

If you purchased or owned a GE Profile or GE Monogram brand microwave oven bearing model numbers beginning with JEB1090, JEB1095, ZMC1090 OR ZMC1095, you may be entitled to benefits from a Class Action Settlement.

A court authorized this notice. This is not a solicitation from a lawyer. You are not being sued.

A settlement has been proposed in a class action lawsuit pending in the United States District Court for the District of Connecticut (the “Court”). The lawsuit alleges that General Electric Company (“GE”) sold certain GE-branded microwave ovens that contained defects such that the glass on the door of these microwaves may break or shatter spontaneously. GE denies that the microwaves are defective and denies that it did anything wrong.

The proposed settlement will provide monetary benefits to persons (other than retailers, resellers, or wholesalers) who purchased or owned a GE Profile or GE Monogram brand microwave oven bearing the model numbers JEB1090, JEB1095, ZMC1090, or ZMC1095 (a “Covered Microwave”), manufactured between 1995 and 2007. You are receiving this notice because GE’s records show that you may be a Class Member (see Question 3 below).

| YOUR LEGAL RIGHTS AND OPTIONS IN THIS PROPOSED SETTLEMENT | |
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| CLAIM A BENEFIT | You may submit a claim form to the Settlement Administrator. The deadline is October 14, 2020. (see Question 7 below) |
| EXCLUDE YOURSELF | You may submit a request for exclusion to the Settlement Administrator. The deadline is June 15, 2020. (see Question 8 below) |
| OBJECT | You may submit an objection to the proposed settlement to the Court. The deadline is June 15, 2020. (see Question 12 below) |
| GO TO A HEARING | You may attend a hearing at the Court. You may also submit to the Court a request for permission to speak at a hearing. (see Questions 14 and 15 below) |
| DO NOTHING | You will not be able to receive a benefit under the settlement nor pursue any other lawsuit against GE. (see Question 16 below) |

These rights and options, and the deadlines to exercise them, are explained in this notice. The Court in charge of this case still has to decide whether to approve this settlement. Payments for valid claims will be made if the Court approves the settlement and after any appeals are resolved.

Please be patient.

Questions? Call 1-855-913-0602 or visit www.GraysonSettlement.com

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Questions? Call 1-855-913-0602 or visit www.GraysonSettlement.com

BASIC INFORMATION

1. What is this lawsuit about?

In a class action lawsuit, one or more people called a “Class Representative” (in this case, Glen Grayson, Doreen Mazzanti, Daniel Levy, David Mequet, and Lauren Harris), sue on behalf of people who have similar claims. The people together are a “Class.” One court resolves the issues for everyone in the Class, except for those people who choose to exclude themselves from the Class.

This lawsuit alleges that GE sold certain GE Profile and GE Monogram microwave ovens bearing the model numbers JEB1090, JEB1095, ZMC1090, or ZMC1095 that contained defects such that the glass on the door of these microwave ovens may break or shatter spontaneously. GE denies all allegations of wrongdoing and contends that the microwave ovens are not defective.

2. Why is there a proposed settlement?

The Court did not reach a final decision in favor of the Class Representatives or GE. Instead, both sides agreed to a proposed settlement. Settlements avoid the costs and uncertainty of a trial and related appeals, while providing benefits to members of the Class. The Class Representatives and the attorneys for the proposed class think the proposed settlement is best for all members of the Class. The Court in charge of the lawsuit has granted preliminary approval of this proposed settlement and has ordered this notice be made available to explain it.

3. Who is affected by the proposed settlement?

You are a member of the Class and are affected by the proposed settlement, as explained further in this notice, if you purchased or owned a GE Profile or GE Monogram brand microwave oven bearing a model number beginning with JEB1090, JEB1095, ZMC1090, or ZMC1095 at any time between January 1, 1995, and January 15, 2020.

If you have questions about whether you are a Class Member, you may contact the Settlement Administrator at 855-913-0602. You may also contact Class Counsel (see Question 10 below).

If you are a Class Member, you have a right to submit a claim form to receive benefits under the proposed settlement. The process for submitting a claim form is described in Question 7 below.

4. What benefits are provided?

If you are a Class Member and you submit a valid claim form (with accompanying documentation if required) by the deadline, GE will conduct an individual review of your claim, and your benefit will be as follows:

(A) If you are a Class Member who can demonstrate that you have experienced spontaneous glass breakage or shattering of the Covered Microwave oven door at any time prior to the date that is 90 days after the entry of an Order and Final Judgment, your benefit will be a \$300 payment.

(B) If you are a Class Member who has never experienced spontaneous glass breakage or shattering of the Covered Microwave oven door and can demonstrate that you still own a Covered Microwave as of 90 days after the entry of an Order and Final Judgment, your benefit will be \$5 payment.

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(C) If you are a Class Member who has never experienced spontaneous glass breakage or shattering of the Covered Microwave oven door and you no longer own a Covered Microwave as of the date of the entry of an Order and Final Judgment, your benefit will be a certificate entitling you to a \$5 rebate on the purchase of a new GE microwave oven, good for 180 days after the entry of an Order and Final Judgment.

5. What if I disagree with the determination of my claim?

If you submit a claim form, your claim is determined to be invalid, and you disagree, or if you believe that the amount of your individual payment is not calculated properly in accordance with the terms of the settlement (as described in Question 4 above), you must send a letter explaining specifically why you disagree. Be sure to include: (1) your full name and current address; and (2) your signature. You also have the right to object to the approval of the Settlement Agreement instead of or in addition to objecting to the determination of your claim, as described in Question 12 below. You also have the right to exclude yourself from the settlement, in which case you may retain any right you may have to sue GE separately, but you will not receive any payment as part of the settlement. This is described in Question 8 below.

If you decide to dispute the determination of your claim, your letter must be postmarked within 30 days of the postmark date of the notice of the determination of your claim and must be mailed to the Settlement Administrator at the following address:

Grayson v. GE Settlement Administrator
P.O. Box 6727
Portland, OR 97228-6727

The Settlement Administrator will provide a copy of your letter to GE and to Settlement Class Counsel (the lawyers representing the Class). You may also contact Settlement Class Counsel (see Question 10 below) regarding your dispute if you wish to do so. A neutral evaluator will determine whether your claim was resolved correctly. The Settlement Administrator will notify you of the neutral evaluator's final decision, which will be binding on you and GE. A more detailed explanation of the process for resolving disputes regarding the determination of claims Paragraph 40 of the Settlement Agreement, which is available at www.GraysonSettlement.com or by calling 855-913-0602.

If you have questions about this, you should contact the Settlement Administrator through the settlement website at www.GraysonSettlement.com or at 855-913-0602, or you can contact Settlement Class Counsel (see Question 10 below).

6. How will my legal rights be limited by the proposed settlement?

IF THE PROPOSED SETTLEMENT IS APPROVED, YOU WILL LOSE THE RIGHT TO BRING A LEGAL CLAIM AGAINST GE OR SAMSUNG FOR CERTAIN CLAIMS RELATING TO A COVERED MICROWAVE

If you do not exclude yourself (see Question 8 below) and the proposed settlement is approved, you will be in the "Settlement Class." That means that you will not be able to sue or be part of any other lawsuit against General Electric Company, Haier US Appliance Solutions, Inc. d/b/a GE Appliances, a Haier Company, Samsung Electronics America, Inc., Samsung Electronics Co., Ltd. or related persons and entities ("Released Entities") about the legal issues in this case. All of the Court's orders will apply to you and legally bind you. You will "release and discharge" the Released Entities for any claims arising from or relating in any way to the breaking or shattering of the glass on the door of a Covered Microwave, or relating in any way to the purchase or ownership of a Covered Microwave. (Claims for personal injury will not be released.) All of this is described in further detail

Questions? Call 1-855-913-0602 or visit www.GraysonSettlement.com

in Paragraphs 19-21 and 49 of the Settlement Agreement. The Settlement Agreement specifically describes the released claims in necessarily accurate legal terminology. A complete copy of the Settlement Agreement can be obtained from the settlement website at www.GraysonSettlement.com or from the Settlement Administrator at 855-913-0602. Talk to Settlement Class Counsel (see Question 10 in the section on “The Lawyers Representing You” below) or your own lawyer if you have questions about the released claims or what they mean.

If you believe the relief provided by the proposed settlement is inadequate (other than a dispute over your individual claim, which is addressed under Question 5 above), your only options are to exclude yourself as explained under Question 8 below and not be part of the Settlement Class, or to explain your views to the Court by filing an objection in the manner described under Question 12 below.

SUBMITTING A CLAIM FORM TO PARTICIPATE IN THE SETTLEMENT

7. How do I submit a claim form to participate in the proposed settlement?

In order to participate in the proposed settlement and receive a payment if you are eligible for payment, you must submit a claim form. The claim form informs GE and Settlement Class Counsel that you wish to participate in the proposed settlement.

Class Members who reported spontaneous glass breakage or shattering of a Covered Microwave oven door to GE and whose incident is listed in GE’s Product Safety Database will receive with this mailed notice a simplified claim form that does not require them to provide any accompanying documentation. Class Members may submit the claim form either by mail, or online by entering certain information at www.GraysonSettlement.com. Class Members who believe that their claims are in GE’s Product Safety Database and did not receive a mailed notice, or misplaced their mailed notice, may contact the Settlement Administrator at 855-913-0602 or info@GraysonSettlement.com.

Class Members who did not experience spontaneous glass breakage or shattering of a Covered Microwave oven door, or experienced an incident not listed in GE’s Product Safety Database must submit a more detailed claim form together with accompanying documentation. This claim form is attached to this notice. It may be submitted online at www.GraysonSettlement.com with all required information uploaded, or by mail to the Settlement Administrator at Grayson v. GE Settlement Administrator, P.O. Box 6727, Portland, OR 97228-6727.

CLAIM FORMS THAT ARE NOT SUBMITTED ONLINE OR POSTMARKED ON OR BEFORE OCTOBER 14, 2020 WILL NOT BE HONORED.

You must submit your claim form at www.GraysonSettlement.com or by mail. You cannot submit a claim form by telephone, facsimile or email. You cannot submit a claim form by mailing a request to any other location. You cannot submit a claim form after the deadline. The claim form must be signed by you or your legal representative (if you submit an online claim form, typing your name in the signature box will constitute your legal signature).

If you submit a timely claim form, you will be included in the Class, you will receive payment if the settlement is approved by the Court and if you are eligible for payment, and you will not be able to sue or be part of any other lawsuit against GE or Samsung about the legal issues in this case.

If you do not submit a timely claim form, you will not receive any monetary benefit if the proposed settlement is approved. Unless you exclude yourself from the Class (see Question 8 below), you will give up the right you may have, if any, to sue GE or Samsung for relief arising from the claims that this proposed settlement resolves (see Question 6 above).

Questions? Call 1-855-913-0602 or visit www.GraysonSettlement.com

If you move after submitting a claim form, it is your responsibility to provide your new address to the Settlement Administrator. Checks will be mailed to the most recent address on file with the Settlement Administrator.

EXCLUDING YOURSELF FROM THE PROPOSED SETTLEMENT

If you are a Class Member and you want to keep the right you may have, if any, to sue GE or Samsung based on the spontaneous glass breakage or shattering to the door of a Covered Microwave Oven, you must exclude yourself from the Class, as described below.

8. How do I exclude myself from the proposed settlement?

To exclude yourself and not be part of the Settlement Class, you must send a letter by mail saying that you wish to do so. Your letter should state: "I/we request that I/we be excluded from the class in *Glen Grayson, et al. v. General Electric Company*, Case No. 3:13-cv-01799-MPS and do not wish to participate in the settlement." Be sure to include: (1) your full name(s) and current address(es); and (2) your signature(s). Your request for exclusion must be postmarked no later than **June 15, 2020**, and must be mailed to:

Grayson v. GE Settlement Administrator
P.O. Box 6727
Portland, OR 97228-6727

REQUESTS FOR EXCLUSION THAT ARE NOT POSTMARKED ON OR BEFORE JUNE 15, 2020 WILL NOT BE HONORED.

You cannot exclude yourself by telephone or by email. You cannot exclude yourself by mailing a request to any other location. You cannot exclude yourself by mailing a request after the deadline. The letter must be signed by you or your legal representative.

9. If I don't exclude myself, can I sue GE for the same thing later?

No. If the proposed settlement is approved, you give up the right you may have, if any, to sue GE or Samsung for relief arising from the claims that this proposed settlement resolves. See the answer to Question 6 above.

THE LAWYERS REPRESENTING YOU

10. Do I have a lawyer in the case?

The Court has appointed the following lawyers to represent you and the other Settlement Class Members:

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| Hassan A. Zavareei Anna C. Haac Tycko & Zavareei LLP 1828 L St. NW, Suite 1000 Washington, DC 20036 (202) 973-0900 | Robert A. Izard, Jr. Seth R. Klein Mark P. Kindall Izard, Kindall & Raabe LLP 29 South Main St., Suite 305 West Hartford, CT 06107 (860) 493-6292 |
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Questions? Call 1-855-913-0602 or visit www.GraysonSettlement.com

These lawyers are called Settlement Class Counsel. You will not be charged by these lawyers for their work on the case. If you want to be represented by your own lawyer, you may hire one at your own expense.

11. How will the lawyers be paid?

Payments of attorneys' fees and expenses will not reduce the amounts paid to Settlement Class Members who are entitled to payments under the terms of the Settlement Agreement. Any attorneys' fees and expenses approved by the Court will be paid by GE separately from the money paid to Settlement Class Members. Settlement Class Counsel will ask the Court to award up to \$1,350,000 for (1) attorneys' fees and costs to Settlement Class Counsel and (2) service awards to Settlement Class Representatives, who are Glen Grayson, Doreen Mazzanti, Daniel Levy, David Mequet, and Lauren Harris, in the amount of \$5,000 each. Settlement Class Counsel's request will be available on the Settlement Administrator's Website at www.GraysonSettlement.com by **April 30, 2020**. GE has agreed not to oppose the request for the award up to these amounts. The Court may award less than these amounts. The costs of notifying Class Members and of administering the proposed settlement will also be borne by GE and will not reduce the amounts paid to Settlement Class Members.

OBJECTING TO THE PROPOSED SETTLEMENT

12. How do I tell the court that I do not like the proposed settlement?

If you are a Class Member and you do not exclude yourself (see Question 8 above), you can object to the proposed settlement if you do not think the proposed settlement is fair, reasonable or adequate.

You can ask the Court to deny approval of the proposed settlement by filing an objection. You cannot ask the Court to order a larger settlement; the Court can only approve or deny the settlement. If the Court denies approval, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

You may object to the proposed settlement in writing. You may also appear at the Final Approval Hearing, either in person or through your own attorney, at your own expense, if the Court allows. If you appear through your own attorney, you are responsible for paying that attorney. All written objections and supporting papers must: (1) clearly identify the case name and number (*Glen Grayson, et al. v. General Electric Company*, Case No. 3:13-cv-01799-MPS), (2) identify your full name, address, email address, and telephone number; (3) provide an explanation of the basis upon which you claim to be a Class Member; (4) identify all grounds for the objection, accompanied by any legal support for the objection; (5) identify all counsel who represent you, former or current counsel who may seek compensation for any reason related to the objection; (6) include a statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing; (7) include a list of any persons who will be called to testify at the Final Approval Hearing in support of the objection; (8) include all documentary evidence that will be offered at the Final Approval Hearing in support of the objection; (9) identify all counsel representing you who will appear at the Final Approval Hearing; (10) include your signature (an attorney's signature is not sufficient); (11) be submitted to the Court either by mailing them to the Clerk of Court, United States District Court for the District of Connecticut, 450 Main Street, Hartford, CT 06103, or by filing them in person at any location of the United States District Court for the District of Connecticut; and (12) be filed or postmarked on or before **June 15, 2020**.

Questions? Call 1-855-913-0602 or visit www.GraysonSettlement.com

If you object and the settlement is approved, you will still be entitled to receive benefits under the settlement if you qualify, but you must submit a timely claim form to do so (see Question 7 above). Submitting a timely claim form does not waive an objection to the settlement.

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

Objecting is simply telling the Court that you do not like something about the proposed settlement. You can object only if you do not exclude yourself. Excluding yourself is telling the Court that you do not want to be included in the Settlement Class. If you exclude yourself, you have no basis to object to the settlement because the settlement no longer affects you. If you object, and the Court approves the settlement anyway, you will still be legally bound by the result.

THE COURT'S FINAL APPROVAL HEARING

The Court will hold a Final Approval Hearing on **July 16, 2020 at 10 a.m.** in Courtroom 2 of the Abraham A. Ribicoff Federal Building, United States District Court, 450 Main Street, Hartford, CT 06103. The date of the hearing may change. If you plan to attend, please check the settlement website at www.GraysonSettlement.com or the Court's docket on PACER at <https://ecf.ctd.uscourts.gov> or visit the Court Clerk's Office to confirm the date of the hearing. At this hearing, the Court will consider whether the proposed settlement is fair, reasonable and adequate. If there are objections, the Court will consider them. The Court may listen to people who have submitted timely requests to speak at the hearing. The Court may also decide how much Settlement Class Counsel will receive as attorneys' fees and expenses, and the amount of an award, if any, the Settlement Class Representatives will receive. At or after the hearing, the Court will decide whether to approve the proposed settlement. We do not know how long these decisions will take.

14. Do I have to come to the hearing?

No. Settlement Class Counsel will answer questions the Court may have. But you are welcome to come at your own expense. If you send an objection, you do not have to come to the Court to talk about it. As long as you mailed your written objection on time, the Court will consider it.

15. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must send a letter to the Clerk of Court, United States District Court, 450 Main Street, Hartford, CT 06103, saying that it is your "Notice of Intention to Appear in the *Grayson v. General Electric Company* case." You must include your name, address, telephone number and your signature, and your letter must identify the points you wish to speak about at the hearing, enclose copies of any documents you intend to rely on at the hearing, and state whether you intend to have a lawyer speak on your behalf. You or your lawyer cannot speak at the hearing if you have excluded yourself from the settlement.

IF YOU DO NOTHING

16. What happens if I do nothing?

If you are a Class Member and you do nothing, you will be included in the Settlement Class, but you will not receive a monetary benefit even if the proposed settlement is approved. You also will not be able to pursue any other lawsuit against GE, Haier or Samsung concerning or relating to the claims alleged in this lawsuit.

Questions? Call 1-855-913-0602 or visit www.GraysonSettlement.com

GETTING MORE INFORMATION

17. Are there more details about the proposed settlement?

This notice summarizes the proposed settlement. For precise terms and conditions of the settlement, please see the Settlement Agreement available at www.GraysonSettlement.com, by contacting Settlement Class Counsel (see Question 10 above), by accessing the Court docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.ctd.uscourts.gov>, or by visiting the Office of the Clerk of the Court for the United States District Court for the District of Connecticut, 915 Lafayette Boulevard, Bridgeport, CT 06604, between 9:00 a.m. and 5:00 p.m., Monday through Friday, excluding Court holidays.

18. What if there are changes to the proposed settlement?

If you wish to be notified regarding any changes to the Settlement, you must mail to the Settlement Administrator at Grayson v. GE Settlement Administrator, P.O. Box 6727, Portland, OR 97228-6727 a request for notice, or send such a request in writing to Settlement Class Counsel, who will maintain a list of all such requests that are received. If you provide an e-mail address, you agree to electronic notification by e-mail.

PLEASE DO NOT TELEPHONE GE, THE COURT, OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIMS PROCESS.