

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

IN RE: POOL PRODUCTS)
DISTRIBUTION MARKET ANTITRUST)
LITIGATION)
_____)

MDL No. 2328
SECTION: R(2)

Chief Judge Vance
Mag. Judge Wilkinson

This Document Relates to: All Cases

**DEFENDANTS' IDENTIFICATION OF PROSPECTIVE
PARTY AND NON-PARTY DEPONENTS**

Pursuant to Paragraph 8 of Pretrial Order No. 18, and the agreement of all parties as to numerical limits on party and non-party depositions memorialized in the letter filed with the Court on August 30, 2012 (ECF No. 320), the Pool Defendants and the Manufacturer Defendants (collectively "Defendants") hereby identify the following prospective party and non-party deponents in this matter:

Party Depositions

1. Fed. R. Civ. P. 30(b)(6) Deposition of Direct Purchaser Plaintiff Aqua Clear Pools & Decks
2. Fed. R. Civ. P. 30(b)(6) Deposition of Direct Purchaser Plaintiff A Plus Pools Corp.
3. Fed. R. Civ. P. 30(b)(6) Deposition of Direct Purchaser Plaintiff Liquid Art Enterprises d/b/a Carl Boucher – The Pool PhD
4. Fed. R. Civ. P. 30(b)(6) Deposition of Direct Purchaser Plaintiff Oasis Pool Service, Inc.
5. Fed. R. Civ. P. 30(b)(6) Deposition of Direct Purchaser Plaintiff Pro Pool Services
6. Fed. R. Civ. P. 30(b)(6) Deposition of Direct Purchaser Plaintiff SPS Services, LLC d/b/a Premier Pools & Spas
7. Fed. R. Civ. P. 30(b)(6) Deposition of Direct Purchaser Plaintiff Thatcher Pools, Inc.

8. Jacob Broussard – Vice President of Direct Purchaser Plaintiff Oasis Pool Service, Inc.
9. Carl Boucher II – Vice President of Direct Purchaser Plaintiff Liquid Art Enterprises d/b/a Carl Boucher – The Pool PhD

Non-Party Depositions

1. The Association of Pool & Spa Professionals (APSP)¹
2. Raypak, Inc.
3. Waterway Plastics, Inc.
4. Haviland USA
5. Creative Water Solutions a/k/a Spa Naturally
6. APi

In addition, pursuant to Pretrial Order No. 19, “any previously noticed depositions . . . may be re-noticed and taken, and are not subject to the deposition limits to be imposed as set forth in Pretrial Order No. 18.” Accordingly, the prospective party and non-party deponents identified herein are in addition to the previously noticed depositions that are to be rescheduled and taken.

Dated: September 10, 2013

¹ Please note that the only non-party that Defendant Pentair Water Pool and Spa, Inc. (“Pentair”) seeks to depose is The Association of Pool & Spa Professionals (APSP). Pentair does not oppose or join in the Defendants’ request to depose the remaining non-parties.

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CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2013, a copy of the foregoing was served upon all parties by electronically uploading the same to LexisNexis File & Serve in accordance with Pretrial Order No. 8 in this case.

/s/ Samantha P. Griffin