

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

JOHN WALLER AND RICHARD EDWARDS,

Plaintiffs,

v.

RAY WOOD, DAVID PETERSON, DOUGLAS WELLS, THE
COMMITTEE UNDER ROCKFORD PRODUCTS
CORPORATION EMPLOYEE STOCK OWNERSHIP PLAN,
THE COMMITTEE UNDER ROCKFORD PRODUCTS
CORPORATION SAVINGS AND RETIREMENT PLAN, AND
FEDERAL DEPOSIT INSURANCE CORPORATION AS
RECEIVER FOR AMCORE INVESTMENT GROUP, N.A.,

Defendants.

No. 08 CV 5597

Judge Frederick J. Kapala

Magistrate Judge P. Michael Mahoney

**NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION BETWEEN
THE PLAINTIFF CLASS AND THE INDIVIDUAL DEFENDANTS, AND
NOTICE OF HEARING ON PROPOSED SETTLEMENT, PLAN OF ALLOCATION,
ATTORNEYS' FEE PETITION, AND REQUEST FOR PLAINTIFF COMPENSATION**

TO: All Participants and Beneficiaries of the Rockford Products Corporation ("RPC") Savings and Retirement Plan and/or RPC Employee Stock Ownership Plan whose accounts directly or indirectly held RPC stock when RPC filed for Chapter 11 bankruptcy on July 25, 2007, except for the Individual Defendants ("Plaintiff Class").

This Notice is sent to you because it appears that you or someone to whose rights you have succeeded is a member of the above-defined Plaintiff Class. This Notice is to inform you that: **(a)** the above-captioned Action has been conditionally certified as a class action on behalf of the Plaintiff Class defined above; **(b)** there is a proposed Settlement of this class action for \$1.75 million in cash ("the Settlement Fund") with certain of the Defendants in the case, those being Ray Wood, David Peterson, and Douglas Wells (the "Individual Defendants"); and **(c)** the Court will hold a Fairness Hearing in the Courtroom customarily occupied by the Honorable P. Michael Mahoney of the United States District Court, Northern District of Illinois, Western Division, Rockford, Illinois 61101, at 10 a.m. on **February 14, 2012**, to consider the fairness, reasonableness, and adequacy of the proposed Settlement and the method by which the Settlement Fund will be allocated to members of the Class (the "Plan of Allocation"), to consider the petition by Plaintiffs' Counsel for attorneys' fees and reimbursement of costs and expenses out of the Settlement Fund, and to consider the request for plaintiff compensation to the named plaintiffs out of the Settlement Fund. The United States District Court, Northern District of Illinois, Western Division, is currently located at 211 South Court Street, Rockford, Illinois 61101, and Judge Mahoney is currently located in Courtroom 206 at that address. However, it is possible that by February 14, 2012, the United States District Court and Judge Mahoney will have moved

to a new facility, the Stanley J. Rozskowski U.S. Courthouse, 327 South Church Street, Rockford, Illinois 61101. Please check to make sure of the address and courtroom for Judge Mahoney if you plan to attend.

The proposed Settlement, the terms of which are only summarized in this Notice, is embodied in an Agreement of Settlement Between the Plaintiff Class and the Individual Defendants (“Settlement Agreement”) which has been signed by the settling Parties and filed with the Court. The full text of the Settlement Agreement can be viewed at www.strategicclaims.net/rockford. Plaintiffs and Plaintiffs’ Counsel recommend the Settlement and support it.

YOU MAY BE ENTITLED TO SHARE IN THE PROPOSED SETTLEMENT DESCRIBED IN THIS NOTICE, AND YOUR RIGHTS MAY BE AFFECTED BY MATTERS DESCRIBED IN THIS NOTICE, SO PLEASE READ IT CAREFULLY.

IF YOU WISH TO SUPPORT THE SETTLEMENT, AND RECEIVE ANY FUNDS TO WHICH YOU ARE ENTITLED UNDER THE SETTLEMENT, YOU DO NOT NEED TO DO ANYTHING OTHER THAN FILE A TIMELY AND PROPER CLAIM FORM ACCORDING TO THE INSTRUCTIONS BELOW IN THIS NOTICE. IF YOU WISH TO OBJECT TO THE SETTLEMENT, THE PLAN OF ALLOCATION, THE PETITION FOR ATTORNEYS’ FEES, COSTS, AND EXPENSES, OR THE REQUEST FOR PLAINTIFF COMPENSATION, ALL AS MORE FULLY DESCRIBED BELOW, YOU MUST FOLLOW THE PROCEDURES DESCRIBED BELOW IN THIS NOTICE.

CLAIMS DEADLINE: TO CLAIM YOUR SHARE OF THE SETTLEMENT FUND, YOU MUST FILE A VALID CLAIM FORM BY MARCH 14, 2012.

DESCRIPTION OF THIS CLASS ACTION RETIREMENT LITIGATION

1. This Action is a class action involving two retirement plans formerly maintained by Rockford Products Corporation (“RPC”): the Savings and Retirement Plan (“SRP”) and the Employee Stock Ownership Plan (“ESOP”). The Plaintiffs and Class Representatives who brought this lawsuit are John Waller and Richard Edwards. They worked for RPC and participated in the SRP and the ESOP (collectively, the “Plans”) and owned RPC stock through the Plans. The Plaintiff Class in the Action is defined above.

2. The Defendants in the Action are Ray Wood, David Peterson, Douglas Wells (together referred to as the “Individual Defendants”), and Amcore Investment Group, N.A. (“Amcore”), which is now in Federal Deposit Insurance Corporation (“FDIC”) receivership. RPC is in bankruptcy and is not a Defendant in this Action.

3. The initial Complaint in this Action was filed on October 1, 2008, in Chicago, Illinois. By Order dated January 7, 2009, the case was transferred to Federal Court in Rockford, Illinois. Plaintiffs alleged, among other things, that the Defendants were fiduciaries of the Plans and that they violated their fiduciary duties under a federal retirement statute called the Employee Retirement Income Security Act of 1974 (“ERISA”), 29 U.S.C. § 1001, *et seq.*, in causing the Plans to invest in RPC stock. RPC stock lost its value when RPC went bankrupt. Plaintiffs alleged, among other things, that such investment was imprudent and thus in violation of ERISA.

4. On February 6, 2009, all Defendants in the Action filed motions to dismiss the entire Action under Rule 12(b)(6) of the Federal Rules of Civil Procedure, arguing that Plaintiffs failed to state a cause of action. On April 9, 2009, in response to those motions, Plaintiffs filed their Amended Complaint, further detailing the alleged breaches of fiduciary duty by the Defendants. On May 7, 2009, all Defendants renewed their motions to dismiss, which were then fully briefed and submitted to the Court for decision.

5. On February 5, 2010, the Court entered its Order granting in part and denying in part the motions to dismiss. On March 16, 2010, the Defendants filed their Answers and affirmative defenses to the Amended Complaint. In their Answers, as they have continuously done throughout this litigation, Defendants deny they engaged in any wrongdoing, deny that they violated ERISA, and deny that any of the Plaintiffs have set forth a valid claim against the Defendants.

6. The Individual Defendants also assert numerous affirmative defenses, including that the statute of limitations has expired and that the Action was filed too late, that the Plans were legally permitted to own RPC stock, that the Individual Defendants acted properly in all respects in prudently managing the Plans, that they made all required disclosures, and that they otherwise acted in the best interests of the Plaintiffs, the Plaintiff Class, and the SRP and ESOP. Defendants also have maintained that Plaintiffs will be unable to have this Action certified as a class action unless Defendants agree to same, as the Individual Defendants have done for settlement purposes only as part of this Settlement.

7. Defendants also maintain that any injury purportedly suffered by Plaintiffs, Class Members, and/or the Plans was *not* caused by any misconduct of Defendants, who at all times acted in a good faith effort to protect the Plans and keep RPC in operation. Instead, any losses were attributable to decisions made by Plaintiffs and other Plan participants to invest in RPC stock, and to other causes, including, among other things, unavoidable and unforeseen increases in RPC's costs of doing business, bankruptcies of key RPC customers, and the ongoing downturn in the domestic auto industry, which were alone responsible for RPC's bankruptcy and resultant losses to Plan participants.

8. The Individual Defendants also maintain an affirmative defense concerning the Class Members who are receiving or will be entitled to receive a monthly annuity payment from the RPC Correlated Pension Plan ("CPP"), which was taken over by the Pension Benefit Guaranty Corporation ("PBGC"). Specifically, the Individual Defendants maintain that annuity payments of about 300 CPP-eligible participants are or will be higher than they would have been if the RPC stock in the SRP and the ESOP had been sold before the bankruptcy and that these higher payments are an offset against the damages sought in the Action. Under the CPP, annuity payments are offset by a portion of the value of each participant's SRP and ESOP accounts. Since RPC stock lost its value in the bankruptcy, the offset was in turn reduced and, as a result, the CPP annuity payments were higher. The losses that the Settlement payments are intended to partially redress are separate from the losses offset by the enhanced CPP annuities. Nonetheless, a representative of the PBGC indicated informally that the PBGC may consider recoveries under this Settlement in reevaluating or revising downward benefits paid under the CPP should this Settlement become final. Neither Plaintiffs' Counsel, Defendants' Counsel, nor the Court have agreed to any such reevaluation or revision, nor have they been advised, despite request, of the basis for this position. No prediction or assurance can be offered in regard to the PBGC or its future actions.

9. Plaintiffs have conducted extensive research, investigation, and discovery in prosecuting this Action, and have obtained and reviewed many thousands of documents from Defendants and non-parties as well. They have conducted and participated in depositions and have engaged in extensive motion practice, including motions to dismiss and Plaintiffs' motion for class certification, which is pending and unresolved.

10. This Action has been pending and vigorously litigated for more than two-and-a-half years. However, the Court has not made any findings regarding liability or damages, nor yet expressed any opinion on the merits of the case. The proposed Settlement is not an admission of any liability or damages. This Notice is not an expression of opinion by the Court as to the merits of any claim or defense and does not imply there has been any violation of law or that the Plaintiffs or the Class will recover if the Action is not settled and instead is resolved by trial or otherwise.

11. The Court has not set a trial date, and expert discovery has not yet occurred.

**THE PROPOSED SETTLEMENT WITH THE INDIVIDUAL DEFENDANTS
AND THE REASONS WHY THE SETTLEMENT WAS MADE**

12. Subject to Court approval, Plaintiffs, individually and on behalf of the Class, and the Individual Defendants (but not the FDIC as Receiver for Amcore), have reached a settlement of this Action concerning the claims against the Individual Defendants - i.e., Messrs. Wood, Peterson, and Wells. The proposed Settlement, if approved, calls for them to pay or cause to be paid One Million Seven Hundred Fifty Thousand Dollars (\$1,750,000) ("Settlement Fund"), in exchange for which the Action will be dismissed with prejudice as against the Individual Defendants, and Plaintiffs and all Class Members will release and discharge the Individual Defendants from any and all claims based on facts alleged in the Complaint including allegations of breach of ERISA fiduciary duty, persuasion or coercion, RPC's deteriorating financial condition and ultimate bankruptcy, failure to provide complete and accurate information, and related claims. This release will allow enforcement of the Settlement Agreement. If the Court approves the Settlement, it will include an order barring all Class Members and the FDIC from suing any of the Individual Defendants for anything related to the claims being settled herein. However, the proposed Settlement does *not* resolve claims against Amcore or the FDIC, which continue to be litigated. There can be no assurance, promise, or prediction regarding the outcome of claims against Amcore or the FDIC, which have denied any liability or wrongdoing.

13. The funds paid in settlement, after deductions for Court-approved attorneys' fees, costs and expenses, notice and administration costs, and any Plaintiff Compensation, will be paid to Class Members who submit proper and timely Claim Forms in the form attached at the end of this Notice, as described below in Paragraphs 32 and 33. Only those who submit a timely and proper Claim Form can receive money from this Settlement. The Settlement Fund will be paid to Class Members, if the Court approves the Settlement, employing the claims procedure and deadlines set forth in this Notice and in the Plan of Allocation.

14. The proposed Settlement was made to resolve the Action as against the Individual Defendants, to avoid the expense, risks, and delay of further litigation and to provide a certain recovery for the Plaintiffs and Class Members. The Settlement resulted after a Court-ordered mediation lasting eleven hours was conducted with the assistance of the Honorable Wayne Andersen, United States District Judge (Retired) on May 23, 2011, at

the offices of JAMS in Chicago. At the conclusion of the mediation, Judge Andersen recommended to the Plaintiffs and the Individual Defendants that they settle the case on the monetary terms reflected in the Settlement.

15. The Settlement represents a compromise of disputed claims. In deciding to settle the Action, the Plaintiffs and Plaintiffs' Counsel weighed the potential benefits of continuing with the litigation against the certain benefits provided by the Settlement as well as the potential risks and costs of continuing the litigation. They considered, among other things: (a) the factual and discovery record, including deposition testimony and the documents reviewed; (b) the potential damages; (c) the strength of the Class's claims as determined from a review of the law and the facts established in discovery and through investigation; (d) the likely expense and length of continued proceedings, including possible trial and post-trial proceedings and appeals, necessary to prosecute the Action; (e) the risks arising from the existence of unresolved questions of law and fact; (f) the nature and strength of defenses asserted by and available to the Individual Defendants; and (g) the risks and uncertainties of continued class action litigation of this nature. The amount of the Settlement is less than the amount Plaintiffs allege they and the Class are legally entitled to, but is more than the Individual Defendants believe Plaintiffs and the Class would have received had they gone to trial. The Settlement amount represents the maximum the Individual Defendants would agree to pay to settle the Action at this time.

16. Plaintiffs and Plaintiffs' Counsel believe that, in view of the foregoing, the proposed Settlement is fair, reasonable, and adequate, and in the best interests of the Class, and they recommend it to the Class and the Court without qualification.

17. The Settlement will become effective, if approved by the Court, only after the judgment entered by the Court becomes final.

18. This Notice is not intended to be a complete description of the Agreement of Settlement Between the Plaintiff Class and the Individual Defendants. That document is on file with the Court and is available on the settlement website (see Paragraph 34 below), and contains the full and complete terms of the Settlement.

19. To remain a Class Member, you are not required to do anything. As a Class Member, whether or not you file a Claim Form, you will be bound by any judgment in this Action, whether it is favorable or unfavorable. If money is distributed to the Class Members as a result of the proposed Settlement, you may be entitled to share in the proceeds.

20. You may, but are not required to, enter an appearance personally or through your own counsel at your own expense. You are not required to retain your own counsel, but if you choose to do so, such counsel must file an appearance on your behalf on or before **January 24, 2012**, and must serve copies of such appearance on the attorneys listed below in Paragraph 22. If you do not enter your own appearance or retain your own counsel, you will be represented by Plaintiffs' Counsel:

Charles R. Watkins and John R. Wylie
Donaldson Guin, LLC
300 South Wacker Drive, Suite 1700A
Chicago, Illinois 60606
(312) 878-8391
www.donaldsonguin.com

David Schachman
David Schachman & Assoc.
122 South Michigan Avenue, Suite 1850
Chicago, Illinois 60603
(312) 427-9500
www.schachmanlaw.com

William W. Thomas
Behn & Wyetzner, Chtd.
500 North Michigan Avenue, Suite 850
Chicago, Illinois 60611
www.behnwyetzner.com

21. Unless you retain a separate attorney, you will not be directly responsible for any attorneys' fees, expenses, or any other costs in connection with the litigation against the Individual Defendants. Any such amounts allowed by the Court will be paid out of the Settlement Fund.

OBJECTIONS TO THE SETTLEMENT OR THE PLAN OF ALLOCATION

22. Any Class Member may object to the Settlement by filing papers and by appearing at the Fairness Hearing described below, in person, or through duly authorized counsel of his or her choice. Any objecting Class Member must explain why he or she believes that the proposed Settlement, the petition for attorneys' fees and reimbursement of costs and expenses, the request for Plaintiff Compensation, and/or the proposed *Plan of Allocation* should not be approved. No person will be heard and no objection will be considered unless that person has filed objection papers (as further described below in Paragraph 23) on or before **January 24, 2012**, with the Clerk of the United States District Court, Northern District of Illinois, Western Division, Rockford, Illinois 61101 showing due proof of service, by hand or first class mail, postage prepaid, on Plaintiffs' Counsel and counsel for the Individual Defendants, as follows. As noted above, the United States District Court, Northern District of Illinois, Western Division, is currently located at 211 South Court Street, Rockford, Illinois 60611. However, it is possible that by January 24, 2012, the United States District Court will have moved to a new facility, the Stanley J. Rozskowski U.S. Courthouse, 327 South Church Street, Rockford, Illinois 61101. Please check to make sure of the address if you plan to make any filing:

Plaintiffs' Counsel:

Charles R. Watkins
John R. Wylie
Donaldson Guin, LLC
300 South Wacker Drive, Suite 1700A
Chicago, IL 60606

Individual Defendants' Counsel:

Neil A. Capobianco
Jose M. Jara
SNR Denton LLP
1221 Avenue of the Americas, Suite 2500
New York, NY 10020

23. An objection, to be valid, must consist of or include the following: (a) a written statement setting forth the basis of your objections, along with any supporting memoranda or other papers; (b) documentary proof of your membership in the Class; and (c) a signed written statement setting forth and including the name, address, and telephone number of the objector. Failure to file and serve the objection in a timely manner will bar the objector from presenting any objections, including any objection to the fairness, reasonableness, or adequacy of the Settlement or the Plan of Allocation, or to the entry of the judgment and any other orders contemplated by the Settlement or otherwise. You may file an objection without having to appear at the Fairness Hearing, but you may not appear and be heard at the Fairness Hearing unless you have timely filed objection papers. If you intend to be heard in person in opposition to the Settlement, the Judgment, Plaintiffs' Counsel's petition for attorneys' fees, costs, and expenses, the request for Plaintiff Compensation, and/or the Plan of Allocation, you must so state in your objection papers, and if you desire to present evidence at the Fairness Hearing, you must include the identity of any witnesses you intend to call and any exhibits they and/or you intend to introduce.

24. Class Members who approve of the proposed Settlement do not need to do anything to indicate their approval, although they must file a Claim Form to participate in distribution of the Settlement Fund.

ANY CLASS MEMBER WHO DOES NOT OBJECT IN THE MANNER DESCRIBED HEREIN WILL BE DEEMED TO HAVE WAIVED ANY OBJECTION, AND SHALL BE FOREVER FORECLOSED FROM MAKING ANY OBJECTION TO THE PROPOSED SETTLEMENT, PETITION FOR ATTORNEYS' FEES, COSTS, AND EXPENSES, REQUEST FOR PLAINTIFF COMPENSATION, AND THE PLAN OF ALLOCATION.

ATTORNEYS' FEES, COSTS AND LITIGATION EXPENSES

25. Plaintiffs' Counsel undertook this matter more than two and a half years ago on a wholly contingent basis. To date, they have expended more than 2,500 attorney and professional hours in the prosecution of this case and advanced substantial expenses and costs. They have not yet been paid or compensated in any form for their services, nor reimbursed for any costs or expenses.

26. Before the Fairness Hearing, Plaintiffs' Counsel will file a petition with the Court seeking approval of an amount not to exceed one-third of the Settlement Fund (\$583,333.33) as attorneys' fees, plus reimbursement of their costs and litigation expenses in an amount not to exceed \$40,000. The requested fees represent substantially less than the time value of their efforts measured using Plaintiffs' Counsel's regular hourly billing rates. Notice and administration costs estimated to be less than \$20,000 will also be deducted from the Settlement Fund prior to distribution to Class Members.

REQUEST FOR PLAINTIFF COMPENSATION

27. The Plaintiffs have devoted substantial time and effort over the past three years to assist in the development, initiation, and prosecution of the Action, including without limitation communicating and meeting with Plaintiffs' Counsel on a regular basis, preparing for and undergoing their depositions, responding to written discovery requests promulgated by the Defendants and participating in the eleven-hour Court-Ordered

mediation session on May 23, 2011. In recognition of their service and contribution, Plaintiffs' Counsel will request the Court in connection with approval of the Settlement to award Plaintiffs \$10,000 each to compensate them for their efforts and contributions. This amount will, if awarded by the Court, be paid out of the Settlement Fund *before* allocation of Settlement proceeds to Class Members, and will be paid to the Plaintiffs over and above any amounts they otherwise receive from the Settlement.

PROPOSED PLAN OF ALLOCATION

28. Plaintiffs' Counsel and counsel for the Individual Defendants each proposed to the Court, as more fully set forth at Exhibit C to the Settlement Agreement, a method for distributing the Settlement Fund among Class Members (referred to as a proposed plan of allocation). After review of the proposals, the Court has preliminarily approved its Plan of Allocation, which is subject to final approval at the Fairness Hearing where Class Members can object to or comment on the Plan of Allocation as described in paragraphs 22 and 23 hereof.

29. The Plan of Allocation starts with the presumption that each participant is entitled to be paid an amount roughly equivalent to the RPC stock (at \$7.90 per share) that he or she bought with SRP payroll deductions, plus the RPC stock in the participant's General Fund account, plus the RPC stock held in the participant's ESOP account, minus (for those participants entitled to an annuity from the Correlated Pension Plan) the RPC stock in the participant's General Fund account, minus two-thirds ($\frac{2}{3}$) of the RPC stock in the participant's ESOP account. When all of the Class Members who wish to receive a payout have submitted Claim Forms, each claimant will receive his or her pro rata share of the Settlement Fund (minus the attorneys' fees, expenses, and costs described herein). You may review the Plan of Allocation at www.strategicclaims.net/rockford.

NOTICE OF FAIRNESS HEARING AND YOUR RIGHT TO APPEAR

30. The Fairness Hearing will be held before Judge P. Michael Mahoney on **February 14, 2012**, at 10:00 a.m. in the United States District Court for the Northern District of Illinois, Western Division, Rockford, Illinois 61101, to finally determine, among other things:

- a. whether the Agreement of Settlement Between the Plaintiff Class and the Individual Defendants, on the terms and conditions set forth therein, is fair, reasonable, and adequate and should be approved by the Court;
- b. whether the Plan of Allocation for distributing the settlement monies among Class Members is fair, reasonable, and adequate and should be approved by the Court;
- c. whether Plaintiffs' Counsels' petition for attorneys' fees and reimbursement of litigation costs and expenses should be allowed and whether the request for Plaintiff Compensation should be allowed; and

- d. whether the Order of Final Judgment and Dismissal in the form specified in the Settlement Agreement should be entered.

31. Any Class Member who has complied with the objection procedures set forth above in Paragraphs 22 and 23 may appear at the Fairness Hearing and show cause why the Settlement should not be approved, why the Plan of Allocation should not be approved, why the requested attorneys' fees, costs, and expenses should not be awarded, and/or why the requested Plaintiff Compensation should not be allowed. The Court may adjourn the Fairness Hearing without further notice.

YOU MUST FILE A CLAIM FORM IN ORDER TO RECEIVE MONEY

32. To obtain money from the Settlement Fund, you must submit a timely, proper Claim Form. You cannot obtain any money from the Settlement Fund if you do not submit a timely, proper Claim Form.

33. A Claim Form is enclosed with this Notice. If you wish to receive money, complete it and mail it to the address set forth in the Claim Form. It is important that the Claim Form be completed, and mailed to or received at the correct address on or before **March 14, 2012**. If it is not, you will not participate in distributions of the Settlement Fund and will not receive any money.

THERE IS A WEBSITE YOU CAN VISIT

34. Additional information and relevant documents are available on the Settlement website: www.strategicclaims.net/rockford.

FILED COURT PAPERS ARE AVAILABLE FOR REVIEW

35. This Notice is only a summary and does not fully describe all aspects of the Action or the Settlement. It is subject to and controlled by the more detailed provisions of the Settlement Agreement and related orders, exhibits, and other documents. The Settlement Agreement and related orders, exhibits, and other documents filed in this Action are available for inspection, during business hours, at the Office of the Clerk of the Court, United States District Court for the Northern District of Illinois, Western Division, 211 South Court Street, Rockford, Illinois 61101. You may also contact Plaintiffs' Counsel at the address or telephone number stated herein with any questions, or visit the Settlement website at www.strategicclaims.net/rockford.

TERMINATION OF PROPOSED SETTLEMENT

36. If there is no final Court approval of the proposed Settlement in this case, or if the Settlement is not consummated for any other reason, the Settlement will become null and void, and the Parties will resume their former positions in the Action.

OTHER MATTERS

37. You are not being sued, and you do not need to retain a lawyer.

38. To support the Settlement, you do not need to do anything, although you do need to timely file a Claim Form if you wish to receive any money from the Settlement.

ROLLOVER

39. There may be tax rules that apply to your receipt of settlement monies from the Settlement. If you wish to explore rolling over your settlement money into a qualified retirement plan, please note that neither the Court nor anybody associated with this case can provide tax advice or assistance or assure you that any tax treatment of funds hereunder can or will be obtained. You may want to consult with a professional tax advisor before making any decisions with respect your receipt of settlement money.

WHAT TO DO IF YOU HAVE QUESTIONS

40. If you have any questions about this Notice, or the Action, you may contact the Claims Administrator at **(866) 274-4004** or Plaintiffs' Counsel, whose names and addresses are listed above. However, no one other than your personal tax advisor can answer any tax or rollover questions.

**PLEASE DO NOT CONTACT THE COURT
OR THE OFFICE OF THE CLERK OF THE COURT WITH QUESTIONS
OTHER THAN THOSE RELATING TO REVIEW OF COURT PAPERS**

Dated: October 28, 2011
Rockford, Illinois

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
WESTERN DIVISION