

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

PATRICIA B. BAUM, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

HARMAN INTERNATIONAL
INDUSTRIES, INCORPORATED, et al.,

Defendants.

) No. 3:17-cv-00246-RNC

) CLASS ACTION

) DECLARATION OF ROSS D. MURRAY
) REGARDING NOTICE DISSEMINATION,
) PUBLICATION, AND REQUESTS FOR
) EXCLUSION RECEIVED TO DATE

I, ROSS D. MURRAY, declare and state as follows:

1. I am employed as a Vice President of Securities by Gilardi & Co. LLC (“Gilardi”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. The following statements are based on my personal knowledge and information provided to me by other Gilardi employees and if called to testify I could and would do so competently.

2. Pursuant to this Court’s July 13, 2022 Order Preliminarily Approving Settlement and Providing for Notice (“Notice Order”), Gilardi was appointed as the Claims Administrator in connection with the proposed Settlement of the above-captioned litigation (the “Litigation”).¹ I oversaw the notice services that Gilardi provided in accordance with the Notice Order.

3. I submit this declaration in order to provide the Court and the parties to the Litigation with information regarding: (i) mailing of the Court-approved Notice of Pendency and Proposed Settlement of Class Action (the “Notice”) and Proof of Claim and Release (the “Proof of Claim”) (collectively, the “Claim Package,” attached hereto as Exhibit A); (ii) publication of the Summary Notice; (iii) establishment of the website and toll-free telephone number dedicated to this Settlement; and (iv) the number of requests for exclusion from the Class received to date by Gilardi.

DISSEMINATION OF THE CLAIM PACKAGE

4. Pursuant to the Notice Order, Gilardi is responsible for disseminating the Claim Package to potential Class Members. The Class consists of all Persons who purchased, sold, or held Harman International Industries, Incorporated (“Harman” or the “Company”) common stock at any time during the period from and including January 10, 2017, the record date, through and including March 12, 2017. Excluded from the Class are: (i) Defendants and members of their immediate families; (ii) the officers and directors of the Company at all relevant times and members of their immediate families; (iii) any entity in which Defendants have or had a controlling

¹ Any capitalized terms used that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation of Settlement dated June 23, 2022 (the “Stipulation”), which is available on the website established for the Settlement at www.HarmanMergerLitigation.com.

interest; and (iv) the legal representatives, heirs, successors or assigns of each Defendant and each officer and director of the Company. Also excluded from the Class are those Persons who properly exclude themselves by timely and validly requesting exclusion from the Class in accordance with the requirements set by the Court in connection with the Settlement.

5. Gilardi received a file via email from Harman's transfer agent, which contained the names and addresses of potential Class Members. The list was reviewed to identify and eliminate duplicate entries and incomplete data, resulting in a usable mailing list of 84 unique names and addresses. Gilardi had the unique name and address data printed on to Claim Packages, posted the Claim Packages for First-Class Mail, postage prepaid, and delivered 84 Claim Packages on August 3, 2022, to the United States Post Office for mailing.

6. In addition, on August 3, 2022, as part of its normal mailing procedures, Gilardi mailed, by First-Class Mail, Claim Packages and cover letters to 281 brokerages, custodial banks, and other institutions ("Nominee Holders") that hold securities in "street name" as nominees for the benefit of their customers who are the beneficial owners of the securities. The Nominee Holders also include a group of filers/institutions who have requested notification of every securities case. These Nominee Holders are included in a proprietary database created and maintained by Gilardi. In Gilardi's experience, the Nominee Holders included in this proprietary database represent a significant majority of the beneficial holders of securities. The cover letter accompanying the Claim Packages advised the Nominee Holders of the proposed Settlement and requested their cooperation in forwarding the Claim Packages to potential Class Members. In the more than three decades that Gilardi has been providing notice and claims administration services in securities class actions, Gilardi has found the majority of potential class members hold their securities in street name and are notified through the Nominee Holders. Gilardi also mailed Claim Packages and cover letters to the 4,444 institutions included on the U.S. Securities and Exchange Commission's ("SEC") list of active brokers and dealers at the time of mailing. A sample of the cover letter mailed to Nominee Holders and the institutions included on the SEC's list of active brokers and dealers is attached hereto as Exhibit B.

7. On August 3, 2022, Gilardi also delivered electronic copies of the Claim Package to 367 registered electronic filers who are qualified to submit electronic claims. These filers are primarily institutions and third-party filers who typically file numerous claims on behalf of beneficial owners for whom they act as trustees or fiduciaries.

8. As part of the notice program for this Settlement, on August 3, 2022, Gilardi also delivered electronic copies of the Claim Package via email to be published by the Depository Trust Company (“DTC”) on the DTC Legal Notice System (“LENS”). LENS enables the participating bank and broker nominees to review the Claim Package and contact Gilardi for copies of the Claim Package for their beneficial holders.

9. Gilardi has acted as a repository for shareholder and nominee inquiries and communications received in this Settlement. In this regard, Gilardi has forwarded the Claim Package on request to nominees who purchased, sold, or held Harman common stock for the beneficial interest of other persons. Gilardi has also forwarded the Claim Package directly to beneficial owners upon receipt of the names and addresses from such beneficial owners or nominees.

10. Following the initial mailing, Gilardi received 21 responses to the outreach efforts described above, which included computer files containing a total of 15,915 names and addresses of potential Class Members. In addition, 25 institutions requested that Gilardi send them a total of 16,575 Claim Packages for forwarding directly to their clients. Gilardi also received one response that included a mailing label with the name and address of one additional potential Class Member. Gilardi has also mailed 54 Notices as a result of returned mail for which new addresses were identified for re-mailing to those potential Class Members. Each of these requests has been completed in a timely manner.

11. As of October 6, 2022, Gilardi has mailed a total of 37,721 Claim Packages to potential Class Members and nominees.

PUBLICATION OF THE SUMMARY NOTICE

12. In accordance with the Notice Order, on July 22, 2022, Gilardi caused the Summary Notice to be published in *The Wall Street Journal*, and to be transmitted over *Business Wire*, as shown in the confirmations of publication attached hereto as Exhibit C.

TELEPHONE HELPLINE AND WEBSITE

13. On July 22, 2022, Gilardi established and continues to maintain a case-specific, toll-free telephone helpline, 1-888-813-7419, to accommodate potential Class Member inquiries. The toll-free number was set forth in the Notice and on the case website. Gilardi has been and will continue to promptly respond to all inquiries to the toll-free telephone helpline.

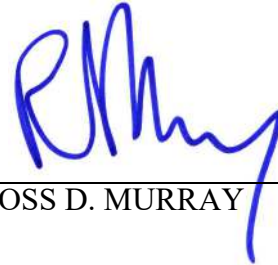
14. On July 22, 2022, Gilardi established and continues to maintain a website dedicated to this Settlement (www.HarmanMergerLitigation.com) to provide additional information to Class Members and to provide answers to frequently asked questions. The web address was set forth in the Claim Package and the Summary Notice. The website includes information regarding the Litigation and the Settlement, including the objection and claim filing deadlines, and the date, time, and location of the Court's Settlement Hearing. Copies of the Notice, Proof of Claim, Stipulation, and Notice Order are posted on the website and are available for downloading. Class Members can also complete and submit a Proof of Claim through the website.

REQUESTS FOR EXCLUSION RECEIVED TO DATE

15. The Notice informs potential Class Members that written requests for exclusion from the Class must be mailed to *Harman Merger Litigation*, Claims Administrator, c/o Gilardi & Co. LLC, EXCLUSIONS, P.O. Box 5100, Larkspur, CA 94977-5100, such that they are received no later than October 20, 2022.

16. The Notice also sets forth the information that must be included in each request for exclusion. Gilardi has monitored and will continue to monitor all mail delivered to this address. As of the date of this declaration, Gilardi has not received any requests for exclusion.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 6th day of October, 2022, at San Rafael, California.



ROSS D. MURRAY

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on October 6, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ David A. Knotts

DAVID A. KNOTTS

ROBBINS GELLER RUDMAN
& DOWD LLP
655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)

Email: dknotts@rgrdlaw.com

Mailing Information for a Case 3:17-cv-00246-RNC Baum v. Harman International Industries, Incorporated et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Wilfred T Beaye , Jr**
wtbeaye@wlrk.com
- **Stephen R. DiPrima**
SRDiPrima@wlrk.com
- **Caitlin A. Donovan**
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- **Tadhg Dooley**
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- **David A. Knotts**
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- **Joseph C. Merschman**
JMerschman@wiggin.com,JKrawczyk@wiggin.com,bhammond@wiggin.com
- **Brett Middleton**
brettm@johnsonfistel.com,paralegal@johnsonfistel.com
- **William H. Narwold**
bnarwold@motleyrice.com,mjasinski@motleyrice.com,vlepine@motleyrice.com,ajanelle@motleyrice.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

PATRICIA B. BAUM, Individually and on Behalf of)	No. 3:17-cv-00246-RNC
All Others Similarly Situated,)	
Plaintiff,)	<u>CLASS ACTION</u>
vs.)	
HARMAN INTERNATIONAL INDUSTRIES,)	
INCORPORATED, et al.,)	
Defendants.)	

NOTICE OF PENDENCY AND PROPOSED SETTLEMENT OF CLASS ACTION

TO: ALL PERSONS WHO PURCHASED, SOLD, OR HELD HARMAN INTERNATIONAL INDUSTRIES, INCORPORATED ("HARMAN" OR THE "COMPANY") COMMON STOCK AT ANY TIME DURING THE PERIOD FROM AND INCLUDING JANUARY 10, 2017, THE RECORD DATE FOR HARMAN'S SPECIAL STOCKHOLDER MEETING REGARDING THE MERGER OF HARMAN INTO SAMSUNG ELECTRONICS CO., LTD. (THE "MERGER"), THROUGH AND INCLUDING MARCH 12, 2017, THE DATE THE MERGER CLOSED (THE "CLASS")

PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS MAY BE AFFECTED BY PROCEEDINGS IN THIS LITIGATION. PLEASE NOTE THAT IF YOU ARE A CLASS MEMBER, YOU MAY BE ENTITLED TO SHARE IN THE PROCEEDS OF THE SETTLEMENT DESCRIBED IN THIS NOTICE. TO CLAIM YOUR SHARE OF THE SETTLEMENT PROCEEDS, YOU MUST SUBMIT A VALID PROOF OF CLAIM AND RELEASE FORM ("PROOF OF CLAIM") **POSTMARKED OR SUBMITTED ONLINE ON OR BEFORE DECEMBER 1, 2022.**

This Notice of Pendency and Proposed Settlement of Class Action ("Notice") has been sent to you pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of Connecticut (the "Court"). The purpose of this Notice is to inform you of the proposed settlement of the Litigation (the "Settlement") and of the hearing to be held by the Court to consider the fairness, reasonableness, and adequacy of the Settlement and the proposed Plan of Allocation of the Settlement proceeds, as well as counsel's application for fees and expenses. This Notice describes the rights you may have in connection with your participation in the Settlement, what steps you may take in relation to the Settlement and this Litigation, and, alternatively, what steps you must take if you wish to be excluded from the Class and this Litigation.¹

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A PROOF OF CLAIM	The only way to be eligible to receive a payment. Proofs of Claim must be postmarked or submitted online on or before December 1, 2022.
EXCLUDE YOURSELF	Receive no payment from the Settlement. This is the only option that potentially allows you to ever be part of any other lawsuit against the Defendants or any other Released Persons about the legal claims related to the issues raised in this Litigation. Exclusions must be received no later than October 20, 2022.
OBJECT	Write to the Court about why you oppose the Settlement, the Plan of Allocation, the request for attorneys' fees, and/or the expenses of Lead Plaintiff (if requested). You will still be a Class Member. Objections must be received by the Court and counsel on or before October 20, 2022.
GO TO A HEARING	Ask to speak in Court about the fairness of the Settlement. Requests to speak must be received by the Court and counsel on or before October 20, 2022.
DO NOTHING	Receive no payment from the Settlement. Unless you have requested exclusion from the Class, you cannot be a party of any other lawsuit against Defendants or any other Released Persons about the legal claims related to the issues raised in this Litigation.

¹ All capitalized terms used in this Notice that are not otherwise defined herein shall have the meanings provided in the Stipulation of Settlement dated June 23, 2022 ("Stipulation"), which, along with other important documents, is available on the website, www.HarmanMergerLitigation.com.

SUMMARY OF THIS NOTICE

Statement of Class Recovery

Pursuant to the Settlement described herein, the Settlement Amount is \$28 million. A Class Member's actual recovery will be a proportion of the Net Settlement Fund determined by that claimant's claim as compared to the total claims of all Class Members who submit acceptable Proofs of Claim. An individual Class Member may receive more or less than the estimated average amount provided below depending on the number of claims submitted. See Plan of Allocation as set forth at pages 9-10 below for more information on your claim.

Statement of Potential Outcome of Litigation

The parties disagree on both liability and damages and do not agree on the average amount of damages per Harman common stock that would be recoverable if the Class prevailed on each claim alleged. The Defendants deny that they are liable to the Class and deny that the Class has suffered any damages.

Statement of Attorneys' Fees and Expenses Sought

Lead Counsel will apply to the Court for an award of attorneys' fees of 31% of the Settlement Amount and expenses in an amount not to exceed \$200,000, plus interest earned from the date the Settlement is funded, at the same rate as earned on the Settlement Fund. Since the Litigation's inception in February 2017, Lead Counsel has expended time and effort in the prosecution of this Litigation on a contingent fee basis and advanced the expenses of the Litigation in the expectation that if they were successful in obtaining a recovery for the Class, they would be paid from such recovery. In this type of litigation it is customary for counsel to be awarded a percentage of the common fund recovery as their attorneys' fees. The requested fees and expenses amount to approximately \$0.13 per damaged share, but the average cost per damaged share will vary depending on the number of acceptable Proofs of Claim submitted.

Further Information

For further information regarding the Litigation, this Notice, or to review the Stipulation, please contact the Claims Administrator toll-free at 1-888-813-7419, or visit the website www.HarmanMergerLitigation.com.

You may also contact a representative of Lead Counsel: Shareholder Relations Department, Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, CA 92101, settlementinfo@rgrdlaw.com, 1-800-449-4900, www.rgrdlaw.com.

Please Do Not Call the Court or Defendants with Questions About the Settlement

Reasons for the Settlement

The principal reason for the Settlement is the benefit to be provided to the Class now. This benefit must be compared to the risk that no recovery might be achieved after a contested trial and likely appeals, possibly years into the future.

BASIC INFORMATION

1.	Why did I get this notice package?
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You or someone in your family may have purchased, sold, or held Harman common stock at any time during the period from and including January 10, 2017, through and including March 12, 2017 (the "Class Period").

The Court directed that this Notice be sent to Class Members because they have a right to know about the proposed Settlement of this class action lawsuit, and about all of their options, before the Court decides whether to approve the Settlement.

This Notice explains the class action lawsuit, the Settlement, Class Members' legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the Litigation is the United States District Court for the District of Connecticut, and the case is known as *Baum v. Harman Int'l Indus., Inc., et al.*, No. 3:17-cv-00246-RNC. The case has been assigned to the Honorable Robert N. Chatigny. Patricia B. Baum has been appointed by the Court as Lead Plaintiff ("Lead Plaintiff"), and the parties who were sued and who have now settled are called the "Defendants."

2.	What is this lawsuit about?
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This is an action on behalf of a putative class of all Persons who purchased, sold, or held Harman common stock at any time during the Class Period. Lead Plaintiff alleges that Defendants violated §§14(a) and 20(a) of the Securities Exchange Act of 1934 (the "1934 Act") and U.S. Securities and Exchange Commission ("SEC") Rule 14a-9 promulgated thereunder by making materially misleading statements and omissions in the Definitive Proxy Statement on Schedule 14A (the "Proxy"), filed with the SEC on January 20, 2017. The record date of the Proxy was January 10, 2017. Defendants deny that they violated any securities laws or SEC rules.

On February 15, 2017, Plaintiff Baum filed the initial complaint in this matter (the “Initial Complaint”).

On February 16, 2017, Plaintiff Baum’s counsel issued a notice to investors informing them of their right to seek appointment as lead plaintiff within 60 days of the notice. The Court ultimately appointed Plaintiff Baum as lead plaintiff and Robbins Geller Rudman & Dowd LLP as lead counsel in this Litigation on May 11, 2017.

Lead Plaintiff filed an amended complaint (the “Amended Complaint”) on July 12, 2017. While dropping certain claims and certain defendants, the Amended Complaint continued to allege claims against Defendants for alleged violations of §§14(a) and 20(a) of the 1934 Act and SEC Rule 14a-9 promulgated thereunder.

Defendants filed a motion to dismiss the Amended Complaint on October 6, 2017. On October 3, 2019, the Court granted in part and denied in part Defendants’ motion to dismiss. Shortly thereafter, Lead Plaintiff served document requests and subpoenas to Defendants and various third parties. Defendants served document requests to Lead Plaintiff.

On December 23, 2019, Lead Plaintiff and putative Class Member Laborers’ Local #231 Pension Fund (“Intervening Plaintiff”) jointly filed a motion seeking to permit Intervening Plaintiff to intervene as an additional plaintiff in the Litigation.

On January 14, 2020, Lead Plaintiff filed a motion seeking an order certifying this Litigation as a class action under Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure and appointing Lead Plaintiff and the Intervening Plaintiff as Class Representatives.

On January 13, 2020, Defendants submitted a letter informing the Court about their intent to file a motion for judgment on the pleadings seeking the dismissal of Lead Plaintiff’s remaining claims (the “Pleadings Motion”), and filed an opposition to the motion to permit Intervening Plaintiff to intervene as an additional plaintiff. On January 21, 2020, the Court held a pre-trial conference in which it informed the Parties that Defendants’ Pleadings Motion was deemed filed as of that date, and that all discovery efforts should cease pending a ruling on the Pleadings Motion.

On June 9, 2020, Defendants filed a motion requesting that the Court take judicial notice of the global auto recession (“Judicial Notice Motion”).

On September 30, 2021, the Court issued an order denying the Pleadings Motion and the Judicial Notice Motion. On November 8, 2021, Defendants filed a motion seeking (i) certification of interlocutory appeal of the order denying the Pleadings Motion, and (ii) a stay of the Litigation pending that appeal.

On October 21, 2021, the Court held a pre-trial conference. During the conference, the Court inquired whether the Parties would engage in private mediation, to which the Parties responded they would be open to doing so. The Parties ultimately retained the Hon. Layn R. Phillips (Ret.) to assist in mediation.

On February 10, 2022, the Parties filed a status report informing the Court that “On January 5, 2022, the parties participated in a mediation in front of the Hon. Layn R. Phillips (Ret.). The parties did not reach a resolution that day, but discussions with the assistance of Judge Phillips’s office continue. In the meantime, the parties are conducting document and written discovery, including electronic and third party discovery.”

Following nearly four months of arm’s-length negotiations, on April 27, 2022, the Parties filed with the Court a “Notice of Settlement,” stating that “the parties, through ongoing mediation, have agreed on the economic terms of a resolution and are working to document a settlement that would resolve all outstanding issues in this case among all parties. The parties are in the process of reducing the agreement to writing, which we expect to be completed within 40 days. When that process has been completed, the parties will file settlement and notice documents with the Court for preliminary approval.”

Defendants have denied and continue to deny each and all of the claims and contentions alleged by Lead Plaintiff in the Litigation and maintain that their conduct was at all times proper and in compliance with all applicable provisions of law. Defendants expressly have denied and continue to deny all charges of wrongdoing or liability against them arising out of any of the conduct, statements, acts, or omissions alleged, or that could have been alleged, in the Litigation. Defendants also have denied, *inter alia*, the allegations that they made a materially false statement or had any intent to make one, the allegations that Lead Plaintiff or the Class has suffered damage, that Lead Plaintiff or the Class were harmed by the conduct that was or could have been alleged in the Litigation, or that Defendants have any liability to the Class. In addition, Defendants maintain that they have meritorious defenses to all claims alleged in the Litigation.

3. Why is this a class action?

In a class action, one or more people called a plaintiff sues on behalf of people who have similar claims. All of the people with similar claims are referred to as a Class or Class Members. One court resolves the issues for all Class Members, except for those Class Members who exclude themselves from the Class.

4. Why is there a settlement?

The Court has not decided in favor of the Defendants or the Class. Instead, both sides agreed to the Settlement to avoid the costs and risks of further litigation, including trial and post-trial appeals. Lead Plaintiff agreed to the Settlement in order to ensure that Class Members will receive compensation, and because Lead Plaintiff (advised by Lead Counsel) considered the Settlement Amount to be a favorable recovery compared to the risk-adjusted possibility of recovery after trial and any appeals, in light of Defendants' legal argument that the statements at issue were not actionable at all by the Class, and Defendants' factual arguments that they were complying with all applicable securities laws. Lead Plaintiff and Lead Counsel believe the Settlement is in the best interest of all Class Members in light of the real possibility that continued litigation could result in no recovery at all.

WHO IS IN THE SETTLEMENT

To see if you will get money from this Settlement, you first have to decide if you are a Class Member.

5. How do I know if I am part of the Settlement?

The Court directed that everyone who fits this description is a Class Member: all Persons who purchased, sold, or held Harman common stock at any time during the period from and including January 10, 2017, the record date, through and including March 12, 2017, the date the Merger closed. Under the Plan of Allocation described below, only Class Members who were holders of record of Harman common stock at the close of business on January 10, 2017, and were thus holders of record entitled to vote on the Merger, and who submit a valid Proof of Claim to the Claims Administrator, may share in the recovery – this aligns the recovery with those who have legal standing to bring the claims currently asserted in the Litigation.

6. Are there exceptions to being included?

Excluded from the Class are: (i) Defendants and members of their immediate families; (ii) the officers and directors of the Company at all relevant times and members of their immediate families; (iii) any entity in which Defendants have or had a controlling interest; and (iv) the legal representatives, heirs, successors or assigns of each Defendant and each officer and director of the Company. Also excluded from the Class are those Persons who properly exclude themselves by timely and validly requesting exclusion from the Class pursuant to this Notice.

7. What if I am still not sure if I am included?

If you are still not sure whether you are included, you can ask for free help. You can contact the Claims Administrator toll-free at 1-888-813-7419 or visit the Settlement website www.HarmanMergerLitigation.com, or you can fill out and return the Proof of Claim enclosed with this Notice package, to see if you qualify.

THE SETTLEMENT BENEFITS – WHAT YOU GET**8. What does the Settlement provide?**

In exchange for the Settlement and the release of the Released Claims (defined below) as well as dismissal of the Litigation, Defendants have agreed that a payment of \$28 million will be made by Defendants (or on their behalf) to be divided, after taxes, fees, and expenses, among all Authorized Claimants.

9. How much will my payment be?

Pursuant to the Settlement described herein, the Settlement Amount is \$28 million. Under the Plan of Allocation described below, only Class Members who were holders of record of Harman common stock at the close of business on January 10, 2017, and were thus holders of record entitled to vote on the Merger, and who submit a valid Proof of Claim to the Claims Administrator, may share in the recovery—this aligns the recovery with those who have legal standing to bring the claims currently asserted in the Litigation. Lead Plaintiff estimates that approximately 69,379,904 shares of Harman common stock are in the Class. Your actual recovery will be a proportion of the Net Settlement Fund determined by your claim as compared to the total claims of all eligible Class Members who submit acceptable Proofs of Claim. You may receive more than the estimated average amount provided below, depending on the number of claims submitted. If 100% of shares outstanding on the record date submit a claim, each share's average distribution under the Settlement will be approximately \$0.40 per share, before deduction of any Taxes on any income earned on the Settlement Amount, Tax Expenses, Notice and Administration Costs, the attorneys' fees and expenses, and the expenses of Lead Plaintiff (if requested), as determined by the Court. See Plan of Allocation as set forth at pages 9-10 below for more information on your claim.

The Settlement Fund less Taxes, Notice and Administration Costs, any award of attorneys' fees and expenses and Lead Plaintiff's expenses ("Net Settlement Fund") will be distributed to Class Members who submit valid, timely Proofs of Claim ("Authorized Claimants") on a *pro rata* basis. However, no distributions will be made to Authorized Claimants who would otherwise receive a distribution of less than \$10.00.

Defendants do not agree with the characterization that any damages were suffered by Lead Plaintiff or the Class.

Payments shall be conclusive against all Authorized Claimants. No Person shall have any claim against Plaintiff's Counsel, Lead Plaintiff, Intervening Plaintiff, the Claims Administrator, Defendants and their Related Parties, or any Person designated by Plaintiff's Counsel based on distributions made substantially in accordance with the Stipulation and the Settlement contained therein, or further order(s) of the Court. No Class Member shall have any claim against Defendants for any Released Claims. All Class Members who fail to complete and submit a valid and timely Proof of Claim shall be barred from participating in distributions from the Net Settlement Fund (unless otherwise ordered by the Court), but otherwise shall be bound by all of the terms of the Stipulation, including the terms of any judgment entered and the releases given.

HOW YOU GET A PAYMENT – SUBMITTING A CLAIM FORM

10. How can I receive a payment?

To be eligible to receive a payment, you must submit a Proof of Claim. A Proof of Claim is enclosed with this Notice or it may be downloaded at www.HarmanMergerLitigation.com. Read the instructions carefully, fill out the Proof of Claim, include all the documents the form asks for, sign it, and return it so that it is postmarked, if mailed, or received, if submitted online, no later than December 1, 2022. The Proof of Claim may be submitted online at www.HarmanMergerLitigation.com.

11. When would I receive my payment?

The Court will hold a Final Approval Hearing on November 10, 2022, to decide whether to approve the Settlement. If the Court approves the Settlement after that, there might be appeals. It is always uncertain whether these appeals can be resolved, and resolving them can take time, perhaps more than a year. It also takes time for all the Proofs of Claim to be processed. Please be patient.

12. What am I giving up to receive a payment or to stay in the Class?

Unless you exclude yourself, you will remain a Class Member, and that means that, if the Settlement is approved, you will give up all "Released Claims" (as defined below), including "Unknown Claims" (as defined below), against the "Released Persons" (as defined below):

- "Released Claims" means any and all claims that have been asserted, could have been asserted, or could be asserted in the future in this Litigation; and any and all claims, actions, potential actions, demands, losses, rights, causes of action, controversies, costs, damages, liabilities, obligations, judgments, suits, matters and issues of any nature for any remedy, known or unknown, suspected or unsuspected, accrued or unaccrued, whether class, individual, or otherwise, arising under the laws, regulations, or common law of the United States of America, any state or political subdivision thereof, or any foreign country or jurisdiction, in law, in contract, or in equity, and regardless of legal theory, and including claims for indemnification, contribution, or otherwise denominated, that have been asserted, could have been asserted, or could be asserted in the future, by Lead Plaintiff or any Class Member in his, her or its capacity as a purchaser, seller or holder of Harman stock, that have arisen from, could have arisen from, or relate in any manner to, in whole or in part, the allegations, conduct, facts, events, transactions, acts, occurrences, statements, representations, omissions or any other matter related to, or arising out of, the Litigation, the Merger, the Proxy, the public statements, projections and investor presentations referenced in the Amended Complaint, or the purchase, sale, or holding of Harman's common stock at any time during the period from and including January 10, 2017 through and including March 12, 2017. "Released Claims" includes "Unknown Claims" as defined below. For the avoidance of doubt, nothing in the Stipulation is intended to, nor shall it be deemed to, release any claim that the Defendants have against any of Defendants' insurers.
- "Released Persons" means each and all of the Defendants and each and all of their Related Parties.
- "Related Parties" means, with respect to each Defendant, any and all of their related parties, including, without limitation, any and all of their past or present parents, subsidiaries, affiliates, predecessors, or successors, as well as any and all of its or their current or former officers, directors, employees, associates, members of their immediate families, agents or other persons acting on their behalf, underwriters, insurers, reinsurers, attorneys, advisors, financial advisors, publicists, independent certified public accountants, auditors, accountants, assigns, creditors, administrators, heirs, estates, or legal representatives.

- “Settled Defendants’ Released Claims” means all actions, claims, debts, demands, liabilities, losses, matters, rights, suits and causes of action of any nature whatsoever, known or unknown, contingent or absolute, mature or immature, discoverable or undiscoverable, whether concealed or hidden, suspected or unsuspected, whether based in law or equity, arising under federal, state, common or foreign law, or any other law, rule or regulation, which now exist or heretofore have existed, that have been or could have been asserted in the Litigation or any forum by the Released Persons or any of them against Lead Plaintiff, Intervening Plaintiff, Class Members, or Plaintiff’s Counsel, that arise out of or relate in any way to the institution, prosecution, or settlement, of the claims against the Released Persons, except for claims related to the enforcement of the Settlement.
- “Unknown Claims” means any of the Released Claims which Lead Plaintiff or any Class Member does not know or suspect to exist in such party’s favor at the time of the release of the Released Persons, and any of the Settled Defendants’ Released Claims that the Released Persons do not know or suspect to exist in his, her or its favor at the time of the release of Lead Plaintiff, each and all of the Class Members and Plaintiff’s Counsel, which, if known by such party, might have affected such party’s settlement with and release of the Released Persons or Lead Plaintiff, each and all of the Class Members and Lead Plaintiff’s counsel, or might have affected such party’s decision not to object to this Settlement or seek exclusion. Unknown Claims include those Released Claims in which some or all of the facts comprising the claim may be suspected, or even undisclosed or hidden. With respect to any and all Released Claims and the Settled Defendants’ Released Claims, upon the Effective Date, Lead Plaintiff and Defendants shall expressly, and each of the Class Members and Released Persons shall be deemed to have, and by operation of the Order and Final Judgment, or the Alternative Judgment, if applicable, shall have, expressly waived to the fullest extent permitted by law, the provisions, rights, and benefits of California Civil Code §1542, which provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

In addition, Lead Plaintiff and Defendants shall expressly, and each of the Class Members and Released Persons shall be deemed to have, and by operation of the Order and Final Judgment, or the Alternative Judgment, if applicable, shall have expressly waived any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law, which is similar, comparable or equivalent to California Civil Code §1542. Lead Plaintiff, Class Members and the Released Persons may hereafter discover facts in addition to or different from those which such party now knows or believes to be true with respect to the subject matter of the Released Claims and the Settled Defendants’ Released Claims, but Lead Plaintiff and Defendants shall expressly, and each Class Member and Released Persons, upon the Effective Date, shall be deemed to have, and by operation of the Order and Final Judgment, or the Alternative Judgment, if applicable, shall have fully, finally, and forever settled and released any and all Released Claims, or the Settled Defendants’ Released Claims, as the case may be, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct that is negligent, reckless, intentional, with or without malice, or a breach of any duty, law, or rule, without regard to the subsequent discovery or existence of such different or additional facts, whether or not previously or currently asserted in any action. Lead Plaintiff and Defendants acknowledge, and the Class Members and Released Persons shall be deemed by operation of the Order and Final Judgment, or the Alternative Judgment, if applicable, to have acknowledged, that the foregoing waiver was separately bargained for and a key element of the Settlement of which this release is a part.

If you remain a Class Member, all of the Court’s orders will apply to you and legally bind you.

EXCLUDING YOURSELF FROM THE CLASS

If you do not want a payment from this Settlement, and you want to keep the right to potentially sue the Defendants and the other Released Persons, on your own, about the legal issues in this Litigation, then you must take steps to remove yourself from the Settlement. This is called excluding yourself.

13. How do I get out of the proposed Settlement?

To exclude yourself from the Class, you must send a letter by First-Class Mail stating that you “request exclusion from the Class in the *Harman Merger Litigation*.” To be valid, your letter must include the number of shares of Harman common stock you held, purchased, or sold at any time during the Class Period and at the close of business on January 10, 2017, and the dates held during such period. In addition, you must include your name, address, telephone number, and your signature. You must submit your exclusion request so that it is **received no later than October 20, 2022** to:

Harman Merger Litigation
Claims Administrator
c/o Gilardi & Co. LLC
EXCLUSIONS
P.O. Box 5100
Larkspur, CA 94977-5100

If you ask to be excluded, you will not get any payment, and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit. If you are requesting exclusion because you want to bring your own lawsuit based on the matters alleged in this Litigation, you may want to consult an attorney and discuss whether any individual claim that you wish to pursue would be time-barred by the applicable statutes of limitations or repose.

14. If I do not exclude myself, can I sue the Defendants and the other Released Persons for the same thing later?

No. Unless you exclude yourself, you give up any rights to sue the Defendants and the other Released Persons for any and all Released Claims. If you have a pending lawsuit against the Released Persons, speak to your lawyer in that case immediately. You must exclude yourself from this Litigation to continue your own lawsuit. Remember, the exclusion deadline is October 20, 2022.

15. If I exclude myself, can I get money from the proposed Settlement?

No. If you exclude yourself, you should not send in a Proof of Claim to ask for any money. But, you may be able to sue or be part of a different lawsuit against the Defendants and the other Released Persons about the claims raised in this Litigation.

THE LAWYERS REPRESENTING YOU**16. Do I have a lawyer in this case?**

The Court ordered that the law firm of Robbins Geller Rudman & Dowd LLP represents the Class, including you. These lawyers are called Lead Counsel. They will be paid from the Settlement Fund to the extent the Court approves their application for fees and expenses. If you want to be represented by your own lawyer, you may hire one at your own expense.

17. How will the lawyers be paid?

Lead Counsel will move the Court for an award of attorneys’ fees of 31% of the Settlement Amount and expenses in an amount not to exceed \$200,000, plus interest on such fees and expenses at the same rate as earned on the Settlement Fund. In addition, the Lead Plaintiff may seek reimbursement for her time and expenses in pursuing the Litigation. Such sums as may be approved by the Court will be paid from the Settlement Fund.

The attorneys’ fees and expenses requested will be the only payment to Plaintiff’s Counsel for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis. To date, Plaintiff’s Counsel have not been paid for their services for conducting this Litigation on behalf of Lead Plaintiff and the Class nor for the litigation expenses they have incurred. The fee requested will compensate Plaintiff’s Counsel for their work in achieving the Settlement Fund and is within the range of fees awarded to class counsel under similar circumstances in other cases of this type.

OBJECTING TO THE SETTLEMENT**18. How do I tell the Court that I object to the proposed Settlement?**

If you are a Class Member, you can write to the Court to object to the proposed Settlement, the proposed Plan of Allocation, Lead Counsel’s fee and expense application, and/or Lead Plaintiff’s time and expense request (if such request was made). The Court will consider your views. To object, you must send a signed letter saying that you object to the proposed Settlement, the proposed Plan of Allocation, Lead Counsel’s application for fees and expenses or Lead Plaintiff’s time and expense request (if any), in the *Harman Merger Litigation* and the reasons why you object. You must include your

name, address, telephone number, and your signature, identify the date(s), price(s), and number of shares of Harman common stock you purchased, sold, or held at any time during the Class Period, and state the reasons why you object. You must also include copies of documents demonstrating such holding(s), purchase(s), and/or sale(s). Your objection must be filed with the Court **and** mailed or delivered to each of the following addresses such that it is **received no later than October 20, 2022**:

COURT

Clerk of the Court
United States District Court
for the District of Connecticut
Abraham Ribicoff Federal Building
450 Main Street, Suite A012
Hartford, CT 06103

LEAD COUNSEL

David A. Knotts
ROBBINS GELLER
RUDMAN & DOWD LLP
655 West Broadway
Suite 1900
San Diego, CA 92101

DEFENDANTS' COUNSEL

Stephen R. DiPrima
WACHTELL, LIPTON,
ROSEN & KATZ
51 West 52nd Street
New York, NY 10019

19. What is the difference between objecting and excluding myself?

Objecting is simply telling the Court that you do not like something about the proposed Settlement, the Plan of Allocation, Lead Counsel's application for fees and expenses or Lead Plaintiff's time and expense request (if any). You can object only if you stay in the Class. Excluding yourself is telling the Court that you do not want to be part of the Class.

THE COURT'S SETTLEMENT HEARING

The Court will hold a hearing to decide whether to approve the proposed Settlement. You may attend and you may ask to speak, but you do not have to.

20. When and where will the Court decide whether to approve the proposed Settlement?

The Court will hold a Final Approval Hearing at 10:00 a.m. on November 10, 2022, at the United States District Court for the District of Connecticut, Abraham Ribicoff Federal Building, 450 Main Street, Room 228, Hartford, CT 06103. At the hearing the Court will consider whether the Settlement and proposed Plan of Allocation are fair, reasonable, and adequate, and whether Lead Counsel's fee and expense application and Lead Plaintiff's time and expense request (if any) should be granted. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. After the Final Approval Hearing, the Court will decide whether to approve the Settlement, the Plan of Allocation and the amount of fees and expenses. We do not know how long these decisions will take. The Court may change the date and time of the Final Approval Hearing without another notice being sent to Class Members. If you want to attend the hearing, you may wish to check with Lead Counsel or the Settlement website beforehand to be sure that the date and/or time has not changed.

21. Do I have to come to the hearing?

No. Lead Counsel will answer questions the Court may have. But, you are welcome to come at your own expense. If you send an objection or statement in support of the Settlement, you are not required to come to Court to discuss it. As long as you mailed your objection on time, the Court will consider it. You may also pay your own lawyer to attend, but you are not required to do so. Class Members do not need to appear at the hearing or take any other action to indicate their approval.

22. May I speak at the hearing?

If you object to the Settlement, the Plan of Allocation or, the fee and expense application or Lead Plaintiff's time and expense request, you may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must include with your objection (see Question 18 above) a statement saying that it is your "Notice of Intention to Appear in the *Harman Merger Litigation*." Persons who intend to object to the Settlement, the Plan of Allocation, the fee and expense application, and/or Lead Plaintiff's time and expense request and desire to present evidence at the Final Approval Hearing must include in their written objections the identity of any witnesses they may call to testify and copies of any exhibits they intend to introduce into evidence at the Final Approval Hearing. You cannot speak at the hearing if you exclude yourself from the Class.

IF YOU DO NOTHING

23. What happens if I do nothing at all?

If you do nothing, you will get no money from this Settlement. But, unless you exclude yourself, you will not be able to start a lawsuit or be part of any other lawsuit against the Released Persons about the legal issues in this case ever again.

GETTING MORE INFORMATION**24. Are there more details about the proposed Settlement?**

This Notice summarizes the proposed Settlement. More details are in the Stipulation dated June 23, 2022. You can obtain answers to common questions regarding the proposed Settlement by contacting the Claims Administrator toll-free at 1-888-813-7419. A copy of the Stipulation and other relevant documents are also available on the Settlement website at www.HarmanMergerLitigation.com.

25. How do I get more information?

For even more detailed information concerning the matters involved in this Litigation, reference is made to the pleadings, the Stipulation, the Orders entered by the Court and the other papers filed in the Litigation, which may be inspected at the Office of the Clerk of the United States District Court for the District of Connecticut, Abraham Ribicoff Federal Building, 450 Main Street, Suite A012, Hartford, CT 06103, during regular business hours. For a fee, all papers filed in this Litigation are available at www.pacer.gov.

You can also call 1-888-813-7419 or write to the Shareholder Relations Department, Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, CA 92101, settlementinfo@rgrdlaw.com or visit www.HarmanMergerLitigation.com.

**PLAN OF ALLOCATION OF NET SETTLEMENT FUND
AMONG CLASS MEMBERS**

The Net Settlement Fund (the Settlement Amount plus interest less taxes, tax expenses, Notice and Administration Costs, attorneys' fees and expenses, and Lead Plaintiff's time and expense payment (if any)) will be distributed to Class Members who, in accordance with the terms of the Stipulation, are entitled to a distribution from the Net Settlement Fund pursuant to any plan of allocation or any order of the Court and who submit a valid and timely Proof of Claim under the Plan of Allocation described below.

26. How will my claim be calculated?

As discussed above, the Settlement provides \$28 million in cash for the benefit of the Class. The Settlement Amount and any interest it earns constitute the "Settlement Fund." The Settlement Fund, after deduction of Court-approved attorneys' fees and expenses, Notice and Administration Costs, Taxes, and any other fees or expenses approved by the Court, is the "Net Settlement Fund." If the Settlement is approved by the Court, the Net Settlement Fund will be distributed to Authorized Claimants—i.e., who were holders of record of Harman common stock at the close of business on January 10, 2017, and who submit a valid Proof of Claim to the Claims Administrator—in accordance with this proposed Plan of Allocation ("Plan of Allocation" or "Plan") or such other plan of allocation as the Court may approve. Only those stockholders holding Harman common stock as of the close of business on January 10, 2017 were considered record holders entitled to vote on the Merger. Given that the currently pending claims in the Litigation challenge statements made in the Proxy related to that vote, this proposed Plan of Allocation aligns the recovery with those who have legal standing to bring the claims currently asserted in the Litigation. Class Members who do not timely submit valid Proofs of Claim and/or who did not hold Harman common stock at the close of business on January 10, 2017 will not share in the Net Settlement Fund, but will otherwise be bound by the Settlement. The Court may approve this proposed Plan of Allocation, or modify it, without additional notice to the Class. Any order modifying the Plan of Allocation will be posted on the Settlement website, www.HarmanMergerLitigation.com.

The objective of the Plan of Allocation is to distribute the Settlement proceeds equitably among those Class Members who have legal standing to bring the claims currently asserted in the Litigation (as described above). The Plan of Allocation is not a formal damage analysis, and the calculations made in accordance with the Plan of Allocation are not intended to be estimates of, or indicative of, the amounts that Class Members might have been able to recover after a trial.

Pursuant to the Settlement described herein, the Settlement Amount is \$28 million. Lead Plaintiff estimates that approximately 69,379,904 shares of Harman common stock are in the Class. A Class Member's actual recovery will be a proportion of the Net Settlement Fund determined by its claim as compared to the total claims of all eligible Class Members who submit acceptable Proofs of Claim. A Class Member may receive more than the estimated average amount provided below depending on the number of claims submitted. If 100% of shares outstanding on the record date submit a claim, each share's average distribution under the Settlement will be approximately \$0.40 per share, before deduction of any Taxes on any income earned on the Settlement Amount, Tax Expenses, Notice and Administration Costs, the attorneys' fees and expenses, the expenses of Lead Plaintiff (if any), as determined by the Court.

The Net Settlement Fund will be distributed to Authorized Claimants on a *pro rata* basis. However, no distributions will be made to Authorized Claimants who would otherwise receive a distribution of less than \$10.00.

Payments shall be conclusive against all Authorized Claimants. No Person shall have any claim against Plaintiff's Counsel, Lead Plaintiff, Intervening Plaintiff, the Claims Administrator, Defendants and their Related Parties, or any Person designated by Plaintiff's Counsel based on distributions made substantially in accordance with the Stipulation and the Settlement contained therein, or further order(s) of the Court. No Class Member shall have any claim against Defendants for any Released Claims. All Class Members who fail to complete and submit a valid and timely Proof of Claim shall be barred from participating in distributions from the Net Settlement Fund (unless otherwise ordered by the Court), but otherwise shall be bound by all of the terms of the Stipulation, including the terms of any judgment entered and the releases given.

SPECIAL NOTICE TO SECURITIES BROKERS AND OTHER NOMINEES

If you purchased, sold, or held Harman common stock at any time during the Class Period for the beneficial interest of an individual or organization other than yourself, the Court has directed that, WITHIN FIFTEEN (15) DAYS OF YOUR RECEIPT OF THIS NOTICE, you either (a) provide to the Claims Administrator the name and last known address of each person or organization for whom or which you purchased, sold, or held such common stock, or (b) request additional copies of this Notice and the Proof of Claim, which will be provided to you free of charge, and within fifteen (15) days mail the Notice and Proof of Claim via First Class mail directly to the beneficial owners of the common stock referred to herein. If you choose to follow alternative procedure (b), upon such mailing, you must send a statement to the Claims Administrator confirming that the mailing was made as directed and retain the names and addresses for any future mailings to Class Members. You are entitled to reimbursement from the Settlement Fund of your reasonable expenses actually incurred in connection with the foregoing, including reimbursement of postage expense and the cost of ascertaining the names and addresses of beneficial owners. Your reasonable expenses will be paid upon request and submission of appropriate supporting documentation. All communications concerning the foregoing should be addressed to the Claims Administrator at notifications@gilardi.com or:

Harman Merger Litigation
Claims Administrator
c/o Gilardi & Co. LLC
P.O. Box 6177
Novato, CA 94948-6177

DATED: July 13, 2022

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

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UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

PATRICIA B. BAUM, Individually and on Behalf of)	No. 3:17-cv-00246-RNC
All Others Similarly Situated,)	
Plaintiff,)	<u>CLASS ACTION</u>
vs.)	
HARMAN INTERNATIONAL INDUSTRIES,)	
INCORPORATED, et al.,)	
Defendants.)	
_____)	

PROOF OF CLAIM AND RELEASE

I. GENERAL INSTRUCTIONS

1. To recover as a Class Member based on your claims in the action entitled *Baum v. Harman Int'l Indus., Inc., et al.*, No. 3:17-cv-00246-RNC (the "Litigation"), you must complete and, on page 6 hereof, sign this Proof of Claim and Release form. If you fail to submit a properly-addressed (as set forth in paragraph 3 below) Proof of Claim and Release form, postmarked or received by the date shown below, your claim may be rejected and you may be precluded from any recovery from the Net Settlement Fund created in connection with the proposed Settlement of the Litigation.

2. Submission of this Proof of Claim and Release form, however, does not assure that you will share in the proceeds of the Settlement.

3. YOU MUST MAIL OR SUBMIT ONLINE YOUR COMPLETED AND SIGNED PROOF OF CLAIM AND RELEASE, ACCOMPANIED BY COPIES OF THE DOCUMENTS REQUESTED HEREIN, NO LATER THAN DECEMBER 1, 2022, TO THE COURT-APPOINTED CLAIMS ADMINISTRATOR IN THIS CASE, AT THE FOLLOWING ADDRESS:

Harman Merger Litigation
Claims Administrator
c/o Gilardi & Co. LLC
P.O. Box 6177
Novato, CA 94948-6177

Online Submission: www.HarmanMergerLitigation.com

If you are NOT a Class Member (as defined in the Notice of Pendency and Proposed Settlement of Class Action (the "Notice")), DO NOT submit a Proof of Claim and Release form.

4. If you are a Class Member and you do not timely request exclusion in connection with the proposed Settlement, you will be bound by the terms of any judgment entered in the Litigation, including the releases provided therein, WHETHER OR NOT YOU SUBMIT A PROOF OF CLAIM AND RELEASE FORM.

II. CLAIMANT IDENTIFICATION

Pursuant to the Plan of Allocation, only Class Members who were holders of record of Harman common stock at the close of business on January 10, 2017, and who submit a valid Proof of Claim and Release form to the Claims Administrator may share in the recovery.

If you held Harman International Industries, Incorporated ("Harman") common stock on January 10, 2017 (the "Record Date"), and held the shares in your name, you are the beneficial holder, as well as the record holder. If, however, you held Harman common stock on the Record Date and the shares were registered in the name of a third party, such as a nominee or brokerage firm, the third party is the record holder.

Use Part I of this form entitled "Claimant Identification" to identify each holder of record ("nominee"), if different from the beneficial holder of the common stock which form the basis of this claim. THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL HOLDER(S) OR THE LEGAL REPRESENTATIVE OF HOLDER(S) OF THE HARMAN COMMON STOCK UPON WHICH THIS CLAIM IS BASED.

All joint holders must sign this claim. Executors, administrators, guardians, conservators and trustees must complete and sign this claim on behalf of persons represented by them and their authority must accompany this claim and their titles or capacities must be stated. The Social Security (or taxpayer identification) number and telephone number of the beneficial

holder may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

If you are acting in a representative capacity on behalf of a Class Member (for example, as an executor, administrator, trustee, or other representative), you must submit evidence of your current authority to act on behalf of that Class Member. Such evidence would include, for example, letters testamentary, letters of administration, or a copy of the trust documents.

NOTICE REGARDING ELECTRONIC FILES: Certain claimants with large numbers of transactions may request to, or may be requested to, submit information regarding their transactions in electronic files. ***All claimants MUST submit a manually signed paper Proof of Claim and Release form listing all their transactions whether or not they also submit electronic copies.*** If you wish to file your claim electronically, you must contact the Claims Administrator at edata@gilardi.com to obtain the required file layout. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the claimant a written acknowledgement of receipt and acceptance of electronically submitted data. Distribution payments must be made by check or electronic payment payable to the Authorized Claimant (beneficial account owner). The Third-Party Filer shall not be the payee of any distribution payment check or electronic distribution payment.

III. CLAIM FORM

Use Part II of this form entitled "Holdings in Harman Common Stock" to state the number of shares of Harman common stock you held at the close of business on January 10, 2017.

You must provide copies of broker information or other documentation of your holdings in Harman common stock as attachments to your claim. If any such documents are not in your possession, please obtain a copy or equivalent documents from your broker because these documents are necessary to prove and process your claim. Failure to provide this documentation could delay verification of your claim or result in rejection of your claim.

Official
Office
Use
Only

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

Baum v. Harman Int'l Indus., Inc., et al.

No. 3:17-cv-00246-RNC

PROOF OF CLAIM AND RELEASE

**Must Be Postmarked (if Mailed)
or Received (if Submitted Online)
No Later Than December 1, 2022**

HRN

Please Type or Print in the Boxes Below
Do NOT use Red Ink, Pencil, or Staples

You must provide copies of broker information or other documentation of your holdings in Harman common stock as attachments to your claim. If any such documents are not in your possession, please obtain a copy or equivalent documents from your broker because these documents are necessary to prove and process your claim. Failure to provide this documentation could delay verification of your claim or result in rejection of your claim.

PART I. CLAIMANT IDENTIFICATION

Last Name

M.I.

First Name

Last Name (Co-Beneficial Owner)

M.I.

First Name (Co-Beneficial Owner)

☐ IRA

☐ Joint Tenancy

☐ Employee

☐ Individual

☐ Other

Company Name (Beneficial Owner - If Claimant is not an Individual) or Custodian Name if an IRA (specify)

Trustee/Asset Manager/Nominee/Record Owner's Name (If Different from Beneficial Owner Listed Above)

Account#/Fund# (Not Necessary for Individual Filers)

Last Four Digits of Social Security Number

Taxpayer Identification Number

or

Telephone Number (Primary Daytime)

Telephone Number (Alternate)

Email Address

MAILING INFORMATION

Address

Address

City

State

ZIP Code

Foreign Province

Foreign Postal Code

Foreign Country Name/Abbreviation

FOR CLAIMS PROCESSING ONLY	OB <input type="text"/>	CB <input type="text"/>	<input type="radio"/> ATP <input type="radio"/> KE <input type="radio"/> ICI	<input type="radio"/> BE <input type="radio"/> DR <input type="radio"/> EM	<input type="radio"/> FL <input type="radio"/> ME <input type="radio"/> ND	<input type="radio"/> OP <input type="radio"/> RE <input type="radio"/> SH	MM / DD / YYYY	FOR CLAIMS PROCESSING ONLY
----------------------------------	-------------------------	-------------------------	--	--	--	--	----------------	----------------------------------



A. Number of shares of Harman common stock held
at the close of business on January 10, 2017:

--	--	--	--	--	--	--	--	--	--

Proof Enclosed?

☐ Y ☐ N

**YOUR SIGNATURE ON PAGE 6 WILL CONSTITUTE YOUR
ACKNOWLEDGMENT OF THE RELEASE DESCRIBED IN PART V BELOW.**

IV. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS

I (We) submit this Proof of Claim and Release under the terms of the Stipulation of Settlement described in the Notice. I (We) also submit to the jurisdiction of the United States District Court for District of Connecticut, with respect to my (our) claim as a Class Member and for purposes of enforcing the release set forth herein. I (We) further acknowledge that I am (we are) bound by and subject to the terms of any judgment that may be entered in the Litigation. I (We) agree to furnish additional information to the Claims Administrator to support this claim if requested to do so. I (We) have not submitted any other claim in connection with the holding of Harman common stock on the Record Date and know of no other person having done so on my (our) behalf.

V. RELEASE

1. I (We) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally and forever release, relinquish, and discharge each and all of the Released Persons from the Released Claims as provided in the Stipulation of Settlement.

2. "Related Parties" means, with respect to each Defendant, any and all of their related parties, including, without limitation, any and all of their past or present parents, subsidiaries, affiliates, predecessors, or successors, as well as any and all of its or their current or former officers, directors, employees, associates, members of their immediate families, agents or other persons acting on their behalf, underwriters, insurers, reinsurers, attorneys, advisors, financial advisors, publicists, independent certified public accountants, auditors, accountants, assigns, creditors, administrators, heirs, estates, or legal representatives.

3. "Released Claims" means any and all claims that have been asserted, could have been asserted, or could be asserted in the future in this Litigation; and any and all claims, actions, potential actions, demands, losses, rights, causes of action, controversies, costs, damages, liabilities, obligations, judgments, suits, matters and issues of any nature for any remedy, known or unknown, suspected or unsuspected, accrued or unaccrued, whether class, individual, or otherwise, arising under the laws, regulations, or common law of the United States of America, any state or political subdivision thereof, or any foreign country or jurisdiction, in law, in contract, or in equity, and regardless of legal theory, and including claims for indemnification, contribution, or otherwise denominated, that have been asserted, could have been asserted, or could be asserted in the future, by Lead Plaintiff or any Class Member in his, her or its capacity as a purchaser, seller or holder of Harman stock, that have arisen from, could have arisen from, or relate in any manner to, in whole or in part, the allegations, conduct, facts, events, transactions, acts, occurrences, statements, representations, omissions or any other matter related to, or arising out of, the Litigation, the Merger, the Proxy, the public statements, projection and investor presentations referenced in the Amended Complaint, or the purchase, sale, or holding of Harman's common stock at any time during the period from and including January 10, 2017 through and including March 12, 2017. "Released Claims" includes "Unknown Claims" as defined below. For the avoidance of doubt, nothing in the Stipulation of Settlement is intended to, nor shall it be deemed to, release any claim that the Defendants have against any of Defendants' insurers.

4. "Released Persons" means each and all of the Defendants and each and all of their Related Parties.

5. "Settled Defendants' Released Claims" means all actions, claims, debts, demands, liabilities, losses, matters, rights, suits and causes of action of any nature whatsoever, known or unknown, contingent or absolute, mature or immature, discoverable or undiscoverable, whether concealed or hidden, suspected or unsuspected, whether based in law or equity, arising under federal, state, common or foreign law, or any other law, rule or regulation, which now exist or heretofore have existed, that have been or could have been asserted in the Litigation or any forum by the Released Persons or any of them against Lead Plaintiff, Intervening Plaintiff, Class Members, or Plaintiff's Counsel, that arise out of or relate in any way to the institution, prosecution, or settlement, of the claims against the Released Persons, except for claims related to the enforcement of the Settlement.



6. "Unknown Claims" means any of the Released Claims which Lead Plaintiff or any Class Member does not know or suspect to exist in such party's favor at the time of the release of the Released Persons, and any of the Settled Defendants' Released Claims that the Released Persons do not know or suspect to exist in his, her or its favor at the time of the release of Lead Plaintiff, each and all of the Class Members and Plaintiff's Counsel, which, if known by such party, might have affected such party's settlement with and release of the Released Persons or Lead Plaintiff, each and all of the Class Members and Lead Plaintiff's counsel, or might have affected such party's decision not to object to this Settlement or seek exclusion. Unknown Claims include those Released Claims in which some or all of the facts comprising the claim may be suspected, or even undisclosed or hidden. With respect to any and all Released Claims and the Settled Defendants' Released Claims, upon the Effective Date, Lead Plaintiff and Defendants shall expressly, and each of the Class Members and Released Persons shall be deemed to have, and by operation of the Order and Final Judgment or the Alternative Judgment, if applicable, shall have, expressly waived to the fullest extent permitted by law, the provisions, rights, and benefits of California Civil Code §1542, which provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

In addition, Lead Plaintiff and Defendants shall expressly, and each of the Class Members and Released Persons shall be deemed to have, and by operation of the Order and Final Judgment or the Alternative Judgment, if applicable, shall have expressly waived any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law, which is similar, comparable or equivalent to California Civil Code §1542. Lead Plaintiff, Class Members and the Released Persons may hereafter discover facts in addition to or different from those which such party now knows or believes to be true with respect to the subject matter of the Released Claims and the Settled Defendants' Released Claims, but Lead Plaintiff and Defendants shall expressly, and each Class Member and Released Persons, upon the Effective Date, shall be deemed to have, and by operation of the Order and Final Judgment, or the Alternative Judgment, if applicable, shall have fully, finally, and forever settled and released any and all Released Claims, or the Settled Defendants' Released Claims, as the case may be, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct that is negligent, reckless, intentional, with or without malice, or a breach of any duty, law, or rule, without regard to the subsequent discovery or existence of such different or additional facts, whether or not previously or currently asserted in any action. Lead Plaintiff and Defendants acknowledge, and the Class Members and Released Persons shall be deemed by operation of the Order and Final Judgment, or the Alternative Judgment, if applicable, to have acknowledged, that the foregoing waiver was separately bargained for and a key element of the Settlement of which this release is a part.

7. This release shall be of no force or effect unless and until the Court approves the Stipulation of Settlement and the Settlement becomes effective on the Effective Date.

8. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any claim or matter released pursuant to this release or any other part or portion thereof.

9. I (We) hereby warrant and represent that I (we) have included information (including supporting documentation) about the number of shares of Harman common stock held by me (us) on the Record Date.

10. I (We) hereby warrant and represent that I am (we are) not a Defendant or other person excluded from the Class.

11. I (We) certify that I am (we are) not subject to backup withholding under the provisions of §3406(a)(1)(C) of the Internal Revenue Code.

Note: If you have been notified by the Internal Revenue Service that you are subject to backup withholding, please strike out the language that you are not subject to backup withholding in the certification above.



I declare under penalty of perjury under the laws of the United States of America that the foregoing information supplied by the undersigned is true and correct.

Executed this _____ day of _____ in _____
(Month/Year) (City/State/Country)

(Sign your name here)

(Sign your name here)

(Type or print your name here)

(Type or print your name here)

(Capacity of person(s) signing, e.g.,
Beneficial Holder, Executor or Administrator)

(Capacity of person(s) signing, e.g.,
Beneficial Holder, Executor or Administrator)

**ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME.
THANK YOU FOR YOUR PATIENCE.**

Reminder Checklist:

1. Please sign the above release and declaration.
2. Remember to attach copies of supporting documentation, if available.
3. Do not send originals of stock certificates or other documentation as they will not be returned.
4. Keep a copy of your Proof of Claim and Release form and all supporting documentation for your records.
5. If you desire an acknowledgment of receipt of your Proof of Claim and Release form, please send it Certified Mail, Return Receipt Requested.
6. If you move, please send your new address to the address below.
7. **Do not use red pen or highlighter** on the Proof of Claim and Release form or supporting documentation.

THIS PROOF OF CLAIM AND RELEASE MUST BE SUBMITTED ONLINE BY DECEMBER 1, 2022, OR, IF MAILED, POSTMARKED NO LATER THAN DECEMBER 1, 2022, ADDRESSED AS FOLLOWS:

Harman Merger Litigation
Claims Administrator
c/o Gilardi & Co. LLC
P.O. Box 6177
Novato, CA 94948-6177
www.HarmanMergerLitigation.com



EXHIBIT B



1 McInnis Parkway
Suite 250
San Rafael, CA 94903
P: (415) 458-3015

August 3, 2022

«FirstName» «LastName»
«Company»
«Addr1»
«Addr2»
South Bend, IN 46601
«FCountry»

Re: Harman Merger Litigation

Dear «GENDER» «LastName»:

Please find enclosed the Notice of Pendency and Proposed Settlement of Class Action and Proof of Claim and Release for the above referenced litigation. Please note both the class period and the designated eligible securities described on page one of the Notice, specifically the inclusion of all persons who purchased, sold, or held Harman International Industries, Incorporated ("Harman" or the "company") common stock at any time during the period from and including January 10, 2017, the record date for Harman's special stockholder meeting regarding the merger of Harman into Samsung Electronics Co., Ltd. (the "merger"), through and including March 12, 2017, the date the merger closed (the "class"). In addition, **the Notice provides that the Exclusion Deadline is October 20, 2022 and the Claim Filing Deadline is December 1, 2022.**

Please pay particular attention to the "Special Notice to Securities Brokers and Other Nominees" on page ten of the Notice which states, in part: If you purchased, sold, or held Harman common stock at any time during the Class Period for the beneficial interest of an individual or organization other than yourself, the Court has directed that, WITHIN FIFTEEN (15) DAYS OF YOUR RECEIPT OF THIS NOTICE, you either (a) provide to the Claims Administrator the name and last known address of each person or organization for whom or which you purchased, sold, or held such common stock, or (b) request additional copies of this Notice and the Proof of Claim, which will be provided to you free of charge, and within fifteen (15) days mail the Notice and Proof of Claim via First Class mail directly to the beneficial owners of the common stock referred to herein. If you choose to follow alternative procedure (b), upon such mailing, you must send a statement to the Claims Administrator confirming that the mailing was made as directed and retain the names and addresses for any future mailings to Class Members.

Please do not make your own copies of the Proof of Claim Form, as copies may not be accepted for processing. Additional copies of the appropriate documents may be requested by contacting us at the above address and/or phone number. If we conduct the necessary mailing on your behalf, please submit names and addresses either via email to Notifications@Gilardi.com, via CD Rom to the above address or contact us to obtain secure FTP transmission instructions. Mailing labels will be accepted, but you may be requested to provide an additional copy of the address information you send. Do not include any confidential information that should not appear on a mailing label.

The data provided must be in one of the following formats:

- ASCII Fixed Length file
- ASCII Tab Delimited file
- Microsoft Excel spreadsheet

Your request must also specify the case name and Control Total(s) (for example, the total number of name and address records provided) for each file submission.

If you have any questions, please email Notifications@Gilardi.com.

Sincerely, Gilardi and Company, LLC

EXHIBIT C

TECHNOLOGY

WSJ.com/Tech

Samsung Mulls Big Push in Chips

Electronics giant suggests \$200 billion effort to build 11 new plants in Texas

By JIYOUNG SOHN

SEOUL—**Samsung Electronics** Co. has floated the prospect of investing nearly \$200 billion for 11 new chip-making plants in Texas over the next two decades, a megaspurge that if executed would dramatically boost its semiconductor foothold in the U.S. The South Korean tech giant's proposed spending was divulged in recent filings submitted to the Texas comptroller's office and made public Wednesday. One likely motivation is a year-end expiration of a Texas state incentive program offering property tax breaks for 10 years for large investments.

The filings don't commit Samsung to invest. The Suwon, South Korea-based company doesn't currently have specific plans to pursue the new factories outlined in the filings, a Samsung spokeswoman said. The spending proposals reflect the company's long-term planning process to evaluate the viability of further U.S. expansion, she added.

Samsung's potentially eye-popping spending comes as U.S. lawmakers weigh more than \$50 billion in subsidies to boost American-based chip production and research. Details of the legislation need to be resolved, though the bipartisan bill cleared a procedural hurdle on Tuesday. Much of the world's chip production has shifted to Asia in recent decades.

The slow progress on the U.S. chip subsidies has prompted some semiconductor giants to stall tens of billions of dollars in potential factory projects. Intel Corp. recently said it would move more cautiously on its factory plans without government incentives and delayed a



The South Korean company floated the plan in a Texas filing, ahead of the expiration of a state tax-break program for large investments.

groundbreaking ceremony for a planned multibillion-dollar chip manufacturing facility in Ohio.

In a Thursday statement, Commerce Secretary Gina Raimondo said that Samsung's investment would be transformational for the American chip-manufacturing industry, job creation and innovation and urged Congress to pass legislation that would offer federal funding for semiconductor production and research.

Samsung currently operates chip-production factories at three locations in South Korea, two in Austin, Texas, and two in China. The company dominates in memory chips, while it harbors big aspirations for its contract chip-making business.

"It all boils down to incen-

tives for Samsung to move a big part of their production to the U.S., and even within the U.S., very specific areas," said Wayne Lam, senior director of research at CCS Insight, a technology advisory firm. "Why go to the U.S. when they could do it just as cheaply and with a ready workforce in South Korea?"

Last year, Samsung said it would build its third Texas-based plant, spending \$17 billion for an advanced chip-making plant in the city of Taylor, which is located near Austin. The company has broken ground on the facility and expects it to become operational by the second half of 2024.

According to the Texas state filings, Samsung could invest nearly \$170 billion toward nine new chip manufacturing facilities in Taylor and

roughly \$25 billion in Austin. Samsung submitted the filings in late May.

If the company were to make the investments, Samsung said in multiple filings, some production would be "up and running" by around 2034 at the earliest, with others planned to start production the following decade.

Texas Gov. Greg Abbott said in a Wednesday statement that the totality of Samsung's investments would bring billions of dollars in additional capital, helping solidify the state as "the nation's leader in the semiconductor industry."

It isn't clear how much, if any, of Samsung's proposed spending would come from a previously announced investment plan over the next five years of about 450 trillion won, equivalent to about \$343

billion. That pool of funds encompasses the entire Samsung conglomerate, including chips but also biopharmaceuticals and other next-generation technologies.

A Samsung spokeswoman declined to comment on the source and other details of the proposed Texas investments.

Other chip makers, including Netherlands-based NXP Semiconductors NV and U.S.-based Texas Instruments Inc., have filed Chapter 313 applications with the Texas comptroller's office, according to the Texas state filings.

The Chapter 313 tax program in Texas allows public school districts in the state to offer property tax breaks for 10 years to businesses in exchange for local job creation. But the program is set to end Dec. 31.

Didi Fined \$1.2 Billion By Beijing For Cyber Violations

By KEITH ZHAI AND LIZA LIN

SINGAPORE—Chinese authorities fined ride-hailing company **Didi Global** Inc. the equivalent of about \$1.2 billion, bringing an end to a yearlong investigation into the company's cybersecurity practices.

The fine accounts for about 5% of Didi's revenue last year, and is the largest regulatory penalty imposed on a Chinese technology company by this metric since Beijing launched a clampdown on its internet giants two years ago.

China's internet regulator, the Cyberspace Administration of China, said in a statement Thursday that an investigation found Didi had flouted the country's cybersecurity, data security and personal information protection laws. In addition to the penalty imposed on the company, Didi's chief executive officer, Cheng Wei, and the company's president, Liu Qing, were each slapped with fines of about \$148,000.

Didi became a poster child of the Chinese government's regulatory campaign in July

5%

Percentage of 2021 revenue that the fine amounts to

2021, when officials announced a data-security investigation into the company. The probe, which came just days after Didi's listing on the New York Stock Exchange, resulted in Chinese authorities ordering mobile app stores in the country to remove Didi's services.

Didi's stock price plunged by as much as 80% from its listing price at one point. In June this year, Didi delisted from the U.S. exchange after telling shareholders it was required to do so to resolve the Chinese government's cybersecurity investigation.

China's state-run Xinhua News Agency, citing an unnamed cybersecurity official, described Didi's case as a serious one. "The nature of the issue was vile and it should be punished severely," Xinhua quoted the official saying.

The Wall Street Journal reported Tuesday that Chinese authorities were preparing to impose a fine of more than \$1 billion on Didi, citing people familiar with the matter. The penalty would pave the way for the company to pursue a share sale in Hong Kong, the people said.

Didi had collected excessive personal information on many of its users, including their ages, facial and job data and the home and office locations of users, according to a transcript of comments by the unnamed official that was published by Xinhua. The official said Didi's practices were illegal and introduced serious risks to China's information and data security, according to the transcript.

Didi said in a statement on its official social-media account that it "sincerely accepted and will resolutely comply" with the regulatory decision and other rules. The company said it would comprehensively re-examine its practices and work with regulators to make necessary changes.

Chinese e-commerce company Alibaba Group Holding Ltd. and food-delivery giant Meituan were also handed fines last year for anticompetitive practices, though their fines were smaller than Didi's when calculated as a percentage of annual revenue.

Alibaba was slapped with a \$2.8 billion fine in April 2021, representing about 4% of the company's domestic revenue in 2019. In October, Meituan was fined more than \$500 million, or about 3% of the firm's domestic sales in the prior year.

The penalty against Didi comes amid signs of an easing of China's regulatory crackdown against its internet giants.



The autonomous Apollo RT6 has a detachable steering wheel.

Baidu Unveils Car With Robotaxi Goal

By RAFFAELE HUANG

SINGAPORE—China's **Baidu** Inc. unveiled an autonomous car with a detachable steering wheel that it wants to use for its robotaxi service in 2023—up to a year before **Tesla** Inc. plans to start mass producing a similar vehicle.

Baidu, China's long-dominant search engine, priced the new model at about \$37,000, nearly half of the \$71,000 for the previous version of the car that was released in June 2021 with an ordinary steering wheel, the company said Thursday.

"We're moving towards a future where taking a robotaxi will be half the cost of taking a taxi today," Robin Li, co-founder and chief executive of Baidu, said at the company's annual technology conference.

He said cost cuts would enable Baidu to deploy tens of thousands of autonomous vehicles in China.

Global car makers and autonomous driving companies around the world are racing to put their driverless technologies in commercial use and lower costs. They still need to persuade governments to lift regulations on such services in the real world, with China and the U.S. yet to approve widespread use of fully autonomous vehicles.

Tesla aims to launch its robotaxi-focused model without a steering wheel or pedals next year and start mass pro-

duction in 2024, Chief Executive Elon Musk said in a call with analysts in April. "A robotaxi ride will cost less than a bus ticket," Mr. Musk said.

When asked about auto competition in China during Tesla's most recent earnings call on Wednesday, Mr. Musk told analysts that any company that isn't as competitive as its Chinese rivals would lose market share.

Google's sister company Waymo LLC also in December unveiled a minivan without a steering wheel, co-developed with Chinese car maker Geely Automobile Holdings Ltd. Waymo said it planned to use the fully autonomous vehicle in its robotaxi fleets in the U.S. in the coming years.

The Apollo RT6, Baidu's new model, will run with Baidu's level-four autonomous driving system, which doesn't require a driver under most conditions, the company said. The electric model, with a regular sport-utility-vehicle look, will integrate eight Lidar sensors—detection systems using pulsed laser light—and a dozen cameras alongside the car, Baidu said.

Chinese laws require the model to have a steering wheel, but being able to remove it would allow more space for installing extra seats and other entertainment devices, such as videogame consoles, if the rules are changed, the company said.

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CLASS ACTION

UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT		
PATRICIA B. BAUM, Individually and on Behalf of All Others Similarly Situated,		No. 3:17-cv-00246-RNC
Plaintiff,		<u>CLASS ACTION</u>
vs.		SUMMARY NOTICE
HARMAN INTERNATIONAL INDUSTRIES, INCORPORATED, et al.,		
Defendants.		

TO: ALL PERSONS WHO PURCHASED, SOLD, OR HELD HARMAN INTERNATIONAL INDUSTRIES, INCORPORATED ("HARMAN") COMMON STOCK AT ANY TIME DURING THE PERIOD FROM AND INCLUDING JANUARY 10, 2017, THROUGH AND INCLUDING MARCH 12, 2017 (THE "CLASS PERIOD"), YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT OF THIS LITIGATION, INCLUDING THE RELEASE AND EXTINGUISHMENT OF CLAIMS YOU MAY POSSESS RELATING TO YOUR HOLDINGS OF HARMAN COMMON STOCK DURING THE CLASS PERIOD. If you have not received a detailed Notice of Pendency and Proposed Settlement of Class Action ("Notice") and a copy of the Proof of Claim and Release form, you may obtain copies by writing to *Harman Merger Litigation*, Claims Administrator, c/o Gilardi & Co. LLC, P.O. Box 6177, Novato, CA 94948-6177, or on the Internet at www.HarmanMergerLitigation.com. If you are a Class Member, in order to share in the distribution of the Net Settlement Fund, you must submit a Proof of Claim and Release form by mail (postmarked no later than December 1, 2022), or online at www.HarmanMergerLitigation.com no later than December 1, 2022, establishing that you are entitled to recovery.

YOU ARE HEREBY NOTIFIED, pursuant to an Order of the United States District Court for the District of Connecticut, that a hearing will be held on November 10, 2022, at 10:00 a.m., before the Honorable Robert N. Chatigny at the United States District Court for the District of Connecticut, Abraham Ribicoff Federal Building, 450 Main Street, Room 228, Hartford, CT 06103, for the purpose of determining: (1) whether the proposed Settlement of the Litigation for \$28 million should be approved by the Court as fair, reasonable, and adequate; (2) whether an Order and Final Judgment or an Alternative Judgment (if applicable) should be entered by the Court dismissing the Litigation with prejudice and releasing the Released Claims; (3) whether the Plan of Allocation for the Net Settlement Fund is fair, reasonable, and adequate and should be approved; and (4) whether the application of Lead Counsel for the payment of attorneys' fees and expenses and any award to Lead Plaintiff (if requested) pursuant to 15 U.S.C. §78u-4(a)(4) should be approved.

If you purchased, sold, or held Harman common stock at any time during the Class Period and you desire to be excluded from the Class, you must submit a request for exclusion so that it is received no later than October 20, 2022, in the manner and form explained in the detailed Notice referred to above. All Class Members who do not timely and validly request exclusion from the Class will be bound by any judgment entered in the Litigation pursuant to the Stipulation of Settlement.

Any objection to the Settlement, the Plan of Allocation, Lead Counsel's request for attorneys' fees and expenses, and Lead Plaintiff's request for time and expenses (if any) must be received by each of the following recipients no later than October 20, 2022:

CLERK OF THE COURT UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT Abraham Ribicoff Federal Building 450 Main Street, Suite A012 Hartford, CT 06103 Lead Counsel: ROBBINS GELLER RUDMAN & DOWD LLP David A. Knotts 655 West Broadway, Suite 1900 San Diego, CA 92101 Counsel for Defendants: WACHTELL, LIPTON, ROSEN & KATZ Stephen R. DiPrima 51 West 52nd Street New York, NY 10019	BY ORDER OF THE COURT UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT
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BUSINESS OPPORTUNITIES

BUSINESS PROJECT WANTED

► We are **SELOUS VIDEO INC.** ◀

We are a video-focused media company headquartered in New York City. We are looking to evaluate businesses and invest in market-promising projects. We are interested in purchasing or investing in a range of businesses.

If you are interested, email us at: fzy670218@126.com (This ad is valid for the long term.)

BUSINESS OPPORTUNITIES

Attention Mergers & Acquisitions Vice Presidents.

Will pay commission for a phone call with America's foremost Corporate Raider to pitch my plan.

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Seeking Partner to License Brand Names and/or Trademarks and Manufacture and Market Proven Proprietary Products Franchising: Affiliate & Internet Product Marketing

www.FranchiseFinder.com

www.AffiliateMarketingDomains.com

Earl: 800-521-6310 info@toilets.com

Declaration of Publication

I, Carla Peak, as Vice President, Legal Notification Services at Gilardi & Co. LLC, a KCC Class Action Services Company in San Rafael, California, hereby certify that I caused the attached notice to be printed in said publication on July 22, 2022:

Name of Publication: The Wall Street Journal

Address: 1211 Avenue of the Americas

City, State, Zip: New York, NY 10036

Phone #: 1-800-568-7625

State of: New York

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 22nd day of July 2022, at Sellersville, Pennsylvania.

A handwritten signature in black ink, reading "Carla Peak", written over a horizontal line.

Carla Peak



Robbins Geller Rudman & Dowd LLP Announces Proposed Settlement in the Harman Merger Litigation

July 22, 2022 08:00 AM Eastern Daylight Time

SAN DIEGO--(BUSINESS WIRE)--The following statement is being issued by Robbins Geller Rudman & Dowd LLP regarding the Harman Merger Litigation:

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

PATRICIA B. BAUM, Individually and on)	No. 3:17-cv-00246-RNC
Behalf of All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	SUMMARY NOTICE
vs.)	
)	
HARMAN INTERNATIONAL)	
INDUSTRIES, INCORPORATED, et al.,)	
)	
Defendants.)	
)	

TO: ALL PERSONS WHO PURCHASED, SOLD, OR HELD HARMAN INTERNATIONAL INDUSTRIES, INCORPORATED ("HARMAN") COMMON STOCK AT ANY TIME DURING THE PERIOD FROM AND INCLUDING JANUARY 10, 2017, THE RECORD DATE FOR HARMAN'S SPECIAL STOCKHOLDER MEETING REGARDING THE MERGER OF HARMAN INTO SAMSUNG ELECTRONICS CO., LTD. (THE "MERGER"), THROUGH AND INCLUDING MARCH 12, 2017, THE DATE THE MERGER CLOSED

YOU ARE HEREBY NOTIFIED, pursuant to an Order of the United States District Court for the District of Connecticut, that a hearing will be held on November 10, 2022, at 10:00 a.m., before the Honorable Robert N. Chatigny at the United States District Court for the District of Connecticut, Abraham Ribicoff Federal Building, 450 Main Street, Room 228, Hartford, CT 06103, for the purpose of determining: (1) whether the proposed Settlement of the Litigation for \$28 million should be approved by the Court as fair, reasonable, and adequate; (2) whether an Order and Final Judgment or an Alternative Judgment (if applicable) should be entered by the Court dismissing the Litigation with prejudice and releasing the Released Claims; (3) whether the Plan of Allocation for the Net Settlement Fund is fair, reasonable, and adequate and should be approved; and (4) whether the application of Lead Counsel for the payment of attorneys' fees and expenses and any award to Lead Plaintiff (if requested) pursuant to 15 U.S.C. §78u-4(a)(4) should be approved.

IF YOU PURCHASED, SOLD, OR HELD HARMAN COMMON STOCK AT ANY TIME DURING THE PERIOD FROM AND INCLUDING JANUARY 10, 2017, THROUGH AND INCLUDING MARCH 12, 2017 (THE "CLASS PERIOD"), YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT OF THIS LITIGATION, INCLUDING THE RELEASE AND EXTINGUISHMENT OF CLAIMS YOU MAY POSSESS RELATING TO YOUR HOLDINGS OF HARMAN COMMON STOCK DURING THE CLASS PERIOD. If you have not received a detailed Notice of Pendency and Proposed Settlement of Class Action ("Notice") and a copy of the Proof of Claim and Release form, you may obtain copies by writing to *Harman Merger Litigation*, Claims Administrator, c/o Gilardi & Co. LLC, P.O. Box 6177, Novato, CA 94948-6177, or on the Internet at www.HarmanMergerLitigation.com. If you are a Class Member, in order to share in the distribution of the Net Settlement Fund, you must submit a Proof of Claim and Release form by mail (**postmarked no later than December 1, 2022**), or online at www.HarmanMergerLitigation.com **no later than December 1, 2022**, establishing that you are entitled to recovery.

If you purchased, sold, or held Harman common stock at any time during the Class Period and you desire to be excluded from the Class, you must submit a request for exclusion so that it is **received no later than October 20, 2022**, in the manner and form explained in the detailed Notice referred to above. All Class Members who do not timely and validly request exclusion from the Class will be bound by any judgment entered in the Litigation pursuant to the Stipulation of Settlement.

Any objection to the Settlement, the Plan of Allocation, Lead Counsel's request for attorneys' fees and expenses, and Lead Plaintiff's request for time and expenses (if any) must be **received by each** of the following recipients **no later than October 20, 2022**:

CLERK OF THE COURT
UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT
Abraham Ribicoff Federal Building
450 Main Street, Suite A012
Hartford, CT 06103

Lead Counsel:

ROBBINS GELLER RUDMAN & DOWD LLP
David A. Knotts
655 West Broadway, Suite 1900
San Diego, CA 92101

Counsel for Defendants:

WACHTELL, LIPTON, ROSEN & KATZ
Stephen R. DiPrima
51 West 52nd Street
New York, NY 10019

PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE REGARDING THIS NOTICE. If you have any questions about the Settlement, you may contact Lead Counsel at the address listed above.

DATED: July 13, 2022

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

Contacts

Robbins Geller Rudman & Dowd LLP

Shareholder Relations Department

Greg Wood

(619) 231-1058

Declaration of Publication

I, Carla Peak, as Vice President, Legal Notification Services at Gilardi & Co. LLC, a KCC Class Action Services Company in San Rafael, California, hereby certify that I caused the attached notice to be published as a press release by the following wire service:

Name of Publication: BusinessWire

Address: 101 California Street 20th Floor

City, ST Zip: San Francisco, CA 94111

Phone #: 415-986-4422

State of: California

The press release was distributed on July 22, 2022 to the following media circuits offered by the above-referenced wire service:

1. US1 National Newslne

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 22nd day of July 2022, at Sellersville, Pennsylvania.

A handwritten signature in black ink, appearing to read "Carla Peak", written over a horizontal line.

Carla Peak