

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

IN RE AIR CARGO SHIPPING SERVICES
ANTITRUST LITIGATION

MDL No. 1775

Master File 06-MD-1775 (JG) (VVP)

If You Directly Purchased Airfreight Shipping Services Between January 1, 2000 and September 11, 2006, You Could be Affected by Proposed Class Action Settlements.

A Federal Court authorized this notice. This is not a solicitation from a lawyer.

- There are additional partial Proposed Settlements totaling \$75.5 million in a class action lawsuit about Airfreight Shipping Services. This in addition to the approximately \$203 million in settlements with other Defendants described in earlier notices. The lawsuit is called *In re Air Cargo Shipping Services Antitrust Litigation* and is pending in the United States District Court for the Eastern District of New York. The Proposed Settlements are partial because there are other Defendants remaining in the case, and the litigation is continuing as to those Defendants.
- Under the **Cargolux Settlement**, Cargolux Airlines International, S.A. (“Cargolux”) has agreed to pay \$35.1 million, in installments, of which \$25.1 million has already been paid. Under the **Qantas Settlement**, Qantas Airways Limited (“Qantas”) has paid \$26.5 million. Under the **ANA Settlement**, All Nippon Airways Co., Ltd. (“ANA”) has paid \$10.4 million. Under the **Thai Airways Settlement**, Thai Airways International Public Company Limited (“Thai Airways”) has paid \$3.5 million. All of the Settling Defendants also have agreed to cooperate in the case against the remaining Defendants. The Settling Defendants have asserted a number of defenses to Plaintiffs’ claims but have settled to avoid the cost and risk of a trial.
- You may be affected by these Proposed Settlements if you purchased Airfreight Shipping Services directly from one or more Defendants or Settling Defendants listed below for shipments to, from, or within the United States from January 1, 2000 to September 11, 2006.

YOUR LEGAL RIGHTS AND OPTIONS:		
YOU MAY:		DUE DATE:
STAY IN THE CLASS		
SUBMIT A CLAIM	The only way to get a payment.	Postmarked by July 26, 2011
GO TO A HEARING	Ask to speak to the Court about the fairness of the Proposed Settlements, the plan of allocation, or the interim request for attorneys’ fees and expenses.	Received by June 6, 2011
OBJECT	Write to the Court about why you don’t like the Proposed Settlements, the plan of allocation, or the interim request for attorneys’ fees and expenses.	Received by June 6, 2011
DO NOTHING	Get no payment and give up your rights.	
EXCLUDE YOURSELF	Get no payment. This is the only option that allows you to ever be part of any other lawsuit against the Settling Defendants about the legal claims in this case.	Postmarked by May 27, 2011

- These rights and options—**and the deadlines to exercise them**—are explained in this notice.
- Your legal rights are affected whether you act or don’t act. Read this notice carefully.

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-888-291-9655 INTERNATIONAL (TOLL): 1-614-553-1296
OR VISIT www.AirCargoSettlement2.com

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BASIC INFORMATION

1. Why did I get this notice package?

You or your company may have purchased Airfreight Shipping Services (paid, private air transport of freight or other cargo by an airline acting as a provider of such service) directly from one or more Defendants for shipments to, from, or within the United States from January 1, 2000 to September 11, 2006.

The Court sent you this notice because, as a possible class member, you have a right to know about Proposed Settlements of this class action lawsuit, and about all of your options, before the Court decides whether to approve the Proposed Settlements. This package explains the lawsuit, the Proposed Settlements, and your legal rights.

The Court in charge of the case is the United States District Court for the Eastern District of New York, and the case is known as *In re Air Cargo Shipping Services Antitrust Litigation*, Master File 06-MD-1775 (JG) (VVP). The people who sued are called the Plaintiffs, and the companies they sued are called the Defendants. The Defendants that have agreed to these Proposed Settlements are called the Settling Defendants.

2. What is this lawsuit about?

The lawsuit claims that the Defendants conspired to fix, raise, maintain, or stabilize prices of Airfreight Shipping Services by, among other things, coordinating surcharges (such as fuel and security surcharges) and by agreeing to eliminate or prevent discounting of surcharges. The lawsuit claims that, as a result, purchasers paid more for Airfreight Shipping Services than they otherwise would have paid. Settling Defendants have denied these claims and have asserted various defenses to the claims.

3. Who are the Defendants?

The Settling Defendants are Cargolux, Qantas, ANA, and Thai Airways. The other Defendants are:

AC Cargo LP	EVA Airways Corporation
Aerolineas Brasileiras S.A (ABSA)	Japan Airlines International Co., Ltd.
Air Canada	Kenya Airways Limited
Air China Cargo Company Ltd.	Koninklijke Luchtvaart Maatschappij N.V.
Air China Ltd.	Korean Airlines Co., Ltd.
Air India	Lan Airlines S.A. (Lan Chile)
Air Mauritius Ltd.	Lan Cargo S.A.
Airways Corp. of New Zealand Ltd.	Lufthansa Cargo AG
Alitalia Linee Aeree Italiane S.p.A.	Malaysia Airlines
American Airlines, Inc.	Martinair Holland N.V.
AMR Corporation	Nippon Cargo Airlines Co., Ltd.
Asiana Airlines, Inc.	Polar Air Cargo, Inc.
Atlas Air Worldwide Holdings, Inc.	SAS Cargo Group A/S
British Airways PLC	Saudi Arabian Airlines, Ltd.
Cathay Pacific Airways, Ltd.	Scandinavian Airlines System
China Airlines, Ltd.	Société Air France
DAS Air Ltd. (DAS Air Cargo)	Singapore Airlines Cargo PTE, Ltd.
Deutsche Lufthansa AG	Singapore Airlines, Ltd.
El Al Israel Airlines	South African Airways (Proprietary), Ltd.
Emirates Airlines	Swiss International Air Lines, Ltd.
Ethiopian Airlines Corp.	Viação Aérea Rio-Grandense, S.A. (Varig)

One former employee of Qantas Airways Limited, Bruce McCaffrey, was also named as a Defendant. Claims against Mr. McCaffrey will be released as a result of the **Qantas Settlement**.

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The Court previously approved an \$85 million settlement with Deutsche Lufthansa AG, Lufthansa Cargo AG, and Swiss International Air Lines, Ltd. (“Lufthansa”). In addition, the Court has approved approximately \$118 million in settlements with Société Air France (“Air France”), Koninklijke Luchtvaart Maatschappij N.V. (“KLM”), Martinair Holland N.V. (“Martinair”), Japan Airlines International Co., Ltd. (“JAL”), American Airlines, Inc. and AMR Corporation (“AA”), and Scandinavian Airlines System and SAS Cargo Group A/S (“SAS”). You may have received notice of these other settlements previously. (Please note that if you submitted a claim form in connection with an earlier settlement, you need to file a new claim form if you are entitled to a portion of the new settlements.) If all of the Proposed Settlements are approved by the Court, the total settlement proceeds recovered in the litigation so far will be approximately \$278 million.

4. Why is this a class action?

In a class action, one or more individuals or companies called Class Representatives (in this case Benchmark Export Services, FTS International Express, Inc., R.I.M. Logistics, Ltd., Olarte Transport Service, Inc., S.A.T. Sea & Air Transport, Inc. and Volvo Logistics AB) sue on behalf of others who have similar claims. All these individuals or companies are a class or class members. One court resolves the issues for all class members, except for those who exclude themselves from the class. U.S. District Judge John Gleeson is in charge of this class action.

5. Why are there Proposed Settlements?

The Settling Defendants have denied all liability in this case and have asserted various defenses to the Plaintiffs’ claims. The Court did not decide in favor of the Plaintiffs or the Settling Defendants. Instead, both sides agreed to the Proposed Settlements. That way, they avoid the cost and risk of a trial, and the class members affected will get compensation. The Class Representatives and Class Counsel think the Proposed Settlements are best for all class members. The case is proceeding against other Defendants.

WHO IS AFFECTED BY THE PROPOSED SETTLEMENTS?

To see if you are affected by these Proposed Settlements, you first have to determine if you are a class member.

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

Judge Gleeson decided that everyone who fits this description is a class member: *All persons or entities (but excluding Defendants, their parents, predecessors, successors, subsidiaries, affiliates, as well as government entities) who purchased Airfreight Shipping Services for shipments to, from or within the United States directly from any of the Settling Defendants, any other Defendant, or from any of their parents, predecessors, successors, subsidiaries, or affiliates, at any time during the period January 1, 2000 up to and including September 11, 2006.*

7. I’m still not sure if I am included.

If you are still not sure whether you are a class member, you can ask for free help. See Question 24 below. You are not required to pay anyone to assist you in filing a claim.

THE PROPOSED SETTLEMENT BENEFITS

8. What do the Proposed Settlements provide?

Under the **Cargolux Settlement**, Cargolux has agreed to pay \$35.1 million in installments and up to \$150,000 for costs of notice of the settlement. It has already paid \$25.1 million and will pay the remaining \$10 million in two annual installments of \$5 million each. These payments may occur sooner depending upon the factors described in Paragraph 39 of the **Cargolux Settlement** agreement, available at www.AirCargoSettlement2.com. If any class member excludes itself from the Cargolux Settlement, the portion of the \$35.1 million attributable to the excluded class member will be transferred to a separate escrow account and held for possible payment of those claims. Any amount remaining in that separate account may be returned to the settlement class after a specified period. This process is explained in Paragraph 50 of the **Cargolux Settlement** agreement. In addition, both Plaintiffs and Cargolux have the option to

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rescind the agreement if more than a certain percentage of class members exclude themselves from the class, as explained in Paragraph 48 of the **Cargolux Settlement** agreement, available at www.AirCargoSettlement2.com.

Under the **Qantas Settlement**, Qantas has paid \$26.5 million and has agreed to pay up to \$250,000 for costs of notice of the settlement. If any class member excludes itself from the Qantas Settlement, the portion of the \$26.5 million attributable to the excluded class member will be transferred to a separate escrow account and held for possible payment of those claims. Any amount remaining in that separate account may be returned to the settlement class after a specified period. One class member has already excluded itself from the class, for which Qantas will receive a refund of \$4 million, plus interest, from the settlement fund. This process is explained in Paragraph 48 of the **Qantas Settlement** agreement, available at www.AirCargoSettlement2.com.

Under the **ANA Settlement**, ANA has paid \$10.4 million. If any class member excludes itself from the ANA Settlement, the portion of the \$10.4 million attributable to the excluded class member will be transferred to a separate escrow account and held for possible payment of those claims. Any amount remaining in that separate account may be returned to the settlement class after a specified period. This process is explained in Paragraph 46 of the **ANA Settlement** agreement, available at www.AirCargoSettlement2.com.

Under the **Thai Airways Settlement**, Thai Airways has paid \$3.5 million. That amount will not be reduced because of class members who exclude themselves from the class.

Under all four Proposed Settlements, the Settling Defendants will also provide cooperation in Plaintiffs' continuing litigation against the other remaining Defendants. This cooperation varies for each Settling Defendant, but includes meetings with their counsel, production of documents and electronic data, and witness interviews and testimony. Details about the cooperation are set forth in the settlement agreements, which have been filed with the Court and may be viewed at www.AirCargoSettlement2.com.

9. How do I get a payment?

If you are a settlement class member and do not exclude yourself from the class, you are eligible to get a payment. If you received this notice by mail you have also received a claim form. If you are reviewing this notice online, or received a copy by some other means, you may request a claim form online at www.AirCargoSettlement2.com, or by calling the settlement administrator toll-free at 1-888-291-9655 in the U.S., U.S. territories, and Canada. Outside the U.S. and Canada, you may call 1-614-553-1296, but toll charges will apply. You may also request a claim form by writing to the settlement administrator at the address below.

Completed claim forms **must be postmarked no later than July 26, 2011** and returned to the settlement administrator at the following address:

Air Cargo Settlement 2
c/o The Garden City Group, Inc.
P.O. Box 9380
Dublin, OH 43017-4280
USA

If you do not mail a timely, properly addressed claim form, your claim may be rejected and you may not be able to get any payment. In order to get a payment from these settlements, you must complete and submit a new claim form even if you previously submitted a claim form for the Lufthansa settlement.

You must keep all of your records of your purchases from Defendants and Settling Defendants because you will need them to complete the claim form and may later be asked to provide them to the settlement administrator.

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-888-291-9655 INTERNATIONAL (TOLL): 1-614-553-1296
OR VISIT www.AirCargoSettlement2.com

10. How much will my payment be?

Class Counsel has proposed a Plan of Allocation describing the division of the settlement funds among class members. If the Court approves the Plan of Allocation, it will apply not only to the **Cargolux Settlement**, the **Qantas Settlement**, the **ANA Settlement**, and the **Thai Airways Settlement** described in this notice, but also to the **Air France-KLM Settlement**, the **JAL Settlement**, the **American Airlines Settlement**, and the **SAS Settlement** described in the earlier notice. (It will not apply to the settlement with Deutsche Lufthansa AG, Lufthansa Cargo AG, and Swiss International Air Lines, Ltd., which is being handled separately.) If you have excluded yourself from one or more of the settlements, you will not be able to share in those settlements but can only share in settlements from which you have not excluded yourself.

Under the Plan of Allocation, the settlement funds (following any reductions for class members that exclude themselves) will first be used to pay attorneys' fees and expenses approved by the Court. The remaining amount will be distributed to class members that submit valid claim forms in proportion to their relevant purchases of Airfreight Shipping Services. For purposes of this calculation, purchase amounts in currencies other than dollars will be converted by the settlement administrator to equivalent dollar amounts using currency exchange rates applicable on September 11, 2006, which is the last day of the class period.

The Plan of Allocation treats **inbound** and **outbound** purchases differently. An **inbound** purchase is a purchase of Airfreight Shipping Services for shipments to the United States. An **outbound** purchase is a purchase of Airfreight Shipping Services for shipments from or within the United States. For purposes of calculating a class member's share of the settlement funds, **inbound** purchases will be valued at 1.625 times the dollar amount of such purchases. No multiplier will apply to **outbound** purchases. (These are the same multipliers previously approved by the Court for allocation of the settlement with Deutsche Lufthansa AG, Lufthansa Cargo AG, and Swiss International Air Lines, Ltd.)

If you wish to object to the Plan of Allocation, you must file your objection by June 6, 2011 as described in Question 17 below.

11. What am I giving up to get a payment or stay in the class?

Unless you exclude yourself from a specific settlement, you are staying in the class, and that means that you can't sue, continue to sue, or be part of any other lawsuit against that Settling Defendant about the legal issues in this case. This is called a release. It also means that all of the Court's orders will apply to you and legally bind you.

However, you would not give up (a) any claim made with respect to any indirect purchase of Airfreight Shipping Services or (b) any claim for negligence, breach of contract, bailment, failure to deliver, lost goods, damaged or delayed goods or similar claim, or any other claim unrelated to the legal issues in this case. The Proposed Settlements also do not affect the rights of class members against any Defendants other than the Settling Defendants, and the lawsuit will continue against the other Defendants, which have not settled.

The settlement agreements, which are available at www.AirCargoSettlement2.com, describe the exact legal claims that you give up if you stay in the class.

EXCLUDING YOURSELF FROM THE PROPOSED SETTLEMENTS

If you want to keep the right to sue or continue to sue one or more of the Settling Defendants, on your own, about the legal issues in this case, then you must take steps to get out of the settlement(s) with those Settling Defendant(s). This is called excluding yourself – or sometimes referenced as opting out of the class. If you opt out of a settlement, you will not get any payment from that settlement.

12. How do I get out of the Proposed Settlements?

To exclude yourself from one or more of the Proposed Settlements, you must send a letter saying that you want to be excluded from the settlement class. The letter must include the following information:

- A statement indicating that you want to be excluded from the settlement class.
- Whether you want to be excluded from the **Cargolux Settlement**, the **Qantas Settlement**, the **ANA Settlement**, and/or the **Thai Airways Settlement**. **Your request for exclusion may not be effective unless you specify from which Proposed Settlement(s) you are seeking exclusion.**
- The case name: *In re Air Cargo Shipping Services Antitrust Litigation*.
- Your name, address, telephone number, and your signature.
- All trade names or business names and addresses you or your business has used, as well as any subsidiaries or affiliates who are requesting to be excluded from the class.

Your letter must be postmarked by May 27, 2011 and sent to:

Air Cargo Settlement 2
c/o The Garden City Group, Inc.
P.O. Box 9380
Dublin, OH 43017-4280
USA

If you ask to be excluded from any of the Proposed Settlements, you will not get any payment from any settlement from which you exclude yourself, and you cannot object to those particular settlements.

Unless you exclude yourself, you give up any right to sue the Settling Defendants for the claims that the Proposed Settlements resolve. If you have a pending lawsuit against the Settling Defendants involving the same legal issues in this case, speak to your lawyer in that case immediately. (You must exclude yourself from *this* class in order to continue your own lawsuit against the Settling Defendants.)

13. Can I remain as part of the class for some of the Proposed Settlements and exclude myself from others?

Yes. Because there are four separate Proposed Settlements (the **Cargolux Settlement**, the **Qantas Settlement**, the **ANA Settlement**, and the **Thai Airways Settlement**), you will need to decide, for each of the Proposed Settlements, whether to exclude yourself from the settlement class, or whether to remain in the class for any or all of them.

14. If I exclude myself, can I get money from the Proposed Settlements?

No. If you decide to exclude yourself from a Proposed Settlement, you will not be able to get money from that Proposed Settlement. If you exclude yourself from some, but not all, of the Proposed Settlements, you will be eligible to receive payment from the Proposed Settlements for which you remain in the settlement class.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

The Court appointed Michael D. Hausfeld of Hausfeld LLP; Robert N. Kaplan of Kaplan Fox & Kilsheimer LLP; Hollis Salzman of Labaton Sucharow LLP; and Howard J. Sedran of Levin, Fishbein, Sedran, and Berman to represent the class. These lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-888-291-9655 INTERNATIONAL (TOLL): 1-614-553-1296
OR VISIT www.AirCargoSettlement2.com

16. How will the lawyers be paid?

You are not personally responsible for payment of attorneys' fees or expenses for Class Counsel. Instead, as compensation for their time and the risk in litigating the case on a contingent basis, Class Counsel will ask the Court to approve from the settlements with ANA, AA, Air France, Cargolux, JAL, KLM, Martinair, Qantas, SAS, and Thai Airways an interim payment of attorneys' fees in an amount not to exceed 25 percent of the settlement funds, as well as interim reimbursement for expenses incurred in the prosecution of the litigation in an amount not to exceed \$5 million. If awarded by the Court, these amounts would be deducted proportionally from the settlement funds.

The attorneys have not received payment for any work done in this case since December 31, 2008. The Court previously awarded \$12.5 million in attorneys' fees from the \$85 million settlement with Deutsche Lufthansa AG, Lufthansa Cargo AG, and Swiss International Air Lines, Ltd. No fees have yet been awarded on the approximately \$193 million in settlements with ANA, AA, Air France, Cargolux, JAL, KLM, Martinair, Qantas, SAS, and Thai Airways.

If you wish to object to this attorneys' fee and expense request, you must file your objection by June 6, 2011 as described in Question 17 below.

OBJECTING TO THE PROPOSED SETTLEMENTS, THE PLAN OF ALLOCATION, OR THE REQUEST FOR ATTORNEYS' FEES AND EXPENSES

You can tell the Court that you don't agree with the Proposed Settlements or some part of them, the Plan of Allocation, or the request for attorneys' fees and expenses.

17. How do I tell the Court that I don't like the Proposed Settlements, the Plan of Allocation, or the request for attorneys' fees and expenses?

You can object to any Proposed Settlement in which you are a member of the settlement class and have not opted out of the settlement class. You can object if you don't like any part of them, or if you disagree with the Plan of Allocation or the request for attorneys' fees and expenses. You can give reasons why you think the Court should not approve any or all of them. The Court will consider your views.

To object, you must send a letter to the Court that includes the following:

- A statement saying that you object to one or more of the Proposed Settlements, or the Plan of Allocation or request for fees and expenses, in *In re Air Cargo Shipping Services Antitrust Litigation*.
- Your name, address, telephone number, and your signature.
- The reason(s) you object.
- Proof of your membership in the class, such as invoices showing that you satisfy the definition in Question 6.

You must file the objection with the Court at the following address, **received by June 6, 2011**:

Clerk of Court
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

You must also mail copies of the objection to the following attorneys, **postmarked by June 6, 2011**:

Michael D. Hausfeld
Hausfeld LLP
1700 K Street, NW
Suite 650
Washington, DC 20006

Robert N. Kaplan
Kaplan Fox & Kilsheimer LLP
850 Third Avenue, 14th Floor
New York, NY 10022

Hollis Salzman
Labaton Sucharow LLP
140 Broadway
New York, NY 10005

Howard J. Sedran
Levin, Fishbein, Sedran & Berman
510 Walnut Street
Philadelphia, PA 19106

Class Counsel

Stephen Fishbein
Shearman & Sterling LLP
599 Lexington Avenue
New York, NY 10022-6069

W. Todd Miller
Baker & Miller PLLC
2401 Pennsylvania Avenue, NW
Suite 300
Washington, DC 20037

*Counsel for Cargolux Airlines
International, S.A.*

Counsel for Qantas Airways Limited

Rowan D. Wilson
Cravath, Swaine & Moore LLP
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019

*Counsel for Thai Airways
International Public Company Limited*

Douglas E. Rosenthal
Constantine Cannon LLP
One Franklin Square
1301 K Street, NW
Suite 1050 East
Washington, DC 20005

Charles J. Simpson, Jr.
Zuckert, Scoutt & Rasenberger, LLP
888 Seventeenth Street, NW
Suite 700
Washington, DC 20006

Counsel for All Nippon Airways Co., Ltd.

18. What's the difference between objecting and excluding?

Objecting is simply telling the Court that you don't like something about the Proposed Settlements, Plan of Allocation, or request for interim attorneys' fees and expenses. You can object to a Proposed Settlement only if you stay in the class for that particular Proposed Settlement. If you exclude yourself, you have no right to object because the Proposed Settlement no longer affects you.

However, you can object to the Plan of Allocation or request for attorneys' fees and expenses even if you exclude yourself from all of the Proposed Settlements with ANA, Cargolux, Qantas, and Thai Airways, so long as you did not exclude yourself from at least one of the following prior settlements: the **Air France-KLM Settlement**, the **JAL Settlement**, the **AA Settlement**, or the **SAS Settlement**. That is because the Plan of Allocation and the request for attorneys' fees and expenses relate to those settlements as well.

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Proposed Settlements, the Plan of Allocation, and the request for attorneys' fees and expenses. You may attend and you may ask the Court's permission to speak (see Question 21 for instructions), but you don't have to participate in the hearing in order to attend.

19. When and where will the Court decide whether to approve the Proposed Settlements?

The Court will hold a Fairness Hearing at 12:00 p.m. on June 23, 2011, in Courtroom 6C South at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, NY 11201. At this hearing the Court will consider whether the Proposed Settlements are fair, reasonable, and adequate, whether to approve the Plan of Allocation, and whether to award attorneys' fees and expenses. If there are objections, the Court will consider them. Judge Gleeson will listen to class members who have asked to speak at the hearing (see Question 21). After the hearing, the Court will decide whether to approve the Proposed Settlements, the Plan of Allocation, and the request for attorneys' fees and expenses. The Court may change the time and date of the Fairness Hearing. Notice of any change will be posted at the courthouse or on the Court's website and on www.AirCargoSettlement2.com.

20. Do I have to come to the hearing?

No. Class Counsel will answer questions Judge Gleeson may have. But, you are welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

21. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. If you wish to do so, you are encouraged to send a letter stating the following:

- "Notice of Intention to Appear in *In re Air Cargo Shipping Service Antitrust Litigation*"
- The position you will take and your reasons.
- Your name, address, telephone number, and your signature.
- Proof of your membership in the class, such as invoices showing that you satisfy the definition in Question 6.

Your Notice of Intention to Appear must be filed with the Court at the following address, **received by June 6, 2011**:

Clerk of Court
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

You must also mail copies of the Notice of Intention to Appear to the attorneys listed in Question 17 above.

IF YOU DO NOTHING

22. What happens if I do nothing at all?

If you do nothing, you will remain in the settlement class for each of the Proposed Settlements but you will not receive a payment. To receive a payment, you must submit a claim form as described in Question 9.

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-888-291-9655 INTERNATIONAL (TOLL): 1-614-553-1296
OR VISIT www.AirCargoSettlement2.com

GETTING MORE INFORMATION

23. Are there more details about the Proposed Settlements, the Plan of Allocation, or the request for attorneys' fees and expenses?

This notice summarizes the Proposed Settlements. More details are in the settlement agreements. You can get a copy of the settlement agreements by visiting www.AirCargoSettlement2.com.

Class Counsel will file a motion for final approval of the Proposed Settlements and the Plan of Allocation, and a request for attorneys' fees and expenses, which will contain additional information. These papers are currently due to be filed by May 10, 2011 and will be available at www.AirCargoSettlement2.com.

24. How do I get more information?

If you have questions or want more information, you can visit the official settlement website at www.AirCargoSettlement2.com. If the answer to your question cannot be located on the website, you may contact the settlement administrator by email at Administrator@AirCargoSettlement2.com. You may also call the settlement administrator toll-free at 1-888-291-9655 in the U.S., U.S. territories, and Canada. Outside the U.S. and Canada, you may call 1-614-553-1296, but toll charges will apply. You may also write to:

Air Cargo Settlement 2
c/o The Garden City Group, Inc.
P.O. Box 9380
Dublin, OH 43017-4280
USA

You may also write to any of Class Counsel at the following addresses:

Michael D. Hausfeld
Hausfeld LLP
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DATED: March 14, 2011

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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