

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

In re PVC Pipe Antitrust Litigation

THIS DOCUMENT RELATES TO:

Non-Converter Seller Purchaser Class
Plaintiffs

Case No. 1:24-cv-07639

Hon. LaShonda A. Hunt

**NON-CONVERTER SELLER PURCHASER CLASS PLAINTIFFS' UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT
AGREEMENT WITH ATKORE DEFENDANTS AND RELATED RELIEF**

PLEASE TAKE NOTE that the Non-Converter Seller Purchaser Class (“NCSPs”) hereby move the Court to: (i) preliminary approve the Settlement Agreement Between NCSPs and Defendants Atkore Inc., Atkore International, Inc., Atkore Plastic Pipe Corp., Atkore RMCP, Inc., and Allied Tube & Conduit Corporation; (ii) preliminarily certify the proposed Settlement Class; (iii) appoint Interim Co-Lead Counsel as Settlement Class Counsel; (iv) appoint the NCSP Class Named Representatives as named representatives for the Settlement Class; (v) approve the proposed plan for disseminating notice to the Settlement Class; (vi) appoint the Settlement Administrator and Escrow Agent, including permitting NCSPs to withdraw from the Settlement Funds up to \$325,000 without further approval for Settlement notice and administration costs; and (vii) set a Fairness Hearing for the Settlement.

This motion is supported by the concurrently filed Memorandum of Law and supporting declaration and exhibits, and all other evidence and arguments presented in the briefings and at the hearing of this motion.

Dated: April 29, 2026

Respectfully submitted,

LOCKRIDGE GRINDAL NAUEN PLLP

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ Brian D. Clark

Brian D. Clark (IL Bar No. 6350416)
Simeon A. Morbey (MN #0391338)
Laura M. Matson (MN #0396598)
100 Washington Avenue South, Suite 2200
Minneapolis, Minnesota 55401
(612) 339-6900
bdclark@locklaw.com
samorbey@locklaw.com
lmmatson@locklaw.com

Kyle J. Pozan (IL Bar No. 6306761)
Consuela Abotsi-Kowu (MN #0505682)
1165 N. Clark Street, Suite 700
Chicago, IL 60610
(312) 205-8968
kjpozan@locklaw.com
cmabotsi-kowu@locklaw.com

/s/ Karin E. Garvey

Karin E. Garvey (N.D. Ill. Bar No. 2997831)
Brian M. Hogan (N.D. Ill. Bar No. 6286419)
The Helmsley Building
230 Park Ave., 24th Floor
New York, NY 10169
(212) 223-6444
kgarvey@scott-scott.com
brian.hogan@scott-scott.com

Patrick J. Coughlin (N.D. Ill. Bar No. 90785466)
600 W. Broadway, Suite 3300
San Diego, CA 92101
(619) 233-4565
pcoughlin@scott-scott.com

Patrick McGahan (admitted *pro hac vice*)
Michael Srodoski (admitted *pro hac vice*)
156 South Main Street
P.O. Box 192
Colchester, CT 06415
(860) 537-5537
pmcgahan@scott-scott.com
msrodoski@scott-scott.com

Co-Lead Class Counsel for the Non-Converter Seller Purchaser Class