

**If You Purchased Liquid Aluminum Sulfate In The United States Directly From A Defendant From January 1, 1997 Through February 28, 2011, You Could Be Affected By A Proposed Class Action Settlement**

*Please read this entire Notice carefully. This Settlement may affect your rights.*

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of New Jersey, that the class action lawsuit captioned *In Re: Liquid Aluminum Sulfate Antitrust Litigation*, Civil Action No. 16-md-2687 (JLL) (JAD) (“Action”) has been preliminarily certified as a class action for the purposes of settlement only and a proposed partial settlement of the Action (“Settlement”) has been reached. The Settlement is between Direct Purchaser Class Plaintiffs<sup>1</sup> and settling defendants GEO Specialty Chemicals, Inc. (“GEO”), Kenneth A. Ghazey and Brian C. Steppig (the “GEO Settling Parties”). GEO has agreed to pay, on behalf of itself and the GEO Settling Parties: (i) \$10,796,800 in cash and (ii) up to \$13,527,400 from a sale of all or substantially all of GEO’s equity interests, a merger of GEO and another entity, or a sale of all or substantially all of GEO’s assets (collectively, a “Sale”), EBITDA-based payments, and/or shareholder dividends. The GEO Settling Parties have also agreed to provide certain cooperation measures in Direct Purchaser Class Plaintiffs’ ongoing litigation efforts against the non-settling defendants. **The Settlement does not release any claims of Direct Purchaser Class Plaintiffs and the other members of the Direct Purchaser Settlement Class (as defined below) against any other Defendant in the Action and litigation against those Defendants is ongoing.**<sup>2</sup>

**WHAT IS THIS LAWSUIT ABOUT?**

The lawsuit claims that the GEO Settling Parties participated in a conspiracy – with other Defendants in the Action and unnamed co-conspirators – to allocate territories and/or to not compete for each other’s historical business by rigging bids, allocating customers, and fixing, stabilizing, and maintaining the price of liquid aluminum sulfate (“Alum”) sold in the United States from January 1, 1997 to at least February 28, 2011 in violation of the federal antitrust laws. The GEO Settling Parties deny all of Direct Purchaser Class Plaintiffs’ claims and deny all wrongdoing. The Court has not made any decision on the merits of Direct Purchaser Class Plaintiffs’ claims against the GEO Settling Parties because the parties have agreed to settle the claims. On July 19, 2018, the Court granted preliminary approval of the Settlement.

**AM I A MEMBER OF THE DIRECT PURCHASER SETTLEMENT CLASS?**

The Direct Purchaser Settlement Class consists of all persons or entities that purchased Alum in the United States directly from a Defendant from January 1, 1997 through February 28, 2011. Excluded from the Direct Purchaser Settlement Class are (1) Defendants and their respective parents, subsidiaries, and affiliates, and (2) any Direct Purchaser Settlement Class Members who timely and validly elect to be excluded from the Direct Purchaser Settlement Class.

**WHAT DOES THE SETTLEMENT PROVIDE?**

In accordance with the terms of the Settlement, GEO, on behalf of itself and the GEO Settling Parties, has agreed to: (i) pay a total of \$10,796,800 in cash; (ii) pay up to \$13,527,400 from a Sale, EBITDA-based payments, and/or shareholder dividends; and (iii) provide certain cooperation measures in the ongoing litigation of the Action against the non-settling Defendants. The foregoing monetary amounts and any accrued interest are referred to herein as the “Settlement Funds.” If you are a Direct Purchaser Settlement Class Member and do not request exclusion from the Direct Purchaser Settlement Class, you may be eligible to receive a payment from the Settlement Funds. Every Direct Purchaser Settlement Class Member who submits a valid claim will receive their pro rata share of the Settlement Funds based on: (1) the Direct Purchaser Settlement Class Member’s eligible purchases of Alum; (2) the total money available to pay claims; (3) the total dollar value of all valid claims submitted; and (4) the cost of settlement administration and notice and Court-awarded attorneys’ fees and expenses. Interim DPP Lead Counsel will seek an award of attorneys’ fees up to 33.3% of the total consideration made available to the Direct Purchaser Settlement Class to compensate all of the lawyers and their law firms that have worked on this Action since its inception. Interim DPP Lead Counsel will also seek reimbursement of the costs and expenses advanced on behalf of the Direct Purchaser Settlement Class, and up to \$40,000 for each of the Director Purchaser Class Plaintiffs. All Court-awarded attorneys’ fees, expenses and case contribution awards will be paid from the Settlement Funds. Interim DPP Lead Counsel’s application for attorneys’ fees, expenses and case contribution awards will be available for review on the Settlement website, [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com), once it is filed with the Court on or before September 17, 2018.

**HOW DO I RECEIVE A PAYMENT FROM THE SETTLEMENT?**

To qualify for a payment, you must complete and submit a valid Claim Form, available at [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com). Be sure to provide all of the information the Claim Form requests, sign it, and mail it by first-class mail, or submit it online at [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com), **postmarked or received no later than December 17, 2018**, to: Liquid Aluminum Sulfate Antitrust Litigation – GEO Direct Purchaser Settlement, c/o Settlement Administrator, P.O. Box 30097, Philadelphia, PA 19103. If the Court approves the Settlement, the Settlement Funds will be distributed, on a pro rata basis at a later date, to Direct Purchaser Settlement Class Members who submit valid and timely Claim Forms. If you have any questions regarding your eligibility to participate in the Settlement or need assistance completing your Claim Form, please contact the Court-appointed Settlement Administrator, at the above address or by calling 1-855-338-6128.

**CAN I EXCLUDE MYSELF FROM THE DIRECT PURCHASER SETTLEMENT CLASS?**

If you want to keep the right to sue or continue to sue the GEO Settling Parties about the legal issues in this case, then you must exclude yourself from the Direct Purchaser Settlement Class. **If you exclude yourself, you will not get any payment from the Settlement.** To exclude yourself, you must send a letter to the Settlement Administrator, **postmarked no later than October 2, 2018**, stating that you want to be excluded from the Direct Purchaser Settlement Class. The mailed notice and the Settlement website, [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com), have instructions regarding how to request exclusion.

**HOW DO I OBJECT TO THE SETTLEMENT?**

You can object to the Settlement, plan of distribution, or the request for attorneys’ fees, expenses, and case contribution awards if you are a Direct Purchaser Settlement Class Member and have not requested exclusion. To object, you must file your written objection and any supporting materials with the Court and mail copies to counsel, **postmarked no later than October 2, 2018**. The mailed notice and the Settlement website, [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com), have instructions regarding how to object.

**WHAT IF I DO NOTHING?**

If you do nothing, you will not receive a payment from the Settlement Funds, but you will remain in the Direct Purchaser Settlement Class, and you will be bound by the releases regarding the claims in this case as set forth in paragraphs 15-16 of the Settlement Agreement, available in its entirety on the Settlement website, [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com). **The only way to qualify for a payment from the Settlement is to submit a Claim Form.**

**WHO REPRESENTS ME?**

The Court appointed James E. Cecchi, Esq. of Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. as Interim DPP Lead Counsel to represent the Direct Purchaser Settlement Class. If you want to be represented by your own lawyer, you may hire one at your own expense.

**WHEN WILL THE JUDGE DECIDE WHETHER TO APPROVE THE SETTLEMENT?**

The Court will hold a final fairness hearing to decide whether to approve the terms of the Settlement at **10:00 a.m. on November 14, 2018**, at the Martin Luther King, Jr. Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101. If there are objections, the Court will consider them but may still approve the Settlement. You may appear at the hearing, but you are not required to do so. The hearing may be rescheduled without notice to the Direct Purchaser Settlement Class, so if you plan to attend, please periodically check the Settlement website for any updates.

**This notice is only a summary. For more information regarding this lawsuit and the Settlement, visit [www.LiquidAluminumDirectSettlement.com](http://www.LiquidAluminumDirectSettlement.com).**

<sup>1</sup> Director Purchaser Class Plaintiffs are Central Arkansas Water; City of Charlotte, North Carolina; City and County of Denver, Colorado, acting by and through its board of Water Commissioners; Flambeau River Papers, LLC; City of Greensboro, North Carolina; Mobile Area Water and Sewer System; City of Rochester, Minnesota; City of Sacramento, California; SUEZ Water Environmental Services Inc.; SUEZ Water New Jersey Inc.; SUEZ Water Princeton Meadows Inc.; SUEZ Water New York Inc.; SUEZ Water Pennsylvania Inc.; and City of Texarkana, Arkansas and City of Texarkana, Texas, d/b/a Texarkana Water Utilities.

<sup>2</sup> The defendants are General Chemical Corporation, General Chemical Performance Products, LLC, General Chemical LLC, GenTek Inc., Chemtrade Logistics Income Fund, Chemtrade Logistics Inc., Chemtrade Chemicals Corporation, Chemtrade Chemicals US, LLC, Chemtrade Solutions, LLC, C&S Chemicals, Inc., GEO Specialty Chemicals, Inc., USALCO, LLC, Kemira Chemicals, Inc., Southern Ionics, Inc., American Securities, LLC, Frank A. Reichl, Brian C. Steppig, Vincent J. Opalewski, Alex Avraamides, Amita Gupta, Kenneth A. Ghazey, Milton Sundbeck, Matthew LeBaron and Scott Wolff (collectively, “Defendants”).