

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

**If you purchased Traditional Blood Reagents on or after January 1, 2000,
a class action settlement may affect you.**

A federal court authorized this notice. This is not a solicitation from a lawyer.

- **This notice applies to individuals or entities that purchased traditional blood reagents in the United States on or after January 1, 2000 directly from either of the following companies: Immucor, Inc. or Ortho-Clinical Diagnostics, Inc. (collectively, the “Defendants”). Other requirements apply—see Section 2.1 on Page 2 to see if this notice applies to you.**
- This notice describes the settlement by Defendant Immucor, Inc. (“Immucor”) of a pending lawsuit alleging that certain traditional blood reagents manufacturers conspired in violation of federal antitrust law to fix the prices of traditional blood reagents (as defined herein).
- The lawsuit claims that, as a result of the Defendants’ alleged conduct, the prices paid by individuals and entities to the Defendant traditional blood reagents manufacturers for traditional blood reagents were higher than they otherwise would have been. The lawsuit seeks treble damages, attorneys’ fees and costs from Defendants.
- Defendant Immucor has agreed to settle the lawsuit. Immucor denies any wrongdoing in this case and the settlement does not represent an admission of liability or that the Court has reached a decision with respect to the merits of the lawsuit.
- Immucor has agreed to pay \$22,000,000 for the benefit of a class of direct purchasers of traditional blood reagents (defined below).
- The lawsuit continues against the non-settling Defendant Ortho-Clinical Diagnostics, Inc. (“Ortho”).

TO DETERMINE WHETHER YOU ARE AFFECTED BY THE SETTLEMENT, PLEASE SEE SECTION 2.1 ON PAGE 4.

Your rights and options – and the deadlines to exercise them – are explained in this notice.

Please contact www.ImmucorSettlement.com or Kurtzman Carson Consultants LLC for court documents about the settlement and the pending lawsuit, frequently asked questions, and more information.

DO NOT CONTACT THE COURT, THE CLERK OF THE COURT OR DEFENDANTS IF YOU HAVE QUESTIONS REGARDING THIS NOTICE

PART 1: GENERAL INFORMATION

WHAT IS THIS NOTICE ABOUT?

1.1 *Why has this notice been issued?*

You have a right to know about the proposed partial settlement of this lawsuit with Immucor and about all your options before the Court decides whether to approve this settlement. This notice explains your legal rights and options regarding the settlement.

1.2 *What is the lawsuit about?*

This lawsuit was filed by a group of Plaintiffs or Class Representatives, individually and as representatives of all persons in the United States who purchased traditional blood reagents directly from the Defendants. The lawsuit asserts that, as a result of the alleged conduct of the Defendants, the prices paid to the Defendant traditional blood reagents manufacturers for traditional blood reagents were higher than they otherwise would have been. The lawsuit seeks treble (triple) damages, attorneys’ fees and costs from Defendants. U.S. District Court Judge Jan E. DuBois is the Judge overseeing this lawsuit.

The Plaintiffs or Class Representatives that filed this case are: F. Baragaño Pharmaceuticals, Inc.; Community Medical Center Health Care System; Professional Resources Management of Crenshaw LLC d/b/a Crenshaw Community Hospital; Professional Resources Management, Inc. d/b/a Bullock County Hospital; Douglas County Hospital; Health Network Laboratories, L.P.; Larkin Community Hospital; Legacy Health System; Mary Hitchcock Memorial Hospital, Inc.; Regional Medical Center Board d/b/a Northeast Alabama Regional Medical Center; Sacred Heart Hospital of the Hospital Sisters of the Third Order of St. Francis; St. Anthony’s Memorial Hospital, of the Hospital Sisters of the Third Order of St. Francis; St. Elizabeth’s Hospital of the Hospital Sisters of the Third Order of St. Francis; St. Francis Hospital of the Hospital Sisters of the Third Order of St. Francis; St. John’s Hospital of the Hospital Sisters of the Third Order of St. Francis; St. Joseph’s Hospital, Breese, of the Hospital Sisters of the Third Order of St. Francis; St. Joseph’s Hospital of the Hospital Sisters of the Third Order of St. Francis (Chippewa Falls); St. Joseph’s Hospital, of the Hospital Sisters of the Third Order of St. Francis (Highland); St. Mary’s Hospital Medical Center of Green Bay, Inc.; St. Mary’s Hospital, Streator, of the Hospital Sisters of the Third Order of St. Francis; St. Mary’s Hospital, Decatur, of the Hospital Sisters of the Third Order of St. Francis; St. Nicholas Hospital of the Hospital Sisters of the Third Order of St. Francis; St. Vincent Hospital of the Hospital Sisters of the Third Order of St. Francis; Schuylkill Medical Center - East Norwegian Street; Schuylkill Medical Center - South Jackson Street; and Warren General Hospital.

1.3 *What are blood reagents and traditional blood reagents?*

“Blood Reagents” are immunohematology products designed and manufactured to test, match, detect, screen, diagnose and/or otherwise identify certain properties of the cell and serum components of human blood. Traditional blood reagents, as used herein, are blood reagents that are primarily used to test blood manually in test tubes. In contrast, proprietary blood reagents, as used herein, are blood reagents that are primarily used to test blood in automated and/or semi-automated platforms. Proprietary reagents sold by Defendants include, but are not limited to, Ortho’s ID-MTS gel products and Immucor’s Capture products. For purposes of this litigation, the definition of traditional blood reagents does not include Ortho’s 0.8% red blood cell reagents. The term “Blood Reagents” includes both traditional blood reagents and proprietary blood reagents, as well as Ortho’s 0.8% red blood cell reagents.

1.4 *Who are the Defendants in this case?*

The Defendants are Immucor and Ortho.

1.5 *What is a class action lawsuit?*

In a class action, people called class representatives sue on behalf of people who have similar claims. All these people make up the class and are called class members. One Court then resolves the issues for all class members, except for those who exclude themselves from the class.

1.6 What is the current status of the lawsuit?

Several lawsuits were originally filed beginning in May 2009 and the cases were consolidated before Judge DuBois in the Eastern District of Pennsylvania. In February 2010, Plaintiffs filed a consolidated amended complaint against the Defendants. Between March and July 2010, Defendants moved to dismiss the Complaint, and the Court denied those motions in August 2010.

The Plaintiffs reached a settlement with Immucor in the amount of \$22,000,000 on January 11, 2012. This settlement was granted preliminary approval by the Court on March 5, 2012. While the Court has not yet determined whether this case can proceed as a class action against Ortho for litigation purposes, the Court has made a preliminary determination that it may proceed as a class action with respect to the settlement agreement with one of the Defendants, Immucor.

PART 2: THE IMMUCOR SETTLEMENT CLASS

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS UNDER THE IMMUCOR SETTLEMENT:	
Remain a Settlement Class Member by Doing Nothing	You do not need to do anything at this time to remain a member of the Immucor Settlement Class. If you choose to remain a member of the Immucor Settlement Class, you will be bound by any decision of the Court with respect to the Immucor settlement and you will give up any legal rights you ever had, now have, or hereafter may have against Immucor regarding the claims in this case. By remaining in the Immucor Settlement Class, you are eligible to receive a share of the settlement amount, after payment for attorneys' fees and costs and other expenses.
Object	If you do not exclude yourself, you may write to the Court to object to the Immucor settlement. (See Paragraph 2.10 of this notice for further information about your right to object.)
Exclude Yourself	You have the right to exclude yourself from the Immucor settlement. If you exclude yourself, you will not be bound by the Immucor settlement and will not be entitled to receive any money from the Immucor settlement. (See Paragraph 2.7 of this notice for further information about your rights to exclude yourself.)
Hire Your Own Lawyer	You may, but are not required to, hire your own lawyer at your expense to advise you of your rights under the proposed settlement. You have the right to enter an appearance in the lawsuit through your lawyer if you wish.
Go to a Hearing	You may ask to speak in Court about the fairness of the Immucor settlement, but only if you first follow certain procedures described below.

WHO IS AFFECTED BY THE IMMUCOR SETTLEMENT?

2.1 How do I know if I am part of this settlement?

You may be affected by the Immucor settlement if you are a person or entity in the United States who directly purchased traditional blood reagents from Immucor and/or Ortho between January 1, 2000 and February 23, 2012 (the "Settlement Class Period").

If you meet these requirements, you are a member of the Settlement Class.

You are not a member of the Immucor Settlement Class, even if you meet these requirements, if you are a Defendant, a Defendant's subsidiary, affiliate or Related Person, or a federal governmental entity.

2.2 What if I still do not know whether I am included in the proposed Immucor Settlement Class?

If you still do not know whether you are included in the Immucor Settlement Class, please visit www.ImmucorSettlement.com, call 1-855-231-9423, or write to:

Blood Reagents Antitrust Administrator
c/o Kurtzman Carson Consultants LLC
P.O. Box 43058
Providence, RI 02940-3058

WHAT THE SETTLEMENT MEANS TO YOU

2.3 What does the Immucor Settlement provide?

Immucor has agreed to pay \$22,000,000 for the benefit of the Immucor Settlement Class.

A portion of the settlement amount is subject to reduction in the event that individuals or entities exclude themselves from the Immucor Settlement Class ("opt out") and separately pursue their own claims. Specifically, the settlement amount will be reduced by 100% of an opt out's pro rata portion of the settlement amount, except that the first 10% of the total traditional blood reagents purchases made by opt-outs during the settlement class period are protected against any such reduction. After calculating the total reduction to the settlement amount due to opt outs, the reduction amount shall be deposited into two separate, interest-bearing accounts (75% shall be deposited into an "Opt Out Settlement Account"; 25% shall be deposited into an "Opt Out Fee and Expense Account"). In the event that an opt out files a lawsuit against, or settles a related claim with Immucor, Immucor will be returned that opt out's pro rata portion of the Opt Out Settlement Account. At a later date, Class Counsel intends to ask the Court to award any funds in the Opt Out Fee and Expense Account to Plaintiffs' Counsel in lieu of Class Counsel pursuing compensation from any opt outs that file lawsuits against or settle a related claim with Immucor. Any award of funds to Plaintiffs' Counsel will be subject to the approval of the Court. Under the terms of the settlement, an opt out's pro rata share of the settlement amount will be based on the percentage of total traditional blood reagents purchases made by the opt out from any of the Defendants during the Settlement Class period.

As part of the Immucor Settlement, Immucor has also agreed to provide cooperation to the Plaintiffs in their ongoing case against the non-settling Defendant, Ortho.

In exchange, Immucor Settlement Class members give up all legal rights to sue Immucor for the claims in this case. Immucor will be released from all claims of Immucor Settlement Class members based on purchases of Blood Reagents (as defined in the Settlement Agreement) during the relevant period. This release includes claims based on any Blood Reagents, including, but not limited to traditional blood reagents and proprietary blood reagents.

Immucor Settlement Class members' rights against Ortho are not affected.

Class Counsel do not intend to seek attorneys' fees or reimbursement for out-of-pocket expenses at this time. However, Class Counsel intends to petition the Court for \$500,000 of the settlement amount for ongoing expenses in connection with the litigation against Ortho, including, for example, expert witness fees. Class Counsel must file their motion for final approval of the Settlement Agreement and request for ongoing litigation expenses on or before May 23, 2012. At a later date, Class Counsel will (1) petition the court for payment of attorneys' fees, which will not exceed one-third of the total amount of all settlements, and incentive awards for the class representatives, (2) request that the court award Plaintiffs' Counsel the funds in the Opt Out Fee and Expense Account, and (3) ask to be reimbursed for out-of-pocket expenses.

2.4 Will I receive any money from the Immucor Settlement?

No funds will be distributed to Immucor Settlement Class members at this time. Except as provided elsewhere herein, it is Class Counsel's intention to hold the funds received from Immucor in escrow (in an interest-bearing account) until it is determined whether there will be an additional settlement with, or judgment against, the non-settling Defendant, Ortho. At a later date, Class Counsel will file with the Court a plan of distribution of the funds to Immucor Settlement Class members, after payment of any court-ordered attorneys' fees, reimbursement of litigation expenses as approved by the Court, incentive awards to class representatives and expenses of providing Notice to the Class and of administering and distributing the settlement fund (including tax-related expenses).

2.5 What happens if Ortho decides to settle? Will I be a part of that settlement?

If Ortho settles the case, you will first receive notice of that settlement, which will describe the settlement's terms and your rights and options. If you are a member of the Immucor Settlement Class described in this Notice, this does not necessarily mean you will be a member of any future settlement class. Whether you will be able to participate in any future settlement will depend on the specific terms of that settlement, which may be different than the terms of the Immucor Settlement.

If you exclude yourself from the Immucor Settlement Class (see "Excluding Yourself from the Settlement," below), this does not affect your ability to participate in any class that may be certified in the future in the ongoing litigation ("Litigation Class") and any future settlement with Ortho. You will still be eligible to participate in any Litigation Class that may be certified in the future, and you will receive notice if the Court decides to certify the Litigation Class.

2.6 Why did the parties agree to this settlement?

Although the Court has not ruled on the merits of Plaintiffs' claims, Plaintiffs have agreed with Immucor to settle the lawsuit. Class Counsel conducted an extensive investigation of the facts and the law relevant to the lawsuit. Immucor vigorously denies that it has acted unlawfully in any respect. It has asserted affirmative defenses to all of the claims and states that it is entering into this settlement only to avoid the costs and inconveniences of litigation.

Plaintiffs and their counsel have concluded that the settlement with Immucor is in the best interests of the Immucor Settlement Class represented by the Plaintiffs. The Immucor Settlement does not represent an admission of liability or that the Court has reached a decision with respect to the merits of the lawsuit. The lawsuit will continue against Ortho.

EXCLUDING YOURSELF FROM THE IMMUCOR SETTLEMENT

You have the right to exclude yourself from the Immucor Settlement Class. If you do not want to be a member of the Immucor Settlement Class, or if you want to be able to start your own suit or be part of a different lawsuit against Immucor involving the same claims as in this lawsuit, then you must take steps to remove yourself from the Immucor Settlement Class. This is called "excluding yourself" or "opting out" of the Class.

2.7 How do I exclude myself from the settlement?

You may exclude yourself from the Immucor Settlement.

To exclude yourself, you must mail (certified mail, return receipt requested) a written request to be excluded from the class to the Clerk of the Court c/o Kurtzman Carson Consultants LLC at the following address: Blood Reagents Antitrust Administrator, c/o Kurtzman Carson Consultants LLC, P.O. Box 43058, Providence, RI 02940-3058. The written request must include your name and address, and specifically state that you request exclusion from the Immucor Settlement Class. Attached to the written request should be a statement describing any direct purchases of traditional blood reagents you made from defendants from January 1, 2000 through February 23, 2012, including the dates and amounts of such purchases. The written request for exclusion must be received no later than June 1, 2012.

If you elect to be excluded from the Immucor Settlement Class and the proposed settlement agreement is finally approved, you will not be entitled to share in the settlement funds and will remain free to pursue any legal rights you may have. In addition, if you ask to be excluded, you cannot object to the settlement, nor will you be legally bound by anything that happens in the current lawsuit against Immucor.

If you wish to remain in the Immucor Settlement Class, you need do nothing at this time. As a member of the class, you will not be responsible for attorneys' fees or litigation expenses.

THE LAWYERS REPRESENTING THE IMMUCOR SETTLEMENT CLASS

2.8 Do I have a lawyer in this case?

The Court has appointed the following law firm to represent the Immucor Settlement Class (called "Class Counsel"):

SPECTOR ROSEMAN KODROFF & WILLIS, P.C.
1818 Market Street
Suite 2500
Philadelphia, PA 19103
(215) 496-0300

You will not be personally charged for the services of these attorneys in litigating this case against the settling or remaining Defendants. If you want your own lawyer, you may hire one at your own expense. You have the right to enter an appearance in the case through your lawyer if you wish.

2.9 How will the lawyers be paid?

Attorneys for the class are undertaking this litigation on a completely contingent fee basis, and are not requesting an award of attorneys' fees at this time. Class Counsel will, at a later time, seek Court approval of an award of reasonable attorneys' fees from the Immucor settlement funds. Class Counsel are requesting \$500,000 from the Immucor settlement fund to cover the ongoing costs of litigation. The Court can approve or deny such a request.

OBJECTING TO THE IMMUCOR SETTLEMENT

2.10 If I do not like the settlement, how do I tell the Court?

If you are a member of the Immucor Settlement Class and do not want to be excluded, you may object to the terms of the settlement agreement prior to final approval. If you wish to object to the settlement, you must mail your written objection, including a statement of the nature and grounds for your objection, to the Clerk of the Court at the following address: 601 Market Street, Philadelphia, PA 19106. The written objection must be received and filed with the Court no later than June 1, 2012. Copies of any objections must be sent to the following lawyers:

Jeffrey J. Corrigan
**SPECTOR ROSEMAN KODROFF
& WILLIS, P.C.**
1818 Market Street, Suite 2500
Philadelphia, PA 19103
Tel.: (215) 496-0300
Fax: (215) 496-6611

Thomas G. Slater, Jr.
HUNTON & WILLIAMS LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219-4074
Tel: (804) 788-8200
Fax: (804) 788-8218

COUNSEL FOR PLAINTIFFS AND CLASS COUNSEL

COUNSEL FOR DEFENDANT IMMUCOR, INC.

You must include in your objection: (i) the name, address, and telephone number of the person objecting and, if represented by a lawyer, of his or her lawyer; and (ii) a statement describing any purchases of traditional blood reagents you made directly from defendants from January 1, 2000 through February 23, 2012, including the dates and amounts of such purchases. You must also specify, in writing, all your objections and the basis for those objections, and provide a statement of whether you would like the Court's permission to speak at the Fairness Hearing.

2.11 What is the difference between objecting and excluding?

Objecting is simply telling the Court that you do not like something about the Immucor settlement. You can object only if you do not exclude yourself from the Immucor Settlement Class to which you are objecting. Excluding yourself is telling the Court that you do not want to be part of the Immucor Settlement Class. If you exclude yourself, you have no basis to object because the settlement no longer affects you.

THE COURT'S FAIRNESS HEARING

2.12 When and where will the Court decide whether to approve the Immucor settlement?

The Court will hold a hearing in this case (*In re: Blood Reagents Antitrust Litigation*, MDL No. 2081) at the United States District Court for the Eastern District of Pennsylvania, 601 Market Street, Philadelphia, PA 19106, on June 15, 2012 at 3 p.m., to determine whether the proposed partial settlement should be approved as fair, adequate and reasonable, the amount of ongoing litigation expenses that should be awarded to Class Counsel, and whether the lawsuit against Immucor should be dismissed with prejudice. The hearing may be continued without further notice.

2.13 Do I have to come to the hearing?

No. Class Counsel will answer any questions Judge DuBois may have. However, you may come at your own expense. If you send a written objection, you do not have to come to the Court to talk about it. As long as you mailed your written objection on time, following the instructions in Paragraph 2.10 of this Notice, the Court will consider it. You may also pay your own lawyer to attend, if you wish.

2.14 May I speak at the hearing?

You may not speak unless you have submitted your objection as provided in Paragraph 2.10 of this Notice and have stated in your objection letter that you wish to speak at the Fairness Hearing.

You cannot speak at the hearing if you exclude yourself from the Immucor Settlement Class.

IF YOU TAKE NO ACTION

2.15 What happens if I do nothing at all? What is the Release of Claims?

If you do nothing, your rights will be affected. You will be bound by the terms of the settlement and you will be agreeing to the Release and Discharge provision contained in Paragraph 39 of the Immucor Settlement Agreement. By agreeing to these provisions, you will be giving up all of your legal rights against Immucor under federal or state law based on the matters that are the subject of this lawsuit. This release extends to claims based on any Blood Reagents purchased directly from Immucor and/or Ortho, including, but not limited to traditional blood reagents and proprietary blood reagents. If you remain in the Immucor Settlement Class, you will be deemed to have entered into this release and may not seek to institute, maintain, prosecute or continue to maintain or prosecute any suit, action or other proceeding against Immucor, or collect from or proceed against Immucor based on the matters that are the subject of this lawsuit. The release will not impact any rights you may have against Ortho.

GETTING MORE INFORMATION

2.16 How can I get more information on the settlement?

This notice is only a summary of the proposed settlement with Immucor. You may obtain copies of the settlement agreement by visiting www.ImmucorSettlement.com, calling 1-855-231-9423, or writing to:

Blood Reagents Antitrust Administrator
c/o Kurtzman Carson Consultants LLC
P.O. Box 43058
Providence, RI 02940-3058

**DO NOT CONTACT THE COURT, THE CLERK OF THE COURT OR DEFENDANTS
IF YOU HAVE QUESTIONS REGARDING THIS NOTICE**