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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CITY OF SOUTHFIELD FIRE AND
POLICE RETIREMENT SYSTEM,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

v.

HAYWARD HOLDINGS, INC.,
KEVIN HOLLERAN, EIFION
JONES, CCMP CAPITAL
ADVISORS, LP, CCMP CAPITAL
INVESTORS III, L.P., CCMP
CAPITAL INVESTORS III
(EMPLOYEE), L.P., CCMP CAPITAL
ASSOCIATES III, L.P., CCMP
CAPITAL ASSOCIATES III GP,
LLC, CCMP CAPITAL, LP, CCMP
CAPITAL GP, LLC, MSD AQUA
PARTNERS, LLC, MSD PARTNERS,
L.P., MSD PARTNERS (GP), LLC,
MARK MCFADDEN, GREG

Civil Action No. 2:23-cv-04146

Hon. William J. Martini

**SUPPLEMENTAL
DECLARATION OF ANN
CAVANAUGH REGARDING
NOTICE DISSEMINATION,
PUBLICATION, AND
REQUESTS FOR EXCLUSION
RECEIVED TO DATE**

**Motion Day: July 28, 2026, 12:00
p.m.**

BRENNEMAN, TIMOTHY WALSH,
CHRISTOPHER BERTRAND, and
KEVIN BROWN

Defendants.

I, ANN CAVANAUGH, declare and state as follows:

1. I am employed as a Project Manager by A.B. Data, Ltd. (“A.B. Data”), located at 600 A.B. Data Drive, Milwaukee, Wisconsin 53217. The following statements are based on my personal knowledge and information provided to me by other A.B. Data employees, and if called to testify, I could and would do so competently.

2. Pursuant to this Court’s March 2, 2026, Order Granting Preliminary Approval to the Class Action Settlement (“Preliminary Approval Order”) (ECF No. 129), A.B. Data was appointed as the Claims Administrator in connection with the proposed Settlement of the above-captioned action (the “Action”).¹ I oversaw the notice services that A.B. Data provided in accordance with the Preliminary Approval Order.

3. I submit this declaration as a supplement to my earlier declaration the Declaration of Ann Cavanaugh Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date, dated May 6, 2026 and filed on May 6, 2026 (the “Initial Cavanaugh Declaration”) (ECF No. 134-1).

¹ All capitalized terms not otherwise defined herein have the same meaning as those set forth in the Stipulation of Settlement (the “Stipulation”), dated January 23, 2026 (ECF No. 128-2).

UPDATE REGARDING DISSEMINATION OF NOTICE

4. As stated in the Initial Cavanaugh Declaration, as of May 6, 2026, A.B. Data has mailed a total of 19,156 copies of the Court-approved Notice of Proposed Class Action Settlement (the “Notice”) and the Proof of Claim and Release Form (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Settlement Class Members and nominees. Since then, A.B. Data has not received any additional requests for Claim Packages. Accordingly, as of the date of this Declaration, an aggregate of 19,156 Claim Packages have been disseminated to potential Settlement Class Members and nominees by first-class mail.

5. As stated in the Initial Cavanaugh Declaration, in accordance with the Preliminary Approval Order, on March 30, 2026, A.B. Data caused the Summary Notice to be published in PR Newswire.

UPDATE TO THE TELEPHONE HELPLINE AND SETTLEMENT WEBSITE

6. As reported in the Initial Cavanaugh Declaration, a website dedicated to this Action (www.HAYWSecuritesLitigation.com) was established on March 20, 2026. Following the Court’s Preliminary Approval Order, A.B. Data updated the website with information regarding the proposed Settlement, including important dates and deadlines and Settlement-related documents. The website has since been updated to include all documents filed in support of final approval, including: Lead Plaintiff’s Notice of Motion and Motion for Final Approval of Class Action

Settlement and Plan of Allocation; Lead Plaintiff's Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement and Plan of Allocation; the Proposed Judgement and Order Granting Final Approval of Class Action Settlement; Notice of Motion and Lead Plaintiff's Motion for Attorneys' Fees, Litigation Expenses, and Lead Plaintiff Award; the Memorandum of Law in Support of Motion for Attorneys' Fees, Litigating Expenses, and Lead Plaintiff Award; and the Proposed Order Awarding Attorneys' Fees, Litigation Expenses; and Lead Plaintiff Award; the Initial Cavanaugh Declaration; and Lead Counsel's respective declarations in support of final approval of the Settlement and the application for award of attorneys' fees, litigation expenses, and Lead Plaintiff Award.

7. As noted in the Initial Cavanaugh Declaration, A.B. Data established and has continued to maintain a case-specific, toll-free telephone helpline, 1-866-302-5581. A.B. Data has and will continue to promptly respond to all inquiries it receives through this dedicated toll-free telephone helpline.

REQUESTS FOR EXCLUSION RECEIVED TO DATE

8. The Notice informs potential Settlement Class Members that written requests for exclusion from the Settlement Class must be mailed to Hayward Holdings, Inc. Securities Litigation Exclusions, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217, such that they are postmarked no later than May 20, 2026. The Notice also set forth the information that should be included in each

request for exclusion. The deadline for submitting requests for exclusion was May 20, 2026.

9. As of July 20, 2026, A.B. Data has received **zero (0)** requests for exclusion – regardless of whether they were timely received.

10. The Notice also directs potential Settlement Class Members that objections must be filed with the Court and served on Lead Counsel and Defendants' Counsel such that they are received no later than May 20, 2026. Despite these instructions, Settlement Class Members sometimes send objections to the Claims Administrator instead. A.B. Data has monitored all mail delivered to A.B. Data's Settlement specific P.O. Boxes. As of July 20, 2026, A.B. Data has received **zero (0)** objections – regardless of whether they were timely received.

CLAIMS RECEIVED TO DATE

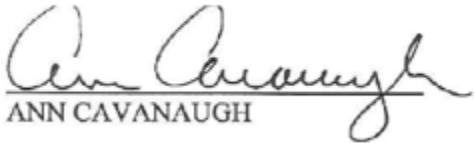
11. The Notice and Claim Form informed Settlement Class Members that in order to qualify for a payment from the Net Settlement Fund, a Claim Form with supporting documentation must be submitted by June 19, 2026. As of July 20, 2026, A.B. Data has received approximately 32,208 claims. Of the claims received through July 20, 2026, approximately 32,028 claims were filed electronically by institutions. Approximately 44 were submitted by mail, and approximately 136 claims were submitted through the Settlement Website claim filing portal. The number of claims filed exceeds the number of Claim Packages mailed because many of those packages

were sent to banks, brokers, and other nominees holding shares in street name on behalf of numerous beneficial owners, each of whom was entitled to submit an individual claim. These figures represent the raw number of claims received to date. A.B. Data has not yet reviewed these claims for eligibility, deficiencies, or duplicates, nor has A.B. Data calculated any distribution amounts pursuant to the Plan of Allocation. These figures are therefore subject to change.

A.B. DATA'S ADMINISTRATION COSTS

12. To date, A.B. Data has incurred approximately \$145,000 in administration costs. A.B. Data expects to sustain an additional \$30,000 to \$60,000 in costs to complete the administration, including the initial distribution of the Settlement proceeds to authorized Claimants, for an estimated total administration cost of approximately \$205,000.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 20th day of July, 2026, at Milwaukee, Wisconsin.


ANN CAVANAUGH