

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

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| IN RE: POOL PRODUCTS DISTRIBUTION |) | MDL No. 2328 |
| MARKET ANTITRUST LITIGATION |) | SECTION: R(2) |
| |) | JUDGE VANCE |
| This document relates to all cases |) | MAG. JUDGE WILKINSON |

**STIPULATION REGARDING PROTOCOL FOR PRODUCTION OF FTC
DOCUMENTS BY MANUFACTURER DEFENDANTS**

Pursuant to Section I.A. of Pretrial Order No. 10, counsel for Plaintiffs and counsel for the Manufacturer Defendants respectfully submit the following proposed protocol for the production of the documents produced by the Manufacturer Defendants to the Federal Trade Commission ("FTC"):

1. Based upon the representations made by counsel for the Manufacturer Defendants concerning the format of each Manufacturer Defendants' production to the FTC, Plaintiffs' counsel have agreed to accept those productions in the same format that was accepted by the FTC.

2. The Manufacturer Defendants have agreed to commence their rolling productions of their FTC documents to Plaintiffs' Counsel as follows: Pentair will commence its FTC production during the week of July 26, 2012. Hayward and Zodiac will each commence its FTC production during the week of August 6, 2012. Each of the Manufacturing Defendants will complete its FTC production to Plaintiffs' Counsel by September 10, 2012.

Date: July 25, 2012

Respectfully Submitted,

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Counsel for Defendant Zodiac Pool Systems, Inc.

DONE AND ORDERED in New Orleans, Louisiana, this 26th day of July,
2012.



SARAH S. VANCE
UNITED STATES DISTRICT COURT JUDGE