

- EXHIBIT B -

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

**\$39.5 Million Class Action Settlement Reached with
Otter Tail, Northern Pipe, and Vinyltech**

If you purchased PVC Pipe and/or Fittings in the United States and its territories between January 1, 2020, and March 31, 2026, directly from any of the following companies, you may be affected:

**Atkore, Inc. (and subsidiaries/divisions and/or brands Allied Tube & Conduit Corp.,
Heritage, Queen City Plastics, Rocky Mountain Colby Pipe, and 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
Westlake Corporation
Westlake Pipe & Fittings 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 (the “Settlement”) 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 (the “Action”). The proposed Settlement is a **partial** Settlement because it includes only one group of defendants, Otter Tail Corporation (“Otter Tail”), Northern Pipe Products, Inc. (“Northern Pipe”), and Vinyltech Corporation (“Vinyltech”). The lawsuit is continuing against 11 Converter Defendants who have **not** settled. Settlements have also been reached with defendants Oil Price Information Service, LLC. (“OPIS”); Atkore Inc., Atkore International, Inc., Atkore Plastic Pipe Corp., Atkore RMCP, Inc., and Allied Tube & Conduit Corporation (collectively, “Atkore”); and Westlake Corporation and Westlake Pipe & Fittings Corporation (collectively, “Westlake”). You may have received a notice about those settlements. This is a separate Notice about an additional Settlement in this litigation.
- Under the proposed Settlement, Northern Pipe and Vinyltech have agreed to collectively pay **\$39,500,000** to create a Settlement Fund for the benefit of DPP Settlement Class Members, in exchange for a release, including the release of any and all claims against Otter Tail, Northern Pipe, Vinyltech,

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

and their Released Parties (as defined in the Settlement Agreement) relating in any way to the allegations in the Action, as set out in the Settlement Agreement. Northern Pipe and Vinyltech have also agreed to provide certain cooperation that may be useful to the DPPs in the continuing lawsuit against the non-settling Converter Defendants. Direct Purchaser Plaintiffs previously entered into settlements with OPIS (\$3 million plus cooperation), Westlake (\$67 million plus cooperation) and Atkore (\$72.5 million plus cooperation). Although the Settlement amount is lower than the amounts in the two prior settlements with Converter Defendants, it reflects Northern Pipe and Vinyltech's comparatively smaller sales base—a fraction of the size of the prior settling Converter Defendants' sales bases—and their negotiated cooperation obligations.

- The release of Otter Tail, Northern Pipe, Vinyltech, and their Released Parties does not include a release of any of the other Converter Defendants. The lawsuit is continuing against them.
- The Converter Defendants include the following manufacturers of PVC Pipe and/or Fittings: Atkore Inc. (and subsidiaries/divisions/affiliated brands Allied Tube & Conduit Corporation, RMCP, Inc., Heritage, Queen City Plastics, Rocky Mountain Colby Pipe, and 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.
- “PVC Pipe and/or Fittings,” as defined in the Settlement Agreement,” refers to pipe and fittings made in whole or in part with polyvinyl chloride (“PVC”), such as:
 - PVC pipes that carry municipal potable water (including, but not limited to, PVC pipes manufactured to AWWA C900 or ASTM D2241 standards),
 - PVC pipes that carry wastewater to sewage treatment plants (including, but not limited to, PVC pipes manufactured to ASTM D3034 or ASTM F679 standards),
 - PVC municipal drinking water pipe and PVC municipal sewer pipe,
 - PVC plumbing pipe used for household and commercial plumbing,
 - PVC conduit used as electrical conduit pipe,
 - Detachable pieces of PVC plastic that connect two or more PVC pipes, including couplings, elbows, tees, crosses, caps, plugs, adapters, bushings, nipples, and flanges, and
 - Any and all PVC pipe systems that connect PVC pipe segments and fittings into piping systems.
- This Settlement is only on behalf of Direct Purchaser Plaintiffs Bill Wagner & Son, Inc., Vitolite Electric Sales Co., and Hodges Supply Company (“DPPs”) and the DPP Settlement Class. DPPs and the DPP Settlement Class are persons and entities who purchased PVC Pipe and/or Fittings *directly* from one or more of the Converter Defendants in the United States and its territories during the period between January 1, 2020 and March 31, 2026.
- Payments to eligible DPP Settlement Class Members will be distributed following the Court's final approvals of the settlements with OPIS, Atkore, Westlake, Otter Tail, Northern Pipe, and Vinyltech. If you did not exclude yourself from the OPIS, Atkore, or Westlake settlements and you do not exclude yourself from this proposed Settlement, you will be eligible to receive payments from **all** of the settlements. If you exclude yourself from one of the settlements, you will **not** be eligible to receive a payment from that settlement. Please visit www.pvcpipedirectclass.com for updates.
- The proposed Settlement relates to a class action lawsuit brought on behalf of *direct* purchasers of

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

PVC Pipe and/or Fittings. This includes all persons or entities that purchased PVC Pipe and/or Fittings *directly* from one or more of the named Converter Defendants during the time period between January 1, 2020 and March 31, 2026. There is also a lawsuit pending in the same Court on behalf of *indirect* purchasers. This proposed Settlement applies only to *direct* purchases of PVC Pipe and/or Fittings from the Converter Defendants and does **not** apply to any *indirect* purchases of PVC Pipe and/or Fittings.

- DPPs allege that, as of January 1, 2020, and continuing until March 31, 2026, Defendants engaged in a conspiracy to inflate prices of PVC Pipe and/or Fittings in the United States and its territories, that Defendants broke the law and as a result DPP Settlement Class Members paid more for PVC Pipe and/or Fittings than they otherwise would have. The Court has not decided who is right.
- If the Court approves the Settlement, it will resolve the claims in the Action against Otter Tail, Northern Pipe, and Vinyltech only. It will also release any and all claims against Otter Tail, Northern Pipe, Vinyltech, and their Released Parties relating in any way to the allegations in the Action, as set out in the Settlement Agreement.
- **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.

Your Legal Rights and Options		
DO NOTHING	<ul style="list-style-type: none"> • Stay in the DPP Settlement Class • If the Court approves the proposed Settlement, you may be eligible for a payment. The Settlement Fund will be distributed after the Court has given final approval of this proposed Settlement. • Give up your right to separately sue or continue to sue Otter Tail, Northern Pipe, Vinyltech, or their Released Parties for any and all claims relating in any way to the allegations in the Action, as set out in the Settlement Agreement (See Question x) 	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 x) 	Month x, 202x
OBJECT TO THE SETTLEMENT	<ul style="list-style-type: none"> • Stay in the DPP Settlement Class, but write to the Court about why you don’t like the proposed Settlement (See Question x) 	Postmarked by Month x, 202x
EXCLUDE YOURSELF (“OPT OUT”)	<ul style="list-style-type: none"> • Remove yourself from the proposed Settlement on or before the exclusion deadline by following the instructions in this notice (see Question x) • Get no payment from the proposed Settlement • Keep your right to separately sue or continue to sue Otter Tail, Northern Pipe, Vinyltech, or their Released Parties for the claims described in the Settlement Agreement (See Question x) 	Postmarked by Month x, 202x

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

What this Notice Contains

BASIC INFORMATION PAGE 5

- 1. Why did I get this Notice?
- 2. What is this lawsuit about?
- 3. Who are the Defendants?
- 4. Why is this a class action?
- 5. Why is there a proposed Settlement with Otter Tail, Northern Pipe, and Vinyltech?

THE DPP SETTLEMENT CLASS PAGE 6

- 6. Am I part of the DPP Settlement Class?
- 7. I bought PVC Pipe and/or Fittings during the timeframe. Am I a DPP Settlement Class Member?
- 8. I'm still not sure if I am included.

THE BENEFITS OF THE PROPOSED SETTLEMENT PAGE 7

- 9. What does the proposed Settlement provide?
- 10. When will I get my payment?
- 11. What am I giving up by staying in the proposed Settlement?

EXCLUDING YOURSELF FROM THE PROPOSED SETTLEMENT PAGE 8

- 12. How do I get out of the proposed Settlement?
- 13. If I exclude myself, can I get money from the proposed Settlement?

THE LAWYERS REPRESENTING YOU PAGE 9

- 14. Do I have a lawyer in this case?
- 15. How will the lawyers be paid?

OBJECTING TO THE PROPOSED SETTLEMENT PAGE 10

- 16. How do I tell the Court that I do not like the proposed Settlement?
- 17. What's the difference between objecting and excluding?

THE COURT'S FAIRNESS HEARING PAGE 11

- 18. When and where will the Court decide whether to approve the proposed Settlement?
- 19. Do I have to come to the hearing?
- 20. May I speak at the hearing?

IF YOU DO NOTHING PAGE 12

- 21. What happens if I do nothing at all?

GETTING MORE INFORMATION PAGE 12

- 22. How can I get more information?

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

Basic Information

1. Why did I get this Notice?

You received this Notice because you or your company may have purchased PVC Pipe and/or Fittings **directly** from one or more of the Converter Defendants between January 1, 2020 and March 31, 2026.

The Court has directed that this Notice be sent to you because, as a possible DPP Settlement 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.

U.S. District Judge 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 Defendants that have settled the lawsuit brought by the direct purchasers are OPIS (\$3 million settlement plus cooperation), for which the Final Approval hearing is scheduled for June 3, 2026, and Westlake (\$67 million settlement plus cooperation) and Atkore (\$72.5 million settlement plus cooperation), for which the Final Approval Hearings are October 1, 2026. You have or will receive notices of these settlements. The Direct Purchaser Plaintiffs have now entered into a Settlement with Otter Tail Corporation and its subsidiaries Northern Pipe Products, Inc. and Vinyltech Corporation. As part of this Settlement, Northern Pipe and Vinyltech will provide \$39.5 million, plus cooperation. This Notice is about this Settlement. While this Settlement is for less than the Westlake and Atkore settlements, it reflects Northern Pipe and Vinyltech's comparatively smaller sales base—a fraction of the size of the prior settling Converter Defendants' sales bases—and their negotiated cooperation obligations. The lawsuit is continuing against the other non-settling 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 and/or Fittings starting as early as January 1, 2020, and continuing until March 31, 2026, 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.

As set forth above, DPPs have reached a proposed Settlement with Otter Tail, Northern Pipe, and Vinyltech. While Otter Tail, Northern Pipe, and Vinyltech do not concede or admit liability for DPPs' allegations, they have agreed to settle this action to avoid the uncertainties and risks of further litigation. The lawsuit is proceeding against the non-settling Converter Defendants.

3. Who are the Defendants?

Otter Tail, Northern Pipe, and Vinyltech and the other Converter Defendants are collectively called Converter Defendants. The Converter Defendants are: Atkore Inc. (and subsidiaries/divisions/affiliated brands Allied Tube & Conduit Corporation, RMCP, Inc., Heritage, Queen City Plastics, Rocky Mountain Colby Pipe, and 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

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

Westlake. OPIS is also a Defendant. As set forth above, DPPs have settled with OPIS, Atkore, and Westlake.

4. Why is this a class action?

In a class action, one or more individuals or entities called class representative 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 Otter Tail, Northern Pipe, and Vinyltech?

The Court did not decide in favor of the DPPs or Otter Tail, Northern Pipe, and Vinyltech. Instead, both sides agreed to the proposed Settlement to avoid the cost and risk of continued litigation and a trial. The proposed Settlement does not mean that any law was broken or that Otter Tail, Northern Pipe, and Vinyltech did anything wrong. DPPs and their counsel believe the proposed Settlement is the best result for all DPP Settlement Class Members. The lawsuit is continuing against the remaining non-settling Converter Defendants.

The DPP Settlement Class

6. Am I part of the DPP Settlement Class?

You are a DPP Settlement Class Member if you or your company purchased PVC Pipe and/or Fittings 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) at any time from January 1, 2020, through March 31, 2026.

“PVC Pipe and/or Fittings,” as defined in the Settlement Agreement, refers to pipe and fittings made in whole or in part with polyvinyl chloride (“PVC”), such as:

- PVC pipes that carry municipal potable water (including, but not limited to, PVC pipes manufactured to AWWA C900 or ASTM D2241 standards),
- PVC pipes that carry wastewater to sewage treatment plants (including, but not limited to, PVC pipes manufactured to ASTM D3034 or ASTM F679 standards),
- PVC municipal drinking water pipe and PVC municipal sewer pipe,
- PVC plumbing pipe used for household and commercial plumbing,
- PVC conduit used as electrical conduit pipe,
- Detachable pieces of PVC plastic that connect two or more PVC pipes, including couplings, elbows, tees, crosses, caps, plugs, adapters, bushings, nipples, and flanges, and
- Any and all PVC pipe systems that connect PVC pipe segments and fittings into piping systems.

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

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

7. I bought PVC Pipe and/or Fittings during the timeframe. Am I a DPP Settlement Class Member?

Not necessarily. You are only a DPP Settlement Class Member if you bought PVC Pipe and/or Fittings 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 DPP Settlement 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, Northern Pipe and Vinyltech have agreed to collectively pay Thirty Nine Million Five Hundred Thousand Dollars (**\$39,500,000**) in cash (the "Settlement Fund") in exchange for a release of any and all claims against Otter Tail, Northern Pipe, Vinyltech, and their Released Parties relating in any way to the allegations in the Action, as set out in the Settlement Agreement. If the Court approves the proposed Settlement, proceeds from the Settlement Fund will be distributed to eligible DPP Settlement Class Members. Payments will be sent after deducting notice and administration costs (up to \$250,000), and attorneys' fees, expenses and service awards to DPPs, if awarded by the Court, from the Settlement Funds. You will receive notice of any future application for attorneys' fees or reimbursement of expenses.

Northern Pipe and Vinyltech will also provide substantial cooperation to DPPs in the continuing lawsuit against the non-settling 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 DPP Settlement Class Member and you don't exclude yourself, you will be eligible to receive a payment at a later date after the Court gives final approval to the Otter Tail, Northern Pipe, and Vinyltech Settlement. This could take time. Please be patient. If you exclude yourself from the proposed Settlement, you will **not** be eligible to get 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 Otter Tail, Northern Pipe, Vinyltech, and their Released Parties for any claims relating in any way to the legal or factual issues in the Action and your direct purchases from one or more Converter Defendants. All the Court's orders will apply to you and legally bind you. As set forth in the Settlement Agreement, which is available on the settlement website, the release includes but is not limited to claims you had, have, or may have arising under any federal or state antitrust, unfair competition, unfair practices, consumer protection, unjust enrichment, price discrimination, unitary pricing, or trade practice

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

law, whether known or unknown.

The Settlement Agreement provides that Northern Pipe and Vinyltech will collectively pay Thirty Nine Million Five Hundred Thousand Dollars (\$39,500,000) and Northern Pipe and Vinyltech will cooperate in the continuing lawsuit against the other Converter Defendants in exchange for a release of claims by DPP Settlement Class Members against Otter Tail, Northern Pipe, and Vinyltech, together with any and all of its past, present, and future, direct and indirect, corporate parents (including holding companies), owners, equity holders, shareholders, subsidiaries, divisions, departments, and related entities and other representatives and individuals, as set forth in the Settlement Agreement which is accessible on the settlement website (the “Released Parties”). The Settlement Agreement, however, does **not** release claims arising in the ordinary course of business under Article 2 of the Uniform Commercial Code pertaining to sales other than claims based in whole or in part on any of the Released Claims or for negligence, breach of contract, bailment, failure to deliver, lost goods, damaged or delayed goods, breach of warranty, or product liability claims, other than claims based in whole or in part on any of the Released Claims. In addition, the Settlement Agreement does not release claims based solely for the purchase of PVC Pipes and/or Fittings made *indirectly* from one or more of the Converter Defendants or any claims against the remaining non-settling Converter Defendants.

Broadly speaking, the Settlement Agreement completely releases, acquits, and forever discharges Otter Tail, Northern Pipe, Vinyltech, and their Released Parties from any claims arising from purchases made *directly* from Converter Defendants at any time prior to May 28, 2026, the date that the Settlement Agreement was signed, that are related in any way to the 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 DPP Settlement Class.

Excluding Yourself from the Proposed Settlement

If you want to keep the right to sue Otter Tail, Northern Pipe, Vinyltech, or their Released Parties on your own for the claims being released in this Settlement, 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** get a payment from the proposed Settlement.

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 Otter Tail, Northern Pipe, and Vinyltech 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 or entity seeking exclusion.

Additionally, any DPP Settlement Class Member, or Affiliate (which, as defined and stated in the Settlement Agreement, “means with respect to any person, entity or company, a person, entity, or company that directly or indirectly controls, is controlled by or is under common control with such person, entity or company”) or assign thereof, who requests to be excluded from the proposed Settlement with respect to an assigned claim must identify the assignor, the assignee, and the total value of direct purchases during the Settlement Class Period from each Converter Defendant that is subject to the assignment, and provide a copy of the assignment agreement.

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

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 **Month x, 2026** and mailed to:

PVC Pipe Direct Purchaser Settlement – OTTER TAIL, NORTHERN PIPE, VINYLTECH EXCLUSIONS
c/o JND Legal Administration
PO Box xxxx
Seattle, WA 98111

If you ask to be excluded from the proposed Settlement, you will not get a 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 payment from the Settlement Fund. If you have a pending lawsuit against Otter Tail, Northern Pipe, Vinyltech, or their Released Parties involving the same allegations or claims involved 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 lawsuit against Otter Tail, Northern Pipe, Vinyltech, or their Released Parties involving such claims.

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 DPP 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 Otter Tail, Northern Pipe, or Vinyltech, 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, Interim Lead Counsel will ask the Court to approve a payment from the Settlement Fund for fees, reimbursement of expenses and a service award for the named DPPs. You will be provided notice of such request and given an opportunity to object to such request.

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

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 DPP 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 DPP Settlement Class, such as an invoice showing that you purchased PVC Pipe and/or Fittings directly from one or more Converter Defendants between January 1, 2020 and March 31, 2026, or otherwise satisfy the definition in answer to Question x; 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.

You must mail your objection postmarked by **Month x, 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
Matthew P. McCahill
KAPLAN FOX &
KILSHEIMER LLP
800 Third Avenue, 38th Floor
New York, NY 10022

**Otter Tail, Northern Pipe, and
Vinyltech Counsel:**

Eliot A. Adelson
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105

Lisa P. Phelan
Megan E. Gerking
Robert Manoso
MORRISON & FOERSTER LLP
2100 L Street NW
Washington, DC 20037

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

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

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 x), but you do not have to participate.

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

The Court will hold a Fairness Hearing at x:xx 9:00 a.m. CT on **Month x, 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 #x. The hearing may be moved to a different date or time without additional notice, so check www.pvcpipeirectclass.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 DPP Settlement 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 DPP 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, your signature; and
- Proof of your membership in the DPP Settlement Class, such as invoices showing that you directly purchased PVC Pipe and/or Fittings from one or more Converter Defendants between January 1, 2020, and March 31, 2026, or proof that otherwise satisfies the definition in Question x.

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

Your Notice of Intention to Appear must be postmarked by **Month x, 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
Matthew P. McCahill
KAPLAN FOX &
KILSHEIMER LLP
800 Third Avenue,
38th Floor
New York, NY 10022

**Otter Tail, Northern Pipe, and
Vinyltech Counsel:**

Eliot A. Adelson
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105

Lisa P. Phelan
Megan E. Gerking
Robert Manoso
MORRISON & FOERSTER LLP
2100 L Street NW
Washington, DC 20037

If You Do Nothing

21. What happens if I do nothing at all?

If you do nothing, you will remain a DPP Settlement Class Member and be eligible to get a payment from the proposed Settlement (if approved by the Court), as well as payments from future settlements or recoveries in the continuing lawsuit against other Converter Defendants. If the Court approves the Settlement, you will release any and all claims against Otter Tail, Northern Pipe, Vinyltech, and their Released Parties that in any way relate to the allegations in the Action, including but not limited to claims arising under any federal or state antitrust, unfair competition, unfair practices, consumer protection, unjust enrichment, price discrimination, unitary pricing, or trade practice law, whether such claims are known or unknown, foreseen or unforeseen, suspected or unsuspected, or asserted or unasserted, from the beginning of the world up to May 28, 2026 (the date the Settlement Agreement was signed).

Getting More Information

22. How do I get more information?

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

DATED: Month x, 2026

The Honorable LaShonda A. Hunt

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