

**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)

**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**

A federal court authorized this Notice. This is not a solicitation from a lawyer or a claims filing service.

There are two partial Proposed Settlements, a SIGMA Settlement and a Star Settlement, totaling \$8,528,750, 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 the litigation is continuing as to that defendant.

- Under the **SIGMA Settlement**, SIGMA Corporation and its subsidiary SIGMA Piping Products Corporation (together, “SIGMA”) have agreed to pay \$4,895,000. Under the **Star Settlement**, Star Pipe Products, Ltd. (“Star”) has agreed to pay \$3,633,750. The settling defendants have asserted a number of defenses to plaintiffs’ claims and deny all wrongdoing, but have settled to avoid the cost and risk of a trial.
- These two Proposed Settlements pertain to a class action lawsuit brought on behalf of *direct* purchasers. There are two other lawsuits that are also pending in the same Court, one brought on behalf of *indirect* purchasers, and the other brought by the State of Indiana. These Proposed Settlements apply only to *direct* purchases of DIPF, and thus are separate from any settlements reached in either of the other lawsuits.
- “Ductile Iron Pipe Fittings” or “DIPF,” as those terms are used in these settlements, are items used to join ductile iron pipes, valves, and hydrants within water systems as well as to change, divide, or direct the flow of water. “Domestic DIPF,” as that term is used in these settlements, means DIPF that is produced in the United States for domestic-only specifications.
- The lawsuit is continuing against McWane, Inc. and its divisions Clow Water Systems Co., Tyler Pipe Company, and Tyler Union (collectively, “McWane” or “Non-Settling Defendant”). SIGMA, Star, and McWane are collectively referred to as “defendants.”
- Plaintiffs claim that, from at least as early as January 11, 2008, through at least as late as 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 at least as early as September 17, 2009, through December 31, 2013, defendant McWane illegally monopolized, and defendants SIGMA and McWane conspired to restrain trade in and monopolize, the market for Domestic DIPF in the United States in violation of the antitrust laws. Plaintiffs allege that, as a result of defendants’ anticompetitive conduct, plaintiffs and members of the settlement classes paid more for DIPF and Domestic DIPF than they otherwise would have paid absent the anticompetitive conduct. Defendants deny all plaintiffs’ claims and have asserted various defenses. The Court has not made any decision as to the merits of the plaintiffs’ allegations.
- Approval of the proposed settlements by the Court will resolve this lawsuit as to SIGMA and Star.
- **Your legal rights will be affected whether or not you act.** This Notice includes information on the lawsuit and regarding the SIGMA and Star Settlements. Please read the entire Notice carefully.

QUESTIONS? CALL TOLL-FREE 1-888-298-6316

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:

YOU MAY:		DUE DATE
DO NOTHING	You do not have to take any action to remain part of the Settlement Classes. (See Question 23)	
SUBMIT A CLAIM FORM	If you wish to make a claim against the settlement funds, you will need to file a Claim Form in order to receive money from the settlements. (See Question 9)	Postmarked by January 29, 2016
GO TO THE COURT'S HEARING	Ask the Court for permission to speak about the fairness of the SIGMA and Star Settlements, the Plan of Allocation, or the Request for Expenses. (See Question 22)	January 28, 2016 at 10:30 a.m.
OBJECT	Write to the Court about why you don't like the SIGMA or Star Settlements, the Plan of Allocation, or the Request for Expenses. (See Question 18)	Filed by January 8, 2016
EXCLUDE YOURSELF	Get no payment from the SIGMA and Star Settlements. (See Question 13)	Postmarked by December 29, 2015

- These rights and options – **and the deadlines to exercise them** – are explained in this Notice.

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BASIC INFORMATION

1. WHY DID I GET THIS NOTICE?

You or your company may have purchased DIPF directly from one or more of the defendants during the period from and including January 11, 2008, up to and including December 31, 2013.

The Court has directed that this Notice be sent to you because, as a possible member of one or both of the settlement classes, you have the right to know about the SIGMA and Star Settlements in this class action lawsuit and about all your options before the Court decides whether to approve the SIGMA and Star Settlements.

This Notice explains the lawsuit, the SIGMA and Star Settlements, and your legal rights.

The Court supervising the case is the United States District Court for the District of New Jersey. The case is called *In re Ductile Iron Pipe Fittings (“DIPF”) Direct Purchaser Antitrust Litigation*, Civ. No. 12-711. The people who sued are the plaintiffs, and the companies they sued are called defendants. The defendants that have agreed to these proposed settlements are SIGMA and Star. The litigation is continuing against McWane.

2. WHAT IS THIS LAWSUIT ABOUT?

The lawsuit alleges that (i) defendants entered into price-fixing agreements in the alleged market for DIPF in the United States in violation of the antitrust laws, (ii) McWane monopolized the alleged market for Domestic DIPF in the United States in violation of the antitrust laws, and (iii) SIGMA and McWane conspired to restrain trade and to monopolize the alleged market for Domestic DIPF in the United States in violation of the antitrust laws. The lawsuit claims that, as a result, plaintiffs paid more for DIPF and Domestic DIPF purchased from defendants than they otherwise would have paid.

Defendants have denied all these claims, deny any wrongdoing, and have asserted various defenses to the claims. The Court has not made any decision as to the merits of the plaintiffs’ allegations.

3. WHO ARE THE DEFENDANTS?

The Defendants are: SIGMA Corporation, SIGMA Piping Products Corporation, Star Pipe Products, Ltd., McWane, Inc., and its divisions, Clow Water Systems Co., Tyler Pipe Company, and Tyler Union.

4. WHY IS THIS A CLASS ACTION?

In a class action, one or more individuals or entities, called class representatives, sue on behalf of others who have similar claims. The class representatives in this case are the City and County of Denver; Coastal Plumbing Supply Company Inc.; GCO, Inc. f/k/a Groeniger & Co.; HI Line Supply Co. Ltd.; John Hoadley & Sons, Inc.; Mountain States Supply LLC; Mountainland Supply LLC; and Public Works Supply Co., Inc. The class representatives and the individuals or entities with similar claims are individually class members, together comprising a class. One court resolves the settlement-related issues for all class members, except for those who exclude themselves from one or both of the settlements. U.S. District Judge Anne E. Thompson is in charge of this class action.

5. WHY ARE THERE PROPOSED SETTLEMENTS WITH SIGMA AND STAR?

Both SIGMA and Star have denied all liability and wrongdoing in this case and have asserted various defenses to the plaintiffs’ claims. The Court did not decide in favor of the plaintiffs or SIGMA and Star. Instead, both sides agreed to the SIGMA and Star Settlements. That way, they avoid the cost and risk of a trial, and the class members affected will get compensation. The class representatives and class counsel think the SIGMA and Star Settlements are the best result for all class members. The case is continuing against McWane.

WHO IS AFFECTED BY THE SIGMA AND STAR SETTLEMENTS

To see if you are affected by the SIGMA and Star Settlements, you first have to determine if you are a class member.

6. HOW DO I KNOW IF I AM PART OF THE SIGMA AND STAR SETTLEMENTS?

Judge Thompson has decided that for purposes of the **SIGMA Settlement** only, there are two classes:

- (1) All persons or entities in the United States that purchased DIPF directly from any defendant at any time 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 at any time from September 17, 2009, through December 31, 2013.

Excluded from the SIGMA Settlement Classes are defendants and their parents, subsidiaries and affiliates, whether or not named as a defendant in this action, federal governmental entities, and instrumentalities of the federal government.

For purposes of the **Star Settlement** only, there is one class:

All persons or entities in the United States that purchased DIPF directly from any defendant at any time from January 11, 2008, through June 30, 2011.

Excluded from the Star Settlement Class are defendants and their parents, subsidiaries and affiliates, whether or not named as a defendant in this action, federal governmental entities, and instrumentalities of the federal government.

7. I'M STILL NOT SURE IF I AM INCLUDED.

If you are still not sure if you are a class member, you can ask for free help. See Question 24 below.

THE BENEFITS OF THE SIGMA AND STAR SETTLEMENTS

8. WHAT DO THE SIGMA AND STAR SETTLEMENTS PROVIDE?

Under the SIGMA Settlement, SIGMA has agreed to pay \$4,895,000 in cash (“the SIGMA Settlement Fund”). SIGMA has agreed to pay the Settlement Amount into an escrow account in three equal installments on the following schedule: (i) on or before July 1, 2015 (reduced by the \$250,000 separately paid for notice and notice administration costs); (ii) on or before July 1, 2016; and (iii) on or before May 31, 2017.

Under the Star Settlement, Star has agreed to pay \$3,633,750 in cash (“the Star Settlement Fund”). Star has agreed to pay the Settlement Amount into an escrow account in three equal installments on the following schedule: (i) on or before September 30, 2015 (reduced by the \$150,000 separately paid for notice and notice administration costs); (ii) on or before July 30, 2016; and (iii) on or before May 31, 2017.

SIGMA and Star will also provide limited discovery and cooperation in plaintiffs’ continuing lawsuit against McWane. This cooperation may include the explanation of previously produced transactional data and authentication of documents and certification as to business records. Details about the cooperation are set forth in the settlement agreements, which have been filed with the Court and may be viewed at www.DIPFDirectSettlement.com.

9. HOW DO I GET A PAYMENT?

If you are a Settlement class member and do not exclude yourself from the Settlements, you may be eligible to receive a payment. To qualify for a payment, you must send in a Claim Form, which is enclosed with this Notice. Please read the instructions carefully.

The Claim Form covers both the SIGMA and Star Settlements, and you need send only one Claim Form to participate in both Settlements. You must fill out the form and include all the information the form asks for. Be sure to sign it, and mail it by first-class mail in the enclosed envelope postmarked no later than January 29, 2016 to the address below.

DIPF Direct Purchaser Antitrust Litigation
c/o GCG P.O. Box 10220
Dublin, OH 43017-5720

If the Court approves the Settlements (see “The Court’s Fairness Hearing” below), payments from the SIGMA Settlement Fund and the Star Settlement Fund will be distributed at a later date to members of each class who submit valid and timely claims. In the interim you should maintain all of your records of purchases of DIPF from defendants during the period January 11, 2008 through December 31, 2013.

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 sign a contract with one of these companies, you should examine the claim-filing process provided here and decide whether using a specialized company is worth the cost. You can always seek help free of charge from the Claims Administrator or Class Counsel.

10. HOW MUCH WILL MY PAYMENT BE?

Class Counsel has proposed a Plan of Allocation describing the division of the SIGMA and Star Settlement Funds among class members.

Under the Plan of Allocation, part of the SIGMA Settlement Fund and the Star Settlement Fund each will be used to pay expenses approved by the Court. Class Counsel with the permission of the Court will deduct fees and expenses from the SIGMA Settlement Fund and the Star Settlement Fund in proportion to each individual settlement’s contribution to the \$8,528,750 that the two Settlement Funds represent. The remaining amounts (the “Net SIGMA Settlement Fund” and the “Net Star Settlement Fund,” respectively) will be distributed to class members that submit valid and timely claims.

The Net SIGMA Settlement Fund will be distributed on a pro rata basis among all members of the SIGMA Classes who submit valid and timely claim forms for purchases of DIPF from January 11, 2008 through June 30, 2011 from SIGMA, McWane, or Star and for purchases of Domestic DIPF from July 1, 2011 through December 31, 2013 from SIGMA or McWane. In other words, each SIGMA Settlement class member shall be paid a percentage of the Net SIGMA Settlement Fund that each class member’s recognized claim bears to the total of all recognized claims submitted by all SIGMA Settlement class members who file claims.

The Net Star Settlement Fund will be distributed on a pro rata basis among all members of the Star Class who submit valid and timely claim forms for purchases of DIPF from January 11, 2008 through June 30, 2011 from SIGMA, McWane, or Star. In other words, each Star Settlement class member shall be paid a percentage of the Net Star Settlement Fund that each class member’s recognized claim bears to the total of all recognized claims submitted by all Star Settlement class members who file claims.

As further described below, if a class member excludes itself from either or both of the SIGMA or Star Settlement Classes, it will not be able to share in the distribution from the net settlement fund for the settlement from which the class member elects to be excluded.

If you wish to object to the Plan of Allocation, you must file your objection by January 8, 2016 as described in Question 18 below.

11. WHEN WILL I RECEIVE A PAYMENT?

The Net SIGMA Settlement Fund and the Net Star Settlement Fund will be distributed to class members at a later time after the claim forms are distributed and processed by a Claims Administrator and the Court has authorized distribution.

12. WHAT AM I GIVING UP TO GET A PAYMENT OR STAY IN THE SETTLEMENTS?

Unless you exclude yourself from either or both of the SIGMA or Star Settlements, you are staying in the Settlements, and that means that you cannot sue, continue to sue, or be part of any other lawsuit against SIGMA or Star about the legal issues in this case. It also means that all of the Court's orders will apply to you and legally bind you.

In exchange for the consideration provided, the Settlement Agreements provide that there will be a release of claims against SIGMA and Star and the Releasees (as defined in ¶29 of the SIGMA Settlement Agreement and ¶27 of the Star Settlement Agreement). The SIGMA and Star Settlement Agreements, however, do not release any Claims relating to indirect purchases of DIPF, any claims based upon purchases of DIPF brought by the State of Indiana, or claims relating to DIPF arising in the ordinary course of business for any product defect, product performance, or breach of warranty or for breach of contract based on product defect, product performance, or warranty, relating to DIPF. The Settlement Agreements with SIGMA and Star each provide the specific and full terms of the releases as to SIGMA and Star, but broadly the Agreements completely release, acquit, and forever discharge SIGMA and Star and the Releasees from any and all other claims arising at any time prior to the Effective Dates of each Settlement Agreement under antitrust, unfair competition, or similar laws relating to the supply, pricing, marketing, distribution, and sale of DIPF.

The SIGMA and Star Settlement Agreements, which are available at www.DIPFDirectSettlement.com, more fully describe the legal claims that you give up if you stay in the class.

EXCLUDING YOURSELF FROM THE SIGMA OR STAR SETTLEMENTS

If you want to keep the right whether to sue or continue to sue SIGMA or Star (or both) on your own about the legal issues being resolved in this case, then you must take steps to get out of either or both of the SIGMA Settlement and the Star Settlement. This is called excluding yourself—or sometimes referenced as “opting out.” If you opt out of the SIGMA Settlement, you will not receive any payment from the Net SIGMA Settlement Fund. If you opt out of the Star Settlement, you will not receive payment from the Net Star Settlement Fund. If you opt out of both the SIGMA Settlement and the Star Settlement, you will not receive any payment from either of the Net Settlement Funds.

13. HOW DO I GET OUT OF THE SIGMA OR STAR SETTLEMENT?

To exclude yourself from the SIGMA or Star Settlements (or both), you must send a letter saying that you want to be excluded from the settlement. The letter must include the following information:

- A statement indicating that you want to be excluded from the SIGMA Settlement or the Star Settlement, or from both of the Settlements.
- The case name: In re Ductile Iron Pipe Fittings (“DIPF”) Direct Purchaser Antitrust Litigation, Civ. No. 12-711 (D.N.J.).
- Your name, address, telephone number, and your signature.
- All trade names or business names and all addresses (including any addresses that have received shipments of DIPF from defendants) you or your business have used, as well as any subsidiaries or affiliates who are requesting to be excluded from the class.

Your letter must be postmarked by December 29, 2016 and sent to:

DIPF Direct Purchaser Antitrust Litigation
c/o GCG
PO Box 10220
Dublin, OH 43017-5720
Phone: 1-888-298-6316
www.DIPFDirectSettlement.com

QUESTIONS? CALL TOLL-FREE 1-888-298-6316

If you ask to be excluded from the SIGMA or Star Settlements, you will not get any payment from the Net Settlement Fund for the Settlement or Settlements from which you elect to be excluded and you cannot object to the Settlement from which you excluded yourself.

Unless you exclude yourself, if the SIGMA and Star Settlements are approved by the Court, you give up any right to sue SIGMA and Star for the claims that the SIGMA and Star Settlements resolve. If you have a pending lawsuit against SIGMA and Star involving the same legal issues in this case, speak to your lawyer in that case immediately. (You must exclude yourself from the class in order to continue your own lawsuit against SIGMA or Star.)

14. CAN I REMAIN PART OF THE SETTLEMENT CLASS FOR ONE OF THE PROPOSED SETTLEMENTS AND EXCLUDE MYSELF FROM THE OTHER?

Yes. Because there are two separate proposed settlements (the SIGMA Settlement and the Star Settlement), you will need to decide, for each, whether to exclude yourself from the Settlement, or whether to remain in the Settlement for either or both of them.

15. IF I EXCLUDE MYSELF, CAN I RECEIVE MONEY FROM THE SIGMA AND STAR SETTLEMENTS?

No. If you decide to exclude yourself from both the SIGMA and Star Settlements, you will not be able to receive money from either proposed Settlement. If you exclude yourself from one, but not both, of the proposed Settlements, you will be eligible to receive payment only from the proposed Settlement for which you have not excluded yourself.

THE LAWYERS REPRESENTING YOU

16. DO I HAVE A LAWYER IN THIS CASE?

Yes. The Court has appointed Robert N. Kaplan of Kaplan Fox & Kilsheimer LLP and Kit A. Pierson of Cohen Milstein Sellers & Toll PLLC (“Class Counsel”) to represent the class on an interim basis, and for purposes of the SIGMA and Star Settlements. If you want to be represented by your own lawyer and have that lawyer appear in court for you concerning the SIGMA and Star Settlements, you may hire one at your own expense.

17. HOW WILL THE LAWYERS BE PAID?

You are not personally responsible for payment of attorneys’ fees or expenses for Class Counsel. At this time, Class Counsel will ask the Court to approve from both the SIGMA Settlement Fund and the Star Settlement Fund an award of \$2,842,916.67 (one-third of the total amount of the SIGMA and Star Settlements) for costs and expenses incurred and to be incurred in the prosecution of the lawsuit.

**OBJECTING TO THE SIGMA AND STAR SETTLEMENTS, THE PLAN OF ALLOCATION
OR THE REQUEST FOR EXPENSES**

You can tell the Court that you don’t agree with the SIGMA or Star Settlements, or some part of either of those Settlements, or the Plan of Allocation, or the Request for Expenses.

18. HOW DO I TELL THE COURT THAT I DON’T LIKE THE SIGMA OR STAR SETTLEMENTS OR THE PLAN OF ALLOCATION OR THE REQUEST FOR EXPENSES?

You can object to either or both of the SIGMA and Star Settlements if you are a member of the appropriate class or classes and have not opted out of the class for the settlement to which you object. You can object if you do not like any part of either or both of the SIGMA and Star Settlements, or if you disagree with the Plan of Allocation or the Request for Expenses. You can give reasons for your objections. The Court will consider your views, but the Settlements may still be approved in spite of your objections.

To object, you must send a letter to the Court that includes the following:

- A statement indicating that you object to either or both of the SIGMA or Star Settlements, or the Plan of Allocation or the Request for Expenses, in In re Ductile Iron Pipe Fittings (“DIPF”) Direct Purchaser Antitrust Litigation, Civ. No. 12-711 (D.N.J.).
- Your name, address, telephone number, and your signature.
- The reasons you object.
- Proof of your membership in the class, such as invoices showing that you satisfy the definition in Question 6.

You must file the objection with the Court at the following address by January 8, 2016:

Clerk of Court
United States District Court
for the District of New Jersey
402 East State Street
Trenton, NJ 08608

You must also mail copies of the objections to the following attorneys by January 8, 2016:

Counsel for the Direct Purchaser Plaintiffs and the Settlement Classes	
Kit A. Pierson COHEN MILSTEIN SELLERS & TOLL PLLC 1100 New York Avenue, NW Suite 500 West Washington, DC 20005	Robert N. Kaplan KAPLAN FOX & KILSHEIMER LLP 850 Third Avenue, 14th Floor New York, New York 10022
SIGMA Corporation and SIGMA Piping Products Corporation	
Matthew A. White Leslie E. John BALLARD SPAHR LLP 1735 Market Street, 51st Floor Philadelphia, PA 19103	
Counsel for Star Pipe Products, Ltd.	
Gregory S.C. Huffman Nicole L. Williams THOMPSON & KNIGHT LLP 1722 Routh Street, Ste. 1500 Dallas, TX 75201	

19. WHAT IS THE DIFFERENCE BETWEEN OBJECTING AND EXCLUDING?

Objecting is simply telling the Court that you do not like something about either or both of the SIGMA and Star Settlements, or about the Plan of Allocation, or about the Request for Expenses. You can object to the SIGMA or Star Settlements only if you stay in the Settlement that you object to. Excluding means that you are removing yourself from the Settlement Class and will have no right to proceeds from the Settlement from which you exclude yourself. If you exclude yourself from

either or both of the SIGMA and Star Settlements, you also have no right to object as to the Settlement from which you have excluded yourself because that Settlement no longer affects you.

THE COURT'S FAIRNESS HEARING

The Court will hold a fairness hearing to decide whether to approve the SIGMA and Star Settlements, the Plan of Allocation, and the Request for Expenses. You may, but need not, attend the hearing. If you do attend you may ask the Court's permission to speak (see Question 22 for instructions), but you do not have to participate in the hearing if you do attend.

20. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SIGMA AND STAR SETTLEMENTS?

The Court will hold a Fairness Hearing 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. The hearing may be moved to a different date or time without additional notice, so you should check the settlement website www.DIPFDirectSettlement.com before making travel plans. At the Fairness Hearing, the Court will consider whether the SIGMA and Star Settlements are fair, reasonable, and adequate and whether to approve the Plan of Allocation and the Request for Expenses. Judge Thompson will listen to class members who have asked to speak at the hearing. If there are objections or comments, the Court will consider them at this time. After the hearing, the Court will decide whether to approve the SIGMA and Star Settlements, the Plan of Allocation, and the Request for Expenses. We do not know how long a decision will take to be made.

21. DO I HAVE TO COME TO THE HEARING?

No. Class Counsel will be prepared to answer any questions the Court may have at the hearing. However, you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to come to court to explain. As long as you mailed your written objection on time as set out in this Notice, the Court will consider it. You may also pay another lawyer to attend, but it is not required.

22. MAY I SPEAK AT THE HEARING?

You may ask the Court for permission to speak at the Fairness Hearing. If you wish to do so, you are encouraged to send a letter stating the following:

- “Notice of Intention to Appear in *In re Ductile Iron Pipe Fittings (“DIPF”) Direct Purchaser Antitrust Litigation*, Civ. No. 12-711 (D.N.J).”
- The position you will take and your reasons.
- Your name, address, telephone number, and your signature.
- Proof of your membership in the class, such as invoices showing that you satisfy the definition in Question 6.

Your Notice of Intention to Appear must be filed with the Court at the following address by January 8, 2016:

Clerk of Court
United States District Court
for the District of New Jersey
402 East State Street
Trenton, NJ 08608

You must also mail copies of the Notice of Intention to Appear to the attorneys listed in Question 18 above, so they are received no later than January 8, 2016.

IF YOU DO NOTHING

23. WHAT HAPPENS IF I DO NOTHING AT ALL?

If you do nothing, you will remain in the classes for both the SIGMA and Star Settlements. If you remain in the classes, to qualify for a payment you must send in a Claim Form, which is enclosed with this Notice. See the discussion under Question 9 above for further information.

GETTING MORE INFORMATION

24. ARE THERE MORE DETAILS ABOUT THE SIGMA AND STAR SETTLEMENTS OR THE PLAN OF ALLOCATION?

This Notice summarizes the SIGMA and Star Settlements. More details are in the SIGMA and Star Settlement Agreements. You can get copies of the Settlement Agreements by visiting www.DIPFDirectSettlement.com.

Class counsel will file a motion for final approval of the SIGMA and Star Settlements, the Plan of Allocation and the Request for Expenses, which will contain additional information. These papers are currently due to be filed by December 29, 2015 and will be available at www.DIPFDirectSettlement.com.

25. HOW DO I GET MORE INFORMATION?

If you have questions or want more information, you may visit the official settlement website at www.DIPFDirectSettlement.com, contact the Claims Administrator toll-free at 1-888-298-6316, or write to either of the following counsel for Plaintiffs:

<p>Kit A. Pierson COHEN MILSTEIN SELLERS & TOLL PLLC 1100 New York Avenue, NW Suite 500 West Washington, DC 20005</p>	<p>Robert N. Kaplan KAPLAN FOX & KILSHEIMER LLP 850 Third Avenue, 14th Floor New York, New York 10022</p>
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DATED: October 30, 2015

BY ORDER OF THE COURT

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY