

These instructions and claim form relate to settlements on behalf of direct purchaser plaintiffs in *In re Domestic Drywall Antitrust Litigation*, Case No. 13-MD-2437, in the United States District Court for the Eastern District of Pennsylvania. You may have previously received Court-ordered notices in this case informing you of settlements with various defendants. All of those settlements have now received final approval from the Court, and the net settlement funds will be distributed to class members after claim forms have been submitted and reviewed.

You have received this claim form because you have been identified as a purchaser of Wallboard—that is, paper-backed gypsum wallboard, also known as drywall or plasterboard—directly from one or more Wallboard manufacturer or certain of their subsidiaries identified below between January 1, 2012 and June 16, 2016. In order to determine the amount of any share in the settlement funds to which you may be entitled, the Claims Administrator needs to gather more information about your Wallboard purchases during this time period.

This packet contains instructions and a claim form. Your Wallboard purchases have been calculated based on transactional data produced in the litigation. As explained below, you have the option to accept this calculation, or to supplement or dispute the calculated amount. **In order to receive money from the settlements, you must fill out and sign this Claim Form and return it either (a) by First-Class Mail, postmarked no later than November 15, 2018, or (b) as a scanned attachment to an email sent no later than November 15, 2018.** Please see Instruction #1 below for more information about submitting your Claim Form.

If, after reviewing these instructions, you have questions about the Claim Form or how to submit your information, please contact the Claims Administrator using one of the methods described below under Instruction #10.

INSTRUCTIONS

1. What do I have to do to submit a claim?

In order to submit a claim, you must complete the attached Claim Form pursuant to these instructions. The Claim Form must be filled out completely, **including your tax identification number**, and it **must be signed**. If you are accepting the calculation of your Wallboard purchases contained on the pre-populated Claim Form, then you only need to return the signed and completed Claim Form. If, however, you are supplementing or disputing the amounts on the pre-populated Claim Form, you must also submit supporting documentation (as discussed in Instruction #5).

You may submit your claim either by returning it via First-Class mail to:

Domestic Drywall Claims Administrator
P.O. Box 404000
Louisville, KY 40233-4000

or emailing the signed and scanned form as an attachment to info@drywalldirectpurchaserlitigation.com. Please be mindful that if you are submitting supporting documentation, emails larger than 10 MB likely will not successfully transmit and thus such material should be sent via First-Class mail instead.

Please keep a copy of your completed Claim Form and any submitted documentation for your records. If you wish to have confirmation that your Claim Form has been received, you should submit it via certified mail, return receipt requested.

2. I received a solicitation from a company offering to help me file my claim. What should I do?

Some companies may offer to help you file your Claim Form in exchange for a portion of your recovery from the settlements. While you may choose to use such companies, you should know that you can file with the Claims Administrator on your own, free of charge. Additionally, you are entitled to contact the Claims Administrator for assistance with understanding and filing your Claim Form—again, at no cost to you.

3. What is the deadline for submitting the claim form?

Only signed claims submitted by November 15, 2018 will be considered. If you are mailing your form, it must be postmarked by November 15, 2018; if you are emailing it, it likewise must be sent by 11:59 p.m. PST on November 15, 2018. In either case, if you are supplementing or disputing the amounts contained in the pre-populated Claim Form below, the supporting documentation must also be submitted by the November 15, 2018 deadline.

4. What kinds of purchases, and from what companies, are eligible purchases for submitting a claim?

Products. The litigation concerns paper-backed gypsum wallboard, also known as drywall or plasterboard. Purchases of glass-faced gypsum products, or of Wallboard-related products like joint compound or joint tape, are not eligible for claim submissions.

Sellers. A Wallboard purchase is only eligible if you made the purchase directly from any of the following companies: USG Corporation, United States Gypsum Company, New NGC, Inc., Lafarge North America Inc., Eagle Materials Inc., American Gypsum Company LLC, PABCO Building Products, LLC, CertainTeed Gypsum, Inc., TIN, Inc., Georgia Pacific LLC, or L&W Supply Corp. (or L&W's subsidiaries or affiliates). These companies are collectively referred to in these materials as the "Wallboard Sellers." Purchases made from a third-party distributor are not consider "direct" for purposes of submitting a claim.

Time Period. The settlement classes include persons and entities that purchased Wallboard directly from January 1, 2012 through June 16, 2016 (the "Claims Period"). Your Wallboard is considered "purchased" on the date that it was invoiced, regardless of when the Wallboard was shipped or received, or when the invoice was paid. As noted below in Instruction #7, the Court has approved an allocation plan whereby the majority of the distribution will be allocated based on Wallboard purchases from January 1, 2012 through December 31,

2013 (the core time period of the litigation, referred to here as the “Damages Period”), with limited payments to class members who only purchased Wallboard from January 1, 2014 through June 16, 2016.

Location. Only Wallboard purchased in the United States is eligible. Your Wallboard is considered purchased in the United States if it was either billed to or shipped to an address in the United States.

5. My records show different purchase totals than those on the pre-populated Claim Form. How do I support my claim for a different amount?

Plaintiffs’ counsel believe that the amounts calculated from the transactional data produced in the litigation are accurate. However, if your records show a different purchase total for any Wallboard Seller, you may supplement or dispute what is pre-populated on the Claim Form.

To properly supplement or dispute the amount, you must submit your supplement or dispute **in writing** together with this signed Claim Form, indicating specifically what information you dispute and attaching documentation (receipts, invoices or other proof of purchase) supporting the requested correction(s). Only include copies of such documentation, not originals. **Supplements or disputes that are submitted without documentation will not be accepted.**

Please note that the calculated purchase totals on the pre-populated Claim Form are net of all adjustments, such as shipping, credits, and rebates, and your supporting documentation must also reflect all adjustments. Additionally, for purposes of the Claim Form, your Wallboard is considered “purchased” on the date it was invoiced—not the date it was shipped or received, or when the invoice was paid.

After receiving your supporting documentation, the Claims Administrator will review it and compare it to the transactional data from the litigation to verify your claim. If the Claims Administrator disagrees with the calculation you submit, you will be contacted about the disagreement. If the disagreement cannot be resolved, then, if necessary, it will be brought before the Court for resolution.

6. What should I do if I have received more than one Claim Form?

If you/your firm appeared in the Wallboard Sellers’ records under other names or at different locations, you/your firm and related entities and locations may have received multiple Claim Forms. These forms are unique, and are represented by a unique Claim Number and unique purchase totals.

If you received multiple Claim Forms and you wish to file for all purchases shown on each Claim Form, you must file all Claim Forms received. You may combine your claims into one claim, but you must mail all Claim Forms together and include a written request that clearly identifies the specific Claim Numbers that you wish to combine.

7. How much money will I receive from the settlements?

Your exact claim amount cannot be determined until all claim forms are collected and processed. It is not known at this time how much money you will receive from the settlements. However, the process the Court has approved for how the settlement funds will be distributed among those who submit valid and timely claims (“Authorized Claimants”) is described below.

The funds from all the direct purchaser settlements in this case have been combined into a single Combined Settlement Fund. From this, the Court has already ordered to be paid certain attorneys’ fees, expenses, and service awards to the class representatives. The remainder is the Net Combined Settlement Fund (approximately \$120 million), and it will be distributed according to the following plan previously approved by the Court. The substantial majority of the Net Combined Settlement Fund will be distributed pro-rata in accordance with each Authorized Claimant’s Wallboard purchases from January 1, 2012 through December 31, 2013 (the “Damages Period”). Except as described below, each Authorized Claimant that files a timely claim will be allocated a share of the funds available for distribution, such that its share will be in proportion to the total of all Authorized Claimants’ Wallboard purchases during the Damages Period, with a minimum guaranteed distribution to each such Authorized Claimant of \$250.

Several circumstances will result in a reduction in the pro-rata share received for certain types of purchases. These reductions will be accomplished by valuing such purchases at less than 100% in calculating Authorized Claimants' pro-rata shares.

- Purchases from Georgia-Pacific will be valued at approximately \$0.656 on the dollar. This reflects the fact that approximately 65.6% of the Combined Settlement Fund is attributable to the Joint Settlement with American Gypsum, Eagle Materials, National Gypsum, and PABCO, which was the only settlement that included purchases from Georgia-Pacific.
- Purchases from CertainTeed will be valued at \$0.10 on the dollar. This reflects the fact that summary judgment was granted in CertainTeed's favor in February 2016, which resulted in CertainTeed being dismissed as a defendant from the case.
- If you opted out of one or more settlements, your purchases during the Damages Period will be reduced accordingly. For example, approximately 20.6% of the Combined Settlement Fund is attributable to the USG Settlement. If you opted out of the USG Settlement but no other settlement, your purchases will be valued at approximately \$0.794 (i.e., \$1 minus \$0.206) on the dollar.

While claims arising from post-2013 purchases were not at the core of the litigation, some funds have been allocated to provide recovery based on such purchases because these class members will be releasing those claims. The Joint Settlement only includes purchases made during the Damages Period (from all the Wallboard Sellers, including Georgia-Pacific), but the earlier settlements with USG, TIN, and Lafarge specified settlement class periods extending after the Damages Period (and did not include purchases from Georgia-Pacific). Therefore, because the USG and TIN Settlement Classes include purchases through November 30, 2014 and the Lafarge Settlement Class includes purchases through June 16, 2016, the earlier settlement classes include some entities that only purchased Wallboard after 2013 (and not during the Damages Period). Accordingly, each Authorized Claimant who purchased Wallboard from a Wallboard Seller (other than Georgia-Pacific) between January 1, 2014 and June 16, 2016, but did not purchase Wallboard from any Wallboard Seller between January 1, 2012 and December 31, 2013, will receive \$250.

8. When will I receive money from the settlements?

All Claim Forms must be sent to the Claims Administrator no later than November 15, 2018. The Claim Forms must then be reviewed and any disputes resolved. When all disputes are resolved, distributions to Authorized Claimants will be made. There is no way at this time to predict with certainty when the distributions will be made.

9. I did not receive a copy of the Claim Form with pre-populated information, but believe I have purchases that qualify me to receive a portion of the settlement funds. How do I submit a claim?

A blank Claim Form is available at www.drywalldirectpurchaserlitigation.com. If you did not receive a Claim Form but believe you have eligible purchases, you may submit the signed and completed Claim Form with supporting documentation to the Claims Administrator.

10. I have questions or need assistance. Who can I contact?

You may contact the Claims Administrator with any questions about the Claim Form or distribution process:

Domestic Drywall Claims Administrator
P.O. Box 404000
Louisville, KY 40233-4000
info@drywalldirectpurchaserlitigation.com
(888) 706-3401

In addition, more information about the litigation, the settlements, the plan of allocation, and other matters is available at the settlement website, www.drywalldirectpurchaserlitigation.com.