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

DECLARATION OF CHRISTIE K. REED OF KROLL SETTLEMENT ADMINISTRATION LLC IN CONNECTION WITH 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

I, Christie K. Reed, hereby declare:

INTRODUCTION

1. I am the Media Director of Kroll Notice Media Solutions ("Kroll Media"),[1] a business unit of Kroll Settlement Administration LLC ("Kroll"), the proposed Settlement Administrator relating to the Non-Converter Seller Purchasers' ("NCSPs") settlement with Defendants Westlake Corporation and Westlake Pipe & Fittings Corporation ("Westlake"). Kroll's principal office is located at One World Trade Center, 285 Fulton Street, 31st Floor, New York, New York 10007. I am over 21 years of age and am authorized to make this declaration on behalf of Kroll and myself. The following statements are based on my personal knowledge and information provided by other experienced Kroll employees working with me, including information reasonably relied upon in the fields of advertising media and communications. This declaration is being filed in connection with (a) Preliminary Approval of the Westlake Settlement and (b) NCSPs' motion for approval of a plan for notice of settlement in connection with the

[1] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Settlement Agreement between Non-Converter Seller Purchasers and Defendants Westlake Corporation and Westlake Pipe & Fittings Corporation entered into in this Action.

Court's preliminary approval of the Westlake Settlement, as well as NCSPs' Settlement with Pipelife Jet Stream, Inc. ("Pipelife"), preliminarily approved by the Court on July 7, 2026 (ECF No. 842).

2. I have nearly 15 years of legal notice experience, and I have been involved with some of the largest and most complex programs in the legal notice industry, including cases involving antitrust class actions, consumer and product liability class actions, data breaches and consumer privacy actions, and government restitution. My expertise includes media planning and research, media buying, creative design and notice drafting, and data analysis of hundreds of court-approved national, local and international notice programs.

3. Kroll has extensive experience in class action matters, having provided services in class action settlements involving antitrust, privacy, securities, labor and employment, consumer and government enforcement matters. Kroll has provided class action services in over 4,000 settlements varying in size and complexity over the past 50 years. Attached as **Exhibit 1** are overviews of Kroll's settlement administration services and antitrust experience.

4. Interim Co-Lead Counsel have proposed Kroll as the Settlement Administrator to, among other tasks, develop and implement a combined notice plan (the "Notice Program") in connection with both the Settlement Agreement between Non-Converter Seller Purchasers and Westlake, and the preliminarily approved settlement with Pipelife (the "Settlement Agreements").

5. The proposed Notice Program, as more fully detailed below, contemplates a mix of direct notice, where possible, targeted industry publication, and a consumer-oriented publication program to reach members of the Settlement Class, via methods described below, designed to reach at least 70% of likely Settlement Class members approximately 2.9 times on average. The

Federal Judicial Center states that a publication notice plan that reaches[2] over 70% of targeted class members is considered a high percentage and the "norm" of a notice campaign.[3]

6. To ensure that our calculations and estimates are accurately projected, the Notice Program was calculated using objective, syndicated advertising research tools from MRI-Simmons Research ("MRI"),[4] and online measurement from Comscore.[5] These are the same tools reasonably relied upon by advertising agencies nationwide as the basis to select media for large brands.

NOTICE PROGRAM SUMMARY

7. The proposed Notice Program is designed to inform likely Settlement Class members of the proposed Settlements between NCSPs, and Westlake and Pipelife (together, the "Settling Defendants"). Pursuant to Paragraph 5 of the Settlement Agreement, the Settlement Class is defined as:

> All entities and persons who purchased PVC Pipe Systems in the United States between January 1, 2020 through May 13, 2026 (1) directly from a seller that purchased PVC Pipe Systems from a Converter Defendant that was (2) manufactured by a Converter Defendant.
>
> Specifically excluded from the Settlement Class are (1) the following categories of purchasers: (a) All public water systems that purchased PVC Pipe Products for end-use, including in connection with the treatment or supply of water; (b) All public wastewater systems that purchased PVC Pipe Products for end-use, including for the collection, disposal, or treatment of wastewater; (c) All suppliers of public energy or electricity that purchased PVC Pipe Products for end-use, including in connection with the supply of electricity for public consumption; or (d) All purchasers of PVC Pipe Products that purchased from a seller who purchased the product indirectly from a Converter Defendant; (2) Defendants; the officers,

[2] "Reach" measures the number of people who receive or are otherwise exposed to a notice plan.

[3] Barbara Rothstein and Thomas Willging, *Federal Judicial Center Managing Class Action Litigation: A Pocket Guide for Judges*, at 27 (3d ed. 2010).

[4] MRI-Simmons USA is the most comprehensive study on American Consumers and is used by the majority of media and marketing agencies in the country to perform a wide variety of analytical, planning, and reporting functions. The nationally representative study provides comprehensive data on consumer attitudes, behaviors, media preferences, and more.

[5] Comscore is a global Internet information provider on which leading companies and advertising agencies rely for consumer behavior insight and Internet usage data.

directors, or employees of any Defendant; any entity in which any Defendant has a controlling interest; and any Affiliate, legal representative, heir, or assign of any Defendant, (3) any federal government entities, (4) any judicial officer presiding over this action and the members of his/her immediate family and judicial staff, any juror assigned to this action, and any business majority-owned by any such person, and (5) the following alleged co-conspirators: Core & Main Inc., Ferguson Enterprises, Inc., Fortiline Waterworks, Hajoca Corporation, Porter Pipe & Supply Co., and United Pipe & Steel Corp.

8. The Notice Program includes a detailed notice that will be posted on the Settlement website (**Exhibit 2**, "Detailed Notice"), direct notice by email (**Exhibit 3**, "Email Notice"), a digital media banner ad campaign that will be published in relevant trade publications and through various online placements and social media platforms (**Exhibit 4**, sample digital ads), and a press release distribution (**Exhibit 5**, press release).

9. To reach Settlement Class members, the proposed Notice Program contemplates usage of the following direct and indirect notice components:

- Class Action Fairness Act notice to applicable government officials;
- Email Notice to potential Settlement Class members;
- Paid notice in trade publications;
- Online display banner advertising;
- Google keyword search advertising;
- Social media advertising through Facebook and YouTube;
- A press release;
- A neutral, informational Settlement website; and
- A toll-free telephone information line.

10. In connection with a prior settlement between NCSPs and Defendant Oil Price Information Service ("OPIS"), Interim Co-Lead Counsel obtained and Kroll analyzed email contact information for millions of potential Settlement Class members (the "Class List"). The list

contained 14,598,558 unique email records. However, only 12,205,807 of those email addresses did not result in a bounceback.

CAFA NOTICE

11. On behalf of Westlake, Kroll will provide notice of the proposed Settlement pursuant to the Class Action Fairness Act, 28 U.S.C. § 1715(b) (the "CAFA Notice"). At the direction of Westlake's counsel, Kroll will send the CAFA Notice via first-class certified mail to (a) the Attorney General of the United States and (b) the applicable state Attorneys General. The CAFA Notice will also direct the recipients to the website www.CAFANotice.com, a site that will contain all the documents relating to the Settlement referenced in the CAFA Notice.

EMAIL NOTICE

12. Kroll will email the Email Notice (Exhibit 3) to Settlement Class members. The Email Notice will consist of the information provided in Exhibit 3 noted above, with formatting to enable it to be emailed to the Class List. Kroll will track and monitor emails that are rejected or "bounced back" as undeliverable. At the conclusion of the email campaign, Kroll will provide a report with the email delivery status of each record. The report will include the number of records that had a successful Email Notice delivery and a count of the records where delivery failed. Kroll will also update its administration database with the appropriate status of the email campaign for each of the Settlement Class member records.

PUBLICATION NOTICE

13. As required under Paragraph 6(b) of the Settlement Agreement, digital ads (Exhibit 4) and a press release (Exhibit 5) will also be provided by publication via media outlets. Kroll Media's proposal for notice by publication is set forth below.

Target Audiences

14. The publication notice program will utilize trade media to reach likely Settlement Class members and an online media campaign to achieve at least 70% reach among a target audience of adults employed in installation, maintenance, and repair occupations, and therefore likely Settlement Class members.

15. This target audience is a proxy definition for the Settlement Class, as no nationally syndicated media research data provides an exact target audience for Settlement Class members. Utilizing an overinclusive proxy audience is commonplace in both class action litigation and advertising generally.[6]

Trade Media

16. To reach likely Settlement Class members, Kroll recommends paid notice in one or more digital trade publications targeted to professionals and businesses that likely use PVC pipe or PVC fittings in their lines of work.

17. This trade-targeted paid notice may include digital newsletters such as *CONTRACTOR eNews*, *Electrical Construction & Maintenance*'s *Electrical Zone* e-newsletter, *Municipal Sewer & Water*'s *MSW* e-newsletter, or *PHCP Pros* segmented newsletters targeting HVAC, Hydronics, Plumbing, and/or Pipes, Valves, and Fittings (PVF). Paid notice to trade media may also include website placements on sites like *Electrical Products & Solutions* (www.epsmag.net) or on websites owned by the aforementioned publishers.

Online Display

18. Kroll Media will apply a programmatic approach to display advertising placements.[7] Digital banner ads will be purchased "programmatically" using a computer algorithm

[6] "If the total population base (or number of class members) is potentially unknown, it is accepted advertising and communication practice to use a proxy-media definition, which is based on accepted media research tools and methods that will allow the notice expert to establish that number. The percentage of the population reached by supporting media can then be established." Duke Law School, *GUIDELINES AND BEST PRACTICES IMPLEMENTING 2018 AMENDMENTS TO RULE 23 CLASS ACTION SETTLEMENT PROVISIONS*, at 56. This publication is available online at: https://scholarship.law.duke.edu/cgi/viewcontent.cgi?article=1003&context=bolch.

[7] In practice, when a user visits a website, an IP connection between the user's device and the publisher's webserver is established. The website then flags available ad tags so that the ad server can analyze data about the user, such as demographic attributes or location. This information is shared with advertising exchanges *(i.e.*, digital advertising marketplaces for ad space) where ad buyers can bid on the ad unit relevant to the campaign. If the ad unit is user-relevant, *i.e.*, it targets a likely class member based on matching user attributes, a bid is offered. Upon winning the bid for the ad unit, the ad is downloaded on a webpage for a user to see and this counts as an impression.

to show a specific ad to a specific visitor in a specific context. These ads are device-agnostic and will appear across desktop, laptop, tablet, or mobile devices.

19. Online display ads will be targeted to adults 18 years of age or older nationwide who are likely plumbers, electricians, plumbing contractors, electrical contractors, etc., and behaviorally or contextually targeted to users interested in or alongside content related to home DIY, home repair, crafts, plumbing fixtures and equipment, hobbies, and/or energy and utilities.

20. The content of the digital banner ads will include relevant information for users to self-identify whether they are part of the Settlement Class. When an ad is clicked, an embedded link will direct the user to the Settlement website where they can learn more about the Settlements.

21. The display ad units will include the most popular and widely-accepted formats such as 160x600 (wide skyscraper), 300x250 (rectangle), 300x600 (large skyscraper), 728x90 (leaderboard), 300x50 (mobile banner), 320x50 (mobile leaderboard), and 336x280 (large rectangle).[8]

Google Search Ads

22. Keyword search advertising will be used to display advertisements to users in their Google Search results. This will help drive likely Settlement Class members who are actively searching for information about the Settlement to the Settlement website. When a user conducts a search for Settlement-related content, such as "*pvc pipe*," "*pvc fittings*," "*pvc price fixing*," and other similar terms, a sponsored link may appear, which will provide brief information about the Settlement and direct users to the Settlement website.

Social Media Ads

23. Social media ads will appear on Facebook and YouTube.

24. Facebook ads will be targeted to adults 18 years of age or older who have listed employment relevant to the Settlement Class, such as plumbers, electricians, plumbing contractors,

[8] Creating multiple ad sizes increases a notice plan's probability of getting the message in front of the right target audience at the right time. If a web page serves only 300x250 and 728x90 ads, and the campaign only created a 320x50 ad, a notice plan ad will not have the opportunity to serve an ad on that website.

electrical contractors, etc. Additionally, ads will be targeted to users who are interested in home DIY, home repair, crafts, and more.

25. On YouTube, banner ads will be targeted to users 18 years of age or older who are interested in channels and/or content related to plumbing, electrical work, home DIY, PVC pipe crafting, etc.

26. Social media advertising will include relevant information for users to self-identify whether they are included in the Settlement Class. If users click on the social media ad, an embedded link takes them to the Settlement website where they can learn more about the Settlement.

Press Release

27. Kroll Media will issue a press release (Exhibit 5) concerning the Settlement over Cision PR Newswire's US1 National Newsline. This network includes thousands of news outlets. The press release will also include additional targeting to a General Construction & Building Influencer List of journalists and media outlets covering news about building and construction, including civil engineering, architecture, landscape, materials such as concrete, and more.

SETTLEMENT WEBSITE

28. Kroll established a dedicated Settlement website for the NCSP Settlement Class that went live on January 15, 2026. The Settlement website URL is: www.PVCantitrust.com. The Settlement website will contain a summary of the Settlement Agreements, will allow Settlement Class members to contact the Settlement Administrator with any questions or changes of address, provide answers to frequently asked questions, and notice of important dates such as the Fairness Hearing for the Settlement. The Settlement website will also contain downloadable copies of relevant documents including the Complaint, Settlement Agreements, Preliminary Approval orders, Detailed Notice (in English and Spanish), and any other materials agreed upon by counsel for the Parties and/or required by the Court.

TOLL-FREE TELEPHONE NUMBER

29. Kroll has established a toll-free telephone number for the Settlement. The toll-free telephone number will allow Settlement Class members to call and obtain information about the Settlements through an Interactive Voice Response system.

POST OFFICE BOX

30. Kroll has designated a post office box with the mailing address In re PVC Antitrust Litigation, c/o Kroll Settlement Administration LLC, P.O. Box 225391, New York, NY 10150-5391, in order to receive requests for exclusion, objections, and correspondence from Settlement Class members.

COSTS OF NOTICE PROGRAM

31. Kroll has provided Interim Co-Lead Counsel with a proposal that the total costs of administration of this Settlement will not exceed $220,200 (excluding the cost of distribution at a later time) for the notice to commence no later than twenty-eight (28) days after the Court's order granting NCSPs' Motion for Preliminary Approval of Settlement Agreement with Defendants Westlake Corporation and Westlake Pipe & Fittings Corporation and Related Relief, which includes notice of the preliminary approved Pipelife Settlement Agreement.[9]

CONCLUSION

32. The proposed Notice Program reflects a particularly appropriate and highly targeted way to provide notice to Settlement Class members. The publication notice via media outlets is designed and estimated to reach at least 70% of likely Settlement Class members approximately 2.9 times on average. This reach will be further supplemented by the direct notice effort and paid notice in trade publications. In my opinion, the Notice Program described above is reasonably calculated to provide notice to likely Settlement Class members and is consistent with best

[9] This amount is contingent upon no change in the scope of work provided.

practicable, court-approved notice programs in similar matters, the requirements of Fed. R. Civ. P. 23(c)(2)(B), and the Federal Judicial Center's guidelines concerning appropriate reach.[10]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge. Executed on November 19, 2026, in Lakewood, California.



CHRISTIE K. REED

[10] FED. JUD. CTR., *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* (2010), available at https://www.fjc.gov/sites/default/files/2012/NotCheck.pdf. The guide suggests that the minimum threshold for adequate notice is 70%. *See id*. at pp. 1, 3.