

If You Directly Purchased Ductile Iron Pipe Fittings between January 11, 2008 and December 31, 2013, You Could Be Affected by a Proposed Class Action Settlement

Please read the entire Notice carefully. These Settlements may affect your rights.

What is this lawsuit about?

There is a Proposed Settlement, in a class action lawsuit called *In re Ductile Iron Pipe Fittings* (“DIPF”) *Direct Purchaser Antitrust Litigation*, which is pending in the United States District Court for the District of New Jersey. The defendants in this lawsuit are McWane, Inc. and its divisions Clow Water Systems Co., Tyler Pipe Company, and Tyler Union (collectively “McWane”); SIGMA Corporation and its subsidiary SIGMA Piping Products Corporation (together, “SIGMA”); and Star Pipe Products, Ltd. (“Star”).

The McWane settlement is in addition to two earlier settlements with defendants SIGMA and Star.

This lawsuit alleges that from January 11, 2008 through September 21, 2009, defendants engaged in a conspiracy to fix prices for DIPF in the United States in violation of the antitrust laws. Plaintiffs also claim that from September 22, 2009 through December 31, 2013, defendant McWane illegally monopolized, and defendants SIGMA and McWane conspired to restrain trade and monopolize, the market for Domestic DIPF in the United States in violation of the antitrust laws. Defendants deny all of plaintiffs’ allegations.

Am I a Class Member?

The **McWane Settlement** has three classes: (1) All persons or entities in the United States that purchased Open-Spec DIPF directly from any Defendant at any time from January 11, 2008, through September 21, 2009; (2) All persons or entities in the United States that purchased Domestic DIPF directly from McWane or SIGMA at any time from September 22, 2009, through December 31, 2013; and (3) All persons or entities in the United States that purchased Domestic DIPF directly from McWane at any time from September 22, 2009, through December 31, 2013.

Excluded from the McWane Settlement Classes are certain companies that have otherwise agreed to exclude themselves from the Settlement.

Full descriptions of DIPFs and a list of excluded entities are available at www.DIPFDirectSettlement.com.

What does the Settlement provide and how do I get a payment?

Under the McWane Settlement, McWane has agreed to pay \$8,787,500. If you are a Settlement Class Member, you may be eligible to receive payment from the Settlement. To qualify for payment, you must complete and send in a valid Claim Form, available at www.DIPFDirectSettlement.com. Be sure to sign the Claim Form and mail it by first-class mail postmarked no later than June 9, 2018 to DIPF Direct Purchaser Antitrust Settlement, c/o GCG, P.O. Box 10220, Dublin, OH 43017-5720.

If the Court approves the McWane Settlement, the Net Settlement Fund will be distributed on a pro rata basis among all Settlement Class Members who submit valid and timely Claim Forms.

There are specialized companies that may offer to fill out and file your claim in return for a percentage of the

value of your claim. The Court has not authorized any of these companies to contact you. Before you contract with one of these companies, you can always seek help from the Claims Administrator or Class Counsel in filing your Claim.

Can I Exclude Myself?

If you want to keep the right to sue or continue to sue McWane about the legal issues in this case, then you must exclude yourself from the Settlement Classes. **If you exclude yourself from the Settlement Classes, you will not get any payment from the Settlement.**

To exclude yourself, you must send a letter saying that you want to be excluded. Important instructions about how to exclude yourself can be obtained from www.DIPFDirectSettlement.com. **Your letter must be postmarked by April 10, 2018.**

How Do I Object?

You can object to the Settlement if you are a Settlement Class Member and have not excluded yourself.

To object, you must send a letter to the Court. Instructions about how to object may be obtained from www.DIPFDirectSettlement.com. **Your letter must be postmarked by April 20, 2018.**

What if I do nothing?

If you do nothing, you will not receive payment, you will remain in the Classes for the McWane Settlement, and you will be bound by the Releases regarding claims in this matter. The only way to qualify for a payment from the Settlement is to send in a Claim Form.

Who Represents Me?

The Court has appointed Kit A. Pierson of Cohen Milstein Sellers & Toll PLLC and Robert N. Kaplan of Kaplan Fox & Kilsheimer LLP to represent the Settlement Class. If you want to be represented by your own lawyer, you may hire one at your own expense.

These lawyers will ask the Court to approve an award of attorneys’ fees in an amount up to \$2,929,166.67 (one-third of the total amount of the McWane Settlement), and reimbursement for costs and expenses in an amount not to exceed \$1,200,000.00, and incentive awards of up to \$15,000 for each of the eight class representatives. The request for attorneys’ fees, expenses, and incentive awards will be available for viewing on the website below once it is filed with the Court.

When will the Judge decide?

The Court will hold a Fairness Hearing to decide whether to approve the terms of the McWane Settlement at 10:00 a.m. on May 10, 2018, at the United States District Court for the District of New Jersey, 402 East State Street, Trenton, NJ 08608. You may appear at the hearing, but you are not required to do so. The hearing may be moved to a different date or time without notice. You should check the Settlement Website below for updates.

This Notice is only a summary. For more information visit the website below or call 1 (888) 298-6316.

www.DIPFDirectSettlement.com