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Attorneys for Defendant Star Pipe Products, Ltd.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE DUCTILE IRON PIPE FITTINGS
("DIPF") INDIRECT PURCHASER
ANTITRUST LITIGATION

:
:
: Civil Action No.: 12-169
: (AET) (LHG)
:
:
: DEFENDANT STAR PIPE
: PRODUCTS, LTD.'s NOTICE OF
: MOTION TO DISMISS COUNTS 3,
: 4, 5, 6 AND 10 OF THE
: AMENDED CLASS ACTION
: COMPLAINT OF INDIRECT
: PLAINTIFFS

TO: Lisa J. Rodriguez, Esq.
TRUJILLO RODRIGUEZ & RICHARDS, LLC
258 Kings Highway East
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Liaison Counsel for Indirect Purchaser Classes

See Attached Counsel List

PLEASE TAKE NOTICE that on November 5, 2012 at 10:00 a.m.
or as soon thereafter as counsel may be heard, the undersigned,
attorneys for defendant Star Pipe Products, Ltd. ("Star Pipe")
will move before the Honorable Anne E. Thompson, United States

District Court Judge, at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608 for an order dismissing counts 3, 4, 5, 6, and 10 the Amended Class Action Complaint of Indirect Purchaser Plaintiffs Waterline Industries Corporation and Waterline Services, LLC, Yates Construction Co., Inc., City of Hallandale Beach (Florida), Wayne County (Michigan), South Huntington Water District (New York), City of Fargo (North Dakota), and City of Blair (Nebraska) ("Indirect Plaintiffs") for failure to state a claim upon which relief can be granted pursuant to Fed. R. Civ. P. 12(b)(6).

PLEASE TAKE FURTHER NOTICE that in support of this motion Star Pipe will rely upon "Memorandum of Law in Support of Defendant Star Pipe Products, Ltd.'s Motion to Dismiss as to Counts 3, 4, 5, 6 and 10 of the Amended Class Action Complaint" and the submissions of co-defendants McWane, Inc. and Sigma Corporation in support of their respective motions to dismiss.

PLEASE TAKE FURTHER NOTICE that a proposed form of order accompanies these papers.

NORRIS McLAUGHLIN & MARCUS, P.A.

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Dated: September 26, 2012
Bridgewater, New Jersey

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CERTIFICATION OF SERVICE

I, Joseph J. Fleischman, certify that on September 26, 2012 I caused to be filed via electronic mail to the Clerk of the Court, United States District Court, Defendant Star Pipe Product, Ltd.'s Notice of Motion to Dismiss Counts 3, 4, 5, 6, and 10 of the Amended Complaint of Indirect Plaintiffs, and supporting brief in accordance with the Court's Electronic Filing System.

I further certify that once the electronic filing receipt is received, any party not receiving electronic notices from the court will receive a copy of the aforementioned papers, along with a copy of the Notice of Electronic Filing by regular mail.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Joseph J. Fleischman
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