

## CLASS ACTION SUMMARY

DEALER MANAGEMENT SYSTEMS AND DATA INTEGRATION SERVICES  
ANTITRUST CLASS ACTION SETTLEMENTDID YOUR BUSINESS PURCHASE  
DEALER MANAGEMENT SYSTEMS OR  
DATA INTEGRATION SERVICES?

## YOU MAY BE ELIGIBLE TO RECOVER MONEY!

## SUMMARY

Total Settlements Reached:  
\$29.5 MillionPurchase Dates:  
On or After  
October 1, 2013Filing Deadline:  
Not establishedSpecific information about the class  
action(s) listed below

## Eligible Class Members:

*If certified, Eligible Class Members are all persons and entities located in the United States who or which:*

a) *Dealership Class* - are engaged in the business of the retail sale of automobiles and from January 1, 2015 to October 23, 2018, directly purchased "Dealer Management Systems" ("DMS") from CDK Global, LLC ("CDK") and/or The Reynolds and Reynolds Company (collectively, "Reynolds") or any predecessor, successor, subsidiary, joint venture or affiliate of CDK or Reynolds (collectively, the "Defendants"); or

b) *Software Vendor Class* - are engaged in the sale of software solutions to automotive dealerships and purchased Data Integration Services ("DIS") from the Defendants from October 1, 2013 to the present.

## Definition of "DMS" and "DIS":

A DMS is the critical software that operates as an automotive dealership's central database and is the repository of its operational information (including payroll, inventory, human resources, marketing, repair and service and customer information). DIS enables the dealerships and third-party application service providers engaged by the dealerships to extract, organize, and integrate the dealerships own data on its DMS into a usable format.

**THIS IS NOT AN OFFICIAL COURT NOTICE.  
INFORMATION CONTAINED IN THIS SUMMARY IS SUBJECT TO CHANGE.**

**The Services FRS Provides:** Financial Recovery Strategies (FRS) is a class action claims management consultant; we are not a court appointed claims administrator or class counsel. If you hire FRS, FRS will work within your guidelines to manage the claims process. The services that FRS provides include the following: (i) notifying you when we believe that you may be eligible to participate in settlements likely to be valuable to you; (ii) endeavoring to enhance the likelihood that all of your eligible business units (e.g., subsidiaries, divisions, acquisitions and divestitures) are included in the claims process; (iii) to reduce the support needed from your in-house staff, providing advice on what, if any, documents need to be collected and maintained, and, when requested, assisting in that effort; (iv) when required documents are not available or are too burdensome to collect, attempting to develop innovative alternatives to satisfy documentation requirements and striving to obtain approval of those alternatives; (v) preparing, assembling and submitting your claim package, and managing it throughout the claims processing phase, including working with you to address any concerns or questions claims administrators may have; (vi) providing regular updates on the recovery process; (vii) reviewing your payment to assure that it has not been under calculated; and (viii) following up with you to assure that your recovery check is deposited. FRS's recovery specialists are always available to answer any questions you may have.

**How to Retain FRS:** If you wish to hire FRS to file and manage a claim on your behalf, you must return a signed Claims Management Agreement and a signed Authority to File and Manage Claims. Before doing so, it is important that you understand their terms and make sure that all information about you is correct.

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**DEALER MANAGEMENT SYSTEMS AND DATA INTEGRATION SERVICES  
ANTITRUST CLASS ACTION SETTLEMENT**

## Case History

In 2017, several class action lawsuits were filed alleging the Defendants conspired to fix, raise, maintain and/or stabilize prices in the DMS and DIS markets in violation of federal antitrust laws. It is alleged that, as part of the scheme, Defendants utilized their control of the DMS market to impose exclusive dealing provisions on vendors, thus necessitating that any vendor doing business with the Defendants could not contract with any other independent DIS provider. Since then, the Dealership Class reached a settlement in the amount of \$29.5 million with Reynolds (this settlement received final Court approval). These funds (less any expenses and attorney's fees) will be distributed to those eligible Dealership Class members after the completion of a claims process. The litigation is ongoing at this time so it is possible that additional money may become available to eligible class members if a settlement is reached in the future between CDK and the Dealership Class and/or either of the Defendants and the Software Vendor Class.

**Class Counsel or the Settlement Administrator may be contacted  
for additional settlement information.**

**You also may visit the Court-approved website once one is made available.  
Please understand that you have the right to file on your own.**

**To learn more about our services, visit [www.FRSCO.com](http://www.FRSCO.com).**

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