

November 11, 2024

VIA E-MAIL

Office of Chief Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

*Re: Leslie's, Inc.
Shareholder Proposal of Chris Mueller
Securities Exchange Act of 1934 – Rule 14a-8*

Ladies and Gentlemen:

On behalf of Leslie's, Inc., a Delaware corporation (the “**Company**”), we submit this letter requesting confirmation that the staff of the Division of Corporation Finance (the “**Staff**”) of the U.S. Securities and Exchange Commission (the “**Commission**”) will not recommend enforcement action to the Commission if, in reliance on Rule 14a-8 under the Securities Exchange Act of 1934 (the “**Exchange Act**”), the Company omits the shareholder proposal (the “**Proposal**”) submitted by Chris Mueller (the “**Proponent**”) from the Company's proxy statement and form of proxy for its 2025 Annual Meeting of Shareholders (collectively, the “**2025 Proxy Materials**”).

Pursuant to Rule 14a-8(j) under the Exchange Act, we have concurrently sent copies of this correspondence to the Proponent.

Rule 14a-8(k) and Staff Legal Bulletin No. 14D (Nov. 7, 2008) (“SLB 14D”) provide that shareholder proponents are required to send companies a copy of any correspondence that the proponents elect to submit to the Commission or the Staff. Accordingly, we are taking this opportunity to inform the Proponent that if the Proponent elects to submit additional correspondence to the Commission or the Staff with respect to this Proposal, a copy of that correspondence should be furnished concurrently to the Company pursuant to Rule 14a-8(k) and SLB 14D.

Copies of the Proposal and related tracking information are attached hereto as Exhibit A. Additionally, the Company's request to withdraw relating to the Proposal is attached to this letter as Exhibit B.

I. SUMMARY OF THE PROPOSAL

On October 28, 2024, the Company received from the Proponent the Proposal for inclusion in the Company's 2025 Proxy Materials. In relevant part, the Proposal, which did not confirm whether or not it was being made pursuant to Rule 14a-8, reads:

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My proposal: Leslie's Inc. (sic) should allow our shareholders the option to hold their shares in certificated form by utilizing the "print on demand" service that Computershare offers called QuickCert.

II. EXCLUSION OF PROPOSAL

A. Basis for Excluding the Proposal

As discussed in more detail below, we respectfully request that the Staff concur with the Company's view that it may properly omit the Proposal from its 2025 Proxy Materials for failure to comply with Rule 14a-8(e)(2) because the Company did not receive the Proposal from the Proponent before the deadline by which shareholder proposals were required to be submitted to the Company for inclusion in the 2025 Proxy Materials.

B. Background

Rule 14a-8(e)(2) provides that shareholder proposals submitted with respect to a company's regularly scheduled annual meeting must be received at a company's principal executive offices no less than 120 calendar days before the anniversary date of the company's proxy statement that was released to shareholders in connection with the previous year's annual meeting. On January 24, 2024, the Company filed with the Commission, and commenced distribution to its shareholders of, a proxy statement and form of proxy for its 2024 Annual Meeting of Shareholders (the "**2024 Proxy Statement**"). As required by Item 1(c) of Exchange Act Schedule 14A and Rule 14a-5(e), the Company included in the 2024 Proxy Statement the deadline for receiving shareholder proposals submitted for inclusion in the Company's proxy statement and form of proxy for the Company's next annual meeting, calculated in the manner prescribed in Rule 14a-8(e). Specifically, the following disclosure appeared on page 63 of the 2024 Proxy Statement:

SUBMISSION OF SHAREHOLDER PROPOSALS FOR THE 2025 ANNUAL MEETING

Rule 14a-8 Proposals. For any proposal to be considered for inclusion in our proxy statement and form of proxy for submission to the shareholders at our 2025 annual meeting of shareholders, it must be submitted in writing and comply with the requirements of Rule 14a-8 of the Exchange Act. Such proposals must be received by the Company at its offices at 2005 East Indian School Road, Phoenix, Arizona 85016 no later than September 26, 2024.

A copy of page 63 of the 2024 Proxy Statement is attached to this letter as Exhibit C. As described below, the Company calculated the September 26, 2024 deadline in the manner prescribed in Rule 14a-8(e) and Staff Legal Bulletin No. 14 (July 13, 2001) ("**SLB 14**").

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On October 28, 2024, 32 days after the Company's deadline for shareholder proposals, the Company received the Proposal by certified mail. *See Exhibit A.*

On November 7, 2024, the Company sent a letter via email (the "**Request to Withdraw**") to the Proponent notifying him that the Proposal was not received by the September 26, 2024 deadline and asking the Proponent to withdraw the Proposal. *See Exhibit B.* Such Request to Withdraw was also delivered to the Proponent via UPS. The UPS tracking information shows that the Request to Withdraw was delivered to the Proponent on November 8, 2024, a copy of which is attached to this letter as *Exhibit D.*

On November 7, 2024, the Company received a response to the Deficiency Notice from the Proponent via email, to reiterate the substance of his request, a copy of which is attached to this letter as *Exhibit E.* The Proponent did not agree to withdraw the Proposal or clarify whether the basis for the Proposal was or was not Rule 14a-8.

Since November 7, 2024, the Company has not received any communication or further correspondence from the Proponent concerning the Proposal. For this reason, we are writing to request that the Staff concur that the Company may exclude the Proposal pursuant to Rule 14a-8(e)(2).

C. The Proposal May Be Omitted in Reliance on Rule 14a-8(e)(2) Because the Company Did Not Receive the Proposal Until After the Deadline for Submitting Shareholder Proposals to the Company for Inclusion in the 2025 Proxy Materials

Rule 14a-8(f)(1) permits exclusion of a shareholder proposal should the proponent fail to follow one of the eligibility or procedural requirements contained in Rule 14a-8. Generally, exclusion on this basis is permitted only after timely notification to the proponent of an applicable defect and a proponent's failure to timely and adequately correct the defect. However, a company "need not provide [the proponent] such notice of deficiency if the deficiency cannot be remedied, *such as if [the proponent] fail[s] to submit a proposal by the company's properly determined deadline*" as per Rule 14a-8(f)(1) (emphasis added).

Rule 14a-8(e)(2) provides that shareholder proposals must be received at a company's principal executive offices no less than 120 calendar days before the anniversary date of the company's proxy statement that was released to shareholders in connection with the previous year's regularly scheduled annual meeting. Under Rule 14a-8(e)(2), a meeting is "regularly scheduled" if it has not changed by more than 30 days from the date of the annual meeting held in the prior year. The Company's 2024 Annual Meeting of Shareholders was held on March 15, 2024. The Company's 2025 Annual Meeting of Shareholders is anticipated to be held on or around Wednesday, March 12, which is within 30 days of the date of the 2024 Annual Meeting of Shareholders.

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SLB 14, Section C.3.b indicates that, to calculate the deadline, a company should “[i] start with the release date disclosed in the previous year’s proxy statement; [ii] increase the year by one; and [iii] count back 120 calendar days.” Consistent with this guidance, to calculate the deadline for receiving shareholder proposals submitted for the Company’s 2025 Annual Meeting of Shareholders, the Company (i) started with the release date of its 2024 Proxy Statement (i.e., January 24, 2024), (ii) increased the year by one (i.e., January 24, 2025), and (iii) counted back 120 calendar days. As per SLB 14, Section C.3.b, “day one” for purposes of this calculation was January 23, 2025, resulting in a deadline for receiving shareholder proposals submitted for inclusion in the Company’s 2025 Proxy Statement of September 26, 2024. As mentioned above, this September 26, 2024 submission deadline was also disclosed explicitly on page 63 of the 2024 Proxy Statement as required by Item 1(c) of Exchange Act Schedule 14A and Rule 14a-5(e).

All of this means, that in order for the Proponent’s submission to be timely, it was required to be received by the Company on or before September 26, 2024. As noted above and as shown in Exhibit A, the Proposal was received on October 28, 2024 by certified mail, and the document itself is signed and dated October 18, 2024. The Proposal was thereby received by the Company 32 days after the Rule 14a-8(e)(2) deadline.

Based upon both Staff guidance and previous responses to no-action requests, the Staff has made it abundantly clear that the deadline for shareholder proposal submissions under Rule 14a-8 is to be strictly construed. *See, e.g., Tesla, Inc.* (avail. Mar. 23, 2023) (concurring that Rule 14a-8(e)(2) provides a basis to exclude a proposal received 61 days after the submission deadline); *Etsy, Inc.* (avail. Apr. 19, 2022) (concurring that Rule 14a-8(e)(2) provides a basis to exclude a proposal received one day after the submission deadline); *AT&T Inc.* (avail. Jan. 26, 2022) (concurring that Rule 14a-8(e)(2) provides a basis to exclude a proposal received six days after the submission deadline); *Walgreens Boots Alliance, Inc.* (avail. Oct. 12, 2021) (concurring that Rule 14a-8(e)(2) provides a basis to exclude a proposal received two days after the submission deadline); *Hewlett Packard Enterprise Co.* (avail. Jan. 15, 2021) (concurring that Rule 14a-8(e)(2) provides a basis to exclude a proposal received two days after the submission deadline); *General Dynamics Corp.* (avail. Jan. 8, 2021, *recon. denied* Mar. 17, 2021) (concurring with exclusion of a proposal received four days after the submission deadline); *Verizon Communications, Inc.* (avail. Jan. 4, 2018) (concurring that Rule 14a-8(e)(2) provides a basis to exclude a proposal received one day after the submission deadline); *Wal-Mart Stores, Inc.* (avail. Feb. 13, 2017) (concurring that Rule 14a-8(e)(2) provides a basis to exclude a proposal received six days after the submission deadline); *Applied Materials, Inc.* (avail. Nov. 20, 2014) (concurring that Rule 14a-8(e)(2) provides a basis to exclude a proposal received one day after the submission deadline); *General Electric Co. (GE Stockholder’s Alliance)* (avail. Jan. 24, 2013) (concurring that Rule 14a-8(e)(2) provides a basis to exclude a proposal received one day after the submission deadline); *Tootsie Roll Industries, Inc.* (avail. Jan. 14, 2008) (concurring that Rule 14a-8(e)(2) provides a basis to exclude a proposal received two days after the submission deadline). The Staff has also emphasized this point in SLB 14 by advising, “[t]o

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avoid exclusion on the basis of untimeliness, a shareholder should submit his or her proposal well in advance of the deadline. . . .”

III. Waiver Of The 80-Day Requirement In Rule 14a-8(j)(1) Is Appropriate.

We further request that the Staff waive for good cause the 80-day filing requirement set forth in Rule 14a-8(j). Rule 14a-8(j)(1) requires that, if a company “intends to exclude a proposal from its proxy materials, it must file its reasons with the Commission no later than 80 calendar days before it files its definitive proxy statement and form of proxy with the Commission.” However, Rule 14a-8(j)(1) allows the Staff to waive the deadline if a company can show “good cause.”

The Staff previously has granted waivers in similar circumstances where the reason for the delayed submission of a request for “no action” was that the company had been waiting for a response from the proponent to correct deficiencies in the proponent’s submission. *See, e.g., Exxon Mobil Corp.* (avail. Feb. 13, 2017); *Toll Brothers, Inc.* (avail. Jan. 10, 2006); *Toll Brothers, Inc.* (avail. Jan. 5, 2006); *E*TRADE Group, Inc.* (avail. Oct. 31, 2000); *PHP Healthcare Corp.* (avail. Aug. 25, 1998).

We note that:

- The Company sent the Request to Withdraw to the Proponent via email on November 7, 2024, within 14 days of the Company’s receipt of the Proposal on October 28, 2024. *See Exhibit B.*
- The Proponent responded to the Request to Withdraw via email on November 7, 2024, asking that the Company take the action addressed in the Proposal. The Proponent did not address the Request to Withdraw. *See Exhibit E.*
- The Company has not received any further documentation from the Proponent.

The Company currently intends to file its definitive 2025 Proxy Materials on or around January 23, 2025, which means that the last day to have satisfied the 80-day requirement was November 4, 2024. Because the Company fully complied with the requirements set forth in Rule 14a-8, SLB 14F, and SLB 14L to send the Proponent the Request to Withdraw, but the Proponent transmitted its Proposal 32 days after the applicable deadline, we believe that there is “good cause” for not satisfying the 80-day requirement. Therefore, we respectfully request that the Staff waive the 80-day requirement with respect to this letter.

IV. CONCLUSION

Based upon the foregoing analysis, we respectfully request that the Staff concur that it will take no action if the Company excludes the Proposal from its 2025 Proxy Materials. We

GIBSON DUNN

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would be happy to provide you with any additional information and answer any questions that you may have regarding this subject. Correspondence regarding this letter should be sent to shareholderproposals@gibsondunn.com. If we can be of any further assistance in this matter, please do not hesitate to call me at (212) 351-2309.

Sincerely,

A handwritten signature in blue ink that reads "Lori Zyskowski". The signature is written in a cursive, flowing style.

Lori Zyskowski

Enclosures

cc: Ben Lindquist, Senior Vice President, General Counsel & Corporate Secretary

GIBSON DUNN

EXHIBIT A

October 18, 2024

Leslie's Inc.
2005 E. Indian School Rd.
Phoenix, AZ 85016

Members of the board.

My name is Chris Mueller, and I would like to submit a shareholder proposal for the 2025 annual shareholder meeting. I am an individual investor with a directly registered ownership position in our company. I intend to hold my position through the date of the meeting, and I'm available to discuss my proposal with the board at any time.

My proposal: Leslie's Inc. should allow our shareholders the option to hold their shares in certificated form by utilizing the "print on demand" service that Computershare offers called QuickCert.

Hundreds of issuers use Computershare's QuickCert service including: Tesla, Nvidia, Walmart, Yelp, MGM, United Airlines, Harley, Starbucks, TopGolf, Citizens, Icahn, JP Morgan, Goldman Sachs, Nasdaq, Hasbro, Cisco, Paypal, Foot Locker, Domino's, Wayfair, Colgate, Amex, PNC, PepsiCo, Campbell's, Manitowoc, Warner Bros, BNY Mellon, K-Force, JetBlue, Carnival, AGNC, Nokia, Mattel, Funko.

Based on my own holdings, MOST issuers, that use Computershare as a transfer agent, continue to offer the option for certificated holdings. A majority of those issuers use QuickCert. The service is low cost, and the fee to the investor is \$25 per certificate.

Holding book-entry shares with the transfer agent already adds a layer of protection for the investor, however, there are still risks with holding uncertificated shares. According to Computershare's FAQ, book-entry shares (enrolled in certain investment plans) are held by Computershare's nominee Dingo & Co. "A portion" of those shares are held "at DTC for operational efficiency". Computershare has not provided information regarding how they determine what portion of those shares are held at DTC, however, Computershare has stated that certificated shares are not included in the aggregate total of DSPP shares held at DTC. Allowing investors to certificate their shares enables investors to enroll in certain investment plans while eliminating the ability for Computershare to hold a portion of those shares at DTC.

It is also worth mentioning is that transfer agents are not immune to negligence nor cyber attacks. On 8/20/24, the SEC announced settled charges with Equiniti for failing to assure that client securities and funds were protected from cyber intrusions against theft or misuse. Personally, I was not able to log in to dozens of accounts at AST for MONTHS in 2023. Without holding many of my securities in certificated form, I was limited in my ability to prove that I owned those shares during that time.

Although this added layer of protection may not be a priority to everyone, it is worth the additional \$25 investment to me personally. I encourage our company to take my proposal seriously. **Issuers that refuse to offer the certificated holding option are denying our investors the ability to incorporate this extra layer of protection for their shares.**

I would appreciate correspondence through email (if possible) to limit the resource expenditure necessary for responding to my proposal.

Thank you for your time,



Chris Mueller

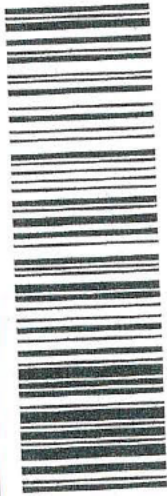


Chris Mueller

9589 0710 5270 1811 6504 74

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL®



9589 0710 5270 1811 6504 74

Retail



RDC 99



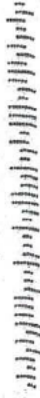
85016

U.S. POSTAGE PAID
FCM LETTER
TAMPA, FL 33607
OCT 22, 2024

\$5.58

R2305M146439-15

Leslie's Inc.
Attention: Corporate Secretary
2005 E. Indian School Rd.
Phoenix, AZ 85016



Tracking Number:

Remove X

9589071052701811650474

Copy Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was delivered to the front desk, reception area, or mail room at 2:19 pm on October 28, 2024 in PHOENIX, AZ 85016.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Front Desk/Reception/Mail Room

PHOENIX, AZ 85016
October 28, 2024, 2:19 pm

In Transit to Next Facility

October 27, 2024

Arrived at USPS Regional Destination Facility

PHOENIX AZ DISTRIBUTION CENTER
October 26, 2024, 9:17 am

Departed USPS Facility

TAMPA, FL 33630
October 23, 2024, 3:23 am

Arrived at USPS Origin Facility

TAMPA, FL 33630
October 22, 2024, 7:15 pm

USPS in possession of item

Feedback

TAMPA, FL 33607
October 22, 2024, 11:27 am

● Hide Tracking History

[What Do USPS Tracking Statuses Mean?](https://faq.usps.com/s/article/Where-is-my-package) (https://faq.usps.com/s/article/Where-is-my-package)

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Product Information



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Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

GIBSON DUNN

EXHIBIT B

November 7, 2024

VIA OVERNIGHT MAIL AND EMAIL

Chris Mueller

Re: Shareholder Proposal Submitted to Leslie's, Inc.

Dear Mr. Mueller:

I am writing on behalf of Leslie's, Inc. (the "**Company**"), which on October 28, 2024, received your letter giving notice of your intent to present a shareholder proposal (the "**Proposal**") at the Company's 2025 Annual Meeting of Shareholders (the "**Submission**"), which you submitted by certified mail on October 22, 2024 (the "**Submission Date**"). The Submission is not clear as to whether you intend to submit the Proposal for inclusion in the Company's proxy materials pursuant to Securities and Exchange Commission ("**SEC**") Rule 14a-8 or whether you intend to submit the Proposal solely pursuant to state corporate law, and not pursuant to SEC Rule 14a-8.

If you were submitting the Proposal with the intention of including the Proposal in the Company's proxy materials for the 2025 Annual Meeting of Shareholders pursuant to SEC Rule 14a-8, please note that the Submission was received after the deadline for timely submission of shareholder proposals under Rule 14a-8. As disclosed in the Company's definitive proxy statement filed on January 24, 2024, to be timely for consideration at the Company's 2025 Annual Meeting of Shareholders, shareholder proposals submitted pursuant to Rule 14a-8 must have been received by the Company no later than September 26, 2024. Therefore, if you were providing notice pursuant to Rule 14a-8, we respectfully request that you withdraw the Proposal.

If you were not submitting the Proposal for inclusion in the Company's proxy materials pursuant to SEC Rule 14a-8, and instead submitted the Proposal solely pursuant to state corporate law, please note that the Submission does not satisfy the advance notice provisions of Article II, Section 2.03(A)(2) of the Company's Bylaws. For your reference, page 63 of the Company's 2024 proxy statement (which is available at <https://ir.lesliespool.com/sec-filings/proxy-documents>) discusses the requirements for submitting a proposal under the Company's Bylaws, which are available at https://ir.lesliespool.com/sec-filings/all-sec-filings?form_type=8-K&year=##document-546-0000950170-24-097631-3.

Please address any response to me at 200 Park Avenue, New York, NY 10166. Alternatively, you may transmit any response by email to me at lzyskowski@gibsondunn.com.

Chris Mueller
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If you have any questions with respect to the foregoing, please contact me at

[REDACTED]

Sincerely,

Lori Zyskowski

Lori Zyskowski

GIBSON DUNN

EXHIBIT C

Other Matters

OTHER BUSINESS

We are not currently aware of any business to be acted upon at the Annual Meeting other than the matters discussed in this proxy statement. The form of proxy accompanying this proxy statement confers discretionary authority upon the named proxy holders with respect to amendments or variations to the matters identified in the accompanying Notice of Annual Meeting of Shareholders and with respect to any other matters which may properly come before the Annual Meeting or any adjournment or postponement thereof. If other matters do properly come before the Annual Meeting, or at any such adjournment or postponement of the Annual Meeting, we expect that shares of our common stock, represented by properly submitted proxies, will be voted by the proxy holders in accordance with the recommendations of our Board.

SUBMISSION OF SHAREHOLDER PROPOSALS FOR THE 2025 ANNUAL MEETING

Rule 14a-8 Proposals. For any proposal to be considered for inclusion in our proxy statement and form of proxy for submission to the shareholders at our 2025 annual meeting of shareholders, it must be submitted in writing and comply with the requirements of Rule 14a-8 of the Exchange Act. Such proposals must be received by the Company at its offices at 2005 East Indian School Road, Phoenix, Arizona 85016 no later than September 26, 2024.

Advance Notice Proposals and Nominations. In addition, our bylaws provide notice procedures for shareholders to nominate a person as a director and to propose business to be considered by shareholders at a meeting (but not for inclusion in the proxy statement). Notice of a nomination or proposal must provide the information set forth in our bylaws (which includes information required under Rule 14a-19 with respect to nominations) must be delivered to the Corporate Secretary at 2005 East Indian School Road, Phoenix, Arizona 85016 no later than the close of business on the 90th day, nor earlier than the close of business on the 120th day prior to, the first anniversary of the preceding year's annual meeting; provided, however, that in the event that the date of the annual meeting is more than 30 days before or more than 70 days after such anniversary date, or if for any reason the Annual Meeting does not occur, notice by the shareholder to be timely must be so delivered not earlier than the close of business on the 120th day prior to such annual meeting and not later than the close of business on the later of (i) the 90th day prior to such annual meeting or (ii) the 10th day following the day on which public announcement of the date of the annual meeting is first made by us. Accordingly, for our 2025 annual meeting of shareholders, notice of a nomination or proposal must be delivered to us no later than 5:00 p.m. Mountain Time on December 13, 2024 and no earlier than 5:00 p.m. Mountain Time on November 15, 2024. Nominations and proposals also must satisfy the other requirements set forth in the bylaws.

HOUSEHOLDING INFORMATION

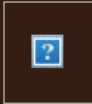
Unless we have received contrary instructions, we may send a single copy of this proxy statement to any household at which two or more shareholders reside. This process, known as "householding," reduces the volume of duplicate information received at any one household, helps to reduce our expenses, and benefits the environment. However, if shareholders prefer to receive multiple sets of our disclosure documents at the same address this year or in future years, the shareholders should follow the instructions described below. Similarly, if an address is shared with another shareholder and together, both of the shareholders would like to receive only a single set of our disclosure documents, the shareholders should follow these instructions: If the shares are registered in the name of the shareholder, the shareholder should contact our Corporate Secretary at our offices by sending a written request to 2005 East Indian School Road, Phoenix, Arizona 85016 or calling 602-366-3999, to inform us of his or her request; or if a bank, broker or other nominee holds the shares, the shareholder should contact the bank, broker or other nominee directly.

GIBSON DUNN

EXHIBIT D

From: [UPS](#)
To: [Refvem, Jill C.](#)
Subject: UPS Delivery Notification, Tracking Number 1Z2748260198906731
Date: Friday, November 8, 2024 12:01:54 PM

This Message Is From an External Sender
This message came from outside your organization.



Hello, your package has been delivered.

Delivery Date: Friday, 11/08/2024
Delivery Time: 11:58 AM
Left At: OTHER-RELEAS



- Set Delivery Instructions
- Manage Preferences
- View My Packages

GIBSON DUNN CRUTCHER

Tracking Number:	1Z2748260198906731
Ship To:	CHRIS MUELLER [Redacted Address] US
Number of Packages:	1
UPS Service:	UPS Next Day Air®
Package Weight:	0.1 LBS
Reference Number:	56314-00027

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GIBSON DUNN

EXHIBIT E

From: [Chris Mueller](#)
To: [Refvem, Jill C.](#)
Cc: [Zyskowski, Lori](#); [Jindra, Paul Michael](#)
Subject: Re: Leslie's, Inc. Deficiency Notice (Chris Mueller)
Date: Thursday, November 7, 2024 9:17:07 PM

This Message Is From an External Sender

This message came from outside your organization.

Hi Jill

Thank you for your email. I believe the one time cost for setting up the QuickCert service is only \$400. If our company is willing to offer this service to our shareholders, I would consider my concerns addressed as it would allow me to certificate my position. Please let me know if that is something our company would consider.

Thank you

Chris

On Thu, Nov 7, 2024 at 12:20 PM Refvem, Jill C. [REDACTED] wrote:

Mr. Mueller,

On behalf of Leslie's, Inc., attached please find correspondence regarding the shareholder proposal you submitted. A paper copy of this correspondence is being delivered to you via overnight mail as well.

We would appreciate you kindly confirming receipt of this correspondence.

Thank you,

Jill

Jill Refvem
[Associate Attorney](#)



GIBSON DUNN
Gibson, Dunn & Crutcher LLP
1700 M Street, N.W., Washington, D.C. 20036-4504

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