

**IN THE 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)

[PROPOSED] ORDER APPROVING REIMBURSEMENT OF EXPENSES

THIS MATTER, having come before the Court on Direct Purchaser Plaintiffs’ Motion for Reimbursement of Expenses, filed on December 29, 2015,

Whereas, the Court has separately granted final approval to a settlement entered between Direct Purchaser Plaintiffs and SIGMA Corporation and its owned subsidiary SIGMA Piping Products Corporation (the “SIGMA Settlement”), and to a settlement entered between Direct Purchaser Plaintiffs and Star Pipe Products, Ltd. (the “Star Settlement”);

And good cause having been shown,

It is on this _____ day of _____, 2016 **ORDERED** that:

The Court, having reviewed the Motion and its accompanying memorandum, supporting declarations, and the file:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

1. Terms capitalized in this Order have the same meanings as those used in the Settlement Agreements.

2. The notice afforded Settlement Class members the opportunity to object to the proposed request for reimbursement of litigation costs and expenses.

3. Interim Co-Lead Counsel are awarded one-third of the Settlement Amounts from the SIGMA Settlement and the Star Settlement to be used for: (a) reimbursement to Plaintiffs' counsel of incurred litigation and expenses in the amount of \$1,736,685.75. The Court finds that these expenses are necessary, reasonable and proper; and (b) an award of \$1,106,230.92 disbursement, to be kept in a separate escrow account and to be used solely to pay pretrial and trial expenses as they come due in connection with the ongoing litigation against McWane, Inc., and its divisions Clow Water Systems Co., Tyler Pipe Company, and Tyler Union. The Court finds that such disbursement is reasonable and proper.

4. Under the SIGMA and Star Settlement Agreements, the Settlement Amounts are to be paid in installments. The Court orders that up to one-third (33 1/3%) of each installment as received may be applied to satisfy this award.

IT IS SO ORDERED.

Dated: _____, 2016

HON. ANNE E. THOMPSON
UNITED STATES DISTRICT JUDGE