

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 SETTLEMENT 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.

- A settlement has 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 Settlement is between the Plaintiffs in the Lawsuit and Defendant Lafarge North America, Inc. (the "Lafarge Settlement"), and affects the rights of direct purchasers of Ready-Mix Concrete from Lafarge 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 Lafarge Settlement and has certified the following "Settlement Class": All persons or entities who purchased Ready-Mix 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
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
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 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 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 Dr., Bluffton, SC 29910
East Savannah – 42 Forbes Rd., Savannah, GA 31404
Pooler – 1724 Old Dean Forest Rd., Pooler GA 31322

- The Court has appointed the Plaintiffs to represent the Settlement Class and its attorneys as Class Counsel. This is a partial settlement of the Lawsuit and does 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 www.SavannahConcreteCase.com 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 Class of the proposed Lafarge Settlement and how to assert any rights you may have under the Settlement. It is also intended to advise you of a hearing to consider the proposed Settlement on September 16, 2025. The Court must decide whether to approve the Settlement as fair, reasonable and adequate.
- If you are a member of the Settlement Class (a “Class Member”), your legal rights are affected whether you act or choose not to act. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS (YOU MUST CHOOSE AMONG ONE OF THESE OPTIONS)		DEADLINE
EXCLUDE YOURSELF	You may exclude yourself from the Lafarge Settlement, in which case you will not be eligible to receive any payments from the Lafarge Settlement that are approved by the Court, or to comment on the Lafarge Settlement. This is the only option that allows you to be part of any other lawsuit against Lafarge about the legal claims brought or which could be brought in this case.	August 4, 2025
DO NOTHING	If you choose to do nothing, you will remain eligible to receive any payments from the Lafarge Settlement 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 Lafarge based on direct purchases from the Subject Plants during the Class Period. If you choose to do nothing, and the Lafarge Settlement is approved by the Court, you will be required to submit a Claim Form to receive money from the Settlement.	
OBJECT	Write to the Court if you do not think the Lafarge Settlement is fair. If you exclude yourself from the Lafarge Settlement, you may not object.	August 4, 2025
GO TO A HEARING	If you object, you may also ask to speak in Court about the fairness of the Lafarge Settlement.	The final approval hearing is set for September 16, 2025 at 10 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 and including January 1, 2010 through and including July 31, 2016. You have the right to know about a proposed settlement of a class action lawsuit that may affect your rights.

This Notice explains the Lawsuit, the terms of the Lafarge Settlement, your legal rights, what benefits may be available, who may be eligible for them, and what you will be giving Lafarge in this Settlement.

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. The Plaintiffs in this Lawsuit, who seek to represent themselves and the proposed Settlement Class 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 Class. 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 Lafarge Settlement is fair, reasonable and adequate to the Settlement Class before the Settlement can receive final court approval.

4. Why is there a settlement?

The Lawsuit has not gone to trial. Instead, the Plaintiffs and Lafarge agreed to settle to avoid the costs and risks of trial. The Lafarge Settlement provides the opportunity for payments or other benefits to be made available to Class Members. Under the Lafarge Settlement, Class Members give Lafarge a release of any right they may have to pursue the same legal claims brought, or which could have been brought, in this case against Lafarge 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 Settlement?

You are a Class Member 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 Class?

If you are still not sure if you are included, please review the detailed information contained in the Lafarge Settlement, available on the settlement website, www.SavannahConcreteCase.com (the “Settlement Website”). You may also call the Settlement Administrator at 1-888-999-5317, or contact Class Counsel at 1-317-572-7119 or Concrete@CohenMalad.com, or by mail at the address listed in Question 13 below.

THE SETTLEMENT TERMS

8. What does the Settlement provide?

Lafarge has agreed to pay the amount of \$5,400,000 (the “Settlement Amount”) pursuant to the terms of the Lafarge Settlement.

The Lafarge Settlement was achieved after several years of litigation and numerous negotiating sessions between Class Counsel and the lawyers for Lafarge. It was also based on an economic analysis of the potential damages incurred by the Settlement Class. Because of the inherent risks of litigation, Plaintiffs believe that the Lafarge Settlement provides a fair and efficient resolution of the Plaintiffs’ and Class Members’ claims against Lafarge in the Lawsuit.

Under the terms of the Lafarge Settlement, Lafarge has deposited or will deposit the Settlement Amount into a settlement fund. Class Counsel will seek Court permission to distribute part of the Settlement Amount 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 \$15,000 each for the Lafarge Settlement). The Settlement Amount remaining after Court-approved distributions for these payments is called the “Lafarge Net Settlement Fund.”

9. How will the LaFarge Net Settlement Fund be distributed to Class Members?

Subject to Court approval, the proposed distribution of the LaFarge Net Settlement Fund 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 Lafarge Net Settlement Fund will not be distributed to Class Members at this time.

10. When will the Settlement be final?

The Court will hold a hearing on September 16, 2025, to decide whether to give final approval to the Lafarge Settlement. If the Court approves the Lafarge Settlement and there are no appeals, the Lafarge Settlement will become final thirty (30) days after the Court’s approval.

You can check www.SavannahConcreteCase.com after the Fairness Hearing on September 16, 2025 to confirm whether the Court has approved the Lafarge Settlement.

PARTICIPATING IN THE SETTLEMENT

11. How do I participate in the Settlement?

If you received this Notice and believe you are a member of the Settlement Class, you do not need to take any action at this time to participate in the Lafarge Settlement. Once the Court approves a method of distributing the Settlement Fund, 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 www.SavannahConcreteCase.com 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.

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

If you are a member of the Settlement Class and do not exclude yourself, you will be bound by the terms of the Lafarge Settlement and any orders of the Court related to the Lafarge Settlement, 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 Lafarge 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 Lafarge 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, the Settlement Class. If you elect to be excluded from the Settlement Class, you will not be bound by any of the terms of the Lafarge Settlement or any judgment entered pursuant to the Lafarge Settlement, nor will you be eligible to receive any of the benefits of the Lafarge Settlement. You will retain and be free to pursue any claims that you may have against Lafarge on your own behalf and at your own cost.

If you wish to exclude yourself from the Settlement Class, you must mail a written request for exclusion, no later than 8/4/2025 to the following:

Settlement Class Counsel
Scott D. Gilchrist Cohen & Malad, LLP One Indiana Square, Suite 1400 Indianapolis, IN 46204

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 Settlement Class for claims against Lafarge;
- 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 8/4/2025.

You cannot exclude yourself by phone or email.

14. If I do not exclude myself, can I sue Lafarge later?

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

COMMENTING ON THE SETTLEMENT

15. How do I tell the Court I do not think the Settlement is Fair?

If you are a Class Member and have not excluded yourself, you can object to the Lafarge Settlement or any part of the Lafarge Settlement. The Court will consider your views. Your objection must be in writing and must be mailed no later than 8/4/2025 to the following:

Settlement Class Counsel	Counsel for Lafarge
Scott D. Gilchrist Cohen & Malad, LLP One Indiana Square, Suite 1400 Indianapolis, IN 46204	Heather P. Lamberg FRESHFIELDS US LLP 700 13th St. NW Washington, DC 20005
The Court	
The Honorable Bruce H. Hendricks, Judge United States District Court District of South Carolina P.O. Box 835 Charleston, SC 29402	

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

- State that you intend to object to the Lafarge 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;
- 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 8/4/2025.

You cannot object to the Lafarge Settlement by phone or email.

Intervention: 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, you are no longer a member of the Settlement Class and you keep your right to file your own lawsuit against Lafarge at your own expense. If you exclude yourself, you may not object to the Lafarge Settlement and you cannot receive any payments or credits from the Lafarge Settlement. If you remain a Class Member, you may object.

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 August 4, 2025. Copies of the appearance must be served on Class Counsel and counsel for Lafarge 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 Class Member and will remain eligible for any benefits available under the Lafarge Settlement. If the Court approves the Lafarge Settlement, you will be bound by its terms as well as any Court orders related to the Lafarge Settlement, and a release will be granted to Lafarge of any rights you may have to pursue the same legal claims in this case against it. To receive payments from the Lafarge Settlement, you will be required to submit a completed Claim Form. Once the Court approves a method of distributing the Settlement Fund, 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 August 19, 2025, asking for payment of attorneys’ fees in the amount of 1/3 of the Settlement Amount, and the reimbursement of reasonable expenses, not to exceed \$2.6 million, to be paid from the Settlement Amount. The petition will be available on the Settlement Website. The Court may consider whether to approve the payment of attorneys’ fees and expenses in this amount 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 Amount. These fees and expenses, however, will not be paid until the LaFarge Settlement becomes Final. The costs of providing this Notice and published Notice of the LaFarge Settlement, and the costs of settlement administration, will also be paid from the Settlement Amount.

THE COURT'S FAIRNESS HEARING

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

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 29401, at **10 a.m. on September 16, 2025**. At the Fairness Hearing, the Court will consider whether the LaFarge Settlement is 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 LaFarge Settlement.

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 LaFarge 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 the Settlement Class, you may not object to the LaFarge Settlement and you may not speak at the Fairness Hearing.

23. How can I get more information?

This Notice summarizes the proposed LaFarge Settlement. More details are available in the Settlement Agreement. You can find a copy of the Settlement Agreement, other important documents, and information about the current status of the litigation by visiting www.SavannahConcreteCase.com. 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