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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  
ENTRY OF FINAL JUDGMENT OF  
DISMISSAL**

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

2 1. I make this declaration in support of the Oregon Attorney General's  
3 Notice of Motion and Motion for Order Granting Approval of Final Plan of  
4 Distribution and Entry of Final Judgment of Dismissal with Prejudice. This  
5 declaration is based upon my personal knowledge and upon information provided by  
6 counsel for the State of Oregon and staff of the Oregon Department of Justice, and if  
7 called on to do so, I could and would testify competently thereto.

8 2. I am an attorney licensed to practice in the State of Oregon, State of  
9 Indiana and the District of Columbia, and am the Director of Consumer Outreach &  
10 Education at the Oregon Department of Justice ("DOJ").

11 3. Following Court approval of the settlements DOJ completed the  
12 following actions:

13 A. Attorney General's Website: Throughout the Opt-Out Period the  
14 Attorney General's website, available at  
15 [http://www.doj.state.or.us/consumer/pages/lcd\\_antitrust\\_litigation.aspx](http://www.doj.state.or.us/consumer/pages/lcd_antitrust_litigation.aspx),  
16 included information regarding the above-captioned matter and links to  
17 the Settlement Website established by Garden City Group, and made  
18 available for download the Long Form Notice. The Attorney General's  
19 website will maintain the same information throughout the Claims Period  
20 as well.

21 B. Emails to Natural Persons: During the Opt-Out Period, DOJ sent the  
22 Short Form Notice by email to natural persons who had previously  
23 signed up with the Attorney General to receive consumer-related  
24 information.

25 C. Twitter: During the Opt-Out Period, the DOJ periodically posted brief  
26 announcements and links to the Settlement Website on DOJ Twitter

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accounts. During the Claims Period, the DOJ will continue to periodically post such announcements and links.

- D. Public Outreach by the Attorney General: During the Opt-Out Period, the Attorney General and/or her staff spoke at public events and orally described the settlement and made available the Short Form Notice. During the Claims Period, the Attorney General and/or her staff will continue to provide information regarding the settlement at public events.
- E. Attorney General Consumer Hotline: During the Opt-Out Period, the Attorney General’s Consumer Hotline operators provided information regarding the settlement and the ways in which to obtain further information regarding opting out or submitting a claim to callers who requested information. During the Claims Period, the Attorney General’s Consumer Hotline operators will continue to provide information regarding the settlement.
- F. News Media: During the Opt-Out Period, the Attorney General or her staff were available for interviews by and/or appearances on various news sources throughout the state. During the Claims Period, Attorney General and her staff will continue to be available for interviews or appearances.

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G. Press Release: The Attorney General did not issue a press release during the Opt-Out Period, however the recipients of the Email to Natural Persons described above included several members of the Oregon news media. A formal press release will be issued by the Attorney General or Garden City Group as a component of the Notice Plan implemented during the Claims Period.

DATED this 21 day of March, 2016.

  
Ellen M. Klem

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of April, 2016, I electronically filed the  
**DECLARATION OF ELLEN M. KLEM IN SUPPORT OF MOTION FOR  
ENTRY OF FINAL JUDGMENT OF DISMISSAL**, with the Clerk of the Court using  
the CM/ECF system, which will automatically send email notification to the parties and  
counsel of record.

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