

IMPORTANT NOTICE

YOU MAY BE ENTITLED TO BENEFITS FROM A CLASS ACTION SETTLEMENT

Subject to Court approval, a proposed settlement has been reached in a class action alleging that Samsung (defined below) failed to make available to Authorized Service Centers (“ASCs”) replacement plasma display panel assemblies (“PDPs”) for Samsung plasma television models PN51F5500, PN51F5300, or PN51F5350 (“Affected Models”). The representative plaintiff claims that Affected Model televisions owned by her and other individuals experienced a “line” issue, under which lines appeared on the screen, but that she and the other individuals have been unable to repair their televisions due to the alleged lack of replacement PDPs for the Affected Models. The representative plaintiff further claims that Samsung violated California consumer protection laws. Samsung denies any claims of wrongdoing and believes Plaintiff’s claims are without merit, but has agreed to settle the lawsuit (defined below) to avoid the burden and cost of further litigation.

You may be a Settlement Class Member if you are a California resident and own a Samsung plasma television model PN51F5500, PN51F5300, or PN51F5350, that exhibits a “line” issue that requires a replacement PDP.

Under the Settlement, the named Plaintiff will ask for a \$6,000 Service Award and counsel will ask for \$487,000 in fees and expenses. You will receive no money damages, but your claims for potential damages, if any, will not be released. This means that you are free to bring your own lawsuit for damages against Samsung on your own or on behalf of a putative class, or to participate in a new class action if someone else files one. From the date of the original lawsuit (April 17, 2018) until the date of this notice November 15, 2019, the statute of limitations has been suspended. Now, however, the limitations period will begin to run again. Thus, if you would like to bring your own lawsuit, you must do so before the statute of limitations runs on your claim (assuming it is not already barred). You will, however, be the beneficiary of aspects of the Settlement Agreement: namely, if you qualify, Samsung will either make the replacement PDP available to you for purchase or provide you with your choice of an exchange for an alternative flat panel display television with reasonably similar display size and features to your current Affected Model or a refund of the estimated purchase price of your Affected Model. The Court has not given final approval to this settlement. If you want to object, you may do so provided you follow the procedures stated elsewhere in this notice. The Court will decide whether to grant final approval on February 27, 2020, at 11:00 a.m., and would appreciate your views.

Your Legal Rights Are Affected Even If You Do Not Act. Please Read This Notice Carefully.

Questions? Visit www.CaliforniaPDPSettlement.com

A SUMMARY OF YOUR RIGHTS AND CHOICES

You May	Summary	Due Date
Seek Relief Under the Settlement	You may be eligible to purchase a replacement PDP, receive an exchange for an alternative flat panel display television with reasonably similar display size and features to your current Affected Model television, or receive a refund of the estimated purchase price of your Affected Model television.	November 30, 2021
Submit an Objection	You may write to the Court and explain why you do not want the Settlement to be approved. You may appear and speak at the Fairness Hearing on your own or through a lawyer hired by you. If your objection is denied by the Court, you may seek relief under the Settlement or do nothing.	January 31, 2020
Do Nothing	You do not give up the right to sue on your own regarding any claims, even if they are part of the Settlement.	

THESE RIGHTS AND OPTIONS

– AND THE DEADLINES TO EXERCISE THEM –

ARE EXPLAINED IN THIS NOTICE.

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BASIC INFORMATION

1. Why Is There a Notice?

The purpose of this Notice is to inform potential Class Members about the proposed Settlement of a class action lawsuit before the Court decides whether to approve the Settlement. This Notice explains:

- What the lawsuit and the Settlement are about.
- Who is a member of the Settlement Class.
- Who represents the Settlement Class Members in the lawsuit.
- What your legal rights and choices are.
- How and by when you need to act.

2. What Is a Class Action and Who Is Involved?

In a class action lawsuit, one or more people, called “Class Representatives,” sue on behalf of people who plaintiffs believe have similar claims. The people together are called the “Class” or “Class Members.” One of the people who initiated this lawsuit, the Plaintiff, and the companies being sued, Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd. (together, “Samsung”), have reached a proposed Settlement. The Court that is considering whether to approve the Settlement has allowed, or “certified,” this case to proceed as a class action for purposes of settlement only, and all decisions that the Court makes concerning the Settlement will affect everyone in the Class.

3. What Lawsuit Is Involved in This Settlement?

A class action was filed in the United States District Court for the Northern District of California titled *Alexis Bronson, et al. v. Samsung Electronics America, Inc., et al.*, Case No. 3:18-cv-2300-WHA (the “Class Action”).

4. What Is This Class Action About?

Plaintiff alleges that in California Samsung failed to make available to Authorized Service Centers (“ASCs”) replacement PDPs for the Affected Models. Plaintiff claims that she was injured by the alleged lack of available PDPs. Samsung denies any wrongdoing and believes Plaintiff’s claims are without merit, but has agreed to settle the lawsuit to avoid the burden and cost of further litigation.

5. Why Is There a Settlement?

The Court did not decide in favor of either Plaintiff Crystal Hardin (the Class Representative) or Samsung. The Class Representative and Class Counsel (listed below) believe that the claims asserted in the Class Action have merit, but believe that the Settlement is in the best interests of the Settlement Class. Class Counsel have evaluated information made available in the course of the lawsuit and settlement

negotiations and have taken into account the risks and uncertainties of proceeding with the Class Action. Those risks include the uncertainty of obtaining and maintaining class certification, prevailing on the merits, proving damages at trial, and prevailing on post-trial motions and likely appeals. Based upon the consideration of these and other factors, including the substantial time and expense of further litigation, Class Counsel believe that it is in the best interests of the Settlement Class to settle the Class Action on the terms described below.

Samsung strongly denies any wrongdoing, does not believe it has any liability to the Class Representative or the Settlement Class, and believes Plaintiff's claims are without merit. However, Samsung believes that it is in its best interests to settle the Class Action under the terms of the Settlement Agreement and obtain closure on this matter to avoid the uncertainty, expense, and diversion of business resources resulting from further litigation.

The parties engaged in extensive settlement negotiations, participated in mediation before Magistrate Judge Jacqueline Corley, and shared significant amounts of information about the Class Action before reaching the Settlement.

This Notice does not imply that any court has found or would have found that Samsung violated the law as to Plaintiff Hardin, that a class would have been certified, or that any member of the proposed class would have recovered any amount of damages if the Class Action was not settled.

SETTLEMENT MEMBERS

To find out if you are entitled to benefits from this Settlement, you first have to determine if you are a Class Member.

6. Am I a Member of the Settlement Class?

You are a member of the Settlement Class if you are a California resident and own a Samsung plasma television model PN51F5500, PN51F5300, or PN51F5350, that exhibits a "line" issue that requires a replacement PDP.

THE PROPOSED SETTLEMENT

This Notice provides a summary of some, but not all, of the terms of the Settlement Agreement. Visit the "Documents" page of the Settlement Website, www.CaliforniaPDPSettlement.com, to see a copy of the entire Settlement Agreement. The Settlement Agreement must be approved by the Court and become "Final" before any relief is provided through the Settlement Agreement.

7. What Benefits Will I Receive as a Settlement Class Member if the Settlement is Approved?

Until November 30, 2021, Settlement Class Members may receive one of three forms of relief by first contacting your local ASC. Samsung, at its sole discretion, may provide a replacement PDP for the

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Settlement Class Member to purchase. If Samsung does not provide a replacement PDP for a Settlement Class Member to purchase, that Settlement Class Member is entitled to receive, at his or her discretion, an exchange for an alternative flat panel display television with reasonably similar display size and features, or a refund of the estimated purchase price of the Affected Model television. Samsung intends to exercise its discretion so that Class Members will be able to exercise this choice of receiving either an exchange or refund.

8. Are the Settlement Benefits Available Now?

No benefits are available now through the Settlement Agreement because the Court has not yet decided whether to approve the Settlement.

YOUR RIGHTS AND OPTIONS

9. Can I Decline to Participate in the Settlement?

No. Because the Settlement has no effect on your ability to bring your own lawsuit for damages and you are not releasing or waiving any rights or claims by participating in the Settlement, you will automatically be a member of the Settlement Class.

10. Can I Object to the Settlement?

You can ask the Court to deny approval by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, none of the relief described above will be provided and the lawsuit will continue. If that is what you want to happen, you must object.

Any objection to the proposed Settlement must be in writing. If you file a timely written objection, you may appear at the Fairness Hearing. If you appear through your own attorney, you are responsible for hiring and paying that attorney. All written objections and supporting papers must (a) clearly identify the case name and number (*Alexis Bronson et al. v. Samsung Electronics America, Inc., et al.*, Case No. 3:18-cv-2300-WHA), (b) be submitted to the Court either by mailing them to the Class Action Clerk, United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, or by filing them in person at any location of the United States District Court for the Northern District of California, and (c) be filed or postmarked on or before January 31, 2020.

The deadline to file your objection and intention to appear at the Fairness Hearing is January 31, 2020. The address for the Court is:

Clerk of the Court
U.S. District Court for the Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102

Questions? Visit www.CaliforniaPDPSettlement.com

11. When Is the Fairness Hearing?

The Court will hold a Fairness Hearing on February 27, 2020, at 11:00 a.m. in Courtroom 12 of the United States District Court for the Northern District of California, the Honorable William H. Alsup presiding, located at 450 Golden Gate Avenue, San Francisco, CA 94102. The date of the Fairness Hearing may change, so please refer to the Settlement website to confirm the date and time of the Fairness Hearing. At the Fairness Hearing, the Court will consider if:

- The Settlement is fair, reasonable, and adequate;
- The Settlement should be approved; and
- If there are any objections to the Settlement.

12. Do I Have to Attend the Fairness Hearing?

No. Your attendance at the Fairness Hearing is not required even if you submit a written objection. However, you or your attorney may attend the hearing at your own expense.

13. May I Speak at the Fairness Hearing?

Yes. You may speak at the Fairness Hearing to object to the proposed Settlement, but only if you filed a written objection as described above. Your written objection must include a statement that you intend to appear at the Fairness Hearing. You may also enter an appearance through an attorney hired at your own expense.

THE LAWYERS REPRESENTING YOU

14. Does the Settlement Class Have a Lawyer?

Yes. The Court appointed Paul S. Rothstein and Kyla V. Alexander to represent you and the other Settlement Class Members. They are called “Class Counsel.” More information about these lawyers and their practices is available at www.rothsteinforjustice.com.

15. Should I Hire My Own Lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. You will not have to pay any attorneys’ fees, court costs, or any other costs to participate in this Settlement. However, you may hire an attorney at your own expense to represent you and speak on your behalf.

16. How Will Class Counsel Be Paid?

If the Court approves the Settlement Agreement at the Fairness Hearing, then Class Counsel will ask the Court for an award of reasonable attorneys’ fees and expenses in an amount not to exceed \$487,000.

The Court will determine how much Class Counsel are paid.

17. Will the Class Representatives Request Any Payments in Addition to the Settlement Benefits?

Yes. The Class Representative in this Class Action is Crystal Hardin. Class Counsel will request that the Court grant a Service Award of up to \$6,000 to Ms. Hardin as Class Representative for her efforts in obtaining the benefits of the Settlement for the Class.

MORE INFORMATION

18. Where Can I Get More Information?

This Notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement available on the “Documents” page of the Settlement Website. You can also see the Settlement Agreement by contacting Class Counsel, by accessing the Court docket in this case, for a fee, through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

Visit the “Documents” page of the Settlement Website to see complete copies of important case-related documents, including but not limited to (1) this Class Notice, (2) Motion for Preliminary Approval of Class Action Settlement, (3) Motion for Final Approval of Class Action Settlement (when filed), and (4) Motion for Attorneys’ Fees and Costs (when filed). If you have further questions, you may contact Plaintiff’s Counsel directly as follows:

Paul S. Rothstein, Esq.
Kyla V. Alexander, Esq.
626 N.E. First Street
Gainesville, Florida 32601
samsungclassaction@rothsteinforjustice.com
Telephone: 352-376-7650

19. May I Contact the Court or Samsung Directly?

Please do not contact the Court, Samsung or Samsung’s attorneys regarding this Settlement. They cannot provide you any advice.