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Via E-mail / Website

Re: PVC Pipe Antitrust Litigation Investigation Retainer Letter

Dear Direct Purchaser:

My firm has investigated possible violations of federal antitrust law by the nations' largest producers of PVC Pipe. It is alleged that PVC Pipe manufacturers used a shared industry newsletter, OPIS, to coordinate pricing actions and fix the price of PVC Pipes sold in the United States and its territories, even as demand and key raw material costs declined.

The alleged price-fixing scheme has resulted in massively inflated PVCP prices and profit margins. These prices and profit margins defy economic logic, remaining at elevated levels despite normalized supply chains, normalized input costs (PVC resin), and weak demand. For example, municipal PVCPs and conduit PVCPs currently remain 4.7 times and 2.7 times above pre-Covid levels, respectively, according to OPIS.

The manufacturers under investigation include: Atkore Inc., Diamond Plastics Corporation, Aliaxis SA/NV, Ipex Inc. And Ipex UUSA LLC, Pipelife International GmbH, Pipelife Jet Stream, Inc., J-M Manufacturing Company, Inc. D/B/A JM Eagle, National Pipe & Plastics, Inc., Ottertail Corporation, Northern Pipe Products, Inc., Vinyltech Corporation, Sanderson Pipe Corporation, Westlake Corporation, and Westlake Pipe & Fittings Corporation (F/K/A Napco Pipe & Fittings) D/B/A North America PVC Pipe Corporation

We understand that you have made direct purchases of PVC Pipe since at least April 1, 2021, from at least one of the defendants referenced above and therefore may have standing to bring a claim. Based on our investigation, we believe the matter has substantial merit.

Countersigning this letter will confirm that you have retained Grabar, LLC, d/b/a Grabar Law Office (the "Law Firm"), as your counsel to investigate, and if appropriate, bring an action alleging violations of federal law as previously described. The action will be brought as a class action on behalf of all persons and entities that we determine have been adversely affected by the violations alleged in the complaint. The Law Firm has agreed to bring this action on a contingency basis. **You will not be responsible for paying any of the Law Firm's fees in connection with this litigation.** Our attorneys' fees and reimbursement of our expenses will be paid as the Court may permit and approve out of any proceeds, by judgment or out-of-court settlement that may be obtained for the benefit of the plaintiffs and class members. The Law Firm will be working in coordination with, and may affiliate as co-counsel with, other law firms in litigating this matter. The Law Firm together with all other such attorneys will advance the costs of the case. **You will**

not be responsible for paying any of the attorneys' expenses in connection with this litigation.

I will send a draft complaint for you to review and accept prior to filing on your behalf.

By countersigning this letter, you further confirm that I have advised you that you should not destroy or alter, and that you should retain and preserve, any and all papers or electronic files which relate in any way to your interactions and transactions with the Defendants in this action, and to the claims asserted in this action generally. This preservation confirmation includes not only preservation of hard copy paper but also of data generated by and/or stored on your electronic storage media (*e.g.*, hard drives, floppy disks, back-up tapes or other electronic media, if any).

Please countersign this letter and return it to me via e-mail at jgrabar@grabarlaw.com or fax to 267-507-6048 to indicate your agreement and authorization to proceed with filing this case on your behalf. If you have any questions, please do not hesitate to call me at my office or my cellular phone. I will, of course, be pleased to answer any questions you may have.

I appreciate this opportunity to represent you in this matter and hope that it can be concluded to your satisfaction.

Agreed and Acknowledged:

Date _____

Joshua H. Grabar, Esq.
Grabar Law Office