

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

IN RE: POOL PRODUCTS DISTRIBUTION
MARKET ANTITRUST LITIGATION

MDL DOCKET NO. 2328

SECTION: R(2)

This document relates to:

CHIEF JUDGE VANCE
MAG. JUDGE WILKINSON

ALL DIRECT PURCHASER CASES

**MOTION FOR FINAL APPROVAL OF THE SETTLEMENTS BETWEEN
DIRECT PURCHASER PLAINTIFFS AND DEFENDANTS HAYWARD
INDUSTRIES, INC. AND ZODIAC POOL SYSTEMS, INC.**

NOW INTO COURT, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, through undersigned counsel, Direct Purchaser Plaintiffs (“Plaintiffs”) respectfully move the Court for an Order granting final approval of the class action Settlements between Plaintiffs and Defendants Hayward Industries, Inc. and Zodiac Pool Systems, Inc. This motion is based on the accompanying Memorandum of Law, and the Declarations of Ronald J. Aranoff and Jennifer M. Keough, submitted herewith.

WHEREFORE, Plaintiffs pray that, after due consideration, the Court: grant this motion for final approval of the Settlements; and enters the attached [Proposed] Order.

Dated: March 12, 2015

Respectfully submitted,

/s/ Leonard A. Davis

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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing Motion for Final Approval of the Settlements Between Direct Purchaser Plaintiffs and Defendants Hayward Industries, Inc. and Zodiac Pool Systems, Inc. has been served on Direct Purchaser Plaintiffs' Liaison Counsel, Russ Herman, Indirect Purchaser Plaintiffs' Liaison Counsel, Thomas H. Brill, Defendants' Liaison Counsel, William Gaudet, and Manufacturer Defendants' Liaison Counsel, Wayne Lee, by e-mail and upon all parties by electronically uploading the same to LexisNexis File & Serve in accordance with Pretrial Order No. 8, and that the foregoing was electronically filed with the Clerk of Court of the United States District Court for the Eastern District of Louisiana by using the CM/ECF System, which will send a notice of electronic filing in accordance with the procedures established in MDL 2328, on this 12th day of March, 2015.

/s/ Leonard A. Davis