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14 **IN THE UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
(SAN FRANCISCO DIVISION)

16 IN RE TFT-LCD (FLAT PANEL)
17 ANTITRUST LITIGATION

Case No. Master File No. 3:07-md-1827 SI

**DECLARATION OF ELLEN M. KLEM
IN SUPPORT OF MOTION FOR
APPROVAL OF SETTLEMENTS**

18 This Document Relates to Individual
19 Case No. 3:10-cv-4346 SI

20 STATE OF OREGON, *ex rel* Ellen F.
21 Rosenblum, Attorney General,

Judge: Honorable Susan Illston

Plaintiff,

22 v.

23 AU OPTRONICS CORPORATION,
24 et al.,

25 Defendants.
26

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1 I, Ellen M. Klem, declare as follows:

2 1. I make this declaration in support of the State of Oregon's Motion for
3 Approval of Settlement with All Defendants ("Approval Motion"). This declaration is
4 based upon my personal knowledge and upon information provided by counsel for the
5 State of Oregon and staff of the Oregon Department of Justice, and if called on to do
6 so, I could and would testify competently thereto.

7 2. I am an attorney licensed to practice in the State of Oregon, State of
8 Indiana and the District of Columbia, and am the Director of Consumer Outreach &
9 Education at the Oregon Department of Justice ("DOJ"). In my role at the DOJ,
10 among other duties, I appear before citizen groups throughout the state to present on
11 consumer-related issues. The Attorney General also makes similar presentations
12 throughout the state.

13 3. As part of the Notice Plan described in the Declaration of Jennifer M.
14 Keough of Garden City Group, LLC, the DOJ will perform certain actions as described
15 herein.¹

16 4. Attorney General's Website: Throughout the Opt-Out Period and Claims
17 Period the Attorney General's website shall include information regarding the above-
18 captioned matter, links to the Settlement Website established by GCG, and will make
19 available for download the Long Form Notice.

20 5. U.S. Mail to Political subdivisions: During the Opt-Out Period, DOJ
21 will send the Short Form Notice by U.S. mail to approximately 900 political
22 subdivisions as well as trade associations and lobbying groups formed by or
23 representing political subdivisions. The contact information for these recipients was

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26 ¹ Unless otherwise defined herein, all capitalized terms shall have the same
meaning as set forth in the Declaration of Jennifer M. Keough of Garden City Group,
LLC.

1 compiled and used to provide legal notice in *In re DRAM Antitrust Lit.*, M 06-04333
2 (N.D. Cal. Jan. 17, 2014).

3 6. Email to Natural Persons: During the Opt-Out Period, DOJ will send
4 the Short Form Notice by email to natural persons who have previously signed up with
5 the Attorney General to receive consumer-related information.

6 7. Press Release: During the Opt-Out Period and/or the Claims Period, the
7 Attorney General will issue a press release that describes the litigation, the settlements,
8 and the method to submit a claim.

9 8. Twitter: During the Opt-Out Period and the Claims Period, the Attorney
10 General and/or her staff will periodically post brief announcements and links to the
11 Settlement Website on DOJ Twitter accounts.

12 9. Public Outreach by the Attorney General: During the Opt-Out Period and
13 the Claims Period, the Attorney General or her staff will speak at public events at which
14 the Attorney General or her staff will orally describe the settlement and make available
15 the Short Form Notice.

16 10. Attorney General Consumer Hotline: During the Opt-Out Period and the
17 Claims Period, the Attorney General's Consumer Hotline operators will provide
18 information to all callers regarding the settlement and the ways in which to obtain
19 further information regarding opting out or submitting a claim.

20 11. News Media: During the Opt-Out Period and the Claims Period, the
21 Attorney General or her staff will be available for interviews by and/or appearances on
22 various news sources throughout the state.

23
24 DATED this 25 day of September, 2015.

25
26 
Ellen M. Klem

CERTIFICATE OF SERVICE

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2 I hereby certify that on the 25th day of September, 2015, I electronically filed the
3 **DECLARATION OF ELLEN M. KLEM IN SUPPORT OF MOTION FOR**
4 **APPROVAL OF SETTLEMENTS** with the Clerk of the Court using the CM/ECF
5 system, which will automatically send email notification to the parties and counsel of
6 record.
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8 HAGLUND KELLEY LLP

9 By: /s/ Michael K. Kelley
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