In re: Hard Disk Drive Suspension Assemblies Antitrust Litigation, Case No. 19-md-02918-MMC
United States District Court for the Northern District of California

If you purchased a Standalone Storage Device or Computer, not for resale, between January 1, 2003, and December 31, 2016, which included hard disk drive suspension assemblies manufactured by Defendants, a class action lawsuit may affect your rights.

A federal court authorized this Notice. This is not a solicitation from a lawyer.

- A class action antitrust lawsuit was filed on behalf of Reseller Plaintiffs and End-User Plaintiffs against Defendants TDK Corporation, Hutchinson Technology Inc., Magnecomp Precision Technology Public Co., Ltd., Magnecomp Corporation, and SAE Magnetics (H.K.) Ltd. (together, "TDK Defendants"), and NHK Spring Co., Ltd., NHK International, NAT Peripheral (Dong Guan) Co., Ltd., NAT Peripheral (Hong Kong) Co., Ltd., and NHK Spring (Thailand) Co., Ltd. (together, "NHK Defendants"). This Notice only applies to End-User Plaintiffs.
- The lawsuit alleges Defendants conspired to fix prices of suspension assemblies ("SAs"), a component contained in hard disk drives ("HDDs"). Suspension assemblies are a necessary component of hard disk drives and are found in products such as standalone storage devices (for example, bare, portable, or external hard drives), laptop and desktop computers, and enterprise servers and storage arrays. The End-User Plaintiffs allege they purchased such "finished products" containing SAs and that prices were higher as a result of the supracompetitive SA prices initially charged by Defendants to hard disk drive manufacturers, who "passed on" those price increases to the End-User Plaintiffs.
- The Court "certified" an End-User Class defined as follows: all persons who and entities that, during the time period January 1, 2003, to December 31, 2016, in the Indirect Purchaser States, purchased Standalone Storage Devices or Computers, not for resale, which included SAs manufactured or sold by Defendants.
- The Indirect Purchaser States include the following: Arkansas, Arizona, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, West Virginia, Wisconsin, and the District of Columbia.
- The Court has not decided who is right or wrong. There is no money available now and no guarantee there will be. However, if you are a member of the End-User Class described above, your legal rights are affected, and you have a choice to make now.

YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
Exclude Yourself	**Get out of this lawsuit. Get no money or benefits if any are available in the future. Keep the right to sue separately.** You will be excluded from this lawsuit, and if money or benefits are later awarded, you will not receive any. You will keep any right to file your own lawsuit or be part of any other lawsuit against Defendants at your own expense and with your own lawyer about the same legal claims in this lawsuit.	**Postmarked by August 23, 2026**
Do Nothing	**Stay in this lawsuit. Await the outcome. Give up the right to sue separately.** By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or a settlement. You will give up your right to sue Defendants separately. You will be bound by any future judgment in this lawsuit.	

- The End-User Plaintiffs must prove their legal claims against Defendants at trial. If you do not ask to be excluded from the lawsuit and money or benefits are obtained from Defendants, you will be notified about how to receive your benefits.

Basic Information

1. Why is this Notice being provided?

This Notice explains that the Court has allowed, or "certified," a class action lawsuit that may affect you if you are a person who or entity that, during the time period January 1, 2003, to December 31, 2016, in the Indirect Purchaser States, purchased Standalone Storage Devices or Computers, not for resale, which included SAs manufactured or sold by Defendants.

A District Judge of the United States District Court for the Northern District of California is overseeing this class action. The lawsuit is known as *In re: Hard Disk Drive Suspension Assemblies Antitrust Litigation*, Case No. 19-md-02918-MMC (the "lawsuit").

This Notice only applies to the class of End-User Plaintiffs.

In this Notice, "Defendants" refers to TDK Corporation, Hutchinson Technology Inc., Magnecomp Precision Technology Public Co., Ltd., Magnecomp Corporation, and SAE Magnetics (H.K.) Ltd. (collectively, "TDK Defendants"), and NHK Spring Co., Ltd., NHK International, NAT Peripheral (Dong Guan) Co., Ltd., NAT Peripheral (Hong Kong) Co., Ltd., and NHK Spring (Thailand) Co., Ltd. (collectively, "NHK Defendants").

2. Why is the lawsuit a class action?

In a class action, one or more people (called "class representatives") sue on behalf of all people who have similar legal claims. Together, all these people are called a "class" or "class members." One court resolves the issues for all class members, except for those class members who timely exclude themselves (opt out) from the class.

The Legal Claims in the Lawsuit

3. What is this lawsuit about?

The End-User Plaintiffs allege Defendants conspired to fix prices of the suspension assemblies, a component contained in hard disk drives. The End-User Plaintiffs further allege that the Defendants sold suspension assemblies to HDD manufacturers (like Seagate, Western Digital, and Toshiba), who in turn sold standalone storage devices, such as bare, portable, or external HDDs, to End-User Plaintiffs, distributors (like Ingram Micro, D&H, MA Labs, and Synnex), or companies that make storage devices and computers called original equipment manufacturers ("OEMs"), like HP Inc., Dell, and Lenovo. OEMs in turn sell their computers and storage devices to End-User Plaintiffs, distributors, and resellers. Suspension assemblies are a necessary component of HDDs and are found in standalone storage devices such as bare, portable, or external hard drives, in laptop and desktop computers, and in enterprise servers and storage arrays. The End-User Plaintiffs purchased the "finished product" containing the HDD. The End-User Plaintiffs assert that Defendants' unfairly high SA prices charged to HDD manufacturers were passed down the chain of distribution to the End-User Plaintiffs.

Defendants deny the legal claims and deny the alleged wrongdoing and liability. No court or other judicial entity has made any judgment or other determination of the alleged wrongdoing by the Defendants.

4. Has the Court decided who is right?

The Court has not decided whether End-User Plaintiffs or Defendants are right. By establishing the class and providing this Notice, the Court has not decided and is not suggesting that End-User Plaintiffs will win or lose this lawsuit. The parties have a chance to prove or disprove their legal claims and/or defenses. The End-User Plaintiffs must prove their legal claims at a trial.

5. What are the End-User Plaintiffs asking for?

The End-User Plaintiffs are asking for money for the End-User Class members for Defendants' alleged wrongdoings. The End-User Plaintiffs are also asking for prejudgment interest and damage multipliers under state law, attorneys' fees, and costs for Class Counsel.

6. Is any money or are any benefits available now?

No money or benefits are available now. The Court has not decided whether Defendants did anything wrong, and End-User Plaintiffs and Defendants have not settled the lawsuit. There is no guarantee money or benefits will be obtained in the future. You will be notified if money or benefits become available.

Who Is Included in the Lawsuit?

7. Am I part of the End-User Class?

The Court "certified" an End-User Class defined as follows: all persons who and entities that, during the time period January 1, 2003, to December 31, 2016, in the Indirect Purchaser States, purchased Standalone Storage Devices or Computers, not for resale, which included SAs manufactured or sold by Defendants.

The Indirect Purchaser States include the following: Arkansas, Arizona, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, West Virginia, Wisconsin, and the District of Columbia.

8. Is anyone excluded from the End-User Class?

Yes. Excluded from the End-User Class are the following: Defendants, their parent companies, subsidiaries, and affiliates, any coconspirators, federal governmental entities or instrumentalities of the federal government, states and their subdivisions, agencies and instrumentalities, and persons who purchased HDD suspension assemblies directly or for resale.

9. What is an original equipment manufacturer?

An original equipment manufacturer (sometimes referred to as an "OEM") is a company that manufactures or incorporates hard disk drives ("HDDs") into products for sale by others. Examples of original equipment manufacturers include Dell, HP Inc., and Lenovo.

10. What is a Standalone Storage Device?

A Standalone Storage Device refers to both personal hard disk drive ("HDD") and enterprise HDD storage systems. For purposes of this Notice, an HDD is a data storage device that includes a suspension assembly (thus excluding solid-state drives and flash memory drives) that stores digital information, such as computer operating systems, applications, documents, pictures, and music. Personal HDDs include "bare" HDDs purchased for installation into computers, external and portable hard drives, and network-attached storage ("NAS") drives. Enterprise HDD storage systems are storage servers or storage arrays and generally comprise multiple HDDs.

11. What if I am still not sure whether I am in the End-User Class?

If you are still not sure whether you are included in the End-User Class, you may go to HDDSuspensionEndUser.com or call toll-free at 1-877-366-0874.

Your Rights and Options

You must decide whether to stay in the End-User Class or ask to be excluded (and keep your right to sue Defendants in your own separate lawsuit).

12. What happens if I do nothing at all?

You do not have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit in the future. By doing nothing, you are staying in the End-User Class, and if the End-User Plaintiffs obtain money or benefits in the future, you will be notified about how to get your share. If you do nothing now, you will not be able

to sue or continue to sue Defendants—as part of any other lawsuit—about the same legal claims in this lawsuit. You will also be legally bound by the orders and judgments. If you do nothing now and there is a settlement or judgment in the future, you may not be allowed to exclude yourself from the lawsuit.

13. Why would I ask to be excluded?

If you want to sue Defendants on your own regarding the same legal claims in this lawsuit, or you already have your own lawsuit against Defendants regarding the same legal claims in this lawsuit and want to continue with it, you need to ask to be excluded from the End-User Class. If you exclude or remove yourself from the End-User Class—sometimes called "opting out" of the class—you will not get any money or benefits from this lawsuit even if End-User Plaintiffs win at trial or there is a settlement. However, you may be able to sue or continue to sue Defendants on your own. If you exclude yourself, you will not be legally bound by the Court's judgments in this class action lawsuit.

If you start your own lawsuit or continue with an existing lawsuit against Defendants regarding the same legal claims in this lawsuit after you exclude yourself, you will have to hire your own lawyer(s) for that lawsuit, and you will have to prove your legal claims. If you exclude yourself so you can start or continue your own lawsuit against Defendants, you should talk to your own lawyer soon because *your legal claims may be subject to a statute of limitations*, meaning that you may face a deadline after which you cannot sue.

14. How do I ask the Court to exclude me from the End-User Class?

To exclude yourself or an entity you represent from the End-User Class, you must mail a written request for exclusion, which includes the following:

1) Your name or entity name, address, telephone number, and email address (if any);
2) Your personal physical signature or personal physical signature and title of the representative of any entity; and
3) A statement that you want, or the entity wants, to be excluded from the End-User Class, such as "I hereby request to be excluded from the End-User Class in *In re: Hard Disk Drive Suspension Assemblies Antitrust Litigation"* or "[Entity name] hereby requests to be excluded from the End-User Class in *In re: Hard Disk Drive Suspension Assemblies Antitrust Litigation."*

The exclusion request must be **mailed** to the Notice Administrator at the following address and be **postmarked** by **August 23, 2026**:

HDD Antitrust Litigation
End-User Class
Notice Administrator
P.O. Box 2829
Portland, OR 97208-2829

You cannot opt out (exclude yourself or an entity) by telephone or by email.

"Mass" or "class" requests for exclusion filed by third parties on behalf of a "mass" or "class" of End-User Class members or multiple End-User Class members where the opt-out hasn't been signed by each and every individual End-User Class member will not be allowed.

Please note that per the United States Postal Service, mail may *not* be postmarked the day it is deposited in a mailbox or at a local post office. Postmarks occur when mail reaches a processing facility. To meet a postmark deadline, **mail at least a week prior to a postmark deadline**, get a manual postmark in person at any post office, or send via Certified Mail.

15. If I exclude myself, can I get anything from the lawsuit?

No. If you exclude yourself, and the End-User Class is later awarded money or benefits, you will not be eligible to receive any of the money or benefits. You will also not be legally bound by the Court's judgments if you exclude yourself. You will be able to sue (or continue to sue) Defendants on your own about the legal claims that are involved in this lawsuit.

16. If I do not exclude myself, can I sue Defendants for the same thing later?

No. Unless you exclude yourself from the End-User Class, you give up the right to sue Defendants for the legal claims that the lawsuit involves. If you have a pending lawsuit against any Defendant, speak to your lawyer for that lawsuit immediately to determine whether you must exclude yourself from this lawsuit to continue your own lawsuit against Defendants.

The Lawyers Representing You

17. Do I have a lawyer in this lawsuit?

Yes, the Court has appointed Christopher T. Micheletti and Qianwei Fu from Zelle LLP and Stacey Slaughter and Ellen Jalkut from Robins Kaplan LLP as Class Counsel for the End-User Class to represent you and the class for the purposes of this lawsuit. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in this lawsuit.

18. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. If you want your own lawyer, you can hire your own lawyer at your own expense. For example, you can ask them to appear in court for you if you want someone other than Class Counsel to speak for you.

19. How will Class Counsel be paid?

If Class Counsel gets money or benefits for the End-User Class, they may ask the Court for an award of attorneys' fees and expenses. You will not have to personally pay these attorneys' fees and expenses. If the Court grants Class Counsel's request, the attorneys' fees and expenses will either be deducted from any money obtained for the End-User Class or paid separately by Defendants.

The Trial

20. How and when will the Court decide who is right?

Class Counsel will have to prove End-User Plaintiffs' legal claims at a trial. The trial has not been scheduled. During the trial, a jury and the Judge will hear all the evidence to help them reach a decision about whether End-User Plaintiffs or Defendants are right about the legal claims in the lawsuit. There is no guarantee that End-User Plaintiffs will win or that they will get any money for the End-User Class.

21. Do I have to attend the trial?

No. You do not need to attend the trial. Class Counsel will present the case for the End-User Plaintiffs and the End-User Class, and lawyers for Defendants will present on their behalf. You or your own lawyer may attend at your own expense.

22. Will I get money after the trial?

If the End-User Plaintiffs obtain money or benefits as a result of the lawsuit, and you remain in the End-User Class, you will be notified about how to participate to receive money or benefits. It is unknown how long this will take.

Getting More Information

23. How do I get more information?

This Notice summarizes the lawsuit and the proceedings. You can get additional information by visiting HDDSuspensionEndUser.com, by calling 1-877-366-0874, or by writing to the following address:

HDD Antitrust Litigation
End-User Class
Notice Administrator
P.O. Box 2829
Portland, OR 97208-2829

You may also contact Class Counsel at the following addresses:

ZELLE LLP
Christopher T. Micheletti
Qianwei Fu
555 12th Street
Suite 1230
Oakland, CA 94607

ROBINS KAPLAN LLP
Stacey Slaughter
800 LaSalle Avenue
Suite 2800
Minneapolis, MN 55402

Ellen Jalkut
1325 Avenue of the Americas
Suite 2601
New York, NY 10019

You may also access the Court docket in this lawsuit, for a fee, through the Court's Public Access to Electronic Records (PACER) system at ECF.CAND.USCourts.gov. To learn about PACER and register for a PACER account, go to PACER.gov. Once you have a PACER account, you can access and retrieve documents from the Court's docket for the lawsuit at ECF.CAND.USCourts.gov/cgi-bin/login.pl.

You can also access and retrieve documents from the Court's docket 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 REGARDING THIS NOTICE.