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8 *Interim Lead Counsel for Indirect Purchaser Plaintiffs*

9 **UNITED STATES DISTRICT COURT**
 10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 11 **SAN FRANCISCO DIVISION**

12 **IN RE CAPACITORS ANTITRUST**
 13 **LITIGATION**

Case No. 3:14-cv-03264-JD

14 **SUPPLEMENTAL DECLARATION OF**
LINDA V. YOUNG IN SUPPORT OF
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENTS WITH
DEFENDANTS NEC TOKIN CORP. AND
NEC TOKIN AMERICA, INC. (“NEC”);
OKAYA ELECTRIC INDUSTRIES CO.,
LTD. (“OEI”); AND NITSUKO
ELECTRONICS CORPORATION
(“NITSUKO”)

18 This Document Relates to:
 19 Indirect Purchaser Actions
 20

Date: November 10, 2016
Time: 10:00 am.
Place: Courtroom 11, 19th Floor

21
 22 I, Linda V. Young, hereby declare as follows:

23 1. I am the Vice President, Media with A.B. Data, Ltd.’s Class Action Administration
 24 Company (“A.B. Data”). I am fully familiar with the facts contained herein based upon my personal
 25 knowledge. My address is 104 Grande Oaks Court, Simpsonville, SC 29681. My telephone
 26 number is 414-961-6400.

27 2. I submit this Supplemental Declaration (“Declaration”) at the request of Plaintiffs’
 28 Counsel in this matter (the “Action”).

1 [P]ersons and entities in the United States who, from April 1, 2002,
2 through at the latest July 15, 2016, purchased directly from a
3 distributor one or more Capacitor(s) that a Defendant manufactured.
4 Excluded from the Class are Settling Defendants, their parent
5 companies, subsidiaries, and Affiliates, any co-conspirators, Settling
6 Defendants' attorneys in this case, federal government entities and
7 instrumentalities, states, and their subdivisions, all judges assigned to
8 the case, and all jurors in the case.

9 8. A.B. Data researched data regarding the target audience's media consumption,
10 determining the most appropriate media vehicles that would best deliver potential Class Members
11 and provide them with the opportunity to see and respond to the Notice.

12 9. The Notice Program includes a combination of national print media, targeted
13 national trade magazines, and digital media. The Notice Program, which will be nationwide,
14 includes the following media categories:

- 15 • National trade magazines;
- 16 • National targeted trade websites;
- 17 • Email notice through email "blasts";
- 18 • National sponsorship of selected trade e-newsletters;
- 19 • General-market publications to reach "C-level" business executives and
20 electronics enthusiasts;
- 21 • "Banner" ads carried via targeted websites served to consumer electronics
22 hobbyists and enthusiasts who are technically savvy
- 23 • Earned media, including the dissemination of a news release via Business
24 Wire; and
- 25 • Direct mail to key names and addresses in the electronics and purchasing
26 industry.

27 10. The proposed media schedule in the Proposed Notice Program includes advertising
28 in national trade and consumer publications; "banner" ads on national trade publication websites;
"banner" ads targeting consumers who are electronic hobbyists and enthusiasts; "banner" ads in a
national e-newsletter targeted to the specific audience concerned; a custom email "blast" to opt-in
subscribers of targeted publications; direct mail; and a news release disseminated via earned media.

1 11. Print ads will be placed in each of the following trade and consumer publications to
2 reach professionals in the electronics industry, electronics hobbyists, and the “C-level” executives
3 of manufacturers and industrial businesses that purchase Capacitors:

- 4 a. *The Wall Street Journal*
- 5 b. *Electronic Design*
- 6 c. *Nuts and Volts*

7 12. “Banner” ads will be run on the following national trade publication websites and/or
8 e-newsletters targeting electronics hobbyists and consumers and professionals in the electronics
9 and purchasing industries who are large-scale purchasers of capacitors:

- 10 a. Electronicdesign.com
- 11 b. Machinedesign.com
- 12 c. SourceESB.com
- 13 d. Microwaves & RF – mwrf.com
- 14 e. Powerelectronics.com
- 15 f. HydraulicsPneumatics.com
- 16 g. Globalpurchasing.com
- 17 h. nutsvolts.com
- 18 i. passivecomponentmagazine.com
- 19 j. eetimes.com
- 20 k. ebnonline.com
- 21 l. *Nuts and Volts*

22 13. “Banner” ads will be served via a variety of websites over 30 days to a minimum of
23 14.8 million targeted electronics hobbyists and enthusiasts who are technically savvy. Key
24 strategies of contextual, behavioral, and predictive modeling will be utilized to target the banner
25 ads to potential Class Members. A mix of mobile, laptop, and desktop devices will be targeted in
26 this effort.

27 14. The news release regarding the case will be sent as an email “blast” to opt-in subscribers
28 of the following publications:

- 1 a. Penton Publications (including the websites Electronicdesign.com,
- 2 Machinedesign.com, SourceESB.com, mwrf.com, Powerelectronics.com,
- 3 and HydraulicsPneumatics.com)
- 4 b. *Passive Component Industry Magazine*
- 5 c. EE Times

6 15. Direct-mail notice via postcards sent to approximately 150,000 potential Class
7 Members for which Plaintiffs' Counsel provides mailing addresses will be prepared and mailed.
8 The postcard notices will include the web address of the case-specific website and the toll-free
9 telephone number of the case-specific call center.

10 16. In addition to the notice efforts involving print publications and digital media, A.B.
11 Data will disseminate a news release via the Business Wire distribution service to announce the
12 Notice of Settlement. This news release will be distributed via Business Wire to more than 10,000
13 newsrooms, including print, broadcast, and digital media, across the United States. It will also be
14 distributed to trade publications relevant to the industries and fields concerned.

15 17. A case-specific website will be established and listed with major search engines to
16 enable potential Class Members to get detailed information about the Settlements and relevant
17 documents, including the Complaint and the Settlement Agreements.

18 18. All print-media notices in the proposed Notice Program will include a toll-free
19 telephone number, the website address, and a mailing address for Class Members to request or
20 access the Settlement Notice. The online banner and text ads will include the website address and a
21 link to the case-specific Settlements website. The Summary Notice and the Settlement Notice are in
22 plain language, as required by the revisions to Rule 23 of the Federal Rules of Civil Procedure.

23 19. As a Notice Program that primarily targets entities and consumers that have
24 purchased specific types of capacitors (a product used primarily in the manufacturing of products),
25 data to quantify the reach of this program are not available through traditional media resources,
26 such as MRI, that provide accredited media research. Based on the trade-media resources for the
27 passive-component industry and the electronics, electrical, and purchasing fields, some of which
28 state that they deliver, in the words of one such source, "90% coverage of all companies in the

1 passive component supply chain,” A.B. Data believes that the proposed Notice Program satisfies
2 Rule 23 requirements.

3 **CONCLUSION**

4 20. It is my opinion, based on my experience, that the reach of the target audience and
5 the number of exposure opportunities to the Notice information are adequate and reasonable. In my
6 opinion, the proposed Notice Plan is designed to effectively reach potential Class Members, as
7 described herein, deliver Notices that will capture potential Class Members’ attention, and provide
8 them with the information necessary to understand their rights and options. This proposed Notice
9 Program conforms to the standards employed by A.B. Data in notification programs designed to
10 reach unidentified potential class members of settlement groups or classes that are national in scope
11 and reach narrowly defined entities and demographic targets. In my opinion, the proposed Notice
12 Program satisfies the requirements of Rule 23 and of due process.

13 I declare under penalty of perjury under the laws of the United States that the foregoing is
14 true and correct.

15 Executed this 2nd day of November 2016 at Simpsonville, South Carolina.

16 
17 Linda V. Young