

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TENNESSEE**

IN RE CAST IRON SOIL PIPE AND FITTINGS  
ANTITRUST LITIGATION

1:14-md-2508-HMS-CHS

THIS DOCUMENT APPLIES TO:

DIRECT PURCHASER CLASS ACTION

**If You Purchased Cast Iron Soil Pipe or Fittings Directly from Charlotte Pipe, McWane,  
Tyler Pipe or AB&I Foundry Between November 1, 2006, and December 31, 2013,  
You Could Be Affected by a Proposed Class Action Settlement**

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

- There is a proposed Settlement of \$30,000,000 in a class action lawsuit called *In re Cast Iron Soil Pipe and Fittings Antitrust Litigation*, which is pending in the United States District Court for the Eastern District of Tennessee. The defendants in this case, called “Defendants” in this Notice, are McWane, Inc., and its unincorporated divisions, Tyler Pipe Company and AB&I Foundry; Charlotte Pipe and Foundry Company and Randolph Holding Company, LLC; and the Cast Iron Soil Pipe Institute. The Defendants have asserted a number of defenses to plaintiffs’ claims, and deny all wrongdoing, but have settled the case to avoid the costs and risk of a trial.
- “Cast Iron Soil Pipe and Fittings,” or “CISP,” as those terms are used in this Settlement, are items, manufactured predominantly from cast iron, that are primarily used in residential, commercial, industrial and government buildings for sanitary and storm drain, waste, and vent piping applications.
- This proposed Settlement pertains to a class action lawsuit brought on behalf of direct purchasers, which are entities that purchased CISP directly from one or more Defendant manufacturers. There is another lawsuit, also pending in the same Court, that was brought on behalf of indirect purchasers, which are entities that purchased CISP from distributors or from other direct purchasers. The Settlement described in this Notice applies only to direct purchasers of CISP, and thus is separate from any settlement that may be reached in the indirect-purchaser lawsuit.
- This lawsuit claims that, from at least as early as November 1, 2006 through at least as late as December 31, 2013, the Defendants engaged in a conspiracy to fix, raise, maintain or stabilize the prices for CISP in the United States in violation of the federal antitrust laws. The plaintiffs in this case also allege that, in 2010, defendants Charlotte Pipe and Foundry Company and Randolph Holding Company, LLC acquired the CISP inventory and assets of Star Pipe Products, Ltd., in a transaction that plaintiffs allege substantially lessened competition in the CISP market and also violated the federal antitrust laws. The plaintiffs allege that, as a result of Defendants’ anticompetitive conduct, plaintiffs and members of the Settlement Class paid more for CISP than they otherwise would have paid absent the anticompetitive conduct. The Defendants deny all of plaintiffs’ claims and have asserted various defenses to those claims. The Court has not made any decision as to the merits of plaintiffs’ allegations.

- Approval of the proposed Settlement by the Court will resolve this lawsuit as to all the Defendants.
- **Your legal rights will be affected whether or not you act.** This Notice includes information on the lawsuit and regarding the Settlement with the Defendants. Please read the entire Notice carefully.

<b>Your Legal Rights and Options</b>		
<b>You May:</b>		<b>Due Date</b>
<b>Do Nothing</b>	You do not have to take any action to remain part of the Settlement Class. ( <i>See</i> Question 22)	N/A
<b>Submit a Claim Form</b>	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 Settlement. ( <i>See</i> Question 9)	February 13, 2017
<b>Go to the Court’s Hearing</b>	Ask the Court for permission to speak about the fairness of the Settlement, the Plan of Allocation, or the Request for Fees, Expenses and Incentive Awards. ( <i>See</i> Question 21)	May 3, 2017
<b>Object to the Settlement</b>	Write to the Court about why you don’t like the Settlement, the Plan of Allocation, or the Request for Fees, Expenses and Incentive Awards. ( <i>See</i> Question 17)	May 3, 2017
<b>Exclude Yourself from the Settlement</b>	Get no payment from the Settlement. ( <i>See</i> Question 13)	February 13, 2017

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

## WHAT THIS NOTICE CONTAINS

BASIC INFORMATION.....	4
1. Why did I get this Notice? .....	4
2. What is this lawsuit about? .....	4
3. Who are the defendants?.....	4
4. Why is this a class action? .....	4
5. Why is there a proposed settlement with the Defendants? .....	4
WHO IS AFFECTED BY THE SETTLEMENT .....	5
6. How do I know if I am part of the Settlement? .....	5
7. I'm still not sure if I am included .....	5
THE BENEFITS OF THE SETTLEMENT.....	5
8. What does the Settlement provide? .....	5
9. How do I get a payment? .....	5
10. How much will my payment be? .....	6
11. When will I receive payment? .....	6
12. What am I giving up to get a payment or stay in the Settlement? .....	6
EXCLUDING YOURSELF FROM THE SETTLEMENT .....	7
13. How do I get out of the Settlement? .....	7
14. If I exclude myself, can I receive money from the Settlement? .....	7
THE LAWYERS REPRESENTING YOU .....	7
15. Do I have a lawyer in this case? .....	7
16. How will the lawyers be paid?.....	8
OBJECTING TO THE SETTLEMENT, PLAN OF ALLOCATION AND REQUEST FOR FEES, EXPENSES AND INCENTIVE AWARDS .....	8
17. How do I tell the Court I don't like the Settlement, Plan of Allocation or Request for Fees, Expenses and Incentive Awards? .....	8
18. What is the difference between objecting and excluding? .....	9
THE COURT'S FAIRNESS HEARING .....	10
19. When and where will the Court decide whether to approve the Settlement? .....	10
20. Do I have to come to the hearing? .....	10
21. May I speak at the hearing? .....	10
IF YOU DO NOTHING .....	11
22. What happens if I do nothing at all? .....	11
GETTING MORE INFORMATION.....	11
23. Are there more details about the Settlement or Plan of Allocation?.....	11
24. How do I get more information? .....	11

## BASIC INFORMATION

### 1. Why did I get this Notice?

You or your company were sent this Notice because you may have purchased CISP directly from one or more of the Defendants during the period from and including November 1, 2006, up to and including December 31, 2013.

The Court has directed that this Notice be sent to you because, as a possible member of the Settlement Class, you have the right to know about the Settlement in this class action lawsuit and about all of your options before the Court decides whether to approve the Settlement.

This Notice explains the lawsuit, the Settlement, and your legal rights.

The judge supervising this case is U.S. District Judge Harry S. Mattice of the United States District Court for the Eastern District of Tennessee. The case is called *Cast Iron Soil Pipe and Fittings Antitrust Litigation*, 1:14-md-2508-HSM-CHS. The people who sued are called the plaintiffs, and the companies they sued are called the defendants.

### 2. What is this lawsuit about?

The plaintiffs in this lawsuit claim that, from at least as early as November 1, 2006, through at least as late as December 31, 2013, the Defendants engaged in anticompetitive conduct in violation of the federal antitrust laws. The plaintiffs allege that, as a result of Defendants' anticompetitive conduct, plaintiffs and members of the Settlement Class (direct purchasers of CISP from the Defendants) paid more for CISP than they otherwise would have paid absent the anticompetitive conduct. Defendants have denied all of 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: McWane, Inc., and its unincorporated divisions, Tyler Pipe Company and AB&I Foundry; Charlotte Pipe and Foundry Company and Randolph Holding Company LLC; and the Cast Iron Soil Pipe Institute.

### 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 A&S Liquidating, Inc.; Hi Line Supply Co. Ltd.; and Red River Supply, Inc., who have been active participants in this case for nearly three years. The three class representatives devoted significant time and effort to the case by collecting and searching their company documents for production to the Defendants, responding to written interrogatories served by the Defendants, and preparing and sitting for depositions. These class representatives and the individuals or entities with similar claims (direct purchasers of CISP from Defendants) 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 the Settlement.

### 5. Why is there a proposed settlement with the Defendants?

All Defendants 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 Defendants. Instead, both sides agreed to the Settlement. That way, they avoid the cost and risk of a trial, and the Settlement Class Members affected may be eligible to receive a payment. The class representatives and Settlement Class Counsel think the Settlement is the best result for all class members.

## WHO IS AFFECTED BY THE SETTLEMENT

To see if you are affected by the Settlement, you first have to determine if you are a Settlement Class Member.

### 6. How do I know if I am part of the Settlement?

Judge Mattice has decided that, for purposes of the Settlement, there is a Settlement Class consisting of: All persons or entities that purchased CISP in the United States directly from any of the Defendants, their subsidiaries, predecessors, or affiliates, from November 1, 2006, through December 31, 2013. Excluded from the Settlement Class are the Defendants, their parent companies, subsidiaries, predecessors, and affiliates, federal and state governmental entities and instrumentalities of federal or state governments. Also excluded from the Settlement Class are certain companies that have already settled their claims against Defendants or which have otherwise agreed to exclude themselves from the Settlement.

### 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 SETTLEMENT

### 8. What does the Settlement provide?

Under the Settlement, the Defendants have paid \$30,000,000 in cash (the "Settlement Fund").

### 9. How do I get a payment?

If you are a Settlement Class Member and do not exclude yourself from the Settlement, 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 the Settlement. 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 **February 13, 2017** to the address below.

CISP Direct Purchaser Antitrust Litigation  
c/o RG/2 Claims Administration  
P.O. Box 59479  
Philadelphia, PA 19102-9479

If the Court approves the Settlement (*see* "The Court's Fairness Hearing" below), payments from the Settlement Fund will be distributed at a later date to Settlement Class Members who submitted valid and timely claims. In the interim, you should maintain all of your records of purchases of CISP from Defendants during the period November 1, 2006 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 Settlement Class Counsel.

## 10. How much will my payment be?

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

Under the Plan of Allocation, part of the Settlement Fund will be used to pay expenses approved by the Court. Settlement Class Counsel, with the permission of the Court, will deduct from the Settlement Fund attorneys' fees and out-of-pocket costs and expenses incurred during the litigation, as well as incentive awards for each of the three class representatives, whose participation and contribution to the case is described in Question 4 above.

The net Settlement Fund (net of Court-approved attorneys' fees, costs and expenses and incentive awards) will be distributed, on a *pro rata* basis based on the amount of CISP bought directly from Defendants, to Settlement Class Members who submit valid and timely claim forms for purchases of CISP directly from the Defendants from November 1, 2006 through December 31, 2013. In other words, each Settlement Class Member shall be paid a percentage of the Settlement Fund that each class member's recognized claim bears to the total of all recognized claims submitted by all Settlement Class Members who submit claims.

As further described below, if a Settlement Class Member excludes itself from the Settlement Class, it will not be able to share in the distribution from the Settlement Fund.

If you wish to object to the Plan of Allocation, you must file your objection by **May 3, 2017** as described in Question 17 below.

## 11. When will I receive a payment?

The Settlement Fund will be distributed to class members after claims are processed by the Claims Administrator and the Court has authorized distribution.

## 12. What am I giving up to get a payment or stay in the Settlement?

Unless you exclude yourself from the Settlement, you are staying in the Settlement Class, and that means that you cannot sue, continue to sue, or be part of any other lawsuit against the Defendants 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.

**The Settlement Agreement, which is available in its entirety at [www.cispantitrustsettlement.com](http://www.cispantitrustsettlement.com), includes the following release of the Claims by all the members of the Settlement Class who do not exclude themselves from the Settlement (called the "Releasing Parties"), against the Defendants (called the "Released Parties") which you should review carefully:** "Upon the Effective Date and in consideration of payment of the Settlement Amount into the Escrow Account, Releasing Parties shall be deemed to and do completely remise, release, acquit, and forever discharge Released Parties from any and all claims, demands, actions, suits, injuries, and causes of action, damages of any nature, whenever or however incurred (whether actual, punitive, treble, compensatory, or otherwise), including claims for costs, fees, expenses, penalties, and attorneys' fees, whether class or individual, known or unknown, or otherwise, that the Releasing Parties, or any of them, ever had, now has, or hereafter can, shall, or may have, directly, representatively, derivatively, or in any other capacity against any of the Released Parties, whether in law or equity or otherwise, arising out of or relating to any conduct, act, or omission of any of the Released Parties for the period from November 1, 2006 through the Execution Date, concerning any of the conduct alleged or that could have been alleged in the Action against Defendants, including, without limitation, any claim under any federal or state antitrust, unfair competition, unfair practices, fraud, racketeering, price discrimination, unjust enrichment, unitary pricing or trade practice law (the "Released Claims"). However, nothing herein shall release: (a) any claims based upon indirect purchases of CISP brought by prospective members of any class of indirect purchasers (the "Indirect Purchaser Class"); or (b) claims 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 CISP."

## EXCLUDING YOURSELF FROM THE SETTLEMENT

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

### 13. How do I get out of the Settlement?

To exclude yourself from the Settlement, 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 Settlement.
- The case name: *In re: Cast Iron Soil Pipe and Fittings Antitrust Litigation*, 1:14-md-2508-HSM-CHS (E.D. Tenn.).
- 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 CISP 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 **February 13, 2017** and sent to:

CISP Direct Purchaser Antitrust Litigation  
c/o RG/2 Claims Administration  
P.O. Box 59479  
Philadelphia, PA 19102-9479

**If you ask to be excluded from the Settlement, you will not get any payment from the Settlement Fund for the Settlement and you cannot object to the Settlement.**

Unless you exclude yourself, if the Settlement is approved by the Court, you give up any right to sue the Defendants for the Released Claims that the Settlement resolves. If you have a pending lawsuit against the Defendants 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 the Defendants.

### 14. If I exclude myself, can I receive money from the Settlement?

No. If you decide to exclude yourself from the Settlement Class, you will not be able to receive money from the proposed Settlement.

## THE LAWYERS REPRESENTING YOU

### 15. Do I have a lawyer in this case?

Yes. The Court has appointed Solomon B. Cera of Cera LLP, Kit A. Pierson of Cohen Milstein Sellers & Toll PLLC, and Robert N. Kaplan of Kaplan Fox & Kilsheimer LLP (referred to here as “Settlement Class Counsel”) to represent the Settlement Class, and for purposes of the Settlement. If you want to be represented by your own lawyer and have that lawyer appear in court for you concerning the Settlement, you may hire one at your own expense.

**16. How will the lawyers be paid?**

You are not personally responsible for payment of attorneys' fees or the out-of-pocket costs and expenses for Settlement Class Counsel. At this time, Settlement Class Counsel will ask the Court to approve from the Settlement Fund an award of 33<sup>1</sup>/<sub>3</sub>% of the Settlement Fund (which is \$9,999,000) for attorneys' fees, as well as reimbursement from the Settlement Fund, not to exceed \$2,000,000, for Settlement Class Counsel's out-of-pocket costs and expenses, which included significant expert witness fees, incurred in the prosecution of the lawsuit. Settlement Class Counsel will also seek incentive awards of no more than \$50,000 for each of the three entities who served as proposed class representatives while the case was pending (whose role and contribution to the case is described in Question 4, above).

**OBJECTING TO THE SETTLEMENT, THE PLAN OF ALLOCATION OR THE  
REQUEST FOR FEES, EXPENSES AND INCENTIVE AWARDS**

You can tell the Court that you don't agree with the Settlement, or some part of the Settlement, or the Plan of Allocation, or the Request for Fees, Expenses and Incentive Awards.

**17. How do I tell the Court that I don't like the Settlement or the Plan of Allocation or the Request for Fees, Expenses and Incentive Awards?**

You can object to the Settlement if you are a member of the Settlement Class and have not opted out of the Settlement Class. You can object if you do not like any part of the Settlement, or if you disagree with the Plan of Allocation or the Request for Fees, Expenses and Incentive Awards. You can give reasons for your objection(s). The Court will consider your views, but the Settlement may still be approved despite your objection(s).

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

- A statement indicating that you object to the Settlement, or the Plan of Allocation or the Request for Attorneys' Fees, Reimbursement of Expenses, or Payment of Incentive Awards in *In re: Cast Iron Soil Pipe and Fittings Antitrust Litigation*, 1:14-md-2508-HSM-CHS (E.D. Tenn.).
- Your name, address, telephone number, and your signature.
- The reasons you object.
- Proof of your membership in the Settlement Class, such as invoices, showing that you satisfy the definition in Question 6.

You must mail the objection to the Court at the following address, postmarked by **May 3, 2017**:

Clerk of Court  
United States District Court  
for the Eastern District of Tennessee  
900 Georgia Ave.  
Chattanooga, TN 37402

You must also mail copies of the objections to the following attorneys, postmarked by **May 3, 2017**:

Counsel for the Direct Purchaser Plaintiffs and the Settlement Class:

Solomon B. Cera  
**CERA LLP**  
595 Market Street, Suite 2300  
San Francisco, CA 94105

Scott N. Brown  
**SPEARS, MOORE, REBMAN & WILLIAMS, P.C.**  
801 Broad Street, Sixth Floor, P.O. Box 1749  
Chattanooga, TN 37401-1749

Robert N. Kaplan  
**KAPLAN FOX & KILSHEIMER LLP**  
850 Third Avenue, 14<sup>th</sup> Floor  
New York, NY 10022

Kit A. Pierson  
**COHEN MILSTEIN SELLERS & TOLL, PLLC**  
1100 New York Avenue, N.W.  
Suite 500 West  
Washington, DC 20005

Counsel for McWane, Inc. and its unincorporated divisions Tyler Pipe Co. and AB&I Foundry:

Joseph A. Ostoyich  
**BAKER BOTTS L.L.P.**  
The Warner  
1299 Pennsylvania Avenue, N.W.  
Washington, DC 20004

Lee E. Bains, Jr.  
**MAYNARD, COOPER & GALE, P.C.**  
1901 Sixth Avenue North  
2400 Regions/Harbert Plaza  
Birmingham, AL 35203

J. Alan Truitt  
**KAZMAREK MOWREY CLOUD LASETER, LLP**  
3008 7th Avenue South  
Birmingham, AL 35233

Counsel for Charlotte Pipe & Foundry Company and Randolph Holding Company:

Lawrence C. Moore, III  
**ROBINSON, BRADSHAW & HINSON**  
101 North Tryon St., Suite 1900  
Independence Center  
Charlotte, NC 28246

Counsel for the Cast Iron Soil Pipe Institute:

John P. Konvalinka  
**GRANT, KONVALINKA & HARRISON, P.C.**  
633 Chestnut Street, Suite 900  
Chattanooga, TN 37450-0900

**18. What is the difference between objecting and excluding yourself?**

Objecting is simply telling the Court that you do not like something about the Settlement, or about the Plan of Allocation, or about the Request for Fees, Expenses or Incentive Awards. You can object to the Settlement only if you stay in the Settlement. Excluding yourself, or “opting out,” means that you are removing yourself from the Settlement Class and you will have no right to proceeds from the Settlement. If you exclude yourself, you also have no right to object to the Settlement, because the Settlement no longer affects you.

## THE COURT'S FAIRNESS HEARING

The Court will hold a fairness hearing to decide whether to approve the Settlement, the Plan of Allocation, and the Request for Fees, Expenses and Incentive Awards. You may, but need not, attend the hearing. If you do attend you may ask for the Court's permission to speak (*see* Question 21 for instructions), but you do not have to participate in the hearing if you do attend.

### 19. When and where will the Court decide whether to approve the Settlement?

Judge Mattice will hold a Fairness Hearing at **9 a.m. on May 23, 2017**, at the United States District Court for the Eastern District of Tennessee, 900 Georgia Avenue, Chattanooga, Tennessee, 37402. The hearing may be moved to a different date or time without additional notice, so you should check the settlement website [www.cispantitrustsettlement.com](http://www.cispantitrustsettlement.com) before making travel plans. At the Fairness Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and whether to approve the Plan of Allocation and the Request for Attorneys' Fees, Reimbursement of Expenses, and Payment of Incentive Awards. Judge Mattice will listen to 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. At or after the hearing, the Court will decide whether to approve the Settlement, the Plan of Allocation, and the Request for Fees, Reimbursement of Expenses and Payment of Incentive Awards. We do not know how long the Court will take to make its decision.

### 20. Do I have to come to the hearing?

No. Settlement 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.

### 21. 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: Cast Iron Soil Pipe and Fittings Antitrust Litigation*, 1:14-md-2508-HSM-CHS (E.D. Tenn.)."
- 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 mailed to the Court at the following address postmarked by **May 3, 2017**:

Clerk of Court  
United States District Court  
for the Eastern District of Tennessee  
900 Georgia Ave.  
Chattanooga, TN 37402

You must also mail copies of the Notice of Intention to Appear to the attorneys listed in Question 17 above, no later than **May 3, 2017**.

## IF YOU DO NOTHING

### 22. What happens if I do nothing at all?

If you do nothing, you will remain in the Settlement Class for the Settlement, and you will be bound by its terms. If you remain in the Settlement Class, 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

### 23. Are there more details about the Settlement or the Plan of Allocation?

This Notice summarizes the Settlement. More details are in the Settlement Agreement, copies of which can be obtained by visiting [www.cispanitrustsettlement.com](http://www.cispanitrustsettlement.com).

Settlement Class Counsel will file a motion for final approval of the Settlement, the Plan of Allocation and the Request for Attorneys' Fees, Reimbursement of Expenses, and Payment of Incentive Awards which will contain additional information. These papers are currently due to be filed by April 21, 2017 and will be available at [www.cispanitrustsettlement.com](http://www.cispanitrustsettlement.com).

### 24. How do I get more information?

If you have questions or want more information, you may visit the official settlement website at [www.cispanitrustsettlement.com](http://www.cispanitrustsettlement.com), contact the Claims Administrator toll-free at (866) 742-4955, or write to any of the following Settlement Class Counsel:

Solomon B. Cera  
**CERA LLP**  
595 Market Street, Suite 2300  
San Francisco, CA 94105

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, 14<sup>th</sup> Floor  
New York, NY 10022

Scott N. Brown  
**SPEARS, MOORE, REBMAN & WILLIAMS, P.C.**  
801 Broad Street, Sixth Floor, P.O. Box 1749  
Chattanooga, TN 37401-1749

DATED: December 29, 2016

BY ORDER OF THE COURT

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TENNESSEE