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Via E-mail

Re: Replacement Tire Direct Purchaser Antitrust Litigation Investigation Retainer Letter

Dear _____:

I hope this letter finds you well. As you are aware, my firm has investigated possible violations of federal antitrust law by the major manufacturers of replacement tires, including Michelin, Bridgestone Corp, Continental AG, Goodyear Tire & Rubber Co., Pirelli & C. SpA and Nokian Renkaat Oyj.

Specifically, on January 30, 2024, the European Commission (“EU”) issued a press release regarding an antitrust investigation concerning replacement tires. The press release states, in part:

The European Commission is carrying out unannounced inspections at the premises of companies active in the tyres industry in several Member States.

The Commission has concerns that the inspected companies may have violated EU antitrust rules that prohibit cartels and restrictive business practices (Article 101 of the Treaty on the Functioning of the European Union).

The products concerned by the inspections are new replacement tyres for passenger cars, vans, trucks and busses sold in the European Economic Area. The Commission is concerned that price coordination took place amongst the inspected companies, including via public communications.

“The Commission is concerned that price coordination took place amongst the inspected companies, including via public communications,” the EU executive explained in a statement.

Major tire manufacturers including, Michelin, Bridgestone Corp, Continental AG, Goodyear Tire & Rubber Co., Pirelli & C. SpA and Nokian Renkaat Oyj all confirmed that their offices were raided as part of the EU investigation.

The gravamen of the allegations is that the major manufacturers of replacement tires is foreclosed competition in an effort *to* artificially increase and fix the prices of new replacement tires for passenger cars, vans, trucks and buses (“Tires”) sold in the United States and that direct purchases of replacement tires paid more than they should have had these manufacturers competed on the basis of price.

We understand that you made direct purchases of replacement tires directly from Continental, Michelin, Nokian, Goodyear, Pirelli, and/or Bridgestone during the last four years. Therefore, you likely have standing to bring a claim. Based on our investigation, we believe the matter has substantial merit.

Countersigning this letter will confirm that you have retained Grabar, LLC, d/b/a Grabar Law Office (the “Law Firm”), as your counsel to investigate, and if appropriate, bring an action alleging violations of federal law as previously described. The action will be brought as a class action on behalf of all persons and entities that we determine have been adversely affected by the violations alleged in the

Grabar Law Office

Page 2

complaint. The Law Firm has agreed to bring this action on a contingency basis. **You will not be responsible for paying any of the Law Firm's fees in connection with this litigation.** Our attorneys' fees and reimbursement of our expenses will be paid as the Court may permit and approve out of any proceeds, by judgment or out-of-court settlement that may be obtained for the benefit of the plaintiffs and class members. The Law Firm will be working in coordination with, and may affiliate as co-counsel with, other law firms in litigating this matter. The Law Firm together with all other such attorneys will advance the costs of the case. **You will not be responsible for paying any of the attorneys' expenses in connection with this litigation.** The Law Firm together with all other such attorneys will also indemnify you for any direct costs associated with participation in the lawsuit, should there be any.

I am forwarding a draft complaint for you to review and accept prior to filing on your behalf.

By countersigning this letter, you further confirm that I have advised you that you should not destroy or alter, and that you should retain and preserve, any and all papers or electronic files which relate in any way to your interactions and transactions with the Defendants in this action, and to the claims asserted in this action generally. This preservation confirmation includes not only preservation of hard copy paper but also of data generated by and/or stored on your electronic storage media (*e.g.*, hard drives, floppy disks, back-up tapes or other electronic media, if any).

Please countersign this letter and return it to me via DocuSign, e-mail at jgrabar@grabarlaw.com, or fax to 267-507-6048 to indicate your agreement and authorization to proceed with filing this case on your behalf. If you have any questions, please do not hesitate to call me at my office or my cellular phone. I will, of course, be pleased to answer any questions you may have.

I appreciate this opportunity to represent you in this matter and hope that it can be concluded to your satisfaction.

Agreed and Acknowledged:

Date _____

On behalf of

Joshua H. Grabar, Esq.
Grabar Law Office