

Exhibit A

Pro Slab, Inc. v. Argos North America Corp.
Settlement Administrator
P.O. Box 301172
Los Angeles, CA 90030-1172



VISIT THE SETTLEMENT WEBSITE BY
SCANNING THE PROVIDED QR CODE

Pro Slab, Inc., et al. v. Argos USA LLC, et al.

AOP

«3of9 barcode»

«BARCODE»

Postal Service: Please do not mark barcode

AOP: ClaimID: «CLAIM NUMBER»

PIN: «PIN»

«FIRST1» «LAST1»

«ADDRESS LINE 2»

«ADDRESS LINE 1»

«CITY», «STATE»«PROVINCE» «POSTALCODE»

«COUNTRY»

UNITED STATES DISTRICT COURT,
DISTRICT OF SOUTH CAROLINA

Case No. 2:17-cv-03185-BHH

Must Be Postmarked

No Later Than

DATE

Claim ID: <<Claim Number>>

PIN Code: <<PIN>>

Notice of Settlement Distribution and Claim Form Instructions

Our records indicate you may be a member of one or more Settlement Classes in this action, and therefore eligible to share in the settlements with Defendants Lafarge North America, Inc. (“Lafarge”), Thomas Concrete, Inc. and Thomas Concrete of South Carolina, Inc. (together, “Thomas”), and Evans Concrete, LLC (“Evans”) (collectively, the “Settlements”).

The Lafarge, Thomas and Evans Settlement Classes are each defined as “All persons or entities who purchased Ready-Mixed Concrete from January 1, 2010 through July 31, 2016 (the “Class Period”), 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 Coffey 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
Bloomingtondale – 1955 US-80, Bloomingtondale, GA 31302
Hinesville – 7091 US-84, Hinesville, GA 31313
Savannah – 401 Telfair Rd., Savannah, GA 31415
Evans Plants
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 Coffey Highway, Midway, GA 31320



FOR CLAIMS PROCESSING ONLY	OB ☐	CB ☐	☐ DOC ☐ LC ☐ REV	☐ RED ☐ A ☐ B
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Millen – 503 Gilmer St., Millen, GA 30442
Portable Plant – 988 Oracal 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 Hearst 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
Savannah Portable Plant – Various Locations
Lafarge Plants
Hinesville – 60 Leroy Coffey 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 Oracal 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 Rd., Bluffton, SC 29910
East Savannah – 42 Forbes Rd., Savannah, GA 31404
Pooler – 1724 Old Dean Forest Rd., Pooler GA 31322

Defendants and their employees, Defendants' respective parents, subsidiaries, and affiliates, and government entities are excluded from the Settlement Classes.

Your membership in the Settlement Classes is limited to those Settlements for which you have not requested exclusion. If you previously requested exclusion from one or more of the Settlements, you are not eligible to file a claim and receive settlement proceeds from that Settlement.

All Settlement Class Members who wish to receive any of the Lafarge, Thomas or Evans Settlement funds recovered in this lawsuit MUST submit a Claim Form by:

- Visiting the Settlement Website at www.SavannahConcreteCase.com to complete a Claim Form and file your claim online by **DATE**; or
- Completing and signing the Claim Form below and mailing it to the address listed at the top of this Notice so that it is postmarked by **DATE**.

As further instructed below, you may use your Claim ID and PIN Code listed at the top of page 1 to log in at www.SavannahConcreteCase.com, where you can review your sales information electronically. You may then submit your Claim Form directly online or complete and mail the Claim Form below with a postmark no later than **DATE**. If you received more than one Notice and Claim Form, you should file a claim for each Claim ID and PIN Code provided to you in a Notice and Claim Form.



HOW MUCH WILL I RECEIVE FROM THE SETTLEMENTS?

The Lafarge, Thomas and Evans Settlements have provided combined settlement payments of \$18,650,000 (the “Settlement Funds”). This amount will be increased by \$150,000 if Defendant Evans exercises its right under the Evans Settlement to pay a portion of its settlement amount on a later date.

Settlement Class Member distributions will be based on the amount of their Qualifying Purchases, which are those direct purchases of Ready-Mix Concrete from one of the Subject Plants during the Class Period for which a completed and signed Claim Form has been submitted by the Settlement Class Member.

If you are eligible for payments, the amount you will receive from the Settlement Funds will depend on: (1) the total amount of your Qualifying Purchases; (2) the total amount of other Settlement Class Members’ Qualifying Purchases; and (3) the amount of litigation expenses, attorneys’ fees, and class representative incentive awards approved by the Court.

Before Settlement Class Member distributions are calculated, the Net Settlement Funds will be determined by deducting any Court-approved costs of litigation, costs of settlement administration, attorneys’ fees, and service fees for the Plaintiff class representatives. The Net Settlement Funds will then be distributed to Settlement Class Members who submitted qualifying claims on a pro rata basis according to the respective amount of their Qualifying Purchases.

Because the pro rata amount you will receive depends on the amounts of other Settlement Class Members’ Qualifying Purchases, it is not possible at this time to determine how much you will receive. In general, your recovery will be calculated as follows:

$$\frac{\text{Amount of Your Qualifying Purchases}}{\text{Total Amount of All Qualifying Purchases}} = \text{Your Pro Rata Percentage of Net Settlement Funds}$$

HOW ARE MY QUALIFYING PURCHASES DETERMINED?

The Amount of Qualifying Purchases by Settlement Class Members will be determined by the Settlement Administrator as follows:

- The amount of your Qualifying Purchases does not include materials or products other than Ready-Mix Concrete (such as separately charged admixtures, additives such as fiber mesh, costs of building materials, concrete blocks, precast concrete products, equipment/tools, expansion joints, foam/Styrofoam, concrete forms, hardware, plastic, rebar, steel fiber, wire mesh, sealants, and test cylinders), and it does not include services for which an extra charge is assessed (such as special delivery charges, truck/equipment rental charges, minimum load charges, overtime charges, same-day-service charges, truck cleanup charges, weekend/holiday/after-hours service charges). However, Qualifying Purchases do include environmental fees and fuel surcharges.
- The amount of your Qualifying Purchases from the Subject Plants, as determined from records provided by the Defendants, is available by using your Claim ID and PIN Code listed at the top of this document to log in at www.SavannahConcreteCase.com.
- If you believe that the actual amount of your Qualifying Purchases is higher than the amount that has been determined from the Defendants’ records, you may complete and submit a Purchase Audit Request Form with supporting documentation. The Settlement Administrator will review the request and documentation submitted by you and determine whether the amount of your Qualifying Purchases should be the original amount, your proposed higher amount, or some different amount.

CLAIM FORM STEP 1: REVIEW YOUR PURCHASE INFORMATION

Review the amount of your Qualifying Purchases from the Subject Plants during the Class Period, as determined from records provided by the Defendants, by visiting the Settlement Website, www.SavannahConcreteCase.com. Under Claim Form, use the Claim ID number (listed at the top of this Notice) to log in.

If you received more than one Notice, you need to review the amount of your Qualifying Purchases and file a separate Claim Form for each Claim ID and PIN Code. If you did not receive a Claim ID and PIN Code, contact the Settlement Administrator for more information.



If you **agree** with the amount of your Qualifying Purchases as determined from records provided by the Defendants, you just need to complete and submit a Claim Form online by **DATE**, or complete the Claim Form below and mail it to the address at the top of this Notice with a postmark no later than **DATE**. You do not need to complete additional forms or submit supporting documents.

If you **disagree** with the amount of your Qualifying Purchases as determined from records provided by the Defendants and want the Settlement Administrator to consider a different amount, you need to complete and submit a Purchase Audit Request Form, attach your supporting documents, and submit both either online by **DATE**, or by mail with a postmark no later than **DATE**. You can access the Purchase Audit Request Form and instructions on the Settlement Website: www.SavannahConcreteCase.com.

CLAIM FORM STEP 2: ENTER CLAIMANT INFORMATION

Claim ID																			
First Name										M.I.		Last Name							
Company Name																			
Primary Address																			
Primary Address Continued																			
City												State				ZIP Code			
Email Address																			
Area Code				Telephone Number															

CLAIM FORM STEP 3: SIGN STATEMENT

Sign the statement below:

By signing below I/we certify under penalties for perjury that (1) the above and foregoing information is true and correct; (2) I am duly authorized and have the legal capacity to sign this Claim Form on behalf of the Settlement Class Member; (3) I/we are not officers, directors, or employees of any Defendant; any entity in which any Defendant has a controlling interest; an affiliate, legal representative, heir, or assign of any Defendant, or a federal, state, or local governmental entity; and (4) I/we agree to submit additional information, if requested, in order for the Settlement Administrator to process my/our claim.

Signature: _____

Dated (mm/dd/yyyy): _____

Print Name: _____

Title: _____

CLAIM FORM STEP 4: SUBMIT YOUR CLAIM FORM BY **DATE**

Submit your completed Claim Form to the Settlement Administrator by **DATE** (postmarked to the address above or submitted online at www.SavannahConcreteCase.com).

Questions? Call the Settlement Administrator toll-free at 1-888-999-5317 or visit www.SavannahConcreteCase.com.

