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	Case No. 1:24-cv-07639 Judge LaShonda A. Hunt Magistrate Judge Young B. Kim

NON-CONVERTER SELLER PURCHASER CLASS PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AGREEMENT WITH DEFENDANTS WESTLAKE CORPORATION AND WESTLAKE PIPE & FITTINGS CORPORATION AND RELATED RELIEF

PLEASE TAKE NOTICE that the Non-Converter Seller Purchaser Class Plaintiffs ("NCSPs") hereby move the Court to: (i) preliminarily approve the Settlement Agreement between NCSPs and Defendants Westlake Corporation and Westlake Pipe & Fittings Corporation ("Westlake"); (ii) preliminarily certify the proposed Settlement Class; (iii) appoint Interim Co-Lead Class 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 Westlake Settlement Class and preliminarily approved Defendant Pipelife Jet Stream, Inc. Settlement Class; (vi) appoint the Settlement Administrator and Escrow Agent, including permitting NCSPs to withdraw from the Settlement Fund up to $500,000 without further approval for Settlement notice and administration costs; and (vii) set a date for the Fairness Hearing no earlier than March 22, 2027, or as soon thereafter as may be heard by the Court.

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

Dated: November 19, 2026

Respectfully submitted,

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