

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT*Clark v. LG Electronics U.S.A., Inc.*

Case No.: 3:13-cv-0485-JM-JMA

A Settlement has been reached in a class action lawsuit that claims certain LG Signature Model Refrigerators contain a defect with the ice fan that causes certain issues including the appearance of an IF error code in the control panel. LG denies it did anything wrong. The Court has not decided who is right.

Who is Included?

You are included if you have purchased, not for resale, one of the following LG Signature Model Refrigerators or Sears Kenmore Model Refrigerators sold in the United States by LG US through its authorized retailers or Sears (in the case of Kenmore Models) ("Refrigerators") on or before January 29, 2014:

LG Signature Model Refrigerators

Model Number	Manufacturing Dates	Serial Number Range
LFX33975ST	August 2012 – March 2013	208KR***** to 303KR*****
LFX31915ST	August 2012 – April 2013	103KR***** to 304KR*****
LFX31925SB	April 2011 – January 2013	103KR***** to 301KR*****
LFX31925ST	March 2011 – January 2013	103KR***** to 301KR*****
LFX31925SW	April 2011 – January 2013	103KR***** to 301KR*****
LMX31985ST	May 2012 – April 2013	103KR***** to 304KR*****
LFX31935ST	January 2012 – May 2013	103KR***** to 305KR*****
LFX31945ST	April 2012 – March 2013	103KR***** to 303KR*****
LFX25991ST	August 2011 – March 2013	103KR***** to 303KR*****
LSFD2591ST	March 2012 – April 2013	103KR***** to 304KR*****
LFX31995ST	August 2012 – March 2013	103KR***** to 303KR*****

Sears Kenmore Model Refrigerators

Model Number	Manufacturing Dates	Serial Number Range
72052	May 2011 – January 2013	103KR***** to 301KR*****
72053	April 2011 – January 2013	103KR***** to 301KR*****
72059	May 2011 – January 2013	103KR***** to 301KR*****
72043	July 2011 – March 2013	103KR***** to 303KR*****
72049	September 2011 – March 2013	103KR***** to 303KR*****
72042	September 2011 – March 2013	103KR***** to 303KR*****
72063	October 2011 – March 2013	103KR***** to 303KR*****
72062	March 2012 – March 2013	103KR***** to 303KR*****
72182	May 2012 – April 2013	103KR***** to 304KR*****
72183	May 2012 – April 2013	103KR***** to 304KR*****
72189	May 2012 – April 2013	103KR***** to 304KR*****

What Can You Get?

LG US has agreed to provide the opportunity for Settlement Class Members to have their Refrigerators repaired if they experienced problems associated with the ice fan. LG US has also agreed to reimburse out-of-pocket costs, relating to spoiled food or other property damage that resulted from Refrigerator Issues associated with the ice fan, subject to certain confirmation procedures. Pursuant to the Settlement, in the event a Settlement Class Member's Refrigerator cannot be successfully repaired, the Settlement Class Member will be entitled, upon verification, to a \$1,500.00 discount on a future LG or Sears refrigerator purchase or to continued repairs. The Settlement also provides an extended limited warranty for problems associated with the ice fan for one (1) additional year after expiration of the Refrigerator's original one (1) year warranty.

How do you Get Repair, Reimbursement, or Benefits Under the Warranty Extension?

To receive a repair or reimbursement, you must submit a Claim Form and any required documentation. You can submit a Claim Form by mail. The deadline to submit a Claim Form is postmarked no later than [DATE] to *Clark v. LG Electronics U.S.A., Inc.*, P.O. Box 230, Media, PA 19063. To receive benefits under the extended limited warranty, you must contact (800) 228-1757 or [SEARS DEDICATED CUSTOMER CARE NUMBER] (in the case of Kenmore Model Refrigerators).

Your Other Rights.

If you are eligible for the Warranty Extension, you will automatically receive that benefit. If you do not want to be legally bound by the Settlement, you must exclude yourself from the Settlement in the manner detailed in the Long Form Notice. The deadline to exclude yourself is postmarked no later than [DATE]. If you do not exclude yourself, you will not be able to sue LG US for any claim relating to the lawsuit. If you stay in the Settlement, you may object to it by submitting a written objection postmarked no later than [DATE] in the manner detailed in the Long Form Notice. The court will hold a hearing on [DATE] to consider whether to approve the Settlement and a request for attorneys' fees. You can appear at the hearing, but you do not have to. You can hire your own attorney, at your own expense, to represent you at the hearing.

This is not a product recall.

This is only a summary. For a copy of the Agreement of Settlement or Claim Form: visit www.lgrefrigeratorsettlement.com or call [CLAIMS ADMIN PHONE NUMBER]