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 Plaintiff Actions*	Case No. 24-cv-07639 Hon. LaShonda A. Hunt

[PROPOSED] ORDER GRANTING DIRECT PURCHASER PLAINTIFFS' UNOPPOSED MOTION FOR AN ORDER APPROVING: (1) PLAN OF DISTRIBUTION FOR THE SETTLEMENT CLASSES; (2) CLAIM FORM FOR DISTRIBUTION TO SETTLEMENT CLASSES; (3) SCHEDULE TO SUBMIT INTERIM FEE AND EXPENSE APPLICATION; AND (4) ADDITIONAL NOTICES TO SETTLEMENT CLASSES

AND NOW**,** upon consideration of Direct Purchaser Plaintiffs' ("DPPs") Unopposed Motion for an Order Approving: (1) Plan of Distribution for the Settlement Classes; (2) Claim Form for Distribution to Settlement Classes; (3) Schedule to Submit Interim Fee and Expense Application; and (4) Additional Notices to Settlement Classes (ECF No. 960), the Motion is hereby **GRANTED** as follows:

1. Direct Purchaser Plaintiffs' Plan of Distribution for the Settlement Classes from the five finally approved settlements, Exhibit 1 hereto, is hereby **APPROVED**.

2. Direct Purchaser Plaintiffs' Proposed Claim Form for Distribution to Settlement Classes, Exhibit 2 hereto, is hereby **APPROVED**.

3. Direct Purchaser Plaintiffs' request for a schedule to submit an interim fee and expense application is hereby **APPROVED** as follows:

a. By no later than 14 days before the opt-out and objection deadline established by the Court in connection with DPPs' settlement with Cantex Inc., Diamond

Plastics Corporation, Prime Conduit, Inc., Sanderson Pipe Corporation, and Southern Pipe, Inc. (the "Cantex Settlement"), DPPs may file with this Court a petition for fees, expenses, and service awards from the Settlement Funds created by the finally-approved OPIS, Westlake, Atkore, Otter Tail, and Pipelife Settlements.

b. Promptly after filing any such petition, DPPs must make a copy of that filing available to Settlement Class Members on the Settlement Website: www.PVCPipeDirectClass.com.

c. On or before the deadline for Settlement Class Members to object to or opt out of the Cantex Settlement, Settlement Class Members may respond to the petition.

d. DPPs will present the petition to the Court on _____, 2027.

4. Direct Purchaser Plaintiffs' Notice of (1) Plan of Distribution, (2) Claim Form, and (3) Forthcoming Application for Expenses and Attorneys' Fees, Exhibit 3 hereto, and Notice Packet Summary, Exhibit 4 hereto, are hereby **APPROVED**.

SO ORDERED.

DATED: _____

ENTERED:

_____
LASHONDA A. HUNT
United States District Judge

EXHIBIT 1

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 Plaintiff Actions	Case No. 24-cv-07639 Hon. LaShonda A. Hunt

THE DIRECT PURCHASER PLAINTIFFS' PROPOSED PLAN OF DISTRIBUTION FOR THE SETTLEMENT CLASSES

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The Direct Purchaser Plaintiffs Bill Wagner & Son, Inc., Vitolite Electric Sales Co., Hodges Supply Company and Saffron Supply Company, Inc. (collectively, "DPPs"), individually and on behalf of the Settlement Classes (defined below), hereby submit this proposed Plan of Distribution to allocate among the members of the Settlement Classes the settlement funds received from the settlements with Oil Price Information Service, LLC ("OPIS"), Westlake Corporation and Westlake Pipe & Fittings Corporation ("Westlake"), Atkore Inc., Atkore International, Inc., Atkore Plastic Pipe Corp., Atkore RMCP, Inc. and Allied Tube & Conduit Corporation ("Atkore"), Otter Tail Corporation, Northern Pipe Products, Inc., and Vinyltech Corporation ("Otter Tail") and Pipelife Jet Stream, Inc. ("Pipelife"), plus any interest (less taxes) earned on the settlement funds, net of any Court-approved attorneys' fees, service awards, and Court-approved expenses, including settlement-related costs and expenses (the "Net Settlement Funds").

I. OVERVIEW

DPPs propose a unified distribution plan for the Net Settlement Funds from DPPs' settlements with OPIS, Westlake, Atkore, Otter Tail, and Pipelife. As explained below, DPPs' Plan of Distribution distributes funds on a *pro rata* basis, which follows other class action distributions approved in this District.[1] Each claimant's *pro rata* share would be based on its

[1] Courts in the Northern District of Illinois have routinely upheld *pro rata* distribution plans in class action settlements. *Kleen Prods. LLC v. Int'l Paper Co.*, No. 1:10-cv-05711, 2017 WL 5247928, at *3 (N.D. Ill. Oct. 17, 2017) (*pro rata* distribution fair and reasonable); *Standard Iron Works v. ArcelorMittal*, No. 08 C 5214, 2014 WL 7781572, at *1-2 (N.D. Ill. Oct. 22, 2014) (finding a *pro rata* distribution plan in a large antitrust class action settlement fair and reasonable); *In re Cap. One Tel. Consumer Prot. Act Litig.*, 80 F. Supp. 3d 781, 789-91 (N.D. Ill. 2015) (approving large consumer class action settlement with *pro rata* distribution plan); *Douglas v. W. Union Co.*, 328 F.R.D. 204, 217 (N.D. Ill. 2018) (same); *Gehrich v. Chase Bank USA, N.A.*, 316 F.R.D. 215, 222-23 (N.D. Ill. 2016) (*pro rata* shares of the settlement fund based on the number of collection calls received by plaintiffs).
Specifically, for price-fixing class actions, the *pro rata* distribution method has been found to be "the most appropriate" method. *In re Brand Name Prescription Drugs Antitrust Litig.*, No. 94 C 897, 1999 WL 639173, at *4 (N.D. Ill. Aug. 17, 1999); *see also Kleen Prods.*, 2017 WL 5247928, at *3; *Standard Iron Works*, 2014 WL 7781572, at *1-2.

total purchases[2] across all Defendants in the case, which tracks the joint and several liability principles that apply to antitrust conspiracy claims. By applying the same approach to all claimants in the settlement classes, the proposed plan treats Settlement Class Members consistently and fairly.

The proposed Plan of Distribution is also tailored to the current posture of the litigation to promote efficiency and reduce expenses in claims administration. Following the Court's order authorizing a combined notice for the Westlake, Atkore, and Otter Tail settlements, DPPs' plan proposes the use of one claim form for all of the settlements to minimize Class member confusion and administrative expense. Specifically, the proposed unified claim form reduces confusion arising from the fact that there are two defined settlement classes which will receive distributions: (1) the OPIS settlement class; and (2) the Westlake, Atkore, Otter Tail, and Pipelife settlement class. The definitions for those settlement classes are almost, but not entirely, coextensive. The OPIS settlement class consists of direct purchasers of PVC Pipe from the Converter Defendants[3] during the period April 1, 2021 through May 16, 2025, and the Westlake, Atkore, Otter Tail and Pipelife settlement class consists of direct purchasers of PVC Pipe and/or Fittings from the Converter Defendants during the period January 1, 2020 through March 31, 2026. A unified claims

[2] Throughout this Plan of Distribution, "purchases" refers to net dollar purchases (that is, purchases net of any returns, credits, or rebates).

[3] The Converter Defendants include the following manufacturers of PVC Pipe and Fittings: Atkore Inc. (and subsidiaries/divisions/affiliated brands Atkore International, Inc., Atkore Plastic Pipe Corp., Allied Tube & Conduit Corporation, Atkore RMCP, Inc., Heritage, Queen City Plastics, Rocky Mountain Colby Pipe a/k/a RMCP, Inc. n/k/a Cor-Tek); Cantex Inc.; Charlotte Pipe and Foundry Co.; Cresline Plastic Pipe Co.; 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; and Westlake Corporation and Westlake Pipe & Fittings Corporation. While Converter Defendants Charlotte Pipe & Foundry Co. ("Charlotte") and Cresline Plastic Pipe Co. ("Cresline") had not been named as Defendants when the DPP-OPIS Settlement Agreement was executed on May 16, 2025 and purchases from Charlotte Pipe and Cresline are not included in the OPIS settlement class, DPPs named these defendants in their August 18, 2025 Second Consolidated Amended Class Action Complaint and purchases from Charlotte Pipe and Cresline are included in the Westlake, Atkore, Otter Tail and Pipelife settlement class.

process is justified even with those differences because all members of the OPIS settlement class fall entirely within the Westlake/Atkore/Otter Tail/Pipelife class definition and the OPIS settlement funds represent only 1.5% of the Net Settlement Funds across all the settlements.

In addition, a unified claims process with one claim form appropriately reduces the overall burden on claimants. In particular, while JND Legal Administration, DPPs' Court-appointed Settlement Administrator (hereinafter, "JND" or "Settlement Administrator"), has been provided with the names and addresses of the Converter Defendants' customers of PVC Pipe and/or Fittings for these time periods so notice of these settlements could be effectuated by direct mail and other means, DPPs have not been provided with transaction data from all of the Converter Defendants for the entire time period of January 1, 2020 through March 31, 2026.[4] Accordingly, DPPs cannot ascertain from all Converter Defendants' sales transaction data the total purchase volumes of Settlement Class Members. Therefore, it will not be possible to pre-populate claim forms with Settlement Class Members' total purchases.

Recognizing that Settlement Class Members will have to determine their total purchase amounts for the claim form, the proposed Plan of Distribution detailed below has been drafted to make completion of one claim form as easy as possible for all members of the Settlement Classes. DPPs submit that the proposed unified Plan of Distribution should be approved because it is a practical and reasonable way to allocate the Net Settlement Funds and is fair to Settlement Class Members.

II. THE PROPOSED CLAIM FORM AND CLAIMS PROCESS

1. The Claim Form

[4] DPPs have received some transaction data from Settling Defendants Atkore, Otter Tail and Pipelife but the time periods of these data productions vary and represent only a fraction of the overall market for PVC Pipe and Fittings for the relevant time period.

The Claim Form does not require Settlement Class Members to separately identify their purchases covered by only the OPIS class definition because (1) those purchases are also covered by the class definition for the Westlake, Atkore, Otter Tail, and Pipelife settlements and (2) it would be inefficient to separate those transactions due to the fact that the OPIS settlement represents less than 1.5% of the money to be distributed under this Plan of Distribution.

Requiring Settlement Class Members to separately identify and allocate their purchases between the two Settlement Classes, and to report those purchases on separate time-period and product-specific bases, would impose substantial and unnecessary administrative burdens on both the Settlement Class Members and the Settlement Administrator. For instance, rather than simply identifying all purchases from a given Converter Defendant for the entire time period, absent the straightforward approach proposed here, Settlement Class Members would need to disaggregate purchases made during three separate periods: (1) January 1, 2020 through March 31, 2021; (2) April 1, 2021 through May 16, 2025; and (3) May 17, 2025 through March 31, 2026.

To avoid those unnecessary burdens and to facilitate the efficient administration of the distribution of these settlements, the Claim Form does not require Settlement Class Members to separately identify their purchases of PVC Pipe and/or Fittings for each applicable time period. Instead, the Claim Form requests the Settlement Class Member's qualifying purchases of PVC Pipe and/or Fittings for the entire period from January 1, 2020 through March 31, 2026. This approach also permits the Settlement Administrator to make use of the partial sales-transaction data currently available for Atkore, Otter Tail, and Pipelife to audit the claims. Although those sales-transaction data sets are not complete, DPPs may obtain additional transaction data through future settlements, which may provide additional information to assist in verifying claims.

In addition, although the OPIS settlement class definition does not include purchases from Charlotte Pipe and Cresline, the 1.5% of funds in the distribution that derive from the OPIS Settlement will be allocated to include Settlement Class Members' qualifying purchases from Charlotte Pipe and Cresline. This avoids—for a small subset of the overall Net Settlement Funds—unnecessary administrative burdens and streamlines efficiency for Settlement Class Members and the Settlement Administrator. And the Claim Form's use of a single reporting period for PVC Pipe and/or Fittings does not deprive any Settlement Class Member of compensation attributable to qualifying purchases covered by the other settlements. DPPs believe that the proposed Plan of Distribution is fair and reasonable and that there should be no need to create a separate process for the members of the OPIS settlement class, who are also members of the other Settlement Class.

The standard in the Seventh Circuit for both settlements and plans of distribution is whether they are fair and reasonable. *See In re Clearview AI, Inc. Consumer Priv. Litig.,* 181 F.4th 785, 791 (7th Cir. 2026); *Schulte v. Fifth Third Bank*, 805 F. Supp. 2d 560, 589 (N.D. Ill. 2011) (approving claim form after finding that it was not "unduly burdensome, long, or complex"). Small differences in groups of settling plaintiffs/subclasses, in this case the OPIS settlement class, should not necessitate a separate claims process. *Id.* at 592-93; *see also Douglas*, 328 F.R.D. at 217-18 (finding uniform treatment through a single claims process was fair even when individual damages varied). Courts in the Northern District of Illinois are permissive to counsel when structuring the settlement claims process, especially when a more complex process "would be administratively unmanageable or, if not, would entail vastly increased administrative expenses, reducing the amount available to claimants." *Id.* at 217 (citing *In re Cap. One*, 80 F. Supp. 3d at 793). Moreover, a unified claims process reduces the "complexity, length and expense" of the entire process, keeping more money in the settlement fund, another plus factor the Seventh Circuit looks for in

evaluating class action settlements and distribution plans. *See Wong v. Accretive Health, Inc.*, 773 F.3d 859, 863 (7th Cir. 2014).

2. The Claims Process

All returned Claim Forms shall be reviewed and processed by the Settlement Administrator with assistance from DPP Settlement Class Counsel as required and appropriate. The Settlement Administrator shall first determine whether a Claim Form is properly completed and signed. If a Claim Form is incomplete or deficient, the Settlement Administrator shall communicate with the Claimant.

The Claim Form shall require the following:

a) a breakdown by the Settlement Class Member of the dollar value of its PVC Pipe and Fittings purchases in the United States and its territories directly from one or more of the Converter Defendants (or from any of the Converter Defendants' parents, predecessors, subsidiaries or affiliates) for the period January 1, 2020 through March 31, 2026;

b) authorization to the Settlement Administrator to contact the Settlement Class Member or its representative, as the Settlement Administrator deems appropriate, for more information and/or to audit the Claim;

c) a certification that the information submitted in the Claim is true and correct; and

d) if the Claim is submitted by a third-party on behalf of a Settlement Class Member (including a parent company claiming on behalf of a subsidiary or affiliate), the third-party must provide a signed statement from that Settlement Class Member authorizing the third-party to file the Claim on its behalf.

3. The Online Claims Portal

While the Claim Form shall be mailed to Settlement Class Members where an address has been provided by Converter Defendants, the Settlement Administrator shall create an online claims portal that Settlement Class Members can access in order to file a Claim and shall provide the necessary administrative support to enable and encourage Settlement Class Members to do so. The online claims portal shall contain fields that require the Settlement Class Member to provide all applicable information required as part of the Claim, in accordance with this Plan of Distribution.

4. The Claims Filing Process

Settlement Class Members will be encouraged to complete and submit a Claim electronically using the online claims portal. Alternatively, they may mail their completed Claim Forms to the Settlement Administrator. Claims must be submitted to the online claims portal or postmarked to the Settlement Administrator's address on or before the Claim Filing Deadline.

Where a Settlement Class Member has been identified by the Converter Defendants, the Settlement Administrator shall provide to the Settlement Class Member, in writing, by email or regular mail, its Unique ID and PIN to permit that Settlement Class Member access to the online claims portal.

5. Assistance in Filing a Claim

Settlement Class Members can contact the Settlement Administrator or DPP Settlement Class Counsel, at no charge, for assistance in the completion of their Claim. If a Settlement Class Member chooses to use a third-party claims service, a lawyer of its own choosing, or similar services (excluding the Settlement Administrator or DPP Settlement Class Counsel), the Settlement Class Member will be responsible for any expenses arising from those additional and individual services.

6. Audits

Where any of the Settling Defendants have provided customer purchase details for a Settlement Class Member, the Settlement Administrator may use that information to verify the Claim and to identify discrepancies or other issues requiring additional review, including audit.

An audit shall require proof of the Settlement Class Member's PVC Pipe and/or Fittings Purchases:

a. proof of purchase of the Settlement Class Member's PVC Pipe and/or Fittings Purchases may include, but is not limited to, invoices, receipts, purchase records, historical accounting records, or comparable verification that is acceptable to the Settlement Administrator;

b. Settlement Class Members who cannot satisfy the evidentiary requirements of (a) can provide a declaration attesting to the purchase and value of the purchase, together with a credit card statement, a bank statement, cancelled check, wire transfer confirmations, or comparable verification that is acceptable to the Settlement Administrator; or

c. where a Settlement Class Member has extrapolated its PVC Pipe and/or Fittings Purchases, the Settlement Class Member must provide a sworn statement explaining the basis for, and methodology used in, calculating the extrapolated purchases.

At its sole discretion, the Settlement Administrator, in conjunction with DPP Settlement Class Counsel, may reject a Claim, in whole or in part, where, in the Settlement Administrator's view, the Settlement Class Member has submitted insufficient or false information or has otherwise engaged in fraudulent conduct.

7. Deficiencies

If, during claims processing, the Settlement Administrator finds that deficiencies exist in a Claim or other information is required, the Settlement Administrator shall notify the Settlement Class Member, by email where available, otherwise via regular mail, of the deficiencies. The Settlement Class Member shall have thirty (30) days from the date of such notice to submit its deficiency response. If the deficiencies are not corrected within thirty (30) days, the Settlement Administrator shall reject the Claim without prejudice to the right of the Settlement Class Member to cure the deficiencies, provided the Settlement Class Member is able to meet established deadlines and other requirements set forth herein.

The Settlement Administrator shall not accept Claims postmarked or electronically submitted after the Claims Filing Deadline, but, if otherwise complete, a late claim shall be marked as a "late approved claim." Claimants that submit "late approved claims" may receive distributions from the Net Settlement Funds with the approval of DPP Settlement Class Counsel and the Court. If DPP Settlement Class Counsel conclude that any "late approved claim" should not be accepted, the Claimant shall be so notified and then may seek review by the Court via the appeals process described below.

8. Settlement Administrator's and Settlement Counsel's Decision

For each Settlement Class Member who has filed a Claim in accordance with this Plan of Distribution, the Settlement Administrator, in consultation with DPP Settlement Class Counsel, shall:

(a) decide whether the Settlement Class Member is eligible to receive settlement benefits payable from the Net Settlement Funds in accordance with the Settlement Agreements, Orders of the Court and this Plan of Distribution; and

(b) determine the value of the Settlement Class Member's PVC Pipe and/or Fittings Purchases for which the Settlement Class Member is entitled to settlement benefits in accordance with the Settlement Agreements, Orders of the Court and this Plan of Distribution.

The Settlement Administrator shall send to the Settlement Class Member, by email where available, otherwise via regular mail, a decision as to the approval or rejection of the Claim and the determination of the approved PVC Pipe and/or Fittings Purchases (the "Decision Notice").

The Settlement Administrator's decision will be binding upon the Settlement Class Member as outlined in this Plan of Distribution.

9. Processing Challenged Claims

The Settlement Administrator, in conjunction with DPP Settlement Class Counsel, shall review all written challenges by Claimants to the determinations of the Settlement Administrator. If upon review of a challenge and supporting documentation, the Settlement Administrator decides to amend or modify its determination, the Settlement Administrator shall advise the Claimant who made the challenge. These determinations shall be final, subject to the appeals process described in the "Resolution of Disputes" section below.

Where the Settlement Administrator determines that a challenge requires additional information or documentation, the Settlement Administrator will so advise the Claimant and provide that Claimant an opportunity to cure the deficiency within 30 days, as set forth in the "Deficiencies" section above. If that Claimant fails to cure the deficiency within that time, the challenge may be rejected and the Claimant will be notified of the rejection of its challenge, which notification shall be deemed final, subject to any appeal and decision by the Court.

If the Settlement Administrator concludes that it has enough information to properly evaluate a challenge and maintains that its initial determination was correct, the Settlement Administrator shall so inform the Claimant in writing, which notification shall be deemed final subject to any decision by the Court.

10. Report to the Court Regarding Distribution of Net Settlement Funds

After the Settlement Administrator reviews all submitted Claims and determines the amount each Claimant is entitled to receive from the Net Settlement Funds, the Settlement Administrator will prepare a final report for the Court's review and approval, which DPP Settlement Class Counsel shall file as a motion seeking Court approval of the distribution (the "Distribution Motion"). The report will explain the tasks and methodologies employed by the Settlement Administrator in processing the Claims and administering the Plan of Distribution. It will also contain: (a) a list of the Claimants (if any) who filed Claim Forms that were rejected, and the reasons for said rejection; (b) a list of challenges (if any) made by Claimants, and the disposition of any such challenges; and (c) the date any such Claimant whose challenge was rejected was informed by the Settlement Administrator. Notice of the Distribution Motion shall be provided to all Claimants with a disputed claim, which has not been resolved, and they shall be afforded an opportunity to challenge any rejection of their claim or any portion of it.

11. Resolution of Disputes

Any such response by a Claimant to the Distribution Motion must be submitted in writing to the Court, with copies to the Settlement Administrator and DPP Settlement Class Counsel, within the time limit provided by the Local Rules for responses to motions or by a date otherwise set by the Court.

12. Payment of Claims

After the Court has approved the Distribution Motion, the Settlement Administrator shall arrange to pay approved claims as expeditiously as possible. Payments of settlement benefits to Settlement Class Members will be made by check, or by wire transfer if so elected by claimants who will receive a payment of more than $500,000.

It is anticipated that the Net Settlement Funds will be distributed in their entirety in a single distribution. However, subject to further order of the Court, any monies from the Net Settlement Funds that remain unclaimed after the first distribution shall, if economically feasible, be distributed to Settlement Class Members in an additional distribution or distributions on the basis of the same calculations of the Settlement Class Members' *pro rata* shares.

Insofar as the Net Settlement Funds include residual funds after distribution or distributions as set forth in the preceding sections that cannot be economically distributed to the Settlement Class Members (because of the costs of distribution as compared to the amount remaining), such funds may be retained while this litigation continues and, with Court approval, distributed with subsequent distributions, awarded as attorneys' fees, or to reimburse litigation expenses.

EXHIBIT 2

PVC PIPE DIRECT PURCHASER SETTLEMENT CLAIM FORM

This Claim Form is for partial Settlements, which have been finally approved by the Court, in a class action lawsuit called *In re PVC Pipe Antitrust Litigation*, Case No. 1:24-cv-07639, pending in the United States District Court for the Northern District of Illinois. Direct Purchaser Plaintiffs ("DPPs") allege that Defendants conspired to fix, raise, maintain, and stabilize the price of PVC Pipe and/or Fittings, and that DPP Settlement Class Members paid higher prices for PVC Pipe and/or Fittings as a result. The Court has not decided who is right. You previously received notice of the settlements detailed below and were afforded the opportunity to exclude yourself from the settlements. If you did not exclude yourself from all of the settlements, you should file this Claim Form. You may be eligible to share in the settlements from which you have not chosen to be excluded.

You may be a DPP Settlement Class Member if you or your company purchased PVC Pipe and/or Fittings in the United States and/or its territories directly from one or more Converter Defendants (or from any of the Converter Defendants' parents, predecessors, subsidiaries or affiliates) listed below between January 1, 2020, and March 31, 2026.

Atkore Inc.
Allied Tube & Conduit Corp.
Heritage Plastics, Inc.
Queen City Plastics, Inc.
Cor-Tek (Rocky Mountain Colby Plastics, Inc.)
Cantex Inc.
Charlotte Pipe and Foundry Co.
Cresline Plastic Pipe Co.
Diamond Plastics Corporation
Prime Conduit, Inc.
Sanderson Pipe Corporation
Southern Pipe, Inc.
IPEX USA, LLC
JM Eagle (J-M Manufacturing Company, Inc.)
National Pipe & Plastics, Inc.
Pipelife Jet Stream, Inc.
Otter Tail Corporation
Northern Pipe Products, Inc.
Vinyltech Corporation
Westlake Corporation
Northern America PVC Pipe Corporation (Westlake Pipe & Fittings Corporation)

The Settlements are **partial** because the litigation is continuing against certain Converter Defendants. The following settlements have been finally approved by the Court and proceeds from these settlements will be distributed to eligible Settlement Class Members for this distribution:

1. Atkore Inc., Atkore International, Inc., Atkore Plastic Pipe Corp., Atkore RMCP, Inc., Allied Tube & Conduit Corporation, and affiliated brands Heritage, Queen City Plastics, Rocky Mountain Colby Pipe a/k/a RMCP, Inc. n/k/a Cor-Tek - $72.5 million
2. Westlake Corporation and Westlake Pipe & Fittings Corporation - $67 million
3. Otter Tail Corporation, Northern Pipe Products, Inc., and Vinyltech Corporation - $39.5 million
4. Pipelife Jet Stream, Inc. - $19.16 million

A settlement has also been reached with defendant Oil Price Information Service, LLC (OPIS) – $3 million – and proceeds from that settlement will also be used to pay claims. The Court has approved the dissemination of this Claim Form and the Plan of Distribution governing it, which may be viewed at www.PVCPipeDirectClass.com.

The information you provide on this Claim Form may also be used for distributions from future settlements if and when they receive final approval by the Court and as authorized by the Court. Consistent with the Notices you received for these Settlements, the amount to be distributed will include interest but may be reduced for taxes, expenses, service awards, and/or attorneys' fees.

By _____, 2027, Counsel for DPPs intend to file an application for expenses and attorneys' fees to be paid from the Settlement Funds for these five settlements before a distribution is made. That application will be posted on www.PVCPipeDirectClass.com promptly after it is filed. If you have any comments or objections with respect to the application, you may submit them to the Court in writing on or before _____, 2027. The Court will hold a hearing on the application on _____, 2027, at _____ a.m. at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604, in Courtroom _____.

To read more about the Settlements, including copies of the Long Form Notices and Settlement Agreements, please

To get a payment, you must submit a Claim Form by [DEADLINE].

The fastest and easiest way to submit a claim is online at www.PVCPipeDirectClass.com.

You may also complete the Claim Form below and return it by mail to:

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

Only **one Claim Form** is needed per DPP Settlement Class Member, even if you received multiple notices.

UNIQUE ID:	[Unique ID]
PIN:	[PIN]

SECTION A: CLAIMANT INFORMATION		
CONTACT NAME:		
COMPANY NAME:	[Company Name]	
CURRENT ADDRESS:	Street	
	City	State/Province
	Postal Code	Country
PHONE NUMBER:	( )	
EMAIL ADDRESS:		

SECTION B: PURCHASE INFORMATION

Please use the chart below to provide the total value in U.S. dollars of PVC Pipe and/or Fittings purchased in the United States **directly** from each Converter Defendant. "PVC Pipe and/or Fittings" refers to pipe and fittings made in whole or in part with polyvinyl chloride ("PVC"), as defined in each Settlement Agreement.

Please note that you are not required to submit documentation with your Claim Form. If documentation is required to verify your claim, the Settlement Administrator will contact you directly to request it. Examples of acceptable documentation include receipts, invoices, or other payment documents naming the purchaser and seller. If you would like to provide structured transactional data from your business records with dates, vendors, and payment information, contact the Settlement Administrator at info@PVCPipeDirectClass.com or 1-855-779-9069.

Manufacturer (including affiliates)	**January 1, 2020 – March 31, 2026**
Atkore (Atkore International, Atkore Plastic Pipe, Allied Tube & Conduit, Atkore RMCP, Heritage, Queen City Plastics, Rocky Mountain Colby Pipe, RMCP, Cor-Tek)	$_____
Cantex (Diamond Plastics, Prime Conduit, Sanderson Pipe, and Southern Pipe)	$_____
Charlotte Pipe & Foundry	$_____
Cresline Plastic Pipe	$_____
IPEX USA	$_____
JM Eagle	$_____
National Pipe & Plastics	$_____
Otter Tail (Northern Pipe and Vinyltech)	$_____
Pipelife Jet Stream	$_____
Westlake (Northern America PVC Pipe Corporation, NAPCO)	$_____

SECTION C: CERTIFICATION

By signing below, I certify that (1) the above and foregoing information is true and correct; (2) I am duly authorized and have the legal capacity to sign this Claim Form on behalf of the Direct Purchaser entity; (3) the Direct Purchaser entity has not excluded itself from all five of the settlements; (4) I agree to submit additional information, if requested, in order for the Settlement Administrator to process this Claim; and (5) I authorize the Settlement Administrator to contact me or my representative, as the Settlement Administrator deems appropriate, to request additional information to process my Claim.

SIGNATURE:	
PRINTED FULL NAME:	
TITLE:	
COMPANY NAME:	
DATE:	

EXHIBIT 3

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

Notice of (1) Plan of Distribution, (2) Claim Form, and (3) Forthcoming Application for Expenses and Attorneys' Fees

- On November __, 2026, the Court approved a Plan of Distribution and the enclosed Claim Form for Direct Purchaser Plaintiffs ("DPPs") to distribute settlement funds (including interest, but less taxes and any Court-approved deductions for expenses and/or attorneys' fees) from the five finally approved settlements with the following defendants: (1) Oil Price Information Service, LLC ("OPIS"); (2) Atkore Inc., Atkore International, Inc., Atkore Plastic Pipe Corp., Atkore RMCP, Inc., Allied Tube & Conduit Corporation, and affiliated brands Heritage, Queen City Plastics, Rocky Mountain Colby Pipe a/k/a RMCP, Inc. n/k/a Cor-Tek (collectively, "Atkore"); (3) Westlake Corporation and Westlake Pipe & Fittings Corporation (collectively, "Westlake"); (4) Otter Tail Corporation ("Otter Tail"), Northern Pipe Products, Inc. ("Northern Pipe"), and Vinyltech Corporation ("Vinyltech"); and (5) Pipelife Jet Stream, Inc. ("Pipelife"). You may have previously received one or more Court-approved notices regarding these five settlements. The Plan of Distribution, and the Court's order approving it, may be viewed at www.PVCPipeDirectClass.com.

- Under the Plan of Distribution, by _____, 2027, Settlement Class Members who want to receive a share of the settlement funds from these five settlements must complete the enclosed Claim Form and submit it to the Settlement Administrator for processing. The enclosed Claim Form has a unique ID number and PIN, allowing you to submit your completed Claim Form electronically through the Settlement Administrator's secure online portal at www.PVCPipeDirectClass.com. This must be done by _____, 2027. If you prefer to submit a paper copy of your completed Claim Form to the Settlement Administrator via mail, it must be postmarked by _____, 2027, and mailed to: In re PVC Pipe Antitrust Litigation, c/o JND Legal Administration, P.O. Box 91211, Seattle, WA 98111. The Plan of Distribution allows the Settlement Administrator to audit your claim during processing. If you have questions, you may contact the Settlement Administrator at 1-855-779-9069 or info@PVCPipeDirectClass.com.

- By _____, 2027, the Court-appointed lawyers for the DPPs intend to file an application for expenses and attorneys' fees to be paid from the settlement funds from these five settlements. That application will then be promptly posted for Settlement Class Members to review on www.PVCPipeDirectClass.com. Settlement Class Members who object to the lawyers' application for expenses and attorneys' fees may write to the Court to explain why. You can still submit your Claim Form and receive your share of the settlement funds even if you object to the lawyers' application. You **must** mail your objection postmarked by _____, 2027, to the Court **and** the Court-appointed lawyers for the DPPs:

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

Interim Lead Counsel for the DPPs
Robert N. Kaplan
Matthew P. McCahill
Kaplan Fox & Kilsheimer, LLP
800 Third Avenue, 38th Floor
New York, New York 10022

- The Court will hold a hearing with respect to the application for expenses and fees on _____, 2027, at _____ a.m. at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604, in Courtroom _____. Please check the settlement website at www.PVCPipeDirectClass.com for any updates regarding the Court's hearing.

A federal court authorized this Notice. This is not a solicitation from a lawyer or a claims filing service. If you receive communications from third parties, those communications were not approved or authorized by the Court. You do not need to retain a claims filing service to submit a Claim Form or receive a payment from these Settlements.

DATED: Month x, 2026

The Honorable LaShonda A. Hunt

EXHIBIT 4

PVC PIPE DIRECT PURCHASER SETTLEMENTS

Settlements have been reached in a class action lawsuit claiming that Defendants conspired to fix, raise, maintain, and stabilize the price of PVC Pipe and/or Fittings.

You are a Direct Purchaser Plaintiff ("DPP") Class Member if you or your company purchased PVC Pipe and/or Fittings in the United States and/or its territories **directly** from one or more of the Converter Defendants at any time from January 1, 2020, through March 31, 2026. A full list of the Converter Defendants is in the Long Form Notice and the Claim Form.

This mailing includes the following documents:

1. Notice of (1) Plan of Distribution, (2) Claim Form, and (3) Forthcoming Application for Expenses and Attorneys' Fees
2. Claim Form for the five finally approved PVC Pipe DPP Settlements
3. Long Form Notice for the additional PVC Pipe DPP Cantex Settlement

DPP Class Members have the following options:

1. **Submit a Claim Form** by _____, **202X,** to receive payment from the five finally approved Settlement Funds.
2. **Object to (a) the Cantex Settlement, (b) the application for expenses and attorneys' fees, or (c) both by _____, 202X,** if you disagree with the Cantex Settlement and/or the lawyers' application for expenses and attorneys' fees.
3. **Exclude Yourself (or Opt Out) from the Cantex Settlement** by _____, **202X,** to give up your right to receive payment from the Cantex Settlement and have the option to bring your own separate lawsuit against Cantex for the claims the Cantex Settlement resolves.
4. **Do nothing**. If you do not submit a Claim Form, you will not receive a payment from the five finally approved DPP Settlements. If you do not exclude yourself from the Cantex Settlement, you will remain a Class Member of the Cantex Settlement, be eligible to receive payment from the Cantex Settlement in the future and give up your right to sue Cantex as described in the Long Form Notice.

The Court has scheduled a hearing on _____, 202X, at xx:xx x.m. CT at the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Courtroom ____, Chicago, Illinois, to consider whether to approve the Cantex Settlement. The Court will also consider at that time Class Counsel's application for expenses and attorneys' fees, as well as any objections.

FOR MORE INFORMATION:



Visit: www.PVCPipeDirectClass.com



Email: info@PVCPipeDirectClass.com



Call: 1-855-779-9069



Write: PVC Pipe Direct Purchaser Settlement
c/o JND Legal Administration
P.O. Box 91211
Seattle, WA 98111

