

Class Action Summary

**DRAM Indirect Purchaser**  
**Antitrust Class Action**

*This is not an official Court Notice. Information contained in this Summary is subject to change.  
There is no monetary settlement at this time.*

If you or your business purchased, paid and/or provided reimbursement for some or all of the purchase price of DRAM Devices from **June 1, 2016 through February 1, 2018**, an antitrust class action lawsuit alleging price fixing may affect you.

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**Eligible Class Members:** If certified, eligible class members include all persons and/or entities residing in the United States (excluding all federal, state or local government entities), who or which, from June 1, 2016 through February 1, 2018, purchased, paid and/or provided reimbursement for some or all of the purchase price for DRAM Devices.

**Definition of “DRAM Devices”:** For purposes of this summary, dynamic random access memory (“DRAM”) is one of the most common forms of semiconductor memory. DRAM is widely used as a component in digital electronics, including but not limited to: personal computers, network servers, cellular phones, tablets, computer graphical processing units, and computer DRAM memory products.

**“Defendants”:** The Defendants include: 1) Micron Technology, Inc. and Micron Semiconductor Products, Inc. (collectively, “Micron”); 2) Samsung Electronics Co., Ltd. and Samsung Semiconductor, Inc. (collectively, “Samsung”); and 3) SK Hynix, Inc. (fka Hynix Semiconductor, Inc.) and SK Hynix America, Inc. (fka Hynix Semiconductor America, Inc.) (collectively, “SK Hynix”).

**Case History:** A class action was filed in April 2018 in the Northern District of California alleging the Defendants combined and contracted to fix, raise, maintain or stabilize the prices at which DRAM was sold in the United States in violation of federal antitrust laws. At this time, it is impossible to predict the outcome. It is possible, however, that money may become available to eligible class members if settlements are reached in the future. *Note: This class action is separate from the previous \$310 million settlement (In re: Dynamic Random Memory (DRAM) Antitrust Litigation, MDL No. 1486) with the Defendants listed above and other DRAM manufacturers. Eligible claimants received a distribution from that settlement in 2016.* FRS will update this Summary as the case progresses and new information becomes available.

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

**You also may visit the court approved website, if and when one is made available.**

**Please understand that you have the right to file on your own if and when there is a monetary settlement.**

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**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: FRS will notify you when we believe that you may be eligible to participate in valuable settlements; we will take action to assure that all of your eligible business units (e.g., subsidiaries, divisions, acquisitions and divestitures) are included in the claims process; to reduce the support needed from your in-house staff, FRS will provide advice on what, if any, documents need to be collected and maintained, and, when requested, will assist in that effort; when required documents are not available or are too burdensome to collect, FRS will attempt to develop innovative alternatives to satisfy documentation requirements and then negotiate on your behalf to obtain approval of those alternatives; FRS will prepare, assemble and submit your claim package, and manage it throughout the claims processing phase, including working with you to address any concerns or questions the claims administrator may have; FRS will provide regular updates on the recovery process; FRS will review your payment to assure that it has not been under calculated; and FRS will follow 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 copy of an Authorization Agreement. Before doing so, it is important that you understand its terms and make sure that your basic information at the top of the page is correct.