

Sept 7/22
Plaintiffs seek court approval to discontinue as against the
SEHCO + Samsung defendants. The evidence filed indicates that the plaintiffs through
counsel have thoroughly investigated whether SEHCO + Samsung were part of
the alleged conspiracy + are satisfied that there is no evidence that
they were; in fact, the available information obtained indicates that they
were not. There is no merit or point to continuing a baseless claim
against these defendants. It is in the best interests of the class
for the discontinuances be granted. There are Tolling + Standstill
Agts (2) with these defendants. The defendants (SEHCO + Samsung)
undertake through counsel that they will not trigger the termination
of these agreements before they lapse. That satisfies a concern that
I had + is sufficient.

The Plaintiffs ask that no notice be given to class members
given the expense of doing so, + the unlikelihood that class members
would have any claim against these defendants. They propose that
the fact of ^{discontinuance} + a copy of the order be posted on the website of
the Plaintiffs' counsel. Although there is a minuscule ~~chance~~ chance that a class member may
wish to pursue an individual claim against these defendants before the applicable limitation
period expires, I am concerned that simply posting on the website is very unlikely to come
to class members' attention. I agree with Plaintiffs' counsel's suggestion that: 1) they will post
the discontinuances vs these defendants on their social media accounts with a link to their web page when the
Tolling Agreements + order will be posted; 2) the other defendants will be consulted regarding ^{by contract} that posting; and, 3)
over.

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDINGS COMMENCED AT LONDON

Proceeding Under the Class Proceedings Act, 1992

MOTION RECORD OF THE PLAINTIFFS'
(Motion for Discontinuances)

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Lawyers for the Plaintiffs

The Tolling Agreement and order allowing discontinuance will be placed on class counsel's website for this litigation.

Accordingly, I ask as follows:

- 1) the discontinuance as against the SEMCO & Samsung defendants is approved.
- 2) Notice to the class shall be as indicated above.

Clark, T.