the Notice of Settlement attached as the first page  
24 to Exhibit A to the Declaration of Tim D. Nord dated September 30, 2016 (“Nord  
25 Declaration”) and filed with this Court to be published as described in the Notice Plan.

1 The Oregon Attorney General is further ordered to post the Notice of Settlement on the  
2 Oregon Attorney General's CRT websites.

3           5.       The Court finds that ORS 646.775(2)(b) provides that any natural person  
4 on whose behalf the Oregon Attorney General brings a *parens patriae* action pursuant to  
5 ORS 646.775(1)(a) must have the opportunity to exclude themselves from the action. Any  
6 natural persons may exercise their right to be excluded from the action and the Proposed  
7 Settlements by mailing an election of exclusion no later than 60 days after commencement  
8 of the Notice Plan to the appropriate address identified in Exhibit A to the Nord  
9 Declaration. Any election of exclusion must be in writing, set forth the name, address, and  
10 telephone number of the person that wishes to be excluded, and must be signed by the  
11 person seeking exclusion. Any natural person who does not properly and timely elect  
12 exclusion shall be bound by this action and the terms and provisions of the Proposed  
13 Settlements so approved following entry of final judgments of dismissal. Such terms and  
14 provisions shall include, but are not limited to, the releases, waivers, and covenants  
15 described in the Proposed Settlements whether or not such person makes a claim against  
16 the settlement funds.

19           6.       The Oregon Attorney General shall be allowed to remove from the  
20 settlement funds up to \$89,500 which may be drawn against to pay for initial  
21 administrative, notice, and claims processing expenses.

23           7.       The Court finds the preliminary plan of distribution set out in the Motion  
24 for Approval, together with the Oregon Attorney General's Notice Plan, meet the  
25 requirement of ORS 646.775(5)(a) as the Notice Plan and plan of distribution together are  
reasonably designed to provide natural persons a reasonable opportunity to secure an

1 appropriate portion of the amounts Defendants have agreed to pay under the terms of the  
2 Proposed Settlements. No distributions to natural persons or the general fund shall occur  
3 until judgments dismissing all defendants named in the Oregon complaint are entered by  
4 this Court and the Court enters a final judgment directing distribution, subject to any  
5 additional Court orders.

6  
7 8. With the exception of actions required to effectuate the Proposed  
8 Settlements or that are otherwise permitted by this order, the Proposed Settlements, or  
9 agreed to by the Oregon Attorney General and the Settling Defendants, all further  
10 proceedings as to the Settling Defendants involving claims released in the Proposed  
11 Settlements are hereby stayed. This stay includes actions by the Oregon Attorney General  
12 on behalf of Oregon state agencies and in her *parens patriae* capacity, and actions by any  
13 natural person or Oregon political subdivision purporting to assert claims directly or  
14 indirectly against Settling Defendants.  
15

16 9. The Court has determined that there is no just reason for delay in entry of a  
17 limited judgment of dismissal with prejudice as to the Settling Defendants and grants the  
18 parties' request for entry of a limited judgment of dismissal of the Settling Defendants  
19 pursuant to ORCP 67 B.

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1           10. The Court retains exclusive jurisdiction over this action to consider all  
2 further matters arising out of or connected with the Proposed Settlements.

3

4           **IT IS SO ORDERED.**

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9 Submitted By:

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11 **HAGLUND KELLEY LLP**

12 By: s/Michael G. Neff  
13 Michael E. Haglund, OSB No. 772030  
14 Haglund@hk-law.com

15 Michael K. Kelley, OSB 853782  
16 Email: kelley@hk-law.com

17 Michael G. Neff, OSB 925360  
18 Email: neff@hk-law.com

19 Telephone: (503) 225-0777

20 Facsimile: (503) 225-1257

21 Oregon Special Assistant Attorneys General for Plaintiff

22 Tim D. Nord, OSB No. 882800

23 Special Counsel

24 Brian A. de Haan, OSB No. 155251

25 Assistant Attorney General

1162 Court Street, NE

Salem, OR 97301-4096

Telephone: (503) 943-4400

Facsimile: (503) 225-1257

Email: tim.d.nord@doj.state.or.us

Email: brian.a.dehaan@doj.state.or.us

Attorneys for Plaintiff State of Oregon

25

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of September, 2016, I served the foregoing  
**ORDER GRANTING APPROVAL OF PLAINTIFF STATE OF OREGON'S  
SETTLEMENTS WITH HITACHI, PANASONIC, AND LG DEFENDANTS  
NOTICE AND ENTRY OF LIMITED JUDGMENT OF DISMISSAL AS TO  
SETTLING DEFENDANTS**, on the following:

<p><b>STOEL RIVES LLP</b> TIMOTHY W. SNIDER 900 SW Fifth Avenue, Suite 2600 Portland, Oregon 97204 Email: <a href="mailto:twsnider@stoel.com">twsnider@stoel.com</a> Telephone: (503) 224-3380 Facsimile: (503) 220-2480</p> <p><b>WEIL, GOTSHAL &amp; MANGES LLP</b> DAVID L. YOHAI ADAM C. HEMLOCK DAVID YOLKUT KEVIN GOLDSTEIN 767 Fifth Avenue New York, New York 10153-0119 Email: <a href="mailto:david.yohai@weil.com">david.yohai@weil.com</a> Email: <a href="mailto:adam.hemlock@weil.com">adam.hemlock@weil.com</a> Email: <a href="mailto:david.yolkut@weil.com">david.yolkut@weil.com</a> Email: <a href="mailto:kevin.goldstein@weil.com">kevin.goldstein@weil.com</a></p> <p><b>WINSTON &amp; STRAWN LLP</b> JEFFREY L. KESSLER EVA W. COLE MOLLY M. DONOVAN 200 Park Avenue New York, New York 10166 Email: <a href="mailto:jkessler@winston.com">jkessler@winston.com</a> Email: <a href="mailto:ewcole@winston.com">ewcole@winston.com</a> Email: <a href="mailto:mmdonovan@winston.com">mmdonovan@winston.com</a></p> <p><i>Attorneys for Defendants Panasonic Corporation; Panasonic Corporation of North America; and MT Picture Display Co., Ltd.</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><b>ANGELI UNGAR LAW GROUP, LLC</b> DAVID H. ANGELI KRISTEN L. TRANETZKI 121 SW Morrison Street, Ste. 400 Portland OR 97204 Email: <a href="mailto:david@angelilaw.com">david@angelilaw.com</a> Email: <a href="mailto:Kristen@angelilaw.com">Kristen@angelilaw.com</a></p> <p><b>KIRKLAND &amp; ELLIS PC</b> JAMES MUTCHNIK KATE WHEATON 300 North LaSalle Chicago, IL 60654 <a href="mailto:james.mutchnik@kirkland.com">james.mutchnik@kirkland.com</a>; <a href="mailto:kate.wheaton@kirkland.com">kate.wheaton@kirkland.com</a>;</p> <p><b>KIRKLAND &amp; ELLIS LLP</b> Eliot Adelson 555 California Street San Francisco, CA 94104 Email: <a href="mailto:eliot.adelson@kirkland.com">eliot.adelson@kirkland.com</a></p> <p><i>Attorneys for Defendants Hitachi, Ltd., Hitachi Asia, Ltd., Hitachi Displays, Ltd., Hitachi 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><b>BAKER BOTTS, LLP</b> JOHN M. TALADAY ERIK KOONS TIFFANY GELOTT The Warner 1299 Pennsylvania Ave., NW Washington DC 20004-2400 E-mail: <a href="mailto:john.taladay@bakerbotts.com">john.taladay@bakerbotts.com</a> E-mail: <a href="mailto:erik.koons@bakerbotts.com">erik.koons@bakerbotts.com</a> Email: <a href="mailto:tiffany.gelott@bakerbotts.com">tiffany.gelott@bakerbotts.com</a></p> <p><b>CASE &amp; DUSTERHOFF, LLP</b> JAMES D. CASE The 9800 Professional Building 9800 SW Beaverton-Hillsdale Hwy., Suite 200 Beaverton, OR 97007 E-mail: <a href="mailto:jcase@case-dusterhoff.com">jcase@case-dusterhoff.com</a> 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 <b>TONKON TORP, LLP</b></p> <p>3 SCOTT G. SEIDMAN</p> <p>4 ANNA SORTUN</p> <p>5 1600 Pioneer Tower</p> <p>6 888 SW Fifth Avenue</p> <p>7 Portland OR 97204</p> <p>8 Email: <a href="mailto:scott.seidman@tonkon.com">scott.seidman@tonkon.com</a></p> <p>9 Email: <a href="mailto:anna.sortun@tonkon.com">anna.sortun@tonkon.com</a></p> <p>10 <b>WHITE &amp; CASE LLP</b></p> <p>11 DANA E. FOSTER</p> <p>12 LUCIUS B. LAU</p> <p>13 701 Thirteenth Street, NW</p> <p>14 Washington DC 20005</p> <p>15 Email: <a href="mailto:dfoster@whitecase.com">dfoster@whitecase.com</a></p> <p>16 Email: <a href="mailto:alau@whitecase.com">alau@whitecase.com</a></p> <p>17 <i>Attorneys for Defendants Toshiba Corporation</i></p> <p>18 <i>and Toshiba America Electronic Components, Inc.</i></p>	<p><input type="checkbox"/> By hand delivery</p> <p><input type="checkbox"/> By first-class mail*</p> <p><input checked="" type="checkbox"/> By email</p> <p><input type="checkbox"/> By overnight mail</p> <p><input type="checkbox"/> By facsimile</p> <p>Fax # _____</p> <p><input type="checkbox"/> By hand delivery</p> <p><input type="checkbox"/> By first-class mail*</p> <p><input checked="" type="checkbox"/> By email</p> <p><input type="checkbox"/> By overnight mail</p> <p><input type="checkbox"/> By facsimile</p> <p>Fax # _____</p>
<p>12 <b>LARKINS VACURA LLP</b></p> <p>13 CHRISTOPHER J. KAYSER</p> <p>14 CODY HOESLY</p> <p>15 621 SW Morrison Street, Ste. 1450</p> <p>16 Portland OR 97205</p> <p>17 Email: <a href="mailto:cjkayser@larkinsvacura.com">cjkayser@larkinsvacura.com</a></p> <p>18 Email: <a href="mailto:choesly@larkinsvacura.com">choesly@larkinsvacura.com</a></p> <p>19 <b>MUNGER TOLLES &amp; OLSON, LLP</b></p> <p>20 MIRIAM KIM</p> <p>21 LAURA SULLIVAN</p> <p>22 CATHLEEN HARTGE</p> <p>23 560 Mission Street</p> <p>24 San Francisco, CA 94105</p> <p>25 Email: <a href="mailto:Miriam.Kim@mto.com">Miriam.Kim@mto.com</a></p> <p>26 Email: <a href="mailto:Laura.Sullivan@mto.com">Laura.Sullivan@mto.com</a></p> <p>27 Email: <a href="mailto:Cathleen.Hartge@mto.com">Cathleen.Hartge@mto.com</a></p> <p>28 <b>MUNGER TOLLES &amp; OLSON, LLP</b></p> <p>29 JONATHAN E. ALTMAN</p> <p>30 BILL TEMKO</p> <p>31 355 S. Grand Ave., 35th Floor</p> <p>32 Los Angeles, CA 90071</p> <p>33 E-mail: <a href="mailto:jonathan.altman@mto.com">jonathan.altman@mto.com</a></p> <p>34 E-mail: <a href="mailto:William.Temko@mto.com">William.Temko@mto.com</a></p> <p>35 Telephone: 213-683-9100</p> <p>36 <i>Attorneys for Defendants LG Electronics, Inc.</i></p> <p>37 <i>and LG Electronics, U.S.A.</i></p>	<p><input type="checkbox"/> By hand delivery</p> <p><input type="checkbox"/> By first-class mail*</p> <p><input checked="" type="checkbox"/> By email</p> <p><input type="checkbox"/> By overnight mail</p> <p><input type="checkbox"/> By facsimile</p> <p>Fax # _____</p> <p><input type="checkbox"/> By hand delivery</p> <p><input type="checkbox"/> By first-class mail*</p> <p><input checked="" type="checkbox"/> By email</p> <p><input type="checkbox"/> By overnight mail</p> <p><input type="checkbox"/> By facsimile</p> <p>Fax # _____</p>

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<p><b>LANE POWELL PC</b>  <b>MILO PETRANOVICH</b>  <b>PETER D. HAWKES</b>  601 SW Second Ave., Suite 2100  Portland, OR 97204-3158  E-mail: <a href="mailto:petranovichm@lanepowell.com">petranovichm@lanepowell.com</a>  E-mail: <a href="mailto:hawkesp@lanepowell.com">hawkesp@lanepowell.com</a>  E-mail: <a href="mailto:Pettingerk@lanepowell.com">Pettingerk@lanepowell.com</a>; <a href="mailto:docketing-pdx@lanepowell.com">docketing-pdx@lanepowell.com</a>  Telephone: (503) 778-2100  Facsimile: (503) 778-2200</p> <p><b>SHEPPARD, MULLIN, RICHTER  &amp; HAMPTON LLP</b>  <b>MICHAEL W. SCARBOROUGH</b>  <b>DYLAN BALLARD</b>  <b>JAMES McGINNIS</b>  <b>LEO CASERIA</b>  Four Embarcadero Center, 17th Floor  San Francisco, California 94111-4109  Email: <a href="mailto:mscarborough@sheppardmullin.com">mscarborough@sheppardmullin.com</a>  Email: <a href="mailto:dballard@sheppardmullin.com">dballard@sheppardmullin.com</a>  Email: <a href="mailto:jmcGinnis@sheppardmullin.com">jmcGinnis@sheppardmullin.com</a>  Email: <a href="mailto:Lcaseria@sheppardmullin.com">Lcaseria@sheppardmullin.com</a>  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

