

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

In re PVC Pipe Antitrust Litigation

THIS DOCUMENT RELATES TO:

ALL DIRECT PURCHASER CLASS
PLAINTIFF ACTIONS

Case No. 1:24-cv-07639

Hon. LaShonda A. Hunt

**DECLARATION OF GINA INTREPIDO-BOWDEN REGARDING
SETTLEMENT NOTICE PLAN IMPLEMENTATION**

I, Gina Intrepido-Bowden, hereby declare as follows:

1. I am a Vice President at JND Legal Administration (“JND”). JND is a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered hundreds of class action settlements. I am a nationally recognized legal notice expert with more than 20 years of experience designing and implementing class action legal notice programs. I have been involved in many of the largest and most complex class action notice programs, including all aspects of notice dissemination.

2. This Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees and the Parties, and, if called upon to do so, I could and would testify competently thereto.

3. JND is serving as the Settlement Administrator in the above-captioned matter, pursuant to the Court’s Order Granting DPP’s Motion for Preliminary Approval of Settlement Agreement with Defendant OPIS and Related Relief (“Preliminary Approval Order”) dated July 17, 2025 (ECF No. 360).

4. I previously submitted a Declaration Regarding Settlement Notice Plan dated June 6, 2025 (the “Notice Plan”) (ECF No. 305). I submit this Declaration to describe the implementation of the Notice Plan.

NOTICE PLAN OVERVIEW

5. The objective of the Notice Plan was to provide the best notice practicable, consistent with the methods and tools employed in other court-approved notice programs and to allow DPP Settlement Class Members the opportunity to review a plain language notice and easily take the next step to learn more about the proposed Settlement. The FJC’s *Judges’ Class Action Notice and Claims Process Checklist and Plain Language Guide* consider a Notice Plan with a high reach (above 70%) to be effective.¹

6. The DPP Settlement Class consists of all persons and entities who purchased PVC Pipes in the United States directly from one or more of the Converter Defendants (or from any of the Converter Defendants’ parents, predecessors, subsidiaries or affiliates) at any time between April 1, 2021 and May 16, 2025. Converter Defendants include: Atkore, Inc., Cantex, Inc., Diamond Plastics Corporation, Prime Conduit, Inc., Sanderson Pipe Corporation, Southern Pipe, Inc., IPEX USA, LLC, J-M Manufacturing Company, Inc. d/b/a JM Eagle, National Pipe & Plastics, Inc., Pipelife Jet Stream, Inc., Otter Tail Corporation, Northern Pipe Products, Inc., Vinyltech Corporation, Westlake Corporation and Westlake Pipe & Fittings Corporation d/b/a North America PVC Pipe Corporation. Excluded from the DPP Settlement Class are Defendants, and their parents, predecessors, subsidiaries, and affiliates, and all federal government entities and instrumentalities of the federal government.

7. The Notice Plan included the following components, as further described in the sections below:

- a. Class Action Fairness Act (CAFA) Notice to appropriate state and federal officials;

¹ Reach is the percentage of a specific population group exposed to a media vehicle or a combination of media vehicles containing a notice at least once over the course of a campaign. Reach factors out duplication, representing total different/net persons.

b. Direct notice to all known DPP Settlement Class Members for whom contact information was provided;

c. Digital notice targeted specifically to potential DPP Settlement Class Members;

d. A settlement website that provides detailed information about the proposed Settlement, including a page with answers to frequently asked questions, contact information, key dates, links to important case documents including the Long Form Notice, attached as **Exhibit A**, and the Settlement Agreement; and

e. A toll-free number for the Settlement, which includes an interactive voice response (IVR), and post office box through which DPP Settlement Class Members may obtain more information about the proposed Settlement and request that the Long Form Notice be sent to them.

8. Based on my experience in developing and implementing settlement notice programs, I believe that a Notice Plan with these elements provided the best notice practicable under the circumstances.

9. Each component of the Notice Plan is described in more detail in the sections below.

CAFA NOTICE

10. On June 16, 2025, JND mailed the CAFA Notice to the appropriate state and federal government officials. On January 15, 2026, JND posted supplemental CAFA materials to the CAFA website maintained for this matter. As of the date of this Declaration, JND has not received any objection or other correspondence relating to this Settlement from any recipients of the CAFA Notice.

DIRECT NOTICE

11. Following the Preliminary Approval Order, JND received DPP Settlement Class data from the Converter Defendants and promptly loaded the information into a secure, case-specific database for this matter. JND employs robust administrative, technical, and physical

controls to protect confidential class member data and safeguard against the risk of loss, misuse, unauthorized access, disclosure, or modification of the data.

12. Once the data was loaded, JND identified any undeliverable addresses or duplicate records from the data and assigned a unique identification number to each DPP Settlement Class Member for tracking throughout the settlement administration process.

13. On January 15, 2026, JND mailed the Long Form Notice to 14,859 DPP Settlement Class Members for whom a valid postal address was provided.

14. Prior to mailing notice, JND staff performed address research using the United States Postal Service (“USPS”) National Change of Address (“NCOA”) database to update addresses.² JND tracked all notices returned undeliverable by the USPS and promptly re-mailed notices that were returned with a forwarding address.

15. As of April 30, 2026, JND has received 1,586 Long Form Notices returned as undeliverable, of which 77 were forwarded to updated addresses provided by USPS.

16. The overall deliverability rate of the direct notice effort is 89.8%.

DIGITAL NOTICE

17. To supplement the direct notice effort, JND caused a digital effort to launch with the leading digital network (Google Display Network - “GDN”) and the top business social platform (LinkedIn), as well as a notice placement in a well-respected industry website PlasticNews.com and eNewsletter (*Plastic News Daily Report*). Digital advertisements appeared for 28 days from January 15, 2026 through February 11, 2026 on GDN, LinkedIn and PlasticNews.com, delivering 4,552,849 digital impressions,³ 252,849 more than what was originally planned.

18. The GDN impressions targeted (1) sites/articles/pages covering topics such as

² The NCOA database is the official USPS technology product which makes changes of address information available to mailers to help reduce undeliverable mail pieces before mail enters the mail stream.

³ Impressions or Exposures are the total number of opportunities to be exposed to a media vehicle or combination of media vehicles containing a notice. Impressions are a gross or cumulative number that may include the same person more than once. As a result, impressions can and often do exceed the population size.

HVAC & Climate Control Plumbing, Water Filters & Purifiers, Industrial Handling & Processing Equipment, Fluid Handling, Plumbing Fixtures & Equipment, Construction & Maintenance; (2) audiences in-market for PVC, Pipe Materials, PVC Pipe & Fittings; or (3) users with an affinity for Plastic Tubing.

19. The LinkedIn activity reached users: (1) employed at company/industries including Specialty Trade Contractors, Building Construction, Civil Engineering, Wholesale Hardware/Plumbing/Heating Equipment, or Utility System Construction; (2) within member groups such as Pipes & Fittings Manufactures, Plastic Granules or Pipes (HDPE, PVC, PP, LIDPE, ABS, PC); or (3) with skills such as Plumbing, PVC, Mechanical/Electrical/Plumbing (MEP).

20. *PlasticNews.com* impressions targeted plastic product manufacturers and their suppliers and customers.

21. Five notice placements also appeared in the *Plastic News* Daily Report eNewsletter on January 22, 2026, January 27, 2026, January 30, 2026, February 2, 2026 and February 4, 2026. The eNewsletter placements provided a total of 32,515 sends.

22. The digital activity was served across all devices, with an emphasis on mobile. The ads included an embedded link to the settlement website, where DPP Settlement Class Members could receive more information about the proposed Settlement.

23. Screenshots of the digital notices as they appeared on GDN, LinkedIn, *PlasticNews.com* and *Plastic News* Daily Report eNewsletter are attached as **Exhibit B**.

SETTLEMENT WEBSITE

24. JND established an informational, interactive case-specific settlement website, www.PVCPipeDirectClass.com, where DPP Settlement Class Members may obtain more information about the proposed Settlement. The settlement website has an easy-to-navigate design and is formatted to emphasize important information and deadlines. It provides links to important case documents, including the Long Form Notice. The website address is prominently displayed in the Long Form Notice and accessible through the digital notices.

25. The settlement website is ADA-compliant and optimized for mobile visitors so that

information loads quickly on mobile devices. It is designed to maximize search engine optimization through Google and other search engines.

26. As of April 30, 2026, there have been 27,912 total views to the settlement website pages and documents and 24,334 unique visitors to the settlement website. JND will continue to maintain the settlement website throughout the settlement administration process.

TOLL-FREE NUMBER AND POST OFFICE BOX

27. On January 13, 2026, JND established an automated toll-free telephone line, 1-855-779-9069, that DPP Settlement Class Members may call for information related to the proposed Settlement. As of April 30, 2026, JND has received 22 calls to the toll-free line. JND will continue to maintain the toll-free line throughout the settlement administration process.

28. JND also established a dedicated post office box for this matter where DPP Settlement Class Members may send exclusion requests and other correspondence. JND will continue to maintain the post office box throughout the settlement administration process.

REQUESTS FOR EXCLUSION

29. The Long Form Notice informed recipients that any DPP Settlement Class Member who wished to exclude themselves from the proposed Settlement (“opt-out”) could do so by mailing an exclusion letter to JND by the April 9, 2026 deadline.

30. JND has received three (3) timely and valid requests for exclusion for this Settlement. A list of the names of the DPP Settlement Class Members who requested exclusion in accordance with the Settlement’s requirements is attached as **Exhibit C**.

OBJECTIONS

31. The Long Form Notice informed recipients that any DPP Settlement Class Member who wanted to object to the approval of the proposed Settlement must submit a written statement to the Court by April 9, 2026.

32. JND has not received and is not aware of any objections.

PAYMENT INFORMATION

33. The Long Form Notice informed DPP Settlement Class Members that payments

from the Settlement Fund would not be sent to DPP Settlement Class Members at this time. It explained that DPP Settlement Class Members who did not submit an exclusion request would be eligible to receive a payment at a later date.

NOTICE DESIGN AND CONTENT

34. The Court-approved Long Form Notice was written in plain language and is consistent with documents other courts have determined comply with the requirements of Rule 23 of the Federal Rules of Civil Procedure, the Due Process Clause of the United States Constitution, and any other applicable statute, law or rule. Based on my experience designing class notice programs, in my opinion, the Long Form Notice complies with these requirements, as well as the FJC's *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide*.

35. The Long Form Notice contains plain and easy-to-read summaries of the proposed Settlement and the options available to DPP Settlement Class Members. Additionally, the Long Form Notice provides instructions on how to obtain more information about the proposed Settlement.

REACH

36. The mailed notice alone successfully reached 89.8% of DPP Settlement Class Members. The digital effort enhanced that reach further. As a result, the provided reach exceeded that of other court-approved programs and the 70% or above reach standard set forth by the FJC.⁴

⁴ Federal Judicial Center, *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* (2010), p. 3 states: "...the lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70–95%."

CONCLUSION

37. In my opinion, the Notice Plan provided the best notice practicable under the circumstances and is consistent with the requirements of Rule 23 and other similar court-approved notice programs. The Notice Plan provided DPP Settlement Class Members with the opportunity to review the notice and easily take next steps to learn more about the proposed Settlement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19th day of May 2026, in Stone Harbor, NJ



Gina Intrepido-Bowden

EXHIBIT A

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

**If you purchased PVC Pipe in the United States
between April 1, 2021, and May 16, 2025,
directly from any of the following companies,
you may be affected by a class action settlement:**

Atkore, Inc.

Heritage Plastics, Inc.

Allied Tube & Conduit Corp.

Queen City Plastics, Inc.

Rocky Mountain Colby Plastics a/k/a RCMP, Inc. n/k/a Cor-Tek

Cantex Inc.

Diamond Plastics Corporation

Prime Conduit, Inc.

Sanderson Pipe Corporation

Southern Pipe, Inc.

Charlotte Pipe & Foundry Co.

Cresline Plastic Pipe Co.

Ipex USA, LLC

J-M Manufacturing Company, Inc. d/b/a JM Eagle

National Pipe & Plastics, Inc.

PipeLife Jet Stream, Inc.

Otter Tail Corporation

Northern Pipe Products, Inc.

Vinyltech Corporation

Westlake Corporation

Westlake Pipe & Fittings Corporation d/b/a North America PVC Pipe Corporation

A federal court authorized this Notice.

This is not a solicitation from a lawyer or a claims filing service.

- You may be affected by a proposed Settlement in a class action lawsuit called *In re PVC Pipe Antitrust Litigation*, Case No. 1:24cv-07639, pending in the United States District Court for the Northern District of Illinois. The proposed Settlement is a **partial** Settlement because it includes only one defendant, Oil Price Information Service, LLC (OPIS). The lawsuit is continuing against 21 defendants who have **not** settled, referred to as the Converter Defendants.

Questions? Visit www.PVCPipeDirectClass.com or call toll-free 1-855-779-9069

- Under the proposed Settlement, OPIS agreed to pay \$3,000,000 to create a Settlement Fund for the benefit of Class Members, in exchange for a release of all claims against OPIS in this lawsuit. OPIS has also agreed to provide cooperation in the continuing lawsuit against the Converter Defendants. The release to OPIS does not include a release of any of the Converter Defendants. The lawsuit is continuing against them.
- The Converter Defendants include the following manufacturers of PVC Pipe: Atkore, Inc., Heritage Plastics, Inc., Allied Tube & Conduit Corp., Queen City Plastics, Inc., Rocky Mountain Colby Plastics a/k/a RMCP, Inc. n/k/a Cor-Tek, Cantex Inc., Diamond Plastics Corporation, Prime Conduit, Inc., Sanderson Pipe Corporation, Southern Pipe, Inc., Charlotte Pipe & Foundry Co., Cresline Plastic Pipe Co., IPEX USA, LLC, J-M Manufacturing Company, Inc. d/b/a JM Eagle, National Pipe & Plastics, Inc., PipeLife Jet Stream, Inc., Otter Tail Corporation, Northern Pipe Products, Inc., Vinyltech Corporation, Westlake Corporation, and Westlake Pipe & Fittings Corporation d/b/a North America PVC Pipe Corporation.
- “PVC Pipe” refers to polyvinyl chloride pipe, including all PVC pipe and piping products used in plumbing, electrical conduit, and municipal piping systems that are manufactured by combining chlorine and ethylene.
- Payments to eligible Class Members will **not** be distributed at this time. Instead, payments will be combined with any future settlements or recoveries in the continuing lawsuit against the Converter Defendants. Please visit www.PVCPipeDirectClass.com for updates.
- The proposed Settlement relates to a class action lawsuit brought on behalf of *direct* purchasers of PVC Pipe (“Plaintiffs”). This includes all persons or entities that purchased PVC Pipe directly from one or more of the named Converter Defendants. There are also two lawsuits pending in the same Court on behalf of *indirect* purchasers. This proposed Settlement applies only to *direct* purchases of PVC Pipe from the Converter Defendants and does **not** apply to *indirect* purchases of PVC Pipe.
- Plaintiffs allege that between April 1, 2021, and May 16, 2025, Defendants engaged in a conspiracy to inflate prices of PVC Pipe in the United States, that Defendants broke the law and as a result Class Members paid more for PVC Pipe than they otherwise would have. The Court has not decided who is right.
- If the Court approves the Settlement, it will resolve claims against OPIS only.
- **Your legal rights will be affected whether or not you act.**
- Your rights and options – **and the deadlines to exercise them** – are explained in this Notice, along with information about the lawsuit and proposed Settlement. Please read the entire Notice carefully.

Questions? Visit www.PVCPipeDirectClass.com or call toll-free 1-855-779-9069

Your Legal Rights and Options		
DO NOTHING	<ul style="list-style-type: none"> • Stay in the Settlement Class • If the Court approves the proposed Settlement, you may be eligible for a payment in the future. The Settlement Fund will be combined with future settlements or recoveries in the continuing lawsuit against the Converter Defendants and paid to Class Members at a later time • Give up your right to separately sue or continue to sue OPIS for the claims in this case (See Question 11) 	None
GO TO THE COURT'S HEARING	<ul style="list-style-type: none"> • Ask the Court for permission to speak about the fairness of the proposed Settlement (See Question 20) 	June 3, 2026
OBJECT TO THE SETTLEMENT	<ul style="list-style-type: none"> • Stay in the Settlement Class, but write to the Court about why you don't like the proposed Settlement (See Question 16) 	Postmarked by April 9, 2026
EXCLUDE YOURSELF ("OPT OUT")	<ul style="list-style-type: none"> • Remove yourself from the proposed Settlement • Receive no future payment from the proposed Settlement • Keep your right to separately sue or continue to sue OPIS for the claims in this case (See Question 12) 	Postmarked by April 9, 2026

Questions? Visit www.PVCPipeDirectClass.com or call toll-free 1-855-779-9069

What this Notice Contains

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- 2. What is this lawsuit about?
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- 22. How can I get more information?

Basic Information

1. Why did I get this Notice?

You received this Notice because you or your company may have purchased PVC Pipe **directly** from one or more of the Converter Defendants between April 1, 2021, and May 16, 2025.

The Court has directed that this Notice be sent to you because, as a possible Class Member, you have the right to know about the proposed Settlement and your rights and options before the Court decides whether to approve the proposed Settlement.

This Notice explains the lawsuit, the proposed partial Settlement, and your legal rights.

The Honorable LaShonda A. Hunt of the U.S. District Court for the Northern District of Illinois in Chicago, Illinois, is the judge overseeing this class action. The case is called *In re PVC Pipe Antitrust Litigation*, Case No. 1:24-cv-07639. The people who sued are called Plaintiffs, and the companies they sued are called Defendants. The only Defendant that has agreed to the proposed Settlement is OPIS. The lawsuit is continuing against the Converter Defendants.

2. What is this lawsuit about?

The lawsuit alleges that Defendants conspired to fix, raise, maintain, and stabilize the price of PVC Pipe between April 1, 2021, and May 16, 2025, and that Class Members paid higher prices for PVC Pipe as a result. The Court has not decided who is right.

Plaintiffs have reached a proposed Settlement with OPIS only. While OPIS denies all allegations, it has agreed to settle this action to avoid the uncertainties and risks of further litigation. The lawsuit is proceeding against the Converter Defendants.

3. Who are the Defendants?

OPIS and the Converter Defendants are collectively called Defendants. OPIS is the only Settling Defendant. The Converter Defendants are: Atkore, Inc., Heritage Plastics, Inc., Allied Tube & Conduit Corp., Queen City Plastics, Inc., Rocky Mountain Colby Plastics a/k/a RMCP, Inc. n/k/a Cor-Tek, Cantex Inc., Diamond Plastics Corporation, Prime Conduit, Inc., Sanderson Pipe Corporation, Southern Pipe, Inc., Charlotte Pipe & Foundry Co., Cresline Plastic Pipe Co., IPEX USA, LLC, J-M Manufacturing Company, Inc. d/b/a JM Eagle, National Pipe & Plastics, Inc., PipeLife Jet Stream, Inc., Otter Tail Corporation, Northern Pipe Products, Inc., Vinyltech Corporation, Westlake Corporation, and Westlake Pipe & Fittings Corporation d/b/a North America PVC Pipe Corporation.

4. Why is this a class action?

In a class action, one or more individuals or entities called class representatives sue on behalf of others who have similar claims, all of whom together are a “class.” Individual class members do not have to file a lawsuit to participate in the class action settlement. One court resolves the settlement-related issues for all class members, *except* for those who exclude themselves from the settlement.

5. Why is there a proposed Settlement with OPIS?

The Court did not decide in favor of Plaintiffs or OPIS. Instead, both sides agreed to the proposed Settlement to avoid the cost and risk of continued litigation and a trial against OPIS. The proposed Settlement does not mean that any law was broken or that OPIS did anything wrong. Plaintiffs and

Questions? Visit www.PVCPipeDirectClass.com or call toll-free 1-855-779-9069

their counsel believe the proposed Settlement is the best result for all Class Members. The lawsuit is continuing against the Converter Defendants.

The Settlement Class

6. Am I part of the Settlement Class?

You are a Class Member if you or your company purchased PVC Pipes in the United States **directly** from one or more of the Converter Defendants (or from any of the Converter Defendants' parents, predecessors, subsidiaries or affiliates) at any time between April 1, 2021, and May 16, 2025.

Defendants, and their parents, predecessors, subsidiaries, and affiliates, and all federal government entities and instrumentalities of the federal government are excluded from the Settlement Class.

7. I bought PVC Pipe during the timeframe. Am I a Class Member?

Not necessarily. You are only a Class Member if you bought PVC Pipe during the time period **directly** from one of the Converter Defendants.

8. I'm still not sure if I am included.

If you are still not sure if you are a Class Member, please review the detailed case information at www.PVCPipeDirectClass.com. You may also call the Settlement Administrator at 1-855-779-9069.

The Benefits of the Proposed Settlement

9. What does the proposed Settlement provide?

Under the proposed Settlement, OPIS has agreed to pay **\$3,000,000** in cash (the "Settlement Fund"). The Settlement Fund will be distributed at a later time to eligible Class Members after deducting notice and administration costs (up to \$250,000), and attorneys' fees, expenses and service awards to Plaintiffs, if approved by the Court.

OPIS will also provide extensive cooperation to Plaintiffs in the continuing lawsuit against the Converter Defendants. Details about the cooperation are in the Settlement Agreement available at www.PVCPipeDirectClass.com.

10. When will I get my payment?

Payments from the Settlement Fund will **not** be sent to Class Members at this time. But if you are a Settlement Class Member and you don't exclude yourself, you will be eligible to receive a payment at a later date. If you exclude yourself from the proposed Settlement, you will **not** be eligible to receive a payment from the proposed Settlement.

11. What am I giving up by staying in the proposed Settlement?

Unless you exclude yourself from the proposed Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against OPIS about the legal and factual issues in this case. All the Court's orders will apply to you and legally bind you. In other words, if you do nothing, you will **not** be able to sue OPIS in an antitrust lawsuit, because your claim in this case with OPIS will be "released."

Questions? Visit www.PVCPipeDirectClass.com or call toll-free 1-855-779-9069

The Settlement Agreement provides that OPIS will pay \$3,000,000 and cooperate in the continuing lawsuit against the Converter Defendants in exchange for a release of claims by Class Members against OPIS and its past and present parents, subsidiaries, divisions, affiliates, stockholders, and general or limited partners, as well as its past and present respective officers, directors, employees, trustees, insurers, agents, attorneys, and any other representatives (the “Releasees”). The Settlement Agreement, however, does not release any claims relating to or against the Converter Defendants.

Broadly speaking, the Settlement Agreement completely releases, acquits, and forever discharges OPIS and the other Releasees from any and all other claims arising at any time prior to May 16, 2025 that are related to the antitrust claims alleged in *In re PVC Pipe Antitrust Litigation*.

The Settlement Agreement is available at www.PVCPipeDirectClass.com. It fully describes the legal claims that you give up if you do nothing and stay in the Settlement Class.

Excluding Yourself from the Proposed Settlement

If you want to keep the right to sue OPIS on your own about the legal issues being resolved in this case, then you **must** take steps to exclude yourself from, or “opt out” of, the proposed Settlement. If you opt out and the Court approves the proposed Settlement, you will **not** receive a payment.

12. How do I get out of the proposed Settlement?

To exclude yourself from or “opt out” of the proposed Settlement, you **must** mail a letter with the following information:

- A statement indicating that you want to be excluded from the proposed Settlement in *In re PVC Pipe Antitrust Litigation*, Case No. 1:24-cv-07639; and
- The name (including any formerly known names, doing business as names, etc.), address, telephone number, and signature of the person or entity seeking exclusion.

Exclusion requests can only be made by an individual or individual entity on behalf of themselves (and subsidiaries) and personally signed by each individual person or entity requesting exclusion.

Your exclusion letter must be postmarked by **April 9, 2026** and mailed to:

PVC Pipe Direct Purchaser Settlement – EXCLUSIONS
c/o JND Legal Administration
PO Box 91211
Seattle, WA 98111

**If you ask to be excluded from the proposed Settlement,
you will not get any future payment from the proposed Settlement,
and you cannot object to the proposed Settlement.**

If you do not request to be excluded from the proposed Settlement and the proposed Settlement is approved by the Court, you may be entitled to a future payment from the Settlement Fund. If you have a pending lawsuit against OPIS involving the same legal issues in this case, speak to your lawyer in that case immediately. You must exclude yourself from the proposed Settlement in order to bring your own antitrust lawsuit against OPIS.

Questions? Visit www.PVCPipeDirectClass.com or call toll-free 1-855-779-9069

13. If I exclude myself, can I get money from the proposed Settlement?

No. If you exclude yourself from, or “opt out” of, the proposed Settlement, you will **not** be able to get money from the proposed Settlement.

The Lawyers Representing You

14. Do I have a lawyer in this case?

Yes. The Court has appointed the law firm of Kaplan Fox & Kilsheimer LLP (“Interim Lead Counsel”) to represent the Settlement Class on an interim basis and for purposes of the proposed Settlement. If you want your own lawyer to represent you and appear in Court for you concerning the proposed Settlement, you may hire one at your own expense. If you wish to exclude yourself from the proposed Settlement and pursue your own lawsuit against OPIS, you may need to hire your own lawyer.

15. How will the lawyers be paid?

You are not personally responsible for any payment of attorneys’ fees or for reimbursement of expenses incurred or paid by Interim Lead Counsel. Interim Lead Counsel is not asking at this time to be paid from the Settlement Fund. At a later date, likely in conjunction with other possible settlements, Interim Lead Counsel will ask the Court to approve a payment from the Settlement Fund for fees, reimbursement of expenses and service awards for the named Plaintiffs. You will be provided notice of such request and given an opportunity to object to such request.

Objecting to the Proposed Settlement

16. How do I tell the Court that I don’t like the proposed Settlement?

If you stay in the Settlement Class, you can object to the proposed Settlement if you do not like any part of it. The Court will consider your views, but the proposed Settlement may still be approved in spite of your objection.

To object, you **must** mail a letter that includes the following:

- A statement indicating that you object to the proposed Settlement in *In re PVC Pipe Antitrust Litigation*, Case No. 1:24-cv-07639;
- The name (including any formerly known names, doing business as names, etc.), address, telephone number, and signature of the person filing the objection (or their counsel’s signature);
- The reasons you object, and any legal authority;
- The names of the attorneys that represent you, if any;
- Proof of your membership in the Settlement Class, such as invoice showing that you purchased PVC Pipe directly from one or more Converter Defendants between April 1, 2021, and May 16, 2025, or otherwise satisfy the definition in answer to Question 6; and
- A statement of whether you or your counsel intend to appear at the Fairness Hearing, and the identity of any witness that you will call to testify in support of your objection.

Questions? Visit www.PVCPipeDirectClass.com or call toll-free 1-855-779-9069

You must mail your objection postmarked by **April 9, 2026**, to:

The Court:

Clerk of Court
United States District Court for
the Northern District of Illinois
Everett McKinley Dirksen
United States Courthouse
219 South Dearborn Street
Chicago, IL 60604

Interim Lead Counsel:

Robert N. Kaplan
KAPLAN FOX &
KILSHEIMER LLP
800 Third Avenue, 38th Floor
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OPIS Counsel:

Brian O’Bleness
DENTONS US LLP
1900 K. Street NW
Washington, D.C. 20006

Natalie J. Spears
DENTONS US LLP
233 South Wacker Drive,
Suite 5900
Chicago, Illinois 60606

17. 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 don’t exclude yourself from the Settlement Class. “Excluding” yourself means that you are removing yourself from the Settlement Class and you will **not** receive a future payment from the Settlement Fund. If you exclude yourself from or “opt out” of the Settlement Class, you have no right to object to the proposed Settlement because it no longer affects you.

The Court’s Fairness Hearing

The Court will hold a Fairness Hearing to decide whether to approve the proposed Settlement. You may, but need not, attend the hearing. If you do attend the hearing, you may ask the Court’s permission to speak (see Question 20), but you do not have to participate.

18. When and where will the Court decide whether to approve the proposed Settlement?

The Parties anticipate the Court will hold its Fairness Hearing at 10:00 a.m. CT on **June 3, 2026**, at the United States District Court for the Northern District of Illinois, Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604, Courtroom #1425. The hearing may be moved to a different date or time without additional notice, so check www.PVCPipeDirectClass.com before making travel plans. At the hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate. The Court will listen to Class Members who have asked to speak at the hearing. If there are objections or comments, the Court will consider them at that time. After the hearing, the Court will decide whether to approve the proposed Settlement. We do not know how long the Court will take to decide.

19. Do I have to come to the hearing?

No. Interim Lead Counsel will answer any questions the Court may have. However, you are welcome to come at your own expense. If you send an objection to the proposed Settlement, you do not have to come to the Fairness Hearing to explain it. As long as you mail your written objection on time, the Court will consider it. You may also pay your own lawyer to attend and speak (or not) at the hearing on your behalf, but it is not required.

20. May I speak at the hearing?

Yes. If you did not exclude yourself from the Settlement Class, you may ask the Court for permission for you or your own attorney to speak at the Fairness Hearing, at your own expense. To do so, you must send a letter stating the following:

- “Notice of Intention to Appear *In re PVC Pipe Antitrust Litigation*, Case No. 1:24-cv-07639;”
- The position you will take at the hearing and the reasons for your position;
- Your name, address, telephone number, and your signature; and
- Proof of your membership in the Settlement Class, such as invoices showing that you directly purchased PVC Pipe from one or more Converter Defendants between April 1, 2021, and May 16, 2025, or proof that otherwise satisfies the definition in Question 6.

Your Notice of Intention to Appear must be postmarked by **April 9, 2026**, and mailed to:

The Court:

Clerk of Court
United States District Court for
the Northern District of Illinois
Everett McKinley Dirksen
United States Courthouse
219 South Dearborn Street
Chicago, IL 60604

Interim Lead Counsel:

Robert N. Kaplan
KAPLAN FOX &
KILSHEIMER LLP
800 Third Avenue, 38th Floor
New York, New York 10022

OPIS Counsel:

Brian O’Bleness
DENTONS US LLP
1900 K. Street NW
Washington, D.C. 20006

Natalie J. Spears
DENTONS US LLP
233 South Wacker Drive,
Suite 5900
Chicago, Illinois 60606

If You Do Nothing

21. What happens if I do nothing at all?

If you do nothing, you will remain a Settlement Class Member and be eligible to get a future payment from the proposed Settlement (if approved by the Court), as well as payments from future settlements or recoveries in the continuing lawsuit against Converter Defendants.

Getting More Information

22. How do I get more information?

This Notice summarizes the proposed Settlement. For more detailed information, visit www.PVCPipeDirectClass.com or call 1-855-779-9069.

DATED: January 15, 2026

The Honorable LaShonda A. Hunt

Questions? Visit www.PVCPipeDirectClass.com or call toll-free 1-855-779-9069

EXHIBIT B

Banner Ad Screenshots

1

FIRST ALERT 4 ST. Louis, MO 28°

News Watch Live Weather First Alert 4 Investigates Matrix Midwest Traffic My St. Louis LIVE! Great Day We the People First Alert Weather Now

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LEGAL NOTICE

\$3 Million Class Action Settlement
Direct Purchasers of PVC Pipes may be affected. [LEARN MORE](#)

We the People

WE THE PEOPLE

Air Force member creates dog treat business while serving country
Updated: 21 hours ago | By Steve Harris
An active duty Air Force member has launched a dog treat business that connects her military service with her love of animals.

NATIONAL

Lost Korean War letters slowly find their way to 95-year-old veteran who wrote them
Updated: Jan. 13, 2026 at 1:50 PM EST | By Joshua Skinner and Andrew McMunn
A 95-year-old Korean War veteran is receiving letters he wrote home more than 70 years ago.

WE THE PEOPLE

Local young skaters serve as 'sweepers' at U.S. Figure Skating Championships
Updated: Jan. 7, 2026 at 7:41 PM EST | By First Alert 4 Staff
The kids are serving as "sweepers," collecting stuffed animals and other gifts that

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CELEBRATING 250 YEARS
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Who is a building block of our community?

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U.S. Politics Sports Entertainment Life Money Travel Opinion Crossword 62°F

Officials release identity of man shot by federal officer in Minneapolis
DHS identified the man shot Jan. 14 as Julio Cesar Sosa-Celis, a Venezuelan man who remains hospitalized.
NATION 1:55 p.m. ET Jan. 15

Ex-NBA player among 20 indicted in new gambling scandal
MEN'S COLLEGE BASKETBALL
1:27 p.m. ET Jan. 15

Map shows 75 countries on visa pause list
GRAPHICS 8:58 a.m. ET Jan. 15

Renee Good family reveals new details about the morning she was killed by ICE
The family issued a statement about the 37-year-old mother of three the same day they announced they would be pursuing a civil investigation aiming to hold ICE accountable.
NATION 8:37 a.m. ET Jan. 15

Harry Styles is bringing fans to the 'Disco' with new album
Fans have clamored for nearly four years for new music from Harry Styles. On Jan. 15, the Grammy winning British heartthrob complied.
MUSIC 12:20 p.m. ET Jan. 15

Verizon customers can expect a credit after widespread outage
Following a seven-hour network outage, Verizon will offer impacted customers a \$20 credit, the company confirmed to USA TODAY.
MONEY 10:14 a.m. ET Jan. 15

Verizon

Verizon threatens Insurrection Act

Advertisement

LEGAL NOTICE

\$3 Million Class Action Settlement
Direct Purchasers of PVC Pipes may be affected. [LEARN MORE](#)

Banner Ad Screenshots

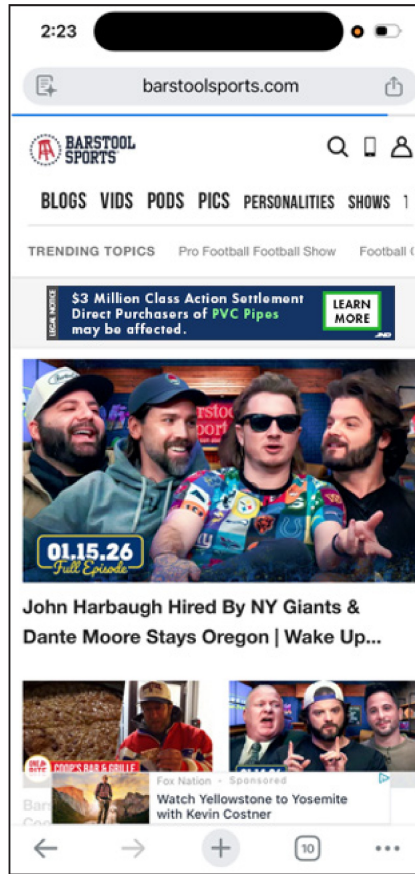
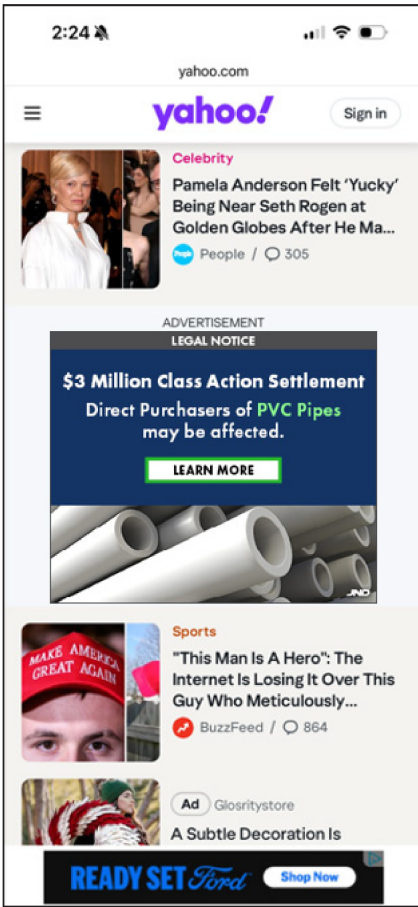
2

The screenshot shows the weather.com website interface. At the top, there is a search bar for "Search City or Zip Code" and navigation links for "US", "Go Premium", and "Sign In". A blue banner at the top right encourages users to "Sign in to see fewer ads" or "Start free trial". The main content area features a weather forecast for Ithaca, New York, showing a temperature of 24° and a "Cloudy" condition. Below this is a "Top Stories" section with the headline "Southern Snow This Weekend" and a weather map. To the right, a prominent blue banner advertises a "\$3 Million Class Action Settlement" for "Direct Purchasers of PVC Pipes" with a "LEARN MORE" button. An "Editor's Pick" section is visible at the bottom right.

This screenshot shows a news article page. At the top, there is a small image of a person in a white protective suit. The main headline reads "Microplastics Inc. lays off 86 in Illinois amid asset sale, possible company sale". The article text states: "Microplastics Inc. permanently laid off 86 employees at its St. Charles, Ill., facility on Dec. 19 as it negotiates a possible sale and its lender moves forward with an asset auction." Below the article is a "Load More Articles" button. At the bottom of the page, a blue banner advertises a "\$3 Million Class Action Settlement" for "Direct Purchasers of PVC Pipes" with a "LEARN MORE" button. The banner also includes the text "LEGAL NOTICE" and a small "JND" logo.

Banner Ad Screenshots

3



LinkedIn Ad Screenshots

4

The desktop screenshot shows a LinkedIn feed. On the left is a profile card for a woman with 28 profile viewers and 6 post impressions. The main ad is from 'Class Action Lawsuits' (29 followers, promoted) with the text: 'Did you purchase PVC Pipes directly from the manufacturer between April 1, 2021, and May 16, 2025?'. The ad features a dark blue banner with white text: '\$3 Million Class Action Settlement' and 'Direct Purchasers of PVC Pipes may be affected.', with a 'LEARN MORE' button. Below the banner is an image of white PVC pipes. At the bottom of the ad, it says 'Your rights and options may be affected by a class action settlement' with a 'Learn more' button and the URL 'www.pvcpipedirectclass.com'. To the right of the ad is another ad for 'Upwork' and a 'Similar pages' section listing 'American Pharmacists Association', 'Magistrates' Court of Victoria', and 'Cytokinetics'.

The mobile screenshot shows the same LinkedIn advertisement on a smartphone. The top status bar shows the time as 1:56. The ad content is identical to the desktop version, including the 'Class Action Lawsuits' header, the question about PVC pipe purchases, the '\$3 Million Class Action Settlement' banner, the PVC pipe image, and the 'LEARN MORE' button. The mobile interface includes a 'Like', 'Comment', and 'Share' row at the bottom of the ad, and a navigation bar at the very bottom with icons for Home, Video, My Network, Notifications, and Jobs.

EXHIBIT C



In re PVC Pipe Antitrust Litigation
Case No. 1:24-cv-07639 (N.D. Ill)

OPIS Direct Purchaser Settlement Exclusion Requests

#	Class Member	Status
1	Star Mechanical Supply Co Inc.	Valid
2	Star Wholesale Supply Co Inc.	Valid
3	Fastenal Company	Valid