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24 **UNITED STATES DISTRICT COURT**  
25 **NORTHERN DISTRICT OF CALIFORNIA**

26 JASON TRABAKOOLAS SHEILA  
27 STETSON, JACK WHEELER, CHRISTIE  
28 MOONEY AND KEVEN TURNER  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

WATTS WATER TECHNOLOGIES, INC.,  
WATTS REGULATOR CO., AND  
WOLVERINE BRASS, INC.,

Defendants.

Case No. 3:12-cv-01172-WHO (EDL)

**STIPULATION AND ORDER  
EXTENDING CLAIM PAYMENT  
DISBURSEMENT DATE**

Honorable William H. Orrick III

1 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs,  
2 through Class Counsel, and Defendants Watts Water Technologies, Inc., Watts  
3 Regulator Co. (“Watts”) and Wolverine Brass, Inc. that the date by which the  
4 Settlement Claims Administrator (Epiq Systems or “Epiq”) shall disburse payment for  
5 claims under Paragraph 115(c)(4) of the Settlement Agreement may be extended from  
6 September 5, 2016 to October 31, 2016.

7 This stipulation is based on the following facts:

8 1. This Court entered its Final Order and Judgment approving the  
9 Settlement Agreement in this class action on August 5, 2014. The class consists of all  
10 persons who owned or leased a residence located in the United States that contained a  
11 Toilet Connector manufactured or sold by Watts. Under Paragraph 115(c)(4) of the  
12 Settlement Agreement, the Claims Administrator is directed to pay, within thirty days  
13 after the deadline, those qualifying property damage claims submitted by August 5 of  
14 each year of the Damage Claim Period. The deadline for payments in 2016 to be  
15 made during the second year of the Damage Claim Period is currently scheduled for  
16 September 5, 2016.

17 2. Epiq anticipates that there will be a number of claims submitted at or  
18 near the August 5 claim submission deadline in each remaining year of the Damage  
19 Claim Period. Based on its experience in this case, Epiq has found that a sizeable  
20 percentage of the claim submissions are deficient in one or more respects; in those  
21 cases, a defect letter is sent to the claimant identifying the deficiency and providing  
22 the claimant an opportunity to correct it. Those deficient claims that are submitted at  
23 or near the August 5, 2016 deadline could not be paid by September 5, 2016 because  
24 there would not be sufficient time to send defect letters, evaluate responses and then  
25 process and conduct quality control review of the payment awards. In addition, it  
26 would not be possible to accurately calculate the amount of the awards, including any  
27 authorized hold-back, until the full set of approved property damage claims is known.  
28

1           3.     In light of these same considerations, Epiq proposed to extend the  
2 payment date for the first year of the Damage Claim Period from September 4, 2015  
3 to October 26, 2016. The Court approved this prior extension of the payment date  
4 (Order Extending Claim Payment Disbursement Date, July 22, 2015, Dkt No. 306.)

5           4.     Epiq proposes a similar alternative schedule for the second year of the  
6 Damage Claim Period that would (a) allow for the orderly and efficient processing of  
7 all property damage claims submitted by August 5, 2016, (b) allow Epiq to consider  
8 the results of a pending claim review expected to be concluded by mid-September; (c)  
9 provide time to send out defect letters that give claimants thirty days to correct any  
10 claim deficiencies, (d) evaluate the responses and corrections to the claims, and (e)  
11 permit the accurate determination of any hold-backs that may be necessary in light of  
12 all the claims. Under this schedule, the disbursement date for all property damage  
13 claims submitted within one year after the Final Order and Judgment would be  
14 October 31, 2016.

15           5.     If this Stipulation is approved by the Court, property damage claimants  
16 will be notified by email or postcard of the new disbursement date. In addition, the  
17 settlement website will be modified to note the changed disbursement date. The  
18 proposed schedule does not impact the timing of Watts' contributions to the Common  
19 Fund.

20  
21           IT IS SO STIPULATED.

22  
23 Dated: August 11, 2016

DAVID S. MacCUIISH  
TODD BENOFF  
**ALSTON & BIRD LLP**

24  
25           /s/ David S. MacCuish

26           David S. MacCuish  
27           Attorneys for Defendants WATTS REGULATOR  
28           CO., WATTS WATER TECHNOLOGIES, INC. and  
              WOLVERINE BRASS, INC.

1 Dated: August 11, 2016

SIMON BAHNE PARIS  
PATRICK HOWARD  
**SALTZ, MONGELUZZI, BARRETT  
& BENDESKY, P.C.**

DANIEL E. GUSTAFSON  
**GUSTAFSON GLUEK PLLC.**

6 /s/ Patrick Howard  
7 PATRICK HOWARD  
8 Attorneys for Plaintiffs

9 Signature Attestation

10 I, David S. MacCuish, am the ECF User whose ID and password are being used  
11 to file this Stipulation and [Proposed] Order Extending Claim Payment Disbursement  
12 Date. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Patrick Howard of  
13 Salta, Mongeluzzi, Barrett & Bendesky, P.C. has concurred in this filing.  
14

15 Dated: August 11, 2016

/s/ David S. MacCuish

**ORDER**

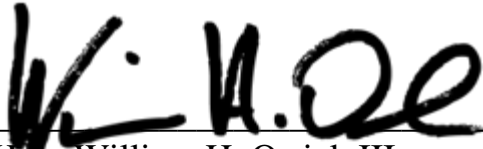
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The Court, having considered the foregoing Stipulation, HEREBY ORDERS:

1. The date by which the Claims Administrator shall make payments for property damage claims properly submitted by August 5, 2016 shall be October 31, 2016.

2. Property damage claimants shall be notified by email or postcard of the change in the disbursement date to October 31, 2016. In addition, the settlement website shall note the new disbursement date.

Dated: August 16, 2016

  
\_\_\_\_\_  
Hon. William H. Orrick III  
United States District Judge