

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re PVC Pipe Antitrust Litigation

This Document Relates to:

Direct Purchaser Class Plaintiffs

Case No. 1:24-cv-07639

Hon. LaShonda A. Hunt

UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES

Direct Purchaser Plaintiff Bill Wagner & Son, Inc. (“DPP”) through its undersigned counsel, intends to file a Motion—Unopposed¹ by Settling Defendant Oil Price Information Service, LLC (“OPIS”)—for Preliminary Approval of Settlement with Defendant OPIS and Related Relief (“Motion for Preliminary Approval”), and hereby moves this Court by unopposed motion for entry of an Order granting it leave to file a brief in support of the Motion for Preliminary Approval not to exceed 20 pages. In support, DPP states the following:

1. On May 5, 2025, Direct Purchaser Plaintiffs (“DPPs”) filed a Notice of Settlement

¹ OPIS, the Settling Defendant, does not oppose DPP’s motion. Because the Settlement Agreement required the terms of DPP’s settlement with OPIS to remain confidential until this motion was filed, it was not possible to conduct a pre-filing meet-and-confer with other parties. As detailed in the accompanying brief, on May 29, 2025, Interim Lead Counsel wrote to the non-settling Defendants asking them to provide, on a confidential basis, Interim Lead Counsel with their customer lists in order to effectuate individual, direct notice of the settlement to members of the DPP Settlement Class. The non-settling Defendants responded on June 4, 2025 that they were not in a position to evaluate the request for customer lists until after they had seen DPP’s preliminary approval filings and until other issues were resolved, and advised that they intended to inform DPP of their position on the motion once they are able to review the papers. Therefore, as of the time of this filing, Interim Lead Counsel does not know whether the non-settling Defendants will oppose the part of DPP’s motion requesting that the Court order the non-settling Defendants to produce their customer information. If, after reviewing this filing, the non-settling Defendants oppose that part of DPP’s motion, Interim Lead Counsel will, pursuant to this Court’s procedures, promptly confer with non-settling Defendants and submit an agreed proposed briefing schedule with respect to the request that non-settling Defendants produce their customer information in order to facilitate notice.

with Defendant Oil Price Information Service, LLC (“OPIS”), ECF No. 283.

2. DPP now seeks to move for preliminary approval of the settlement with OPIS.

3. In order to fully and completely explain the justification for the preliminary approval of the settlement with OPIS, DPP requires additional pages in excess of the 15 pages under Local Rule 7.1 of the Local Rules of the United States District Court for the Northern District of Illinois.

4. While DPP will make every effort to be as concise as possible, it requests up to 20 pages for the brief in support of the Motion.

WHEREFORE, for the above reasons, DPP respectfully requests this Court enter an Order granting it leave to file a brief in support of its Motion, not to exceed 20 pages.

Dated: June 6, 2025

Respectfully submitted,

By: /s/ Robert N. Kaplan

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CERTIFICATE OF SERVICE

I certify that on June 6, 2025, I caused true and correct copies of this Motion to be served via the Court's CM/ECF system on all counsel of record.

/s/ Robert N. Kaplan
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