

EXHIBIT 4

Matthew F. Gately
**COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP**
Park 80 West-Plaza One
250 Pehle Avenue, Suite 401
Saddle Brook, NJ 07663
Telephone: 201-845-9600
Facsimile: 201-845-9423
mfg@njlawfirm.com

*Counsel for Lead Plaintiff
Fulton County Employees' Retirement System
[Additional Counsel Appear on Signature Page]*

**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

**DECLARATION OF MICHAEL
KRAMER, ESQ. IN SUPPORT
OF LEAD PLAINTIFF'S
MOTION FOR (1) FINAL
APPROVAL OF SETTLEMENT
AND (2) AWARD OF
ATTORNEYS' FEES,
LITIGATION EXPENSES, AND
LEAD PLAINTIFF AWARD
PURSUANT TO 15 U.S.C. §78U-
4(A)(7)**

BRENNEMAN, TIMOTHY WALSH,
CHRISTOPHER BERTRAND, and
KEVIN BROWN

Defendants.

1. I, Michael Kramer, Esq. am Fund Counsel for the Fulton County Employees' Retirement System (the "Fulton County" or "Lead Plaintiff"), a public pension fund that provides retirement allowances and other benefits to employees of Fulton County, Georgia. With over \$1.5 Billion in assets, Fulton County provides services and benefits for over 3,000 participants. Fulton County is a Court-appointed Lead Plaintiff and is requesting to serve as a Federal Rules of Civil Procedure Rule 23 Class Representative for purposes of the Settlement, for claims brought on behalf of a Class of Hayward Holdings, Inc. securities purchasers under the Securities Exchange Act of 1934 in the above-captioned action (the "Action"). Fulton County purchased 75,752 shares of Hayward common stock during the Class Period and suffered damages as a result.

2. I am the individual who is primarily responsible for monitoring and directing this litigation on behalf of Fulton County. I respectfully submit this Declaration in support of: (a) final approval of the \$19,850,000 settlement (the "Settlement") of the Action reached between Lead Plaintiff, on behalf of the Class, and Defendants and (b) approval of the application for an award of attorneys' fees, litigation expenses, and a Lead Plaintiff award pursuant to 15 U.S.C. §78u-4(a)(7).

3. In seeking appointment as a Lead Plaintiff and Class Representative, Fulton County understood its fiduciary duty to serve the interests of the members of the Class by supervising the management and prosecution of the case.

4. On December 19, 2023, this Court issued an Order appointing Fulton County as Lead Plaintiff. ECF No. 29.

5. Following its appointment as a Lead Plaintiff, Fulton County expended substantial time supervising, carefully monitoring, and actively participating in the prosecution of this case. Fulton County received periodic status reports from Lead Counsel Scott+Scott Attorneys at Law LLP (“Scott+Scott”) on case developments and participated in regular discussions with attorneys from Scott+Scott concerning the prosecution of the Action, the strengths of and risks to the claims, and potential settlement. Specifically, in its capacity as a Lead Plaintiff and putative Class Representative, Fulton County: (a) regularly communicated with Scott+Scott by email and telephone calls regarding the posture and progress of the case; (b) reviewed the multiple pleadings and briefings submitted in this matter and Orders of the Court; (c) collected and produced documents requested by Defendants in connection with mediation, and (d) actively participated in the extensive settlement discussions.

6. Fulton County has evaluated the risks of continuing this Action, including the possibility of a nominal recovery or no recovery at all, and authorized Lead Counsel to settle this Action for \$19,850,000. Fulton County believes this Settlement is fair and reasonable, represents an excellent recovery, and is in the best interest of the members of the Class.

7. While Fulton County recognizes that any determination of fees is left to the Court, Fulton County believes that Plaintiff's Counsel's application for award of attorneys' fees and litigation expenses is fair and reasonable, as this Settlement would not have been possible without the diligent and aggressive prosecutorial efforts of Plaintiff's Counsel.

8. Fulton County has not received, nor has been promised or offered, any financial incentive or compensation for serving as Lead Plaintiff in the Action. Fulton County understands, however, that courts may authorize an award to a representative serving on behalf of the Class directly relating to their representation.

9. All of work Fulton County undertook, as discussed above, was necessary for the successful prosecution and resolution of the Action

10. Having spent substantial time reading litigation papers, communicating with Lead Counsel, engaging with Lead Counsel for the collection of documents, assisting with the mediation, and otherwise trying to advance the interests of the Class (time that Fulton County would have otherwise spent on its daily business activities), Fulton County respectfully asks that the Court, in its discretion, grant its request to award it \$10,000 from the Settlement Fund for its work on behalf of the Class.

11. Fulton County respectfully requests that the Court grant final approval of the Settlement and approve Plaintiff's Counsel's application for an award of

attorneys' fees and expenses. Fulton County also respectfully requests that the Court approve a service award of \$10,000 to Fulton County in recognition of its time expended in the case in representing and securing a recovery for Class Members in the Action.

I, Michael Kramer, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 5th day of May, 2026.

Michael Kramer

Michael Kramer, Esq.
Fund Counsel