

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

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

## What Is This Lawsuit About?

There are two Proposed Settlements, a SIGMA Settlement and a Star 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 Proposed Settlements are partial because there is a defendant remaining in the case and litigation is continuing.

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 lawsuit alleges that from January 11, 2008 through June 30, 2011, 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 17, 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 **SIGMA Settlement** has two classes: (1) All persons or entities in the United States that purchased DIPF directly from any defendant from January 11, 2008 through June 30, 2011; and (2) All persons or entities in the United States that purchased Domestic DIPF directly from McWane or SIGMA from September 17, 2009 through December 31, 2013.

The **Star Settlement** has only one class: All persons or entities in the United States that purchased DIPF directly from any defendant from January 11, 2008 through June 30, 2011.

Full descriptions of DIPFs are available at [www.DIPFDirectSettlement.com](http://www.DIPFDirectSettlement.com).

## What Do The Settlements Provide And How Do I Get A Payment?

Under the respective Settlements, SIGMA has agreed to pay \$4,895,000 and Star has agreed to pay \$3,633,750. If you are a Class Member, you may be eligible to receive payment from one or both of the Settlements. To qualify for payment, you must complete and send in a valid Claim Form, available at [www.DIPFDirectSettlement.com](http://www.DIPFDirectSettlement.com). The Claim Form is the same for each Settlement, and you need to submit only one Claim Form to participate in both Settlements. Be sure to sign the Claim Form and mail it by first-class mail **postmarked no later than January 29, 2016** to DIPF Direct Purchaser Market Antitrust Settlement, c/o GCG P.O. Box 10095, Dublin, OH 43017-6695.

If the Court approves the SIGMA and Star Settlements, the Net Settlement Funds from each Settlement will be distributed on a pro rata basis among all 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 SIGMA or Star (or both of them) about the legal issues in this case, then you must exclude yourself from the Settlement Class with SIGMA and Star. **If you exclude yourself from either or both Settlement Classes, you will not get any payment from the Settlement(s) from which you are excluded.**

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](http://www.DIPFDirectSettlement.com). **Your letter must be postmarked by December 29, 2015.**

## How Do I Object?

You can object to either or both of the Settlements if you are a 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](http://www.DIPFDirectSettlement.com). **Your letter must be filed by January 8, 2016.**

## What If I Do Nothing?

If you do nothing, you will not receive payment, you will remain in the Class for the SIGMA and Star Settlements, and you will be bound by the Releases regarding claims in this matter. The only way to qualify for a payment from these Settlements 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 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 the reimbursement of costs and expenses incurred in the prosecution of the lawsuit in the amount of \$2,842,916.67 (one-third of the total amount of the SIGMA and Star Settlements). The request for expenses 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 SIGMA and Star Settlements at 10:30 a.m. on January 28, 2016, at the United States District Court for the District of New Jersey, 402 East State Street, Trenton, NJ 08608. If there are objections or comments, the Court will consider them, but may still approve the Settlements. 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.**

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