# THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA

If You Purchased Ready-Mix Concrete Directly From Lafarge, Argos, Coastal, Thomas, Evans Or Elite In The Greater Savannah Area From January 1, 2010, Through July 31, 2016, A Class Action Settlement May Affect Your Rights.

A federal court authorized this Notice. This is not a solicitation from a lawyer.

# NOTICE OF CLASS ACTION SETTLEMENTS AND HEARING

ALL INDIVIDUALS OR ENTITIES WHO PURCHASED READY-MIX CONCRETE FROM JANUARY 1, 2010 THROUGH JULY 31, 2016, DIRECTLY FROM CERTAIN PLANTS LISTED BELOW THAT WERE OPERATED IN THE GREATER SAVANNAH REGION, INCLUDING PARTS OF GEORGIA AND SOUTH CAROLINA, BY LAFARGE NORTH AMERICA, INC. ("LAFARGE"), ARGOS USA LLC OR ARGOS READY MIX LLC ("ARGOS"), COASTAL CONCRETE SOUTHEAST II, LLC ("COASTAL"), THOMAS CONCRETE, INC. OR THOMAS CONCRETE OF SOUTH CAROLINA, INC. ("THOMAS"), EVANS CONCRETE, LLC ("EVANS") AND ELITE CONCRETE, LLC ("ELITE") (COLLECTIVELY THE "DEFENDANTS").

PLEASE READ THIS ENTIRE NOTICE CAREFULLY. YOUR LEGAL RIGHTS MAY BE AFFECTED BY A LAWSUIT NOW PENDING IN THIS COURT.

The United States District Court for the District of South Carolina has authorized this Notice. This is not a solicitation. This is not a lawsuit against you and you are not being sued.

- Two settlements have been reached on behalf of a class of direct purchasers of Ready-Mix Concrete in the lawsuit entitled *Pro Slab, Inc., et al. v. Argos USA LLC, et al.*, Case No. 2:17-cv-03185-BHH (the "Lawsuit"), which is pending in the United States District Court for the District of South Carolina (the "Court"). Other Defendants remain in the case, and Plaintiffs' lawsuit will continue against them. The case is scheduled to be trial ready by October 2025.
- The Settlements are between the Plaintiffs in the Lawsuit and (i) Defendants Thomas Concrete, Inc. and Thomas Concrete of South Carolina, Inc. (the "Thomas Settlement"), and (ii) Defendant Evans Concrete, LLC (the "Evans Settlement"). The Settlements affect the rights of direct purchasers of Ready-Mix Concrete from Thomas, Evans and the other Defendants. Please read this and any other Notices from the Lawsuit carefully to determine if and how your rights may be affected.
- The Court has preliminarily approved the Thomas and Evans Settlements, and for each Settlement has certified an identical "Settlement Class" defined as follows: All persons or entities who purchased Ready-Mixed Concrete from January 1, 2010 through July 31, 2016 directly from one or more of the following plants operated by the Defendants (the "Subject Plants"):

Argos Plants		
Hilton Head/Ridgeland – 204 Pearlstine Dr., Ridgeland, SC 29936		
Hinesville/Midway – 60 Leroy Coffer Highway, Midway, GA 31320		
Pooler – 186 Pine Barren Rd., Pooler, GA 31322		
Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324		
Rincon – 544 Ebenezer Rd., Rincon, GA 31326		
Savannah – 1075 Louisville Rd., Savannah, GA 31415		
Statesboro – 9476 Highway 301 South, Statesboro, GA 30458		
Savannah Portable Plant – Various Locations		
Elite Plants		
Hardeeville – 1499 Stiney Rd., Hardeeville, SC 29927		
Bloomingdale – 1955 US-80, Bloomingdale, GA 31302		
Hinesville – 7091 US-84, Hinesville, GA 31313		
Savannah – 401 Telfair Rd., Savannah, GA 31415		

Claxton – 518 E. Smith St., Claxton, GA 30417  Garden City – 42 Telfair Pl., Garden City, GA 31415  Statesboro – 500 S. Zetterower Ave., Statesboro, GA 30458  Metter – 304 E. Lillian St., Metter, GA 30439  Hinesville/Midway – 160 Leroy Coffer Highway, Midway, GA 31320  Millen – 503 Gilmer St., Millen, GA 30442  Portable Plant – 988 Oracol Parkway, Black Creek, GA 31308  Portable Plant – Jimmy DeLoach Parkway, Pooler, GA 31322  Portable Plant – 400 S.H. Morgan Parkway, Bloomingdale, GA 31302  Portable Plant – Little Hurst Parkway, Port Wentworth, GA 31407  Portable Plant – 1501 Crossgate Rd., Port Wentworth, GA 31407  Jesup – 122 N. Sunset Blvd., Jesup, GA 31545  Swainsboro – 335 South Coleman St., Swainsboro, GA 30401  Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plants  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31405  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910  East Savannah – 42 Forbes Rd., Savannah, GA 31404	Evans Plants		
Statesboro – 500 S. Zetterower Ave., Statesboro, GA 30458  Metter – 304 E. Lillian St., Metter, GA 30439  Hinesville/Midway – 160 Leroy Coffer Highway, Midway, GA 31320  Millen – 503 Gilmer St., Millen, GA 30442  Portable Plant – 988 Oracol Parkway, Black Creek, GA 31308  Portable Plant – Jimmy DeLoach Parkway, Pooler, GA 31322  Portable Plant – 400 S.H. Morgan Parkway, Bloomingdale, GA 31302  Portable Plant – Little Hurst Parkway, Port Wentworth, GA 31407  Portable Plant – 1501 Crossgate Rd., Port Wentworth, GA 31407  Jesup – 122 N. Sunset Blvd., Jesup, GA 31545  Swainsboro – 335 South Coleman St., Swainsboro, GA 30401  Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plant  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Claxton – 518 E. Smith St., Claxton, GA 30417		
Metter – 304 E. Lillian St., Metter, GA 30439 Hinesville/Midway – 160 Leroy Coffer Highway, Midway, GA 31320 Millen – 503 Gilmer St., Millen, GA 30442 Portable Plant – 988 Oracol Parkway, Black Creek, GA 31308 Portable Plant – Jimmy DeLoach Parkway, Pooler, GA 31322 Portable Plant – 400 S.H. Morgan Parkway, Bloomingdale, GA 31302 Portable Plant – Little Hurst Parkway, Port Wentworth, GA 31407 Portable Plant – 1501 Crossgate Rd., Port Wentworth, GA 31407 Jesup – 122 N. Sunset Blvd., Jesup, GA 31545 Swainsboro – 335 South Coleman St., Swainsboro, GA 30401 Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plants Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320 Pooler – 186 Pine Barren Rd., Pooler, GA 31322 Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324 Rincon – 544 Ebenezer Rd., Rincon, GA 31326 Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308 Savannah – 620 Stiles Ave., Savannah, GA 31415 Portable Plant 50347 – Various Locations Coastal and Thomas Plants Beaufort – 69 Pebble Rd., Beaufort, SC 29906 Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Garden City – 42 Telfair Pl., Garden City, GA 31415		
Hinesville/Midway – 160 Leroy Coffer Highway, Midway, GA 31320  Millen – 503 Gilmer St., Millen, GA 30442  Portable Plant – 988 Oracol Parkway, Black Creek, GA 31308  Portable Plant – Jimmy DeLoach Parkway, Pooler, GA 31322  Portable Plant – 400 S.H. Morgan Parkway, Bloomingdale, GA 31302  Portable Plant – Little Hurst Parkway, Port Wentworth, GA 31407  Portable Plant – 1501 Crossgate Rd., Port Wentworth, GA 31407  Jesup – 122 N. Sunset Blvd., Jesup, GA 31545  Swainsboro – 335 South Coleman St., Swainsboro, GA 30401  Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plants  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Statesboro – 500 S. Zetterower Ave., Statesboro, GA 30458		
Millen – 503 Gilmer St., Millen, GA 30442  Portable Plant – 988 Oracol Parkway, Black Creek, GA 31308  Portable Plant – Jimmy DeLoach Parkway, Pooler, GA 31322  Portable Plant – 400 S.H. Morgan Parkway, Bloomingdale, GA 31302  Portable Plant – Little Hurst Parkway, Port Wentworth, GA 31407  Portable Plant – 1501 Crossgate Rd., Port Wentworth, GA 31407  Jesup – 122 N. Sunset Blvd., Jesup, GA 31545  Swainsboro – 335 South Coleman St., Swainsboro, GA 30401  Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plants  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Metter – 304 E. Lillian St., Metter, GA 30439		
Portable Plant – 988 Oracol Parkway, Black Creek, GA 31308  Portable Plant – Jimmy DeLoach Parkway, Pooler, GA 31322  Portable Plant – 400 S.H. Morgan Parkway, Bloomingdale, GA 31302  Portable Plant – Little Hurst Parkway, Port Wentworth, GA 31407  Portable Plant – 1501 Crossgate Rd., Port Wentworth, GA 31407  Jesup – 122 N. Sunset Blvd., Jesup, GA 31545  Swainsboro – 335 South Coleman St., Swainsboro, GA 30401  Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plants  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Hinesville/Midway – 160 Leroy Coffer Highway, Midway, GA 31320		
Portable Plant – Jimmy DeLoach Parkway, Pooler, GA 31322  Portable Plant – 400 S.H. Morgan Parkway, Bloomingdale, GA 31302  Portable Plant – Little Hurst Parkway, Port Wentworth, GA 31407  Portable Plant – 1501 Crossgate Rd., Port Wentworth, GA 31407  Jesup – 122 N. Sunset Blvd., Jesup, GA 31545  Swainsboro – 335 South Coleman St., Swainsboro, GA 30401  Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plants  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Millen – 503 Gilmer St., Millen, GA 30442		
Portable Plant – 400 S.H. Morgan Parkway, Bloomingdale, GA 31302  Portable Plant – Little Hurst Parkway, Port Wentworth, GA 31407  Portable Plant – 1501 Crossgate Rd., Port Wentworth, GA 31407  Jesup – 122 N. Sunset Blvd., Jesup, GA 31545  Swainsboro – 335 South Coleman St., Swainsboro, GA 30401  Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plants  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Portable Plant – 988 Oracol Parkway, Black Creek, GA 31308		
Portable Plant – Little Hurst Parkway, Port Wentworth, GA 31407  Portable Plant – 1501 Crossgate Rd., Port Wentworth, GA 31407  Jesup – 122 N. Sunset Blvd., Jesup, GA 31545  Swainsboro – 335 South Coleman St., Swainsboro, GA 30401  Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plants  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Portable Plant – Jimmy DeLoach Parkway, Pooler, GA 31322		
Portable Plant – 1501 Crossgate Rd., Port Wentworth, GA 31407  Jesup – 122 N. Sunset Blvd., Jesup, GA 31545  Swainsboro – 335 South Coleman St., Swainsboro, GA 30401  Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plants  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Portable Plant – 400 S.H. Morgan Parkway, Bloomingdale, GA 31302		
Jesup – 122 N. Sunset Blvd., Jesup, GA 31545  Swainsboro – 335 South Coleman St., Swainsboro, GA 30401  Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plants  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Portable Plant – Little Hurst Parkway, Port Wentworth, GA 31407		
Swainsboro – 335 South Coleman St., Swainsboro, GA 30401  Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plants  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Portable Plant – 1501 Crossgate Rd., Port Wentworth, GA 31407		
Sylvania – 1745 Florida Ave., Sylvania, GA 30467  Lafarge Plants  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Jesup – 122 N. Sunset Blvd., Jesup, GA 31545		
Lafarge Plants  Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Swainsboro – 335 South Coleman St., Swainsboro, GA 30401		
Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320  Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Sylvania – 1745 Florida Ave., Sylvania, GA 30467		
Pooler – 186 Pine Barren Rd., Pooler, GA 31322  Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Lafarge Plants		
Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324  Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Hinesville – 60 Leroy Coffer Highway, Midway, GA 31320		
Rincon – 544 Ebenezer Rd., Rincon, GA 31326  Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Pooler – 186 Pine Barren Rd., Pooler, GA 31322		
Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308  Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Richmond Hill – 3105 Highway 17, Richmond Hill, GA 31324		
Savannah – 620 Stiles Ave., Savannah, GA 31415  Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Rincon – 544 Ebenezer Rd., Rincon, GA 31326		
Portable Plant 50347 – Various Locations  Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Black Creek – 1800 Orafol Parkway, Black Creek, GA 31308		
Coastal and Thomas Plants  Beaufort – 69 Pebble Rd., Beaufort, SC 29906  Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Savannah – 620 Stiles Ave., Savannah, GA 31415		
Beaufort – 69 Pebble Rd., Beaufort, SC 29906 Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Portable Plant 50347 – Various Locations		
Bluffton – 28 Benton Field Dr., Bluffton, SC 29910	Coastal and Thomas Plants		
	Beaufort – 69 Pebble Rd., Beaufort, SC 29906		
East Savannah – 42 Forbes Rd., Savannah, GA 31404	Bluffton – 28 Benton Field Dr., Bluffton, SC 29910		
2 2 22 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	East Savannah – 42 Forbes Rd., Savannah, GA 31404		
Pooler – 1724 Old Dean Forest Rd., Pooler GA 31322	Pooler – 1724 Old Dean Forest Rd., Pooler GA 31322		

- The Court has appointed the Plaintiffs to represent the Thomas and Evans Settlement Classes and their attorneys as Class Counsel. These are partial settlements of the Lawsuit and do not settle any claims against any other Defendants in the Lawsuit.
- If you received this Notice by U.S. Mail it is because records produced in the Lawsuit indicate you may be a member of the Settlement Class. If you did not receive a Notice by U.S. Mail, but believe you are a Settlement Class Member, you should complete a contact form on <a href="www.SavannahConcreteCase.com">www.SavannahConcreteCase.com</a> so that you can directly receive future communications about the Settlement and a Claim Form, and to receive communications about any future settlements or other significant developments in the Lawsuit.
- The purpose of this Notice is to advise members of the Settlement Classes of the proposed Thomas and Evans Settlements and how to assert any rights you may have under the Settlements. It is also intended to advise you of a hearing to consider the proposed Settlements on November 3, 2025, at 10:00 a.m. The Court must decide whether to approve each of the Settlements as fair, reasonable and adequate.
- If you are a member of the Settlement Classes (a "Class Member"), your legal rights are affected whether you act or choose not to act. Please read this Notice carefully.

(You	DEADLINE	
EXCLUDE YOURSELF	You may exclude yourself from the Thomas Settlement or Evans Settlement, or both, in which case you will not be eligible to receive any payments from the Settlement(s) that are approved by the Court, or to comment on the Settlement(s). This is the only option that allows you to be part of any other lawsuit against Thomas or Evans about the legal claims brought or which could be brought in this case.	September 19, 2025
DO NOTHING	If you chose to do nothing you will remain eligible to receive any payments from the Settlements that are approved by the Court. This will result in a release of any right you may have to pursue the legal claims brought, or which could have been brought in this case, against Thomas or Evans based on direct purchases from the Subject Plants during the Class Period. If you choose to do nothing, and the Thomas Settlement and/or Evans Settlement are approved by the Court, you will be required to submit a Claim Form to receive money from the Settlements.	N/A
Овјест	Write to the Court if you do not think the Thomas Settlement or Evans Settlement is fair. If you exclude yourself from a Settlement, you may not object to that Settlement.	September 19, 2025
GO TO A HEARING	If you object, you may also ask to speak in Court about the fairness of the Thomas or Evans Settlement.	November 3, 2025, at 10:00 a.m.

These rights and options—and the deadlines to exercise them—are explained in this Notice.

#### **BASIC INFORMATION**

## 1. Why did I get this Notice?

This Notice has been sent to you because the Defendants' records show that you purchased Ready-Mix Concrete directly from one or more of the Subject Plants at any time from January 1, 2010 through and including July 31, 2016. You have the right to know about two proposed Settlements of a class action lawsuit that may affect your rights.

This Notice explains the Lawsuit, the terms of the Thomas and Evans Settlements, your legal rights, what benefits may be available, who may be eligible for them, and what you will be giving Thomas and Evans in these Settlements.

The Court in charge of the case is the United States District Court for the District of South Carolina. The case is known *Pro Slab, Inc., et al. v. Argos USA LLC, et al.*, Case No. 2:17-cv-03185-BHH. The companies who sued are called the Plaintiffs in this Lawsuit, who seek to represent themselves and the proposed Settlement Classes are: Pro Slab, Inc. Bremer Construction Management, Inc. and Michelle L. Vieira, Trustee of Forrest Concrete, LLC.

The companies that the Plaintiffs sued are called the Defendants. The Defendants in this lawsuit are Lafarge, Argos, Coastal, Thomas, Evans and Elite. The Defendant companies sold Ready-Mix Concrete from the Subject Plants in the greater Savannah area, including parts of Georgia and South Carolina, during some or all of the period from January 1, 2010 through July 31, 2016 that is the focus of the Lawsuit.

## 2. What is the Lawsuit about?

The Lawsuit asserts that, from January 1, 2010 through July 31, 2016, the Defendants participated in an unlawful conspiracy to raise, fix, maintain, or stabilize the price of Ready-Mix Concrete sold from the Subject Plants, in violation of Section 1 of the Sherman Act, Title 15, United States Code, Section 1. The Plaintiffs claim that this conspiracy among the Defendants resulted in artificially high prices for Ready-Mix Concrete sold by Defendants from the Subject Plants. The Plaintiffs are seeking money damages on behalf of themselves and other persons and entities who purchased Ready-Mix Concrete directly from the Subject Plants during this time period. The Defendants have denied liability and raised certain defenses to these claims, which if sustained by the Court following a trial may minimize or defeat any recovery for the Classes. The Court has not made any determination of any liability as to the Defendants for these claims.

#### 3. What is a class action?

A class action is a lawsuit in which one or more persons or entities called class representatives sue on behalf of other persons or entities who have similar claims. Together all these persons are a "class" or, individually, "class members." In a class action, one court resolves the issues for all class members, except for those who exclude themselves from the class. For this reason, the Court must find that the Thomas and Evans Settlements are fair, reasonable and adequate to the Settlement Classes before the Settlements can receive final court approval.

# 4. Why is there a settlement?

The Lawsuit has not gone to a trial. Instead, the Plaintiffs and Thomas, and the Plaintiffs and Evans, agreed to settle to avoid the costs and risks of trial. The Settlements provide the opportunity for payments or other benefits to be made available to Class Members. Under the Thomas and Evans Settlements, Class Members give Thomas and Evans releases of any right they may have to pursue the same legal claims brought, or which could have been brought, in this case against Thomas and Evans based on direct purchases of Ready-Mix Concrete from the Subject Plants.

### WHO IS IN THE SETTLEMENT?

# 5. How do I know if I am part of the Settlements?

You are a member of the Thomas Settlement Class and the Evans Settlement Class if you purchased Ready-Mix Concrete directly from one or more of the Subject Plants at any time from and including January 1, 2010 through and including July 31, 2016.

#### 6. Are there exceptions to being included?

You are not a Class Member if you are one of the Defendants, their employees, their respective parents, subsidiaries, or affiliates. You are also not a Class Member if you are a government entity.

# 7. What if I am not sure I am in the Classes?

If you are still not sure if you are included, please review the detailed information contained in the Thomas Settlement and Evans Settlement, available on the settlement website, <a href="www.SavannahConcreteCase.com">www.SavannahConcreteCase.com</a> (the "Settlement Website"). You may also call the Settlement Administrator at 1-888-999-5317, or contact Class Counsel at (317) 572-7119 or Concrete@CohenMalad.com.

#### THE SETTLEMENT TERMS

#### 8. What do the Settlements provide?

<u>The Thomas Settlement</u>. Under the terms of the Thomas Settlement, Thomas has agreed to pay the amount of \$7,600,000 (the "Thomas Settlement Amount") pursuant to the terms of the Thomas Settlement.

The Evans Settlement. Under the terms of the Evans Settlement, Evans has agreed to pay the amount of \$5,800,000, which will be reduced to \$5,650,000 if the reduced amount is paid in full no later than 10 days after the Effective Date of the Evans Settlement (the "Evans Settlement Amount"). Evans has agreed to pay \$4,000,000 of the Evans Settlement Amount within 10 days after the preliminary approval of the Evans Settlement. If Evans does not pay the remaining balance of the reduced Evans Settlement Amount within 10 days after the Effective Date of the Evans Settlement, Evans has agreed to pay the remaining balance of the higher Evans Settlement Amount, \$5,800,000, no later than seven (7) months after the Effective Date of the Evans Settlement.

The Thomas and Evans Settlements were each achieved after several years of litigation and numerous negotiating sessions between Class Counsel and the lawyers for Thomas and Evans. They were also based on an economic analysis of the potential damages incurred by the Settlement Classes. Because of the inherent risks of litigation, Plaintiffs believe that the Thomas and Evans Settlements provide a fair and efficient resolution of the Plaintiffs' and Class Members' claims against Thomas and Evans in the Lawsuit.

Under the terms of the Settlements, Class Counsel will seek Court permission to distribute part of the Thomas and Evans Settlement Amounts to pay amounts approved by the Court for the costs of administering the Settlement (such as the cost of giving this Notice), Class Counsel's attorneys' fees and reasonable expenses, and incentive payments to the class representatives (not to exceed \$10,000 each for the Thomas Settlement and \$10,000 each for the Evans settlement). The Settlement Amounts remaining after Court-approved distributions for these payments are called the "Thomas Net Settlement Fund" and the "Evans Net Settlement Fund."

## 9. How will the Net Settlement Funds be distributed to Class Members?

Subject to Court approval, the proposed distribution of each of the Net Settlement Funds to participating Class Members will be in direct proportion to the amount of each participating Class Member's purchases of Ready-Mix Concrete from the Subject Plants at any time from January 1, 2010 through July 31, 2016, when compared to all such purchases by participating Class Members.

The Net Settlement Funds will not be distributed to Class Members at this time.

# 10. When will the Settlements be final?

The Court will hold a hearing on November 3, 2025, at 10:00 a.m. to decide whether to give final approval to the Thomas Settlement and Evans Settlement. If the Court approves the Settlements and there are no appeals, each Settlement will become final thirty (30) days after the Court's approval (the "Effective Date").

You can check <u>www.SavannahConcreteCase.com</u> after the Fairness Hearing on November 3, 2025, to confirm whether the Court has approved the Thomas and Evans Settlements.

## PARTICIPATING IN THE SETTLEMENT

## 11. How do I participate in the Settlements?

If you received this Notice and believe you are a member of the Settlement Classes, you do not need to take any action at this time to participate in the Thomas Settlement or Evans Settlement. Once the Court approves a method of distributing the Settlement Funds, information about the proposed distribution of settlement funds will be provided to Class Members, along with Claim Forms and instructions for completing a claim. These materials will also be made available on the Settlement Website.

NO CLAIMS SHOULD BE SUBMITTED AT THIS TIME. However, if you did not receive a Notice by U.S. Mail, but believe you are a Settlement Class Member, you should complete a contact form on <a href="https://www.SavannahConcreteCase.com">www.SavannahConcreteCase.com</a> so that you can directly receive future communications about the Settlements and a Claim Form, and to receive communications about any future settlements or other significant developments in the Lawsuit.

# 12. Do I have to give anything up to participate?

If you are a member of the Settlement Classes and do not exclude yourself, you will be bound by the terms of the Thomas and Evans Settlements and any orders of the Court related to the Thomas and Evans Settlements, and you agree to and will release any right you may have to pursue the same legal claims brought, or which could have been brought, in this case against Thomas or Evans based on direct purchases from the Subject Plants at any time from January 1, 2010 through July 31, 2016 that relate to antitrust or anticompetitive claims. A complete description of the released claims can be found in the Thomas Settlement and Evans Settlement on the Settlement Website.

#### EXCLUDING YOURSELF FROM THE SETTLEMENT

## 13. How do I get out of the Settlement Class?

You may request to be excluded from, or to "opt out" of, either or both of the Thomas Settlement Class or the Evans Settlement Class.

If you elect to be excluded from the Thomas Settlement Class, you will not be bound by any of the terms of the Thomas Settlement or any judgment entered pursuant to the Thomas Settlement, nor will you be eligible to receive any of benefits of the Thomas Settlement. You will retain and be free to pursue any claims that you may have against Thomas on your own behalf and at your own cost.

Similarly, if you elect to be excluded from the Evans Settlement Class, you will not be bound by any of the terms of the Evans Settlement or any judgment entered pursuant to the Evans Settlement, nor will you be eligible to receive any of benefits of the Evans Settlement. You will retain and be free to pursue any claims that you may have against Evans on your own behalf and at your own cost.

If you wish to exclude yourself from either Settlement Class, you must mail a written request for exclusion, no later than September 19, 2025, to the following:

Administration	Settlement Class Counsel
Pro Slab Inc. v. Argos North America	Scott D. Gilchrist
Corp	Cohen & Malad, LLP
Settlement Administrator	One Indiana Square, Suite 1400
P.O. Box 301172	Indianapolis, IN 46204
Los Angeles, CA 90030-1172	-

Requests for exclusion do not need to be in any particular format, except that the request must:

- State that you intend to "opt out" or request "exclusion" from the Thomas Settlement Class for claims against Thomas and/or the Evans Settlement Class for claims against Evans;
- Contain the full name and current address of the person or entity requesting exclusion;
- Contain the title and a statement of authority of any person requesting exclusion from the Settlement Class on behalf of an entity other than an individual;
- Contain the title of the Lawsuit: "Pro Slab, Inc., et al. v. Argos USA LLC, et al.";
- Be signed by you; and
- Be sent by U.S. Mail, First Class and postage prepaid, with a postmark on or before September 19, 2025.

You cannot exclude yourself by phone or email.

# 14. If I do not exclude myself, can I sue Thomas or Evans later?

Unless you exclude yourself, you cannot sue Thomas for the claims resolved by the Thomas Settlement or sue Evans for the claims resolved by the Evans Settlement.

If you exclude yourself from the Settlement Class for purposes of the Thomas Settlement, you cannot participate in or object to the Thomas Settlement, you will not receive any money from the Settlement, and any claims you may have against Thomas will be subject to applicable statutes of limitation

If you exclude yourself from the Settlement Class for purposes of the Evans Settlement, you cannot participate in or object to the Evans Settlement, you will not receive any money from the Settlement, and any claims you may have against Evans will be subject to applicable statutes of limitation.

#### COMMENTING ON THE SETTLEMENT

## 15. How do I tell the Court I do not think the Thomas or Evans Settlement is Fair?

If you are a Class Member and have not excluded yourself, you can object to the Thomas Settlement or Evans Settlement or any part of the Settlements. The Court will consider your views. Your objection must be in writing, and must be mailed no later than September 19, 2025, to the following:

Settlement Class Counsel	Counsel for Evans
Scott D. Gilchrist	Jeffrey W. DeLoach
Cohen & Malad, LLP	EPPS, HOLLOWAY,
One Indiana Square, Suite 1400	DELOACH & HOIPKEMIER, LLC
Indianapolis, IN 46204	1220 Langford Drive, Building 200, Suite 101
	Watkinsville, GA 30677
The Court	Counsel for Thomas
The Honorable Bruce H. Hendricks, Judge	Michael J. McConnell
United States District Court,	JONES DAY
District of South Carolina	1221 Peachtree Street, N.E.
P. O. Box 835	Suite 400
Charleston, SC 29402	Atlanta, GA 30361

An objection does not need to be in any particular format, except that the objection must:

- State that you intend to object to the Thomas Settlement or Evans Settlement;
- Contain the full name and current address of the person objecting;
- Contain the title and a statement of authority of any person objecting on behalf of an entity other than an individual;
- Contain the title of the Lawsuit: "Pro Slab, Inc., et al. v. Argos USA LLC, et al.";
- State the reasons for your objection to the Thomas Settlement or Evans Settlement;
- Be accompanied by any evidence, briefs, motions or other materials you intend to offer in support of your objection;
- Be signed by you; and
- Be sent by U.S. Mail, First Class and postage prepaid, with a postmark on or before September 19, 2025.

You cannot object to either the Thomas Settlement or Evans Settlement by phone or email.

<u>Intervention</u>: Any request for intervention must meet the requirements set forth above, including the deadline, for filing objections, must be accompanied by any evidence, briefs, motions or other materials you intend to offer in support of your request for intervention, and must meet the requirements of the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of South Carolina.

# 16. What's the difference between excluding myself and objecting?

If you exclude yourself from a Settlement, you are no longer a member of the Settlement Class for that Settlement and you keep your right to file your own lawsuit against the settling Defendant (in this case, Thomas or Evans) at your own expense. If you exclude yourself from a Settlement, you may not object to that Settlement and you cannot receive any payments or credits from that Settlement. If you remain a Settlement Class Member, you may object to that Settlement.

# 17. Can I have a lawyer represent me?

The law firms of Cohen & Malad, LLP, Heins Mills & Olson, P.L.C, and Preti, Flaherty, Beliveau & Pachios LLP have been appointed by the Court and represent you and other Class Members. These lawyers are called Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense. However, any lawyer intending to appear at the Fairness Hearing must be duly admitted to practice law before the United States District Court for the District of South Carolina and must file a written appearance no later than September 19, 2025. Copies of the appearance must be served on Class Counsel and counsel for Thomas and Evans at the addresses included in this Notice in accordance with the Federal Rules of Civil Procedure.

# 18. What happens if I do nothing at all?

If you do nothing, you will remain a Thomas Settlement Class Member and Evans Settlement Class Member, and will remain eligible for any benefits available under the Settlements. If the Court approves the Settlements, you will be bound by their terms as well as any Court orders related to the Settlements, and a release will be granted to Thomas and Evans of any rights you may have to pursue the same legal claims in this case against them. To receive payments from the Thomas or Evans Settlement, you will be required to submit a completed Claim Form. Once the Court approves a method of distributing the Settlement Funds, information about the proposed distribution of settlement funds, along with Claim Forms and instructions for completing a claim, will be provided to known Class Members with contact information on file. These materials will also be made available on the Settlement Website.

# 19. How will the lawyers and costs be paid?

Class Counsel will file a petition with the Court no later than October 4, 2025, asking for payment of attorneys' fees in the amount of 1/3 of the Thomas Settlement Amount and Evans Settlement Amount, and the reimbursement of reasonable expenses to be paid from these Settlement Amounts. The petition will be available on the Settlement Website. To date, litigation expenses total approximately \$3.6 million. Settlement Class Counsel will seek reimbursement of outstanding expenses (those expenses that are not reimbursed from the earlier Lafarge settlement) from the Thomas and Evans Settlements. The Court may consider whether to approve the payment of attorneys' fees and expenses in these amounts during the Fairness Hearing, or at a later time determined by the Court.

If the Court approves these fees and expenses, they will be paid from the Settlement Amounts. These fees and expenses, however, will not be paid from either Settlement Amount until that Settlement becomes Final. The costs of providing this Notice and published Notice of the Settlements, and the costs of settlement administration, will also be paid from the Settlement Amounts.

## THE COURT'S FAIRNESS HEARING

## 20. When and where will the Court decide whether to approve the Settlements?

The Court will hold a hearing—which is called the Fairness Hearing—at the J. Waties Waring Judicial Center, 83 Meeting Street, Charleston, South Carolina, at 10:00 o'clock on November 3, 2025. At the Fairness Hearing, the Court will consider whether the Thomas Settlement and Evans Settlement are fair, reasonable, and adequate. The Court will consider any objections and listen to Class Members who have made written objections and timely asked to speak at the hearing. After the Fairness Hearing, the Court will decide whether to approve the Thomas and Evans Settlements.

## 21. Do I have to come to the hearing?

You do not need to attend the Fairness Hearing, but you are welcome to come at your own expense. If you have sent a written objection, you do not need to be present for the Court to consider it.

## 22. May I show up and speak at the hearing?

If you have submitted a timely written objection to the Thomas Settlement or Evans Settlement and requested to be heard, the Court may allow you to speak at the Fairness Hearing. If you wish for your lawyer to speak for you, he or she must have submitted a timely appearance as provided above.

**Reminder:** If you have excluded yourself from either of the Settlement Classes, you may not object to that Settlement and you may not speak at the Fairness Hearing about that Settlement.

## 23. Are the Thomas and Evans Settlements related to the Lafarge Settlement?

You may have received a separate Notice of another settlement in this Lawsuit with Lafarge. The Lafarge Settlement is separate from the Evans and Thomas Settlements but has similar terms. The deadline to exclude yourself or object to the Lafarge Settlement have now expired. For more information about the Lafarge Settlement, visit <a href="https://www.SavannahConcreteCase.com">www.SavannahConcreteCase.com</a>.

# 24. How can I get more information?

This Notice summarizes the proposed Thomas and Evans Settlements. More details are in the Settlement Agreements. You can find copies of the Settlement Agreements, other important documents, and information about the current status of the litigation by visiting <a href="https://www.SavannahConcreteCase.com">www.SavannahConcreteCase.com</a>. You may also contact the Settlement Administrator at 1-888-999-5317, or info@savannahconcretecase.com or by mail at the address listed in Question 13 above.

# PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE