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*State of California, et al.*

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 COUNTY OF SAN FRANCISCO  
14  
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16  
17 **THE PEOPLE OF THE STATE OF**  
**CALIFORNIA, et al.,**

18 Plaintiffs,

19 v.  
20

21 **SAMSUNG SDI, CO., LTD., et al,**

22 Defendants.

Case No. CGC-11-515784

**EXHIBIT B (LG SETTLEMENT  
AGREEMENT AMENDMENT)  
TO VARANINI DECLARATION IN  
SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF  
SETTLEMENTS WITH HITACHI, LG,  
PANASONIC, TOSHIBA AND SAMSUNG**

Date: March 3, 2016  
Time: 8:30 a.m.  
Dept: 304  
Judge: Curtis E.A. Karnow  
Action Filed: November 8, 2011

AMENDMENT TO SETTLEMENT AGREEMENT BETWEEN  
THE STATE OF CALIFORNIA, ET AL.  
AND LG ELECTRONICS, INC.

This Amendment to the Settlement Agreement dated September 4, 2014 (the "Amendment") is made and entered into by and between LG Electronics, Inc. ("LG"), on the one hand, and the Attorney General of California, on behalf of the State of California and its state agencies, and in her capacity as *parens patriae* on behalf of all natural persons resident in California at any time during the Relevant Period (collectively, the "State"), and its political subdivisions (including the Class of Government Entities as defined below) by and through the City and County of San Francisco, acting as a representative for the Class of Government Entities (the "City"), on the other hand.

WHEREAS the State and LG entered into a Settlement Agreement on September 4, 2014 (the "Agreement"), concerning the allegations described in the action entitled *State of California et al. v. Samsung SDI, Co. Ltd et al.*, Case No. CGC -11-515784 (Sup. Ct. Cal, Filed November 8, 2011) (the "Action");

WHEREAS, the Agreement was executed by duly authorized counsel for the State and LG, respectively;

WHEREAS, the State and LG want California Code of Civil Procedure section 664.6 to apply to the Agreement; and

WHEREAS, the State and LG want to modify the definition of "Settlement Class of Government Entities" in the Agreement, in order to clarify the existing definition and comply with directions provided by the trial court judge in the Action;

NOW, THEREFORE, in consideration of the covenants, agreements, and releases set forth in the Agreement and herein and for other good and valuable consideration, it is agreed by

and among the undersigned that the Agreement is subject to the following modifications, pursuant to Section 35 of the Agreement, with all other provisions within the Agreement, including the Effective Date, continuing in full force and effect, subject all to the approval of the Court, on the following terms and conditions, and incorporating the preceding clauses:

Section A.3 definition of "Government Entities" is replaced as follows:

"Settlement Class of Government Entities" consists of all political subdivisions of the State of California, plus the University of California and the State Bar of California, that indirectly or directly purchased Cathode Ray Tubes ("CRTs") and/or products containing CRTs (including but not limited to computer monitors and televisions) between March 1, 1995 and November 25, 2007. The term "political subdivisions" is defined as all government entities authorized under California state law but without statewide jurisdiction.

The highlighted term below is inserted into the defined term "Settling Parties" as set forth on the first line of Section B.11, as follows:

The Attorney General, the City, on behalf of the Class of Government Entities, and LG (the "Settling Parties")

Section G.36 is replaced as follows:

The Superior Court of California, County of San Francisco, shall retain jurisdiction over the Action pursuant to Code of Civil Procedure 664.6, over the implementation, enforcement, and performance of this Agreement, and shall have exclusive jurisdiction over any suit, action, proceeding or dispute arising out of or relating to this Agreement or the applicability of this Agreement that cannot be resolved by negotiation and agreement by the parties to the Agreement. This Agreement shall be construed according to the laws of the State of California without regard to its choice of law or conflict of laws principles. By this Amendment LG, the

State and the City hereby adopt all provisions of the original Agreement as amended by this Amendment.

Section G.38 is replaced as follows:

This Agreement may be executed in counterparts by the Settling Parties, and an email or facsimile signature shall be deemed an original signature for purposes of executing this Agreement.

Section G.43 is replaced as follows:

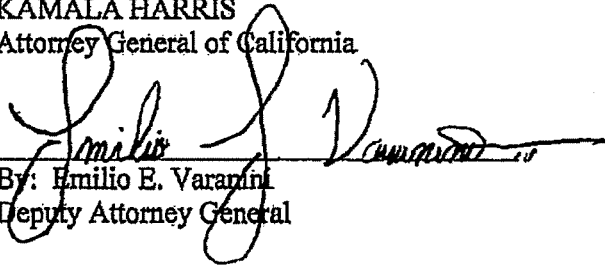
Each of the undersigned attorneys or representatives of the Settling Parties represents that he or she is fully authorized to enter into the terms and conditions of, and to execute, this Agreement on behalf of the Settling Parties he or she represents, subject to Court approval.

New Section G.46 is added as follows:

This Amendment effectuates the intention of the parties to the Agreement as expressed therein, and does not constitute a substantive modification of the Agreement, except that the Amendment effectuates the intention of the Settling Parties to the Agreement in light of California Code of Civil Procedure Section 664.6 and clarification of the definition of the Class of Government Entities, as instructed by the Court. In particular, the composition of the Class of Government Entities in the original Agreement is not modified by this Amendment.

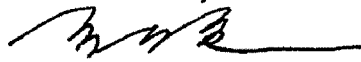
KAMALA HARRIS  
Attorney General of California

Dated: 9/10/2014

  
By: Emilio E. Varanini  
Deputy Attorney General

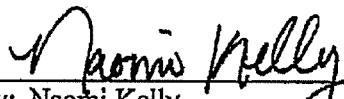
Dated: 9/19/2014

LG ELECTRONICS, INC.

  
By: Ojoon Kwom  
LG Electronics, Inc.

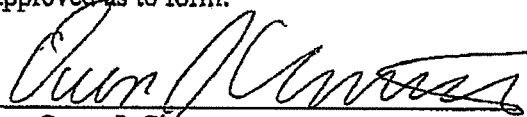
CITY AND COUNTY OF SAN FRANCISCO

Dated: 9/10/2014

  
By: Naomi Kelly  
City Administrator and Dir. of Admin. Services

Approved as to form:

Dated: 9/10/2014

  
By: Owen J. Clements  
Chief of Special Litigation  
San Francisco City Attorney's Office