

**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 June 25, 2021**

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

- Please read this Notice and the Settlement Agreement available at [www.InteriorMoldedDoorSettlement.com](http://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.

<b>Your Legal Rights and Options</b>		
<b>SUBMIT A CLAIM</b>	This is the only way to get a payment from the Settlement. You can submit a valid and timely claim form online at <a href="http://www.InteriorMoldedDoorSettlement.com">www.InteriorMoldedDoorSettlement.com</a> or by mail (described in Question 9 below). If you do not submit a claim, you will not receive a settlement payment.	June 25, 2021
<b>EXCLUDE YOURSELF</b>	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.	June 2, 2021

<b>DO NOTHING</b>	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
<b>OBJECT TO THE SETTLEMENT, FEE AND EXPENSE REQUEST, OR PLAN OF ALLOCATION</b>	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.	June 2, 2021
<b>GO TO THE HEARING</b>	If you submit a written objection, you may ask to speak in Court about your opinion of the Settlement Agreement.	July 13, 2021

- 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 July 13, 2021. Please check the Settlement website, [www.InteriorMoldedDoorSettlement.com](http://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.**

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1.	Why is There a Notice?
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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?
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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?
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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](http://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. 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](http://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](http://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](mailto: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?
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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?
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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](http://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](http://www.InteriorMoldedDoorSettlement.com) or by printing and mailing your completed form postmarked by June 25, 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](mailto:info@InteriorMoldedDoorSettlement.com), or visit [www.InteriorMoldedDoorSettlement.com](http://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](http://www.InteriorMoldedDoorSettlement.com) after approval.

Claims must be submitted online or postmarked no later than June 25, 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](http://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 Settlement.

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](http://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 **June 2, 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
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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](http://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 June 2, 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 June 2, 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 at **9:00 a.m. on July 13, 2021** 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](http://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, important Court documents and more information about the settlement at [www.InteriorMoldedDoorSettlement.com](http://www.InteriorMoldedDoorSettlement.com).

The Plaintiffs' and Settling Defendants' class certification briefing and corresponding expert reports are currently under seal pending an appeal before the Fourth Circuit Court of Appeals.

These documents, however, can be obtained by Settlement Class Members pursuant to Section 3.6 of the Protective Order by contacting Settlement Class Counsel or the Settlement Administrator. The Protective Order is available at [www.InteriorMoldedDoorSettlement.com](http://www.InteriorMoldedDoorSettlement.com). If and when these documents are unsealed, they will promptly be posted online at [www.InteriorMoldedDoorSettlement.com](http://www.InteriorMoldedDoorSettlement.com). Should the Court or Fourth Circuit require any redactions, the documents will be posted online in redacted form.

You may write with questions to [info@InteriorMoldedDoorSettlement.com](mailto: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.