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**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

IN RE DUCTILE IRON PIPE  
FITTINGS (“DIPF”) DIRECT  
PURCHASER ANTITRUST  
LITIGATION

Civ. No. 12-711 (AET)(LHG)

**DIRECT PURCHASER PLAINTIFFS’ NOTICE OF MOTION FOR  
FINAL APPROVAL OF SETTLEMENT**

PLEASE TAKE NOTICE THAT, in accordance with this Court’s January 10, 2018 Order [ECF No. 473], on May 10, 2018 at 10:00 a.m., the undersigned attorneys for Direct Purchaser Plaintiffs (“DPPs”) in the above-captioned action shall move before the Hon. Anne E. Thompson, U.S.D.J., Clarkson S. Fisher Building, & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order that provides for: (i) final approval by the Court of the Settlement between DPPs and McWane, Inc. and its Divisions Clow Water Systems Co., Tyler Pipe Company, and Tyler Union (collectively, “McWane”); (ii) a determination that DPPs’ Notice Plan satisfied due process requirements; (iii)

approval of DPPs' Plan of Allocation; and (iv) granting such other relief as may be proper.

In support of this motion, DPPs rely upon the Memorandum of Law in Support of DPPs' Motion for Final Approval of Settlements with Defendant McWane; the Declaration of Robert N. Kaplan in Support of DPPs' Motion for Final Approval of Settlement; the Declaration of Elana Katcher in Support of Final Approval of Settlement and DPPs' Request for Attorneys' Fees, Expenses, and Incentive Awards; and the Declaration of Lori Castaneda Regarding Notice and Settlement Administration.

A proposed form of order is submitted herewith.

DATED: April 10, 2018

/s/ Joseph J. DePalma  
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*Interim Co-Lead Counsel for  
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**CERTIFICATE OF SERVICE**

I, Karen A. Confoy, hereby certify that on this day, a true and correct copy of Direct Purchaser Plaintiffs' Notice of Motion for Final Approval of Settlement; Memorandum of Law in Support of Direct Purchaser Plaintiffs' Motion for Final Approval of Settlement; the Declaration of Robert N. Kaplan in Support of Direct Purchaser Plaintiffs' Motion for Final Approval of Settlement; the Declaration of Elana Katcher in Support of Direct Purchaser Plaintiffs' Motion for Final Approval of Settlement and for Attorneys' Fees, Expenses, and Incentive Awards; the Declaration of Lori Castaneda Regarding Notice and Settlement Administration; and Proposed Form of Order were electronically filed and served on all counsel of record via the Court's ECF system.

Dated: April 10, 2018

/s/ Karen A. Confoy  
Karen A. Confoy