Exhibit B-6

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re: PVC Pipe Antitrust Litigation	Case No.: 1:24-cv-07639
THIS DOCUMENT RELATES TO: End-User Class Plaintiffs	Hon. LaShonda A. Hunt

JOINT DECLARATION OF BOBBY POUYA AND ELIZABETH A. FEGAN IN SUPPORT OF END-USER CLASS PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT WITH WESTLAKE CORPORATION AND WESTLAKE PIPE & FITTINGS CORPORATION; AND APPROVAL OF NOTICE PLAN FOR THE WESTLAKE AND PIPELIFE SETTLEMENTS

Pursuant to 28 U.S.C. § 1746, I, Bobby Pouya, declare as follows:

1. I, Bobby Pouya, submit this declaration in support of End-User Class Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement with Westlake Corporation and Westlake Pipe & Fittings Corporation (collectively, "Westlake"); and Approval of Notice Plan for the Westlake and Pipelife Settlements, filed simultaneously herewith, and hereby declare under penalty of perjury that the following is true and correct.

2. I am a Partner at Pearson Warshaw, LLP ("Pearson Warshaw"). I have been licensed to practice law since 2006, and I am admitted to practice law in the State of California. I specialize in complex litigation and have prosecuted numerous antitrust class actions as lead counsel or in other leadership positions over the course of nearly twenty years.

3. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief and, as to such matters, I am informed and believe that they are true and correct.

Pursuant to 28 U.S.C. § 1746, I, Elizabeth A. Fegan, declare as follows:

4. I, Elizabeth A. Fegan, submit this declaration in support of End-User Class Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement with Westlake; and Approval of Notice Plan for the Westlake and Pipelife Settlements, filed simultaneously herewith, and hereby declare under penalty of perjury that the following is true and correct.

5. I am the founder and managing partner of Fegan Scott LLP ("Fegan Scott"), and I have been licensed to practice law in the State of Illinois and this District since 1995. I am also admitted to practice law in the State of California. I have more than thirty years of experience

representing plaintiffs in complex and class action litigation, and I have recovered more than $14 billion for my clients nationwide.

6. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief and, as to such matters, I am informed and believe that they are true and correct.

Pursuant to 28 U.S.C. § 1746, we, Bobby Pouya and Elizabeth A. Fegan, declare as follows:

7. Attached as Exhibit 1 hereto is a true and correct copy of the Settlement Agreement Between End-User Class Plaintiffs and Westlake dated November 17, 2026 (the "Settlement Agreement"). Unless otherwise defined herein, capitalized terms shall be those defined in the Settlement Agreement.

8. We submit this joint declaration in support of the End-User Class Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement with Westlake Corporation and Westlake Pipe & Fittings Corporation (the "Settlement").

9. The Settlement provides for a total of $79,500,000 in monetary payment and extensive cooperation.

10. The Settlement amount is significant because Westlake is the first large municipal pipe Defendant to settle with the End-User Class, and the Settlement is the largest End-User settlement to date. The $79,500,000 recovery is approximately 83 percent of the combined $95,250,000 of the prior settlements with Converter Defendants,[1] namely Atkore ($50,000,000),

[1] The "Converter Defendants" are the leading manufacturers of PVC Pipe Products sold in the United States. Compl. ¶ 2.

the Otter Tail Defendants ($30,000,000), and Pipelife ($15,250,000),[2] and is nearly 120 percent of Westlake's settlement with the Direct Purchaser Plaintiff Class for $67,000,000, which was entered into prior to the ruling on the motion to dismiss. The Settlement is also significant because the cooperation to be provided is substantial, including documents, deposition testimony, and trial testimony.

11. Moreover, all commerce associated with the alleged conspiracy remains in the case against the non-settling Defendants, who remain jointly and severally liable for any damages caused by Westlake's conduct. Settlement Agreement, ¶¶ 15, 44. The Settlement is the fifth settlement obtained on behalf of the End-User Class, bringing the total recovery with Converter Defendants to $174,750,000.

I. LITIGATION BACKGROUND

12. This litigation originated from a putative indirect-purchaser class action filed by reseller George Bavolak, whose class definition excludes local government entities such as public water suppliers.

13. On November 8, 2024, Erie County Water Authority, represented by Fegan Scott, filed its Complaint on behalf of public water suppliers, including local government entities and/or private companies, which were excluded from the initial *Bavolak* complaint. *Erie County Water Authority v. Atkore Inc.*, *et al*., Case No. 1:24-cv-11531 (N.D. Ill.), Dkt. No. 1. Following this initial filing, Erie County Water Authority and other End-User Plaintiffs sought leave of the Court

[2] The "Otter Tail Defendants" are Otter Tail Corporation, Northern Pipe Products, Inc., and Vinyltech Corporation. Dkt. No. 815. "Atkore" means Defendants Atkore Inc., Atkore International, Inc., Atkore Plastic Pipe Corp., Atkore RMCP, Inc., and Allied Tube & Conduit Corporation. Dkt. No. 795. "Pipelife" means Pipelife Jet Stream, Inc. Dkt. No. 864.

to plead a separate and distinct putative class of all end-user purchasers of PVC Pipe. Dkt. No. 238.

14. On June 6, 2025, the Court granted Erie County Water Authority's motion for leave to plead a separate indirect purchaser class comprised of PVC Pipe end-users. Dkt. No. 307.

15. On June 18, 2025, this Court appointed Pearson Warshaw and Fegan Scott as Co-Lead Counsel for the End-User Class Plaintiffs in this Action. Dkt. No. 337; *see also* Dkt. No. 340.

16. Following the creation of the End-User Class and our appointment as Co-Lead Counsel, Pearson Warshaw and Fegan Scott have devoted substantial resources to investigating and prosecuting the End-User Class' claims. Our efforts have included, among other things:

a. Negotiating and analyzing the OPIS Settlement and related addendums on behalf of the End-User Class;

b. Preparing and filing motions to approve the notice plan, updating notice documents and obtaining final approval of the OPIS Settlement;

c. Reviewing and analyzing the extensive document production obtained from OPIS under the OPIS Settlement, including attorney proffers, pricing data, and thousands of pages of documents, text messages, and other communications between Donna Todd and employees of the Converter Defendants;

d. Drafting and filing the End-User Class Plaintiffs' Consolidated Class Action Complaint on August 18, 2025 (Dkt. No. 398), which incorporated evidence obtained through OPIS' cooperation;

e. Coordinating with counsel for the other plaintiff classes on matters of common interest in the litigation;

f. Opposing the Converter Defendants' motions to dismiss, which were filed by Westlake and all Converter Defendants by November 11, 2025, with all briefing completed by January 26, 2026;

g. Negotiating the entry of a stipulated protective order governing the handling of confidential information in discovery;

h. Drafting and serving requests for the production of documents, and engaging in meet-and-confers relating thereto;

i. Seeking relevant third-party discovery through motions for the issuance of letters rogatory to obtain telephone records from Canadian carriers relevant to the prosecution of the End-User Class Plaintiffs' claims against the remaining Defendants;

j. Negotiating and obtaining preliminary and final approval of the End-User Class settlement agreements with the Atkore and Otter Tail Defendants;

k. Negotiating and obtaining preliminary approval of the End-User Class settlement agreement with Pipelife Jet Stream, Inc.;

l. Reviewing and analyzing the extensive document production obtained under the OPIS, Atkore, Otter Tail, and Pipelife settlements; and

m. Engaging in extensive settlement negotiations with Westlake culminating in the instant settlement.

II. THE END-USER CLASS SETTLEMENT WITH WESTLAKE

17. Settlement negotiations with Westlake began in August 2025 and included two full-day, in-person mediations with Gregory P. Lindstrom and Miles N. Ruthberg of Phillips ADR, in October 2025 and November 2026. The Settlement Agreement was executed on November 17, 2026.

18. The October 2025 mediation was productive but did not result in an agreement. The parties thereafter focused on litigation until the Court's September 30, 2026 order on the motions to dismiss, after which settlement discussions resumed. On November 2, 2026, the parties participated in a full-day, in-person mediation. The parties then spent approximately two more weeks negotiating the terms of the Settlement Agreement, which was executed on November 17, 2026.

19. At all times, the negotiations were at arm's length, and counsel zealously advocated for their respective clients. There was no collusion or preferential treatment at any time during the negotiations. To the contrary, the negotiations were contentious, hard fought, and fully informed.

20. These negotiations arose only after Co-Lead Counsel undertook a comprehensive and painstaking review of the OPIS cooperation materials and conducted independent investigations relating to the PVC Pipe Products market and the claims alleged herein. The documents and data produced under the OPIS settlement formed the foundation of the End-User Class Plaintiffs' Consolidated Class Action Complaint and materially advanced their ability to reach settlements with four Converter Defendants.

21. As part of the settlement discussions, Co-Lead Counsel considered information provided by Westlake, under the mediation privilege, relating to its PVC Pipe Products sales and revenues, which further informed the parties' negotiations and the sufficiency of the monetary recovery.

22. In evaluating the Settlement, Co-Lead Counsel considered Westlake's potential damages exposure at trial, the merits of the claims, and the stage of the litigation. This Settlement also comes after Co-Lead Counsel engaged in extensive negotiations and entered into settlements

with Atkore, the Otter Tail Defendants, and Pipelife, each of which provided their own sales data, further informing our assessment as to Westlake's role in the PVC market.

23. Based on the foregoing and our years of experience in negotiating settlements in antitrust and complex class action cases, we had sufficient information to assess the value of the claims against Westlake and to negotiate a fair and reasonable settlement. We believe this Settlement with Westlake achieves an excellent result for the End-User Class and is fair, reasonable, and adequate, and is in the best interests of the End-User Class.

24. This assessment is informed by our extensive experience in complex antitrust litigation and thorough evaluation of the case's strengths and weaknesses, the substantial litigation risks of further proceedings, and the significant value delivered through this resolution, namely, the $79,500,000 monetary payment and the extensive cooperation from Westlake, which will fundamentally advance the End-User Class' prosecution of claims against the remaining Converter Defendants.

III. JOINT NOTICE, DEFERRED DISTRIBUTION, FEES, AND APPOINTMENT OF ESCROW AGENT

25. Co-Lead Counsel propose issuing a joint notice of the Westlake Settlement with the preliminarily approved Pipelife settlement (Dkt. No. 864), using Kroll Settlement Administration, LLC as the settlement administrator. A combined notice will provide significant cost savings and avoid the confusion that would result from back-to-back notice campaigns. Co-Lead Counsel provided the proposed notice documents to counsel for Pipelife, and Pipelife agrees to the joint notice plan. Co-Lead Counsel request authority to withdraw up to $325,000 from each of the Westlake and Pipelife Settlement Funds *pro rata* to pay for notice and administration costs without further approval of the Court.

26. As with the Atkore, Otter Tail, and Pipelife settlements, Co-Lead Counsel recommend postponing the claims process and distribution of the Settlement Fund for the Westlake Settlement until a later stage of the litigation when the End-User Class Plaintiffs possess additional discovery relating to settlement administration. At a later date, and with notice to the Class, Co-Lead Counsel will ask the Court for attorneys' fees (up to 33 1/3% of the Settlement Fund may later be sought), reimbursement of expenses, and service awards for the Class Representatives.

27. Co-Lead Counsel propose The Huntington National Bank to serve as Escrow Agent, having the duties and responsibilities as described in the Settlement Agreement.

IV. MISCELLANEOUS

28. In connection with the Settlement, the parties have identified all agreements made in connection with the settlement proposal. The parties have not entered into any side-letter or confidential agreement relating to the Settlement Agreement.

29. End-User Class Plaintiffs have demonstrated a commitment to the Class by actively participating in the litigation, including reviewing relevant pleadings and remaining apprised of the status of the case, and preserving and collecting documents for production.

30. End-User Class Plaintiffs and Co-Lead Counsel are committed to continuing to perform their duties and representing the End-User Settlement Class members throughout the course of this litigation.

31. Co-Lead Counsel met and conferred with Westlake and have confirmed that this Motion is unopposed.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 19th day of November, 2026, in Los Angeles, California.

Bobby Pouya

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 19th day of November, 2026, in Chicago, Illinois.

Elizabeth A. Fegan