

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**IN RE: INTERIOR MOLDED DOORS
INDIRECT PURCHASER ANTITRUST
LITIGATION**

Lead Case 3:18-cv-00850-JAG

**MOTION TO DISSEMINATE NOTICE AND PROPOSED CLAIM FORM TO THE
INDIRECT PURCHASER PLAINTIFF SETTLEMENT CLASS**

Indirect Purchaser Plaintiffs (“IPPs”), on behalf of the Settlement Class¹, respectfully move the Court for an order pursuant to Fed. R. Civ. P. 23:

1. Appointing Postlethwaite & Netterville, APAC (“P&N”) as the Notice and Settlement Administrator;
2. Approving the notice plan and content of the proposed notice forms (“Notice”) and claim form;
3. Authorizing the dissemination of the Notice and the proposed claim form to the Settlement Class; and
4. Approving the proposed schedule for the notice program.

IPPs submit that the proposed notice program satisfies the requirements of Fed. R. Civ. P. 23 and due process. IPPs further submit that P&N has the necessary experience to develop and execute the notice plan and serve as the Settlement Administrator.

WHEREFORE, based on the foregoing, and for the reasons set forth in the accompanying memorandum of law, Declaration of Brandon Schwartz Regarding Proposed Notice Plan and

¹ Unless otherwise indicated, all defined terms have the meaning set forth in the parties’ September 4, 2020 Settlement Agreement (ECF No. 226-1).

Administration, and accompanying exhibits, the Motion should be granted. A proposed form of order granting the relief sought by this Motion is included with this filing.

Dated: October 29, 2020

Respectfully submitted,

By: /s/_____

Conrad M. Shumadine

Conrad M. Shumadine (VSB #4325)
WILLCOX & SAVAGE, P.C.
440 Monticello Avenue, Suite 2200
Norfolk, Virginia 23510
Telephone: (757) 628-5525
Facsimile: (757) 628-5566
cshumadine@wilsav.com

Daniel E. Gustafson
Daniel C. Hedlund
Michelle J. Looby
Kaitlyn L. Dennis
GUSTAFSON GLUEK PLLC
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Tel: (612) 333-8844
Fax: (612) 339-6622
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
mlooby@gustafsongluek.com
kdennis@gustafsongluek.com

Joseph R. Saveri
Steve Williams
Kyle P. Quackenbush
JOSEPH SAVERI LAW FIRM
601 California Street, Suite 1000
San Francisco, CA 94108
Tel: (415) 500-6800
Fax: (415) 395-9940
jsaveri@saverilawfirm.com
swilliams@saverilawfirm.com
kquackenbush@saverilawfirm.com

William V. Reiss
ROBINS KAPLAN LLP
399 Park Avenue, Suite 3600
New York, NY 10022
Tel: 212-980-7400
Fax: 212-980-7499
WReiss@RobinsKaplan.com

*Co-Lead Counsel for Plaintiffs and the Indirect
Purchaser Class*

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically e-mail notification of such filing to all counsel of record.

To the best of my knowledge, there are no other attorneys or parties who require service by U.S. Mail.

By: /s/

Conrad M. Shumadine (VSB #4325)
WILLCOX & SAVAGE, P.C.
440 Monticello Avenue, Suite 2200
Norfolk, Virginia 23510
Tel: (757) 628-5500
Fax: (757) 628-5566
Email: cshumadine@wilsav.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE: INTERIOR MOLDED DOORS
INDIRECT PURCHASER ANTITRUST
LITIGATION

Lead Civil Action No. 3:18-cv-00850-JAG

**[PROPOSED] ORDER GRANTING MOTION TO DISSEMINATE NOTICE AND
PROPOSED CLAIM FORM TO THE INDIRECT PURCHASER PLAINTIFF
SETTLEMENT CLASS**

Upon consideration of the Indirect Purchaser Plaintiffs' ("IPPs") Motion to Disseminate Notice and Proposed Claim Form to the IPP Settlement Class ("Motion") it is hereby

ORDERED as follows:

The Motion is hereby **GRANTED**.

Unless otherwise set forth herein, all defined terms shall have the same meaning ascribed to them in the Settlement Agreement (ECF No. 226-1).

Notice to Potential Settlement Class Members

The Court approves the form and content of the: (a) Long Form Notice attached hereto Exhibit 1; (b) Summary Notice attached hereto as Exhibit 2 (together with the Long Form Notice, "the Notice"); and (c) Claim Form, attached hereto as Exhibit 3.

The Court finds that the posting and publication of the Long Form Notice and Summary Notice, respectively, in the manner set forth herein constitutes the best notice practicable under the circumstances and is valid, due and sufficient notice to all persons entitled thereto and complies fully with the requirements of Federal Rule of Civil Procedure 23 and the due process requirements of the Constitution of the United States.

The Court appoints Postlethwaite & Netterville, APAC ("P&N") as the Notice

Administrator and Settlement Administrator.

On or before **December 7, 2020**, P&N shall launch the toll-free hotline and Settlement Website, publish relevant documents on the Settlement Website, commence publication of the Summary Notice in selected publications; begin online media notice activities, including posting Internet banner ads; begin earned media activities; and initiate its direct notice process in the manner set forth in the Notice Program as described in the Declaration of Brandon Schwartz Regarding Proposed Notice Plan and Administration, filed contemporaneously herewith.

On or before **February 11, 2021**, Settlement Class Counsel shall file with the Court their: (1) motion for final approval of the Settlement Agreement; (2) motion for approval of the proposed plan of allocation; and (3) if Settlement Class Counsel elects, motion for attorneys' fees, reimbursement of expenses, and, incentive awards for the Named Plaintiffs.

On or before **February 11, 2021**, P&N shall file with the Court affidavits or declarations of the persons under whose general direction the posting of the Long Form Notice and publication of the Summary Notice were made, showing that the Notice Program is progressing in accordance with this Order.

All requests for exclusion from the Settlement Class must be in writing; be mailed; be received by P&N no later than **March 15, 2021** and must otherwise comply with the requirements set forth in the Notice.

Any member of the Settlement Class who objects to the Settlement Agreement, the plan of allocation, any requested award of attorneys' fees, costs, expenses, or incentive awards must object in writing. All objections must be received by P&N and the Court Clerk no later than **March 15, 2021** and must otherwise comply with the requirements set forth in the Notice.

The Court will hold a Fairness Hearing on _____2021 at _____, at the Spottswood

W. Robinson III and Robert R. Merhige, Jr., Federal Courthouse, 701 East Broad Street, Richmond, VA 23219, to determine the fairness, reasonableness, and adequacy of the proposed settlement. Any Settlement Class Member who follows the procedure set forth in the Notice may appear and be heard at this hearing. The Fairness Hearing may be rescheduled, adjourned or continued without further notice to the Settlement Class.

IPPs are authorized to make minor adjustments to the Notice Program without Court-approval, including minor adjustments to the content and format of the Notice.

SO ORDERED, this the ____ day of _____, 2020.

John A. Gibney, Jr.
United States District Judge

EXHIBIT 1

**IF YOU BOUGHT A STANDALONE INTERIOR MOLDED DOOR BETWEEN
MARCH 1, 2014 AND SEPTEMBER 4, 2020**

You Could Receive \$25 or More from a Settlement Totaling \$19.5 Million

Claims Deadline Expires April 6, 2021

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

- Please read this Notice and the Settlement Agreements available at www.InteriorMoldedDoorSettlement.com carefully. Your legal rights may be affected whether you act or don't act. This Notice is a summary, and it is not intended to, and does not, include all the specific details of the Settlement Agreement. To obtain more specific details concerning the Settlement Agreement, please read the Settlement Agreement.
- A class action lawsuit alleges that JELD-WEN, Inc. ("JELD-WEN") and Masonite Corporation ("Masonite") (together, "Settling Defendants") participated in a conspiracy to artificially raise prices of Interior Molded Doors (described in Question 4 below).
- You are included in the Settlement Class if at any time between March 1, 2014 and September 4, 2020, you indirectly purchased one or more Standalone Interior Molded Doors (described in Question 4 below) not for resale in or while residing in the Indirect Purchaser States that were manufactured or sold by either Settling Defendant. "Indirectly" means you bought the Standalone Interior Molded Door from someone other than one of the Settling Defendants (e.g., you purchased a Standalone IMD at The Home Depot or a lumber yard). Indirect Purchaser States means the following states: Arizona, Arkansas, California, Florida, Hawaii, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, New Hampshire, New York, North Carolina, North Dakota, Oregon, South Carolina, Tennessee, Utah, West Virginia, and Wisconsin.

Your Legal Rights and Options		
SUBMIT A CLAIM	This is the only way to get a payment from the Settlement. You can submit a valid and timely claim form online at www.InteriorMoldedDoorSettlement.com or by mail (described in Question 9 below). If you do not submit a claim, you will not receive a settlement payment.	April 6, 2021
EXCLUDE YOURSELF	You will not be included in the Settlement Class if you exclude yourself. You will receive no benefits or payments from the settlement, but you will keep any rights you currently have to sue the Settling Defendants about the claims described in the Settlement Agreement.	March 15, 2021

DO NOTHING	You will be included in the Settlement Class, but you will not receive a payment. You will give up your rights to sue the Settling Defendants about the claims in this case.	No Deadline
OBJECT TO THE SETTLEMENT, FEE AND EXPENSE REQUEST, OR PLAN OF ALLOCATION	If you do not exclude yourself, you can write to the Court explaining why you disagree with the Settlement Agreement, the Plan of Allocation, or any request by Settlement Class Counsel for attorneys’ fees, reimbursement of expenses, or service awards for the Class Representatives.	March 15, 2021
GO TO THE HEARING	If you submit a written objection, you may ask to speak in Court about your opinion of the Settlement Agreement.	{Insert Date}

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court will consider granting final approval of the Settlement Agreement on **{Insert Fairness Hearing Date}**. Please check the Settlement website, **www.InteriorMoldedDoorSettlement.com**, for updates. Payments will only be made for valid and timely claims if the Court approves the Settlement Agreement and the Plan of Allocation, and after any appeals are resolved. Please be patient.

Your legal rights may be affected by the settlement, so please read this Notice carefully.

CONTENTS	
	<u>Page</u>
1. Why is There a Notice?.....	3
2. What is This Lawsuit About?.....	3
3. Who are the Settling Defendants?.....	3
4. What Product is Included in the Lawsuit?	4
5. What is a Class Action?	4
6. How do I Know if I am a Settlement Class Member?	4
7. Who is Not Included in the Settlement Class?.....	5
8. What Does the Settlement Agreement Provide?	5
9. How Do I Submit a Claim?.....	6
10. How Much Money Can I Get?.....	6
11. When Will I Get Payment?	7

12.	What Happens if I Remain in the Settlement Class?	7
13.	How do I Get Out of the Settlement Class?	7
14.	If I Don't Exclude Myself, Can I Sue for the Same Thing Later?	8
15.	If I Exclude Myself, Can I Still Get Money Benefits?.....	8
16.	Do I Have a Lawyer Representing Me?.....	8
17.	How Will the Lawyers be Paid?	8
18.	How do I Object to or Comment on the Settlement Agreement?	9
19.	What is the Difference Between Excluding Myself from the Settlement Class and Objecting to the Settlement Agreement?	9
20.	When and Where Will the Court Decide Whether to Approve the Settlement Agreement?	10
21.	Do I Have to Attend the Final Fairness Hearing?	10
22.	May I Speak at the Hearing?.....	10
23.	How Do I Get More Information?	10

1. Why is There a Notice?

This Notice is to inform you about the Settlement reached with the Settling Defendants in this litigation and about the options you can exercise before the Court decides whether to approve the Settlement.

The Court in charge is the United States District Court for the Eastern District of Virginia. This litigation is known as *In re: Interior Molded Doors Indirect Purchaser Antitrust Litigation*. The people who sued are called the "Plaintiffs." The companies they sued are called the "Defendants," hereafter referred to as the "Settling Defendants."

2. What is This Lawsuit About?

This class action lawsuit claims that Settling Defendants agreed to fix the prices of Interior Molded Doors. As a result of the alleged agreement by Settling Defendants, consumers and businesses who indirectly purchased Standalone Interior Molded Doors not for resale may have paid more than they should have. Although the Settling Defendants have agreed to settle, they do not agree that they engaged in any wrongdoing or are liable or owe any money or benefits to Plaintiffs. The Court has not decided who is right.

3. Who are the Settling Defendants?

JELD-WEN, Inc. and Masonite Corporation.

4. What Product is Included in the Lawsuit?

The Settlement Agreement includes Standalone Interior Molded Doors (“IMDs”).

IMDs are a type of interior door made through a process of sandwiching a wood frame and hollow or solid core between two molded doorskins, rather than making the entire door from solid wood. IMDs include, for example, slabs, which may be sold as a single slab or as “bifolds.” IMDs also include pre-hung IMDs, which consist of an IMD slab affixed to a door frame.

A “Standalone Interior Molded Door” is an IMD that is not incorporated as part of a larger product (such as the purchase of a home) or service (such as the installation of the door in a home).

Standalone IMDs contain patterns and do not include flush doors which have no patterns or relief.

The specific definitions of IMDs and Standalone IMDs are available in the Settlement Agreement. The Settlement Agreement and the operative complaint in this case are accessible on the website www.InteriorMoldedDoorSettlement.com or can be obtained by calling 1-844-964-2884.

5. What is a Class Action?

In class actions, one or more individuals or companies called the “Class Representatives” sue on behalf of themselves and other individuals or companies with similar claims in the specific class action. All of these individuals or companies together are the “Class” or “Class Members.” In this Class Action Settlement, there are 28 Class representatives. In a class action, one court may resolve the issues for all Class Members, except for those who exclude themselves from the Class (see Question 13).

6. How do I Know if I am a Settlement Class Member?

You are a Settlement Class Member if at any time from March 1, 2014 through September 4, 2020 you indirectly purchased a Standalone IMD not for resale in, or while (1) residing in or (2) as to businesses, having the principal place of business located in an Indirect Purchaser State at the time of purchase that were manufactured or sold by one of the Settling Defendants.

“Indirectly” means you bought the Standalone IMD from someone other than one of the Settling Defendants (e.g., you purchased a Standalone IMD at The Home Depot or a lumber yard).

“Not for resale” means you did not purchase the Standalone IMD to sell as a Standalone IMD to another individual or business. For example, an individual who purchased a Standalone IMD at The Home Depot and installs the door in her house did not purchase the Standalone IMD for resale. The individual is not selling a Standalone IMD; but rather is selling his services. Likewise, a contractor who purchased a Standalone IMD to install in a client’s home did not purchase the Standalone IMD for resale. The contractor is not selling the Standalone IMD; but rather is selling his services of which the Standalone IMD is a component. In contrast, a lumber yard that purchases

Standalone IMDs from a distributor and then resells those Standalone IMDs to its customers is purchasing for resale and is **not** a Settlement Class Member.

“Indirect Purchaser States” means the following states: Arizona, Arkansas, California, Florida, Hawaii, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, New Hampshire, New York, North Carolina, North Dakota, Oregon, South Carolina, Tennessee, Utah, West Virginia, and Wisconsin.

The definition of who is included in the Settlement Class is set forth in the Settlement Agreement. The Settlement Agreement and the operative complaint in this litigation are accessible at www.InteriorMoldedDoorSettlement.com or can be obtained by calling 1-844-964-2884. You will also be able to obtain additional information to learn whether you are a Settlement Class Member by visiting www.InteriorMoldedDoorSettlement.com and providing details regarding your purchase of a Standalone IMD, calling 1-844-964-2884, or sending an email to info@InteriorMoldedDoorSettlement.com.

Payments to members of the Settlement Class will only be made if the Court approves the Settlement Agreement and after any appeals from such approval are resolved. Payments will be made in accordance with the proposed Plan of Allocation to distribute the Net Settlement Funds (see Question 9).

7. Who is Not Included in the Settlement Class?

The Settlement Class does not include:

- The officers, directors or employees of any Settling Defendant;
- Any entity in which any Settling Defendant has a controlling interest, and any affiliate of a Settling Defendant;
- Legal representatives, heirs, or assigns of any Settling Defendant; and
- Purchasers of Standalone IMDs from Menards.

8. What Does the Settlement Agreement Provide?

The settlement provides for JELD-WEN and Masonite to each pay \$9,750,000, for a total settlement fund of \$19,500,000 (“Settlement Fund”). After deduction of notice and administration expenses, attorneys’ fees, service awards to the Class Representatives, and litigation expenses, as approved by the Court (“Net Settlement Fund”), the Net Settlement Fund will be available for distribution to Settlement Class Members who timely file valid claims.

Any interest earned will be added to the Settlement Fund. More details about the settlement are provided in the Settlement Agreement, available at www.InteriorMoldedDoorSettlement.com.

HOW TO GET BENEFITS

9. How Do I Submit a Claim?

You may be entitled to a portion of the Settlement Fund when a distribution is made to Settlement Class Members. If you exclude yourself from the Settlement Class, you will not receive a payment.

However, you will be required to submit a Claim Form to be eligible to receive a payment from the Settlement Fund. Claims may be submitted online at www.InteriorMoldedDoorSettlement.com or by printing and mailing your completed form postmarked by April 6, 2021 to:

Interior Molded Door Indirect Settlement Claims
c/o Postlethwaite & Netterville
P.O. Box 4147
Baton Rouge, LA 70821

You may also call 1-844-964-2884, write the Settlement Administrator at the address above, or email info@InteriorMoldedDoorSettlement.com, or visit www.InteriorMoldedDoorSettlement.com to obtain a Claim Form and to request assistance.

Please do not contact the Court. All questions should be directed to the Settlement Administrator or to Settlement Class Counsel (identified in Question 16 below).

For certain claims, you may need to submit satisfactory evidence (e.g., purchase records) if you seek to share in the monetary recovery provided by the Settlement Agreement based on the place of purchase. These details will be set forth in a Plan of Allocation to be approved by the Court, which will be available at www.InteriorMoldedDoorSettlement.com after approval.

Claims must be submitted online or postmarked no later than April 6, 2021.

10. How Much Money Can I Get?

At this time, it is estimated that each member of the Settlement Class who submits a valid claim will receive at least \$25. The estimated minimum payment is per claimant not per Standalone IMD. Payments will be based on a number of factors, including at least the number of valid claims filed by all Settlement Class Members and the number of Standalone IMDs purchased by each Settlement Class Member. However, the actual amount of your recovery will be determined by the Plan of Allocation, the terms of which will be posted at www.InteriorMoldedDoorSettlement.com. It is possible that any money remaining after claims are paid will be distributed to charities, governmental entities, or other beneficiaries approved by the Court. No matter how many claims are filed, no money will be returned to the Settling Defendants once the Court finally approves the Settlements.

In order to receive a payment, you will need to file a valid Claim Form (see Question 9).

11. When Will I Get Payment?

Payments may be distributed to members of the Settlement Class after: (1) the Court grants final approval of the Settlement Agreement; (2) any appeals from such approvals are resolved (appeals can take several years to conclude); (3) the claims administration process is completed; and (4) the Court approves the allocation of the Net Settlement Fund.

REMAINING IN THE SETTLEMENT CLASS

12. What Happens if I Remain in the Settlement Class?

If the Settlement Agreement becomes final, you will give up your right to sue the Settling Defendants on your own for the claims described in the Settlement Agreement unless you exclude yourself from the Settlement Class. You also will be bound by any decisions by the Court relating to the Settlement Agreement. In return for paying the settlement amount, the Settling Defendants (and certain related entities defined in the Settlement Agreement) will be released from claims relating to the alleged conduct involving IMDs. The Settlement Agreement describes the released claims in detail. Read the Settlement Agreement carefully, as those releases will be binding on you if the Court approves the Settlement Agreement. If you have any questions, you can talk to Settlement Class Counsel listed in Question 16 for free, or you can talk to your own lawyer at your expense. The Settlement Agreement and the specific releases are available at www.InteriorMoldedDoorSettlement.com.

13. How do I Get Out of the Settlement Class?

To exclude yourself from the Settlement Class, you must send a letter by mail stating that you want to be excluded from In re Interior Molded Doors Indirect Purchaser Antitrust Litigation Settlement Class. Your letter must also include:

- Your name, address, and telephone number.
- Documents reflecting your purchase of Standalone IMDs.
- Purchase documentation should include: (a) the date of purchase, (b) the state where the Standalone IMD was purchased, (c) your place of residency at the time of purchase, or if a business, your principal place of business at the time of purchase, and (d) the amount paid.
- Your signature.

Any request for exclusion must be mailed to the address immediately below and must be **received** no later than **March 15, 2021**:

Interior Molded Doors Indirect Settlement Exclusions
c/o Postlethwaite & Netterville
P.O. Box 4147
Baton Rouge, LA 70821

14. If I Don't Exclude Myself, Can I Sue for the Same Thing Later?

No. Unless you exclude yourself, you give up any right to sue the Settling Defendants for the claims being released in this litigation.

15. If I Exclude Myself, Can I Still Get Money Benefits?

No. If you exclude yourself from the Settlement Class, you will not get any money as a result of the Settlement Agreement.

THE LAWYERS REPRESENTING YOU

16. Do I Have a Lawyer Representing Me?

The Court has appointed the following firms as Settlement Class Counsel to represent you and all Settlement Class Members:

Daniel E. Gustafson Daniel C. Hedlund Michelle J. Looby Kaitlyn L. Dennis GUSTAFSON GLUEK PLLC 120 South 6th Street Suite 2600 Minneapolis, MN 55402	Joseph R. Saveri Steven N. Williams Kyle Quackenbush JOSEPH SAVERI LAW FIRM 601 California Street Suite 1000 San Francisco, CA 941	William V. Reiss ROBINS KAPLAN LLP 399 Park Avenue Suite 3600 New York, NY 10022
---	--	--

You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

17. How Will the Lawyers be Paid?

At the Final Fairness Hearing, Settlement Class Counsel may ask the Court (a) to award service awards to the Class Representatives, not to exceed \$56,000 total, (b) to reimburse Settlement Class Counsel for certain costs and expenses, not to exceed \$5 million and (c) for attorneys' fees based on their services in this litigation, not to exceed 33% of the Settlement Fund. Any payment to the attorneys and/or Class Representatives will be subject to Court approval after notice to the Settlement Class, and the Court may award less than the requested amount. The attorneys' fees, costs, service awards, and litigation expenses that the Court orders, plus the costs to administer the Settlement Agreement, will come out of the Settlement Fund.

When Settlement Class Counsel's motion for fees, reimbursement of costs and expenses, and award for Class Representative service awards is filed, it will be available on the docket and at **www.InteriorMoldedDoorSettlement.com**. The motion will be posted on the website at least 45

days before the Court holds a hearing to consider the request, and you will have an opportunity to comment on the motion. (See Question 18).

Register at the website or call 1-844-964-2884 to receive notice when the motion is filed.

OBJECTING TO THE SETTLEMENT AGREEMENT

18. How do I Object to or Comment on the Settlement Agreement?

If you have objections to or comments about any aspect of the Settlement Agreement, you may express your views to the Court. You can only object to or comment on the Settlement Agreement if you do not exclude yourself from the Settlement Class. To object to or comment on the Settlement Agreement, your submission must contain the following:

- Your name, address, and telephone number;
- Documents reflecting your purchase of one or more Standalone IMDs;
- Purchase documentation should include: (a) the date of purchase, (b) the state where the Standalone IMD was purchased, (c) your place of residency at the time of purchase, or if a business, your principal place of residence at the time of purchase and (d) the amount paid.
- The reasons you object to the Settlement Agreement, along with any supporting materials; and
- Your signature.

Any comment or objection must be in writing, mailed to **both** of the addresses listed immediately below, and must be **received** by both the Clerk of the Court and the Settlement Administrator, no later than March 15, 2021. The addresses are:

Court	Settlement Administrator
District Court for the Eastern District of Virginia Richmond Division 701 East Broad Street Richmond, VA 23219	Interior Molded Doors Indirect Settlement Administrator c/o Postlethwaite & Netterville P.O. Box 4147 Baton Rouge, LA 70821

Any objection or comment must also be timely filed with the Court (on or before March 15, 2021).

19. What is the Difference Between Excluding Myself from the Settlement Class and Objecting to the Settlement Agreement?

If you exclude yourself from the Settlement Class, you are telling the Court that you do not want to participate in the settlement. Therefore, you will not be eligible to receive any payment from the Settlement Agreement, and you will not be able to object to it. Objecting to the Settlement Agreement simply means telling the Court that you do not like something about the Settlement Agreement. Objecting does not make you ineligible to receive a payment.

FINAL FAIRNESS HEARING

20. When and Where Will the Court Decide Whether to Approve the Settlement Agreement?

The Court will hold a Final Fairness Hearing on **[insert Fairness Hearing date]**, at the United States Courthouse, District Court for the Eastern District of Virginia, Richmond Division 701 East Broad Street, Richmond, VA 23219. The hearing may be moved to a different date or time without additional notice, so check www.InteriorMoldedDoorSettlement.com or call 1-844-964-2884 for current information. At this hearing, the Court will consider whether the Settlement Agreement and the Plan of Allocation are fair, reasonable, and adequate. If there are objections or comments, the Court will consider them at that time and may listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Settlement Class Counsel and determine any service awards for the Class Representatives. At or after the hearing, the Court will decide whether to approve the Settlement Agreement.

21. Do I Have to Attend the Final Fairness Hearing?

No. Settlement Class Counsel will answer any questions the Court may have. But you are welcome to attend at your expense. If you send an objection or comment, you do not have to come to Court to talk about it. As long as you mailed your complete and valid written objection on time, as described above in Question 18, the Court will consider it. You may also hire your own lawyer at your own expense to attend on your behalf, but you are not required to do so.

If you do not exclude yourself from the Settlement Agreement, you can (but do not have to) participate and speak for yourself at the final approval hearing. You can also have your own individual lawyer speak separately for you, but you will have to pay for that lawyer yourself.

22. May I Speak at the Hearing?

If you send an objection or comment on the Settlement Agreement, Plan of Allocation, or motion for attorneys' fees, expenses and/or award of Class Representatives Service Awards, as described in Question 17, you have the right to speak at the Final Fairness Hearing as determined by the Court. You cannot speak at the hearing if you exclude yourself from the Settlement Class.

GET MORE INFORMATION

23. How Do I Get More Information?

This Notice summarizes the Settlement Agreement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement and more information about the settlements at www.InteriorMoldedDoorSettlement.com. You also may write with questions to info@InteriorMoldedDoorSettlement.com or call the toll-free number, 1-844-964-2884. You should also register at the website to be directly notified of the terms of the Plan of Allocation of the Settlement Fund, how to file a claim form, and other information concerning this case.

EXHIBIT

Case 3:18-cv-00850-JAG Document 296-1 Filed 10/29/20 Page 16 of 22 PageID# 10693
Businesses and Consumers Who Bought an Interior Molded Door Between March 1, 2014 and September 4, 2020, Could Receive \$25 or More From a Class Action Settlement Totaling \$19.5 Million

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

The lawsuit, *In re: Interior Molded Doors Indirect Purchaser Antitrust Litigation* Case No. 3:18-cv-00850-JAG, pending in the U.S. District Court for the Eastern District of Virginia, claims that JELD-WEN, Inc. and Masonite Corporation (“Settling Defendants”) agreed to fix the prices of Interior Molded Doors (“IMDs”) and as a result consumers and businesses who indirectly purchased Standalone IMDs not for resale may have paid more than they should have. Although the Settling Defendants have agreed to settle, they do not agree that they engaged in any wrongdoing or are liable or owe any money or benefits to Plaintiffs. The Court has not decided who is right.

Who is Included?

You are a Settlement Class Member if you indirectly purchased not for resale a Standalone IMD between March 1, 2014 and September 4, 2020. Purchases must have been made in, or while you were residing in an Indirect Purchaser State at the time of purchase. “Indirectly” means you bought the Standalone IMD from someone other than one of the Settling Defendants (e.g., you purchased a Standalone IMD at Home Depot, Lowe’s, or a lumber yard).

IMDs are a type of interior door made through a process of sandwiching a wood frame and hollow or solid core between two molded doorskins, rather than making the entire door from solid wood. A “Standalone Interior Molded Door” is an IMD that is not incorporated as part of a larger product (such as the purchase of a home) or service (such as the installation of the door in a home). For example, you are included if you are (a) a consumer who purchased an IMD for home installation OR (b) a business or commercial contractor that purchased an IMD to be included as a service provided to a customer or for its own use. Standalone IMDs contain patterns and do not include flush doors which have no patterns or relief.

The definitions of IMDs, Standalone IMDs, and the list of Indirect Purchaser States, among others, are available by visiting the Settlement Website www.InteriorMoldedDoorSettlement.com.

What Does the Settlement Provide?

The Settlement provides for a total Settlement Fund of \$19,500,000 (“Settlement Fund”). After deduction of notice and administration expenses, attorneys’ fees, service awards to the Class Representatives, and litigation expenses, as approved by the Court (“Net Settlement Fund”), the Net Settlement Fund will be available for distribution to Settlement Class Members who timely file valid claims. It is estimated that each member of the Settlement Class who submits a valid claim will receive at least \$25. Payments will be based on a number of factors, including at least the number of valid claims filed by all Settlement Class Members and the number of Standalone IMDs purchased by each Settlement Class Member.

What are My Rights and Options?

Submit a Claim: To receive a Settlement payment, you must submit a claim by going to www.InteriorMoldedDoorSettlement.com and submitting (or printing and mailing) a Claim Form. A valid Claim Form must be **submitted online or postmarked by April 6, 2021**.

Do Nothing: You will be included in the Settlement Class and bound by the Court’s decision, but you will not receive a payment. You will give up your rights to sue the Settling Defendants about the claims in this case.

Exclude Yourself: You can exclude yourself (“opt out”) of the Settlement by submitting an exclusion request to the Settlement Administrator that is **received no later than March 15, 2021**. If you do so, you will not be eligible to receive a settlement payment but you will retain the right to sue on your own regarding any claims that are part of the Settlement.

Object: You may also object to any part of this Settlement. Objections must be must be mailed to the Clerk of the Court and the Settlement Administrator and **received no later than March 15, 2021**.

Details about how to opt-out, object, and mail your Claim Form are available at the Settlement Website.

Has the Court Approved the Settlement?

No, the Court has set a hearing for **Month DD, 202Y at :__ am/pm** to determine whether to approve the Settlement, Class Representative service awards not to exceed \$56,000 total, attorney’s expenses not to exceed \$5 million, and attorneys’ fees not to exceed 33% of the Settlement Fund. If there are objections or comments, the Court will consider them at that time. You or your lawyer may appear at the hearing at your expense. The hearing may be moved to a different date or time without additional notice. Check the Settlement Website or call 1-844-964-2884 for current information.

How Can I Get More Information?

For detailed information about this lawsuit and your rights, visit the Settlement Website or call 1-844-964-2884.

EXHIBIT

Interior Molded Door Indirect Settlement Claims
c/o Postlethwaite & Netterville
PO Box 4147
Baton Rouge, LA 70821

**Your Claim Form Must Be Submitted
On or Before 04/06/2021**

IN RE: INTERIOR MOLDED DOORS INDIRECT PURCHASER ANTITRUST LITIGATION

United States District Court for the Eastern District of Virginia (Case No. 3:18-cv-00850-JAG)

GENERAL CLAIM FORM INFORMATION

This claim form is for all persons and entities that, between March 1, 2014 and September 4, 2020, indirectly purchased one or more Standalone Interior Molded Doors (IMDs) manufactured or sold by JELD-WEN or Masonite (including the Reliablit brand sold by Lowe's) not for resale.

In order for your claim to be eligible for consideration to receive monetary damages, the place of your purchase, the place of your residence (for individuals), or your principal place of business (for businesses) must be in one of the following states: Arizona, Arkansas, California, Florida, Hawaii, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, New Hampshire, New York, North Carolina, North Dakota, Oregon, South Carolina, Tennessee, Utah, West Virginia, or Wisconsin.

Please visit www.InteriorMoldedDoorSettlement.com for additional information regarding who may submit a claim.

Settlement Class Members are eligible for one claim submission per household or entity. The actual payment amount a Settlement Class Member receives will depend on a number of factors, including the amount of money available from the Settlement Fund, the number of valid claims filed by all Settlement Class Members, and the number of Standalone IMDs purchased by each Settlement Class Member. **It is expected that at least \$25.00 will be paid to each eligible Settlement Class Member that submits a valid Claim Form.**

THIRD-PARTY SUBMISSIONS: If you are submitting a Claim Form on behalf of a client, either an individual or business, you **MUST** register with the Settlement Administrator and submit claims online. Please visit the Settlement Website to register.

TO SUBMIT A CLAIM FOR PAYMENT:

1. **Complete all sections of this Claim Form.** You will have the best chance of having your claim approved if you provide complete information for all sections in this form. You **must** provide your name and contact information.
2. **Sign the Claim Form.** You must confirm that the information you provide is true and correct by signing the Claim Form. Unsigned Claim Forms will be denied. All information is subject to verification for accuracy by the Settlement Administrator.
3. **Provide proof of purchase. Claims for greater than three (3) Standalone IMDs require proof of purchase.** There are no purchase limits for products for which proof of purchase is provided. Proof of purchase may be in the form of receipts, purchase orders, invoices, transaction records, or other documents indicating the product purchased, date of purchase, and quantity purchased. If you purchased greater than 3 Standalone IMDs, please mail in the proof of purchase attached to this Claim Form or upload them with your online Claim Form on the settlement website. *If you claim greater than 3 Standalone IMDs and you fail to provide Proof of Purchase or the documentation provided does not adequately support the quantity of purchases claimed, you may be required to provide additional information or your claim may be reduced or denied by the Settlement Administrator.*

Claims for 3 or fewer Standalone IMDs do not require documentation at this time, but please keep any documents that you have. The Settlement Administrator will contact you if additional information is needed.

4. **Submit the completed Claim Form to the Settlement Administrator by April 6, 2021.** This Claim Form should only be used if a claim is being mailed and is not being filed online. You may go to www.InteriorMoldedDoorSettlement.com to submit your claim online, or you may submit the Claim Form by mail to the address at the top of this form.
5. It is your responsibility to notify the Settlement Administrator of any changes to your contact information after the submission of your Claim Form. You can update your contact information at www.InteriorMoldedDoorSettlement.com.

CLAIM FORM

CLAIM SUBMISSION DEADLINE: 04/06/2021

Section 1A: Claimant Information (Individuals)

***Complete Section 1A if you are submitting this claim as an individual (for example, a "Do-It-Yourself" homeowner) who purchased Standalone Interior Molded Doors (IMDs) for a home repair or remodeling project. Businesses should skip to Section 1B.**

First Name	Middle Initial				
Last Name	Suffix				
Mailing Address: Street Address/P.O. Box (include Apartment/Suite/Floor Number)					
City	State	Zip Code			
Email Address (Required)					
()		-	
Phone Number					

Section 1B: Claimant Information (Businesses)

***Complete Section 1B if you are submitting this claim as a business. Claimants that are individuals should complete Section 1A and skip this section.**

Business Name					
Contact Person First Name	Contact Person Last Name				
Mailing Address: Street Address/P.O. Box (include Apartment/Suite/Floor Number)					
City	State	Zip Code			
Email Address (Required)					
()		-	
Phone Number					

Section 1C: Claimant Address at Time of Purchase

If different than the address indicated above, provide the address where you lived (for individuals) or your principal place of business (for businesses) at the time of your Standalone IMD purchases:

Address at the time Standalone IMDs Were Purchased (include Apartment/Suite/Floor Number)			
City	State	Zip Code	

Section 2: Eligibility Questions

1. Did you indirectly purchase Standalone Interior Molded Doors manufactured or sold by JELD-WEN or Masonite (including the Reliablilt brand sold by Lowe's) not for resale in or while residing in the following states between March 1, 2014 and September 4, 2020?

Arizona, Arkansas, California, Florida, Hawaii, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, New Hampshire, New York, North Carolina, North Dakota, Oregon, South Carolina, Tennessee, Utah, West Virginia, or Wisconsin.

Note: To be eligible to receive monetary damages, the state of your purchase, the state of your residence (for individuals), or the state of your principal place of business (for businesses) must be in one of the states listed above.

YES NO

2. Did you purchase the Standalone Interior Molded Doors from a seller (other than Menard's) and not directly from the Defendants? For example, if you purchased the doors from Home Depot, then your answer should be "YES." If your purchases were made directly from either JELD-WEN or Masonite, then your answer should be "NO."

YES NO

Section 3: Purchase Information

Provide the following information regarding purchases of Standalone Interior Molded Doors (IMDs) manufactured by JELD-WEN or Masonite (including the Reliablilt brand sold by Lowe's) that were made between March 1, 2014 and September 4, 2020 in an eligible state listed in Section 2 above.

Proof of Purchase: Claims for greater than 3 Standalone IMDs require proof of purchase. There are no purchase limits for products for which proof of purchase is provided. Proof of purchase may be in the form of receipts, purchase orders, invoices, transaction records, or other documents indicating the product purchased, date of purchase, and quantity purchased. If you purchased greater than 3 Standalone IMDs, please mail in the proof of purchase attached to this Claim Form or upload them with your online Claim Form on the settlement website. *If you claim greater than 3 Standalone IMDs and you fail to provide Proof of Purchase or the documentation provided does not adequately support the quantity of purchases claimed, you may be required to provide additional information or your claim may be reduced or denied by the Settlement Administrator.*

Claims for 3 or fewer Standalone IMDs do not require documentation at this time, but please keep any documents that you have. The Settlement Administrator will contact you if additional information is needed.

Large Quantity Purchases: If your claim includes a large quantity of transactions or products purchased, please submit your claim online or use the attached *Purchase Information Addendum*.

	Purchase Location <small>(Name of Store or Retailer)</small>	City of Purchase	State of Purchase	Approximate Date of Purchase	Brand of Door	Quantity Purchased
1	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
2	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
3	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
Total Quantity Purchased:						<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
Is Proof of Purchase included with your claim submission?						<input type="checkbox"/> YES <input type="checkbox"/> NO

IN RE: INTERIOR MOLDED DOORS INDIRECT PURCHASER ANTITRUST LITIGATION

United States District Court for the Eastern District of Virginia (Case No. 3:18-cv-00850-JAG)

Section 4: Certification

I confirm that all of the information on this Claim Form and supporting documents provided is true and correct to the best of my knowledge. I understand that my Claim Form may be subject to audit, verification, and Court review.

Signature: _____

Printed Name: _____

Date: / / 2 0

REMINDER CHECKLIST

1. Complete all sections of this Claim Form.
2. Sign and date the Claim Form in Section 4.
3. Enclose Proof of Purchase documentation if you have claimed more than 3 Standalone IMDs. Claims for 3 or fewer Standalone IMDs do not require documentation at this time, but please keep any documents that you have. The Settlement Administrator will contact you if additional information is needed.
4. Mail your completed Claim Form to the Settlement Administrator or submit your claim online at www.InteriorMoldedDoorSettlement.com. Please keep a copy of your completed Claim Form for your records.
5. It is your responsibility to notify the Settlement Administrator of any changes to your contact information after the submission of your Claim Form. You can update your contact information at www.InteriorMoldedDoorSettlement.com.

PURCHASE INFORMATION ADDENDUM

Section 3: Purchase Information (Continued - Only Use If Needed)

Provide the following information regarding purchases of Standalone Interior Molded Doors (IMDs) manufactured by JELD-WEN or Masonite (including the Reliablilt brand sold by Lowe's) that were made between March 1, 2014 and September 4, 2020 in an eligible state listed in Section 2 of the Claim Form.

Proof of Purchase: Claims for greater than three (3) Standalone IMDs require proof of purchase. There are no purchase limits for products for which proof of purchase is provided. Proof of purchase may be in the form of receipts, purchase orders, invoices, transaction records, or other documents indicating the product purchased, date of purchase, and quantity purchased. If you purchased greater than 3 Standalone IMDs, please mail in the proof of purchase attached to this Claim Form or upload them with your online Claim Form on the settlement website. *If you claim greater than 3 Standalone IMDs and you fail to provide Proof of Purchase or the documentation provided does not adequately support the quantity of purchases claimed, you may be required to provide additional information or your claim may be reduced or denied by the Settlement Administrator.*

Claims for 3 or fewer Standalone IMDs do not require documentation at this time, but please keep any documents that you have. The Settlement Administrator will contact you if additional information is needed.

Large Quantity Purchases: If you need to include additional purchase transactions that do not fit on this page, please submit your claim online at www.InteriorMoldedDoorSettlement.com.

	Purchase Location <small>(Name of Store or Retailer)</small>	City of Purchase	State of Purchase	Approximate Date of Purchase	Brand of Door	Quantity Purchased
1	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
2	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
3	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
4	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
5	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
6	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
7	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
8	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
9	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
10	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
11	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>
12	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>	<input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/> <input style="width: 20px;" type="text"/>

Total Quantity Purchased:

Is Proof of Purchase included with your claim submission? YES NO