Exhibit C-1

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

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

DECLARATION OF CHRISTIE K. REED OF KROLL SETTLEMENT ADMINISTRATION LLC IN CONNECTION WITH PROPOSED NOTICE PLAN FOR END-USER CLASS PLAINTIFFS' SETTLEMENTS WITH WESTLAKE AND PIPELIFE DEFENDANTS

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 to be appointed in relation to the End-User Class Plaintiffs' settlements with Defendants Westlake Corporation and Westlake Pipe & Fittings Corporation ("Westlake") and Pipelife Jet Stream, Inc. ("Pipelife," and, together with Westlake, the "Settling Defendants"). 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 preliminary approval of the Settlement.

[1] Capitalized terms used but not defined herein shall have the meanings ascribed to them in (a) the Settlement Agreement Between End-User Class Plaintiffs and Defendants Westlake Corporation and Westlake Pipe & Fittings Corporation and (b) the Settlement Agreement Between End-User Class Plaintiffs and Pipelife Jet Stream, Inc. (together, the "Settlement Agreements").

2. I have nearly fifteen 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 notice plan (the "Notice Program") for the Settlement Class in connection with the Settlement Agreements entered into in this Action.

5. The proposed Notice Program, as more fully detailed below, contemplates a mix of direct notice, where possible, 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 2.5 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 formulated using objective, syndicated advertising research tools from MRI-

[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).

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 End-User Class Plaintiffs and Settling Defendants. Pursuant to the Settlement Agreements, each of the Settlement Classes is defined as:

> All purchasers of PVC Pipe Products in the United States and its territories during the period September 1, 2017, through June 10, 2026, who fall into any of the following categories: (1) All public water systems that purchased PVC Pipe Products for end-use, including in connection with the treatment or supply of water; (2) All public wastewater systems that purchased PVC Pipe Products for end-use, including for the collection, disposal or treatment of wastewater; (3) 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; and (4) All purchasers of PVC Pipe Products, who purchased from a seller that purchased the product indirectly from any of the Converter Defendants (or from any of the Converter Defendants' parents, predecessors, subsidiaries, or Affiliates).
>
> Specifically excluded from the Settlement Class are: (1) Defendants; the officers, 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; (2) any federal government entity; and (3) 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.

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

[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.

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;
- Postcard Notice via U.S. First Class Mail to potential Settlement Class members;
- 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. Kroll will create a list of likely Settlement Class member data for municipalities based on publicly-available data from (a) the United States Environmental Protection Agency's Safe Drinking Water Information System ("SDWIS") Federal Reporting Services, which contains information about public water systems, (b) a third-party data provider, and (c) other sources for the purpose of providing direct notice to the Settlement Class, including information obtained through notice discovery permitted by the Court (ECF No. 362, at ¶12) and through other available means (together, the "Class List"). The Class List may include a combination of names, physical mailing addresses, and/or email addresses.

CAFA NOTICES

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

EMAIL NOTICE

12. In preparation for disseminating Class Notices by email (the "Email Notice"), Kroll will work with Interim Co-Lead Counsel and counsel for the Settling Defendants (collectively, "Counsel") to finalize the language for the Email Notice. The content of the Email Notice will be substantially similar to that of the Postcard Notice. Once the Email Notice is approved, Kroll will create an Email Notice template in preparation for the email campaign. Kroll will prepare a file with all Settlement Class member email addresses and upload the file to an email campaign platform. Kroll will prepare email proofs for Counsel's review and final approval. The proofs/test emails for approval will include the body of the email and subject line. Once the proofs/test emails are approved, the email campaign will begin as directed in the Settlement Agreements.

13. 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.

DIRECT MAIL NOTICE

14. Kroll will work with Counsel to format the Postcard Notice for mailing. Upon approval, Kroll will coordinate the preparation of Postcard Notice proofs for Counsel's review and final approval.

15. Pursuant to paragraph 6(b) of the Settlement Agreements, Kroll will mail the Postcard Notice (Exhibit 3) to Settlement Class members for which there is no available email address information. In preparation for the Postcard Notice mailing, Kroll will send the Class List through the United States Postal Service's ("USPS") National Change of Address ("NCOA") database. The NCOA process will provide updated addresses for Settlement Class members who have submitted a change of address with the USPS in the last 48 months and the process will also

standardize the addresses for mailing. Kroll will then prepare a mail file of Settlement Class members that are to receive the Postcard Notice via first-class mail.

16. Postcard Notices returned by the USPS with a forwarding address will be automatically re-mailed to the updated address provided by the USPS.

17. Postcard Notices returned by the USPS undeliverable as addressed without a forwarding address will be sent through an advanced address search process in an effort to find a more current address for the record. If an updated address is obtained through the advanced address search process, Kroll will re-mail the Postcard Notice to the updated address.

PUBLICATION NOTICE

18. Pursuant to paragraph 6(b) of the Settlement Agreements, 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

19. The publication notice program will utilize an online media campaign to achieve at least 70% reach among a target audience of adults who have completed any bathroom, kitchen, or landscape repair or remodel themselves or through another household member, as well as adults who are likely consumers and/or hobbyists interested in DIY, home repair, and/or crafts, and therefore likely Settlement Class members.

20. This target audience is a proxy definition for Settlement Class members who are not public water systems, public wastewater systems, or suppliers of public energy or electricity, 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]

[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*

(continued)

Online Display

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

22. Online display ads will be behaviorally and/or contextually targeted to adults 18 years of age or older in the United States and its territories who are interested in or alongside content related to home DIY, home repair, crafts, plumbing fixtures and equipment, and/or hobbies.

23. 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 and potentially file a claim form online.

24. 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]

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.

[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.

Google Search Ads

25. 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

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

27. Facebook ads will be targeted to adults 18 years of age or older in the United States and its territories who are interested in home DIY, home repair, crafts, and more.

28. On YouTube, banner ads will be targeted to users 18 years of age or older in the United States and its territories who are interested in channels and/or content related to plumbing, home DIY, PVC pipe crafting, etc.

29. 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 Settlements.

Press Release

30. Kroll Media will issue a press release (Exhibit 5) concerning the Settlements over Cision PR Newswire's US1 National Newsline. This network includes thousands of news outlets.

SETTLEMENT WEBSITE

31. Kroll established a dedicated Settlement website for the End-User Settlement Class that went live on January 14, 2026. The Settlement website URL is: www.EndUserPVCLitigation.com. The Settlement website will contain a summary of the Settlements, will allow Settlement Class members to contact the Settlement Administrator with any questions or changes of address, will provide answers to frequently asked questions, and will

provide notice of important dates such as the Fairness Hearing for the Settlements. 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

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

POST OFFICE BOX

33. Kroll has designated a post office box with the mailing address *PVC – End User Class Settlement Notice*, 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.

CONCLUSION

34. 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 2.5 times on average. This reach will be further supplemented by the direct notice effort and may also be furthered by the press release distribution. In my opinion, the Notice Program described above is reasonably calculated to provide notice to likely Settlement Class members and is consistent with best 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.[9]

[9] 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.

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