

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

IN RE BROILER CHICKEN ANTITRUST
LITIGATION

Case No.: 1:16-cv-08637

This Document Relates To:

THE DIRECT PURCHASER PLAINTIFF
ACTION

**DECLARATION OF ERIC
SCHACHTER IN SUPPORT OF
DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENTS WITH
DEFENDANTS FOSTER FARMS,
PERDUE, CASE, CLAXTON,
WAYNE FARMS, AGRI STATS,
AND SANDERSON FARMS AND
APPROVAL OF NOTICE PLAN**

I, Eric Schachter, declare and state as follows:

1. I am a Senior Vice President with A.B. Data, Ltd. ("A.B. Data"). A.B. Data was selected by Direct Purchaser Plaintiffs as the Notice and Settlement Administrator¹ in this matter and has completed numerous rounds of notice to Class members, including the recently completed the Court-approved notice plan to inform Class members of the settlements with the Simmons, Mountaire, and O.K. Foods Defendants. Among other settlements in this case, the Court appointed A. B. Data as the Notice and Settlement Administrator for the HRF and Koch settlements (ECF No. 7070), which the Court preliminarily approved on October 13, 2023 (ECF 6979). I am fully familiar with the facts contained herein based upon my personal knowledge, and if called as a witness, could and would testify competently thereto.

2. In consultation with Class Counsel, I prepared a proposed notice plan for the HRF,

¹ Unless otherwise noted, all capitalized terms shall have the same meaning as in the Settlement Agreements between Direct Purchaser Plaintiffs and HRF, Koch, Foster Farms, Perdue, Case, Claxton, Wayne Farms, Agri Stats, and Sanderson Farms.

Koch, Foster Farms, Perdue, Case, Claxton, Wayne Farms, Agri Stats, and Sanderson Farms (collectively referred to as the “Settling Defendants”) settlements. This plan includes a claims process and distribution plan for the Mar Jac, Harrison Poultry, Simmons, Mountaire, O.K. Foods, HRF, and Koch settlements. This Declaration will describe the proposed notice plan and how it will meet the requirements of Rule 23 of the Federal Rules of Civil Procedure and provide due process to Class members. This Declaration is based upon my personal knowledge and upon information provided to me by Class Counsel, my associates, and A.B. Data staff members.

3. I have implemented and coordinated some of the largest and most complex class action notice and administration plans in the country. The scope of my work includes notification, claims processing, and distribution plans in all types of class actions, including but not limited to consumer, antitrust, securities, ERISA, insurance, and government agency settlements.

4. A.B. Data has also been appointed as notice, claims, and/or settlement administrator in hundreds of high-volume consumer, antitrust, civil rights, insurance, ERISA, securities, and wage and hour class action cases. A profile of A.B. Data’s background and capabilities, including representative case and client lists, is included as **Exhibit A**.

5. The objective of the proposed notice plan is to provide the best practicable notice under the circumstances to Class members. The Class is defined as follows:

All persons who purchased raw Broilers directly from any of the Defendants or their respective subsidiaries or affiliates either fresh or frozen, in the form of: whole birds (with or without giblets), whole cut-up birds, or parts (boneless or bone in) derived from the front half of the whole bird, for use or delivery in the United States from December 1, 2008 until July 31, 2019. Specifically excluded from the Class are the Defendants; the officers, directors or employees of any Defendant; any entity in which any Defendant has a controlling interest; and any affiliate, legal representative, heir or assign of any Defendant; any federal, state governmental entities, any judicial officer presiding over this action and the members of her/her immediate family and judicial staff, any juror assigned to this action; and any co-conspirator identified in this action.

6. The proposed notice plan (which is substantially similar to the notices previously disseminated in this case and approved by this Court for the Simmons, Mountaire and O.K. Foods settlements, ECF No. 6830) includes direct notice by mail and/or email to approximately 28,000 potential Class members identified through previous rounds of notice. To supplement this direct notice and reach potential Class members who may not receive direct notice, A.B. Data will implement a media campaign as discussed below.

7. Direct notice will be provided via a Long-Form Notice, attached as **Exhibit B**, that will be mailed to approximately 25,000 Class members with a known mailing address. The Long-Form Notice will also be posted on the case-specific website, www.broilerchickenantitrustlitigation.com. A Short-Form, attached as **Exhibit C**, will be formatted as an email and sent to the approximately 6,300 Class members with a known email address.

8. For email notice, A.B. Data implements certain best practices to increase deliverability and bypass SPAM and junk filters, and we will be able to verify how many emails were successfully delivered. For the mailed Long-Form Notice, A.B. Data will track any mail returned as undeliverable by the United States Postal Service (“USPS”), and using third-party information providers to which we subscribe, attempt to ascertain an updated address and resend the Long-Form Notice accordingly.

9. To supplement the direct notice efforts, A.B. Data will effectuate a media campaign by causing digital advertisements to appear on websites relevant to the Class. This media campaign is substantially similar to the media campaigns previously used in this case. More specifically, A.B. Data will run digital ad campaigns on ProgressiveGrocer.com, MeatPoultry.com, PoultryTimes.com, SupermarketNews.com, Winsightgrocerybusiness.com, FastCasual.com and

ShelbyReport.com. The digital ads are expected to run on these websites for four weeks. A sample banner ad is attached as **Exhibit D**. Comparable alternatives will be considered if any of these proposed websites will not accept legal notices or if inventory is not available at the time of placement.

10. The Long-Form Notice and Short-Form Notice will inform Class Members that this is a class action; the Class definition in plain and engaging language (“If you purchased Broiler chicken directly from a Broiler chicken producer for use or delivery in the United States from December 1, 2008, through July 31, 2019, a class action settlement may affect your rights.”); that the Action alleges antitrust violations and price-fixing claims; that a Class member may appear through an attorney if the member wants; that Class members can no longer request exclusion from the Class; that Class members can object to the Settlements if they so choose; and the binding effect of a judgment on the Class.

11. The notices will also include summary information concerning: the terms of the HRF and Koch settlements; the terms of the post-trial settlements with the other Settling Defendants; Co-Lead Class Counsel’s requests for attorney’s fees, reimbursement of litigation expenses, and payment of Class Representative service awards; the claims distribution and participation process for the settlements with Mar Jac, Harrison Poultry, Simmons, Mountaire, O.K. Foods, HRF and Koch; and the date, time, and place of the final approval hearing.

12. The notices also indicate that Class members who submitted a qualified claim in the previous claims process will not be required to take any additional steps to receive their *pro rata* portion of the net settlement proceeds. Those Class members who did not participate in the first claims process will have the opportunity to submit a Claim Form, attached as **Exhibit E**, via mail, email or using the Settlement website. All Class members will also be able to review their

known Broilers purchase records, based on defendants' records and the previous claims process, on the Settlement website. Claimants who disagree with or wish to supplement their known purchase information will be able to do so by completing a Purchase Audit Request Form, attached as **Exhibit F**.

13. To assist Class members in understanding the terms of the Settlement Agreements, the current case-specific toll-free telephone number and website from previous settlements in this matter will continue to be maintained with updated information concerning the Settlements, including: relevant information and documents related to the Settlements; Class Counsel's application for attorney's fees, expenses and Class Representative service awards; and the distribution process.

14. The toll-free telephone number will continue to be equipped with an automated interactive voice response system that presents callers with a series of choices to hear prerecorded information. The prerecorded information will be updated with information concerning the Settlements. If callers need further help, they will have an option to speak with a live operator during business hours.

15. It is my opinion, based on my individual expertise and experience and that of my A.B. Data colleagues, that the proposed notice plan is designed to effectively reach Class members, will deliver plain language notices that will capture the attention of the reader, and will provide relevant information in an informative and easy to understand manner that is necessary to effectively understand the rights and options under the terms of the Settlement Agreements. This proposed notice plan conforms to the standards employed by A.B. Data in notification plans designed to reach potential class members of settlement groups or classes that are national in scope and reach narrowly defined entities and demographic targets. For all these reasons, in my opinion,

the proposed notice plan satisfies the requirements of Rule 23 and due process.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 6th day of March 2024 in Milwaukee, Wisconsin.

A handwritten signature in black ink, appearing to read 'Eric Schachter', written over a horizontal line.

Eric Schachter

EXHIBIT A

**Class
Action
Administration**



Headquarters

600 A.B. Data Drive
Milwaukee, WI 53217
P: 866-217-4470
F: 414-961-3099

New York

One Battery Park Plaza
32nd Floor
New York, NY 10004
P: 646-290-9137

Washington DC

915 15th St., NW, Ste. 300
Washington, DC 20005
P: 202-618-2900
F: 202-462-2085

Florida

5080 PGA Boulevard, Ste. 209
Palm Beach Gardens, FL 33418
P: 561-336-1801
F: 561-252-7720


Israel

19 Weissburg Street
Tel Aviv 69358
Israel
P: +972 (3) 720-8782




CAPABILITIES

About A.B. Data


 Founded in 1981, **A.B. Data has earned a reputation** for expertly managing the complexities of class action administration in consumer, antitrust, securities, Securities and Exchange Commission (SEC) enforcement actions, and ERISA, Attorneys General, employment, civil rights, insurance, environmental, wage and hour, and other class action cases. **A.B. Data's work in all aspects of class action administration** has been perfected by decades of experience in hundreds of class action cases involving billions of dollars in total settlements. Dedicated professionals deliver **A.B. Data's all-inclusive services**, working in partnership with its clients to administer their class action cases effectively, efficiently, and affordably, regardless of size or scope.

A.B. Data offers unmatched resources and capacity and is capable of expertly administering any class action notice, settlement, and/or fund administration. Whether notifying millions of class members in the United States or throughout the world, processing millions of claims, distributing payments digitally via A.B. Data's Digital PayPortalSM, or printing and distributing millions of checks, **A.B. Data matches its talent and technology** to the specific needs of its clients, delivering unparalleled service on time and on budget without ever compromising quality.

Location, Ownership Structure

 **A.B. Data is an independently owned**, more than 40-year-old, Milwaukee, Wisconsin-based company that prides itself on its vast expertise and industry-leading innovations. We like to remind our clients and partners that we're not just a class action administration company, but a group of experienced, dedicated professionals who believe that relationships are just as important as the accurate and timely management of class action administrations. In other words, we are people who do business with people.

Services

 **Every A.B. Data client is deserving of the best job we can put forward.** A.B. Data makes class action administration easy for our clients with clarity, convenience, and efficiency. Our priority is to navigate the intricacies of our clients' matters and deliver successful results by using our solid expertise, advanced technology, and top-quality products and services. We pay attention to the details and get it right the first time.

We aim to provide our clients the full experience of a truly collaborative working relationship. It is why we believe much of our success originates from our philosophy of "people doing business with people."

Services

All Digital — From Notice to Distribution

A.B. Data is uniquely positioned to design, implement, and maintain notice and settlement administration programs using an innovative, "all-digital" approach that replaces the more traditional and less efficient methods of administration, such as newspaper ads, mailed notices, and paper checks. Many of our recent proposed notice plans and claim programs utilize the latest technologies such as microtargeted digital ads for notice, streamlined online claims, and distributing settlement funds electronically using a digital paywall. These methods provide significant cost savings, are consistent with the amendments to Rule 23 that are now in effect, and importantly provide much-needed alignment of class action notice and administration with current consumer behaviors.

Pre-Settlement Consultation

The pre-settlement consultation is a collaborative session designed to help A.B. Data clients prepare a stronger case. Our support teams simplify the task of sorting through a maze of documents during investigation and discovery, streamlining the process and preserving fund assets. From there, we assist with fully interactive media packages for court presentations and settlement negotiations. A.B. Data works closely with our clients, offering expert testimony on documents, processing, class and notice manageability, and proposed plans of allocation.

Media Services

A.B. Data continues to earn our reputation as the early innovator in integrating advanced micro-targeting techniques, including contextual targeting, behavioral targeting, and predictive modeling. Coupled with inventive digital media strategies to drive claims, case-specific banner ad development, class member research, and comScore analysis services, our multi-tiered media programs are designed to cost-effectively deliver notice to potential class members and increase claims rates.

Notice Administration

In A.B. Data, clients have a comprehensive resource with a depth of experience in direct notice. Our compliance and understanding of Rule 23 of the Federal Rules of Civil Procedure are crucial in meeting the "plain language" legal requirements for any campaign. From our sophisticated digital media capabilities and extensive global experience with class member research, our experts create notice documents that are easily understandable and cost-efficient to produce. We consult with our clients to deliver notice documents from multi-page, mailed, or emailed notice packets to concise postcards that establish the most influential and cost-effective means of communicating with potential claimants.

Claims Processing

A.B. Data continues to bring game-changing technologies to improve the speed and precision in claims processing. Our robust system for online claims submissions allows us to meticulously verify data and documentation, preserve and authenticate claims, and calculate and verify settlement amounts. In addition, our data network infrastructure includes on-site data storage, backup, contingency plans, and security for electronic and hard copy claim filings. It is all part of a total commitment to be the most innovative and comprehensive resource in the industry. At A.B. Data, we take pride in having the in-house capacity to process millions of pages, as well as the organizational integrity to treat every claim as if it were the only one.

Contact Center

A.B. Data's Contact Center is comprised of a full staff that is trained on and equipped with online and telecommunication systems to monitor and connect with class members. Associates routinely monitor class member communication for all class action administrations, including antitrust, consumer, and securities.

Utilizing monitoring software, associates watch multiple social media channels simultaneously, allowing for instantaneous routing of inquiries and interaction with claimants. Detailed and concise analytical reports outlining Contact Center activities are always provided.

Our Contact Center and case websites are capable of handling millions of class member engagements, as recently displayed in a campaign which garnered over 1.2 million website visits in two months and had more than 72,500 Facebook engagements. Facebook comments and threads are monitored and claimants are guided to the website for more information. Google AdWords and display advertising have also brought hundreds of thousands of visitors to various case websites.

A.B. Data's Contact Center also has Spanish language associates in-house and we can accommodate any language, given proper lead time. Traditional call center facilities are also available, if needed.

Case Websites

We offer a state-of-the-art technology platform that supports every step of our class action administration process. Our expert marketing professionals design customized case-specific websites that provide potential class members easy access to case information, critical documents, important deadlines, as well as the capability to file claim forms and register for future mailings about the case. Claimants can use the website to elect to receive their settlement payments by mail or by one of several digital payment options, all accessible by mobile devices.

Settlement Fund Distribution

From complete escrow services to establishment of qualified settlement funds, check printing and mailing, electronic cash or stock distribution and tax services, A.B. Data has always provided a full-service solution to Settlement Fund Distribution. Our IT team has decades of experience in developing and implementing fast, secure databases and claims administration systems that ensure class members receive the correct amount in their settlement disbursement. Today's digital capabilities allow even greater convenience for class members. In certain instances, claimants can now elect to

instantaneously receive settlement payments through popular digital-payment options, such as PayPal, Amazon, and virtual debit cards.

A.B. Data's Leadership



A.B. Data's administration team is composed of the following key executives, who collectively have decades of experience settling and administering class actions:

Bruce A. Arbit, Co-Managing Director and one of the founders of the A.B. Data Group, serves as Chairman of the Board and oversees the day-to-day operations of the A.B. Data Group of companies, employing almost 400 people in the United States and Israel. Mr. Arbit is also Chairman of the Board of Integrated Mail Industries, Ltd. and has served as a member of the Board of Directors of University National Bank and State Financial Bank. He is the past Chairman of Asset Development Group, Inc., Home Source One, and American Deposit Management and is a member of the National Direct Marketing Association, the Direct Marketing Fundraising Association, and the American Association of Political Consultants. He was named 1996 Direct Marketer of the Year by the Wisconsin Direct Marketing Association.

A.B. Data's work in class action litigation support began with the Court selecting A.B. Data to oversee the restitution effort in the now-famous Swiss Banks Class Action Case, the International Commission on Holocaust Era Insurance Claims, and every other Holocaust Era Asset Restitution program, in which it was the company's job to identify, contact, and inform survivors of the Holocaust. A.B. Data delivered by reaching out to millions of people in 109 countries who spoke more than 30 languages. Since those days, Mr. Arbit has guided the class action division through phenomenal growth and success. Today, A.B. Data manages hundreds of administrations annually that distributes billions of dollars to class members.

Thomas R. Glenn, President, Mr. Glenn's management of A.B. Data's Class Action Administration Company includes designing and implementing notice plans and settlement administration programs for antitrust, securities, and Securities and Exchange Commission settlements and SEC disgorgement fund distributions, as well as consumer, employment, insurance, and civil rights class actions. Mr. Glenn previously served as Executive Vice President at Rust Consulting and has more than 30 years of executive leadership experience.

Eric Miller, Senior Vice President, as a key member of A.B. Data's Class Action Administration Leadership Team, oversees the Case Management Department and supervises the operations and procedures of all of A.B. Data's class action administration cases. Mr. Miller is recognized in the class action administration industry as an expert on securities, SEC, consumer, product recall, product liability, general antitrust, pharmaceutical antitrust, and futures contract settlements, to name a few settlement types. Prior to joining A.B. Data, Mr. Miller served as the Client Service Director for Rust Consulting, responsible there for its securities practice area. He has more than 20 years of operations, project management, quality assurance, and training experience in the class action administration industry. In addition, Mr. Miller manages A.B. Data's office in Palm Beach Gardens, Florida.

Eric Schachter, Senior Vice President, is a member of A.B. Data's Class Action Administration Leadership Team. He has over 15 years of experience in the legal settlement administration services industry. Mr. Schachter's responsibilities include ensuring successful implementation of claims administration services for A.B. Data's clients in accordance with settlement agreements, court orders, and service agreements. He also works closely with Project Managers to develop plans of administration to provide the highest level of effective and efficient delivery of work product. A frequent speaker on claims administration innovation and best practices at industry events nationwide, Mr. Schachter has a bachelor's degree in sociology from Syracuse University, earned his law degree at Hofstra University School of Law, and was previously an associate at Labaton Sucharow LLP in New York City.

Elaine Pang, Vice President, Media, oversees the Media Department and is responsible for the direction, development, and implementation of media notice plans for A.B. Data's clients. Ms. Pang brings more than 15 years of experience in developing and implementing multifaceted digital and traditional media for high profile complex legal notice programs. She uses her experience in class actions and advertising to provide the best practicable notice plans for large scale campaigns across domestic and international regions, and she leverages her expertise to better understand the evolving media landscape and utilize cutting-edge technology and measurement tools. Prior to entering the class action industry, Ms. Pang worked with many leading reputable brands, including General Mills, Air Wick, Jet-Dry, Comedy Central, Madison Square Garden, Radio City Music Hall, and Geox. She earned her MBA from Strayer University and holds a BS in Marketing from Pennsylvania State University. Ms. Pang's credentials include Hootsuite Social Marketing Certification, Google Adwords and Analytics Certification, and IAB Digital Media Buying and Planning Certification.

Paul Sauberer, Vice President of Quality, is responsible for overseeing quality assurance and process management, working diligently to mitigate risk, ensure exceptional quality control, and develop seamless calculation programming. Mr. Sauberer brings more than 20 years of experience as a quality assurance specialist with a leading claims-processing company where he developed extensive knowledge in securities class action administration. He is recognized as the class action administration industry's leading expert on claims and settlement administrations of futures contracts class actions.

Justin Parks, Vice President, is a member of A.B. Data's Class Action Administration Leadership Team. Mr. Parks brings extensive experience in client relations to A.B. Data's business development team. Mr. Parks has over 15 years of experience in the legal settlement administration services industry and has successfully managed and consulted on notice plans and other administrative aspects in hundreds of cases. Mr. Parks is uniquely experienced in Data Privacy matters, having consulted with clients on numerous matters stemming from data breaches as well as violations of the Illinois Biometric Information Privacy Act (BIPA), including some of the first ever Biometric Privacy related settlements in history. Mr. Parks' knowledge and understanding of the class action industry, as well as his client relationship skills, expand A.B. Data's capacity to achieve its business development and marketing goals effectively.

Steve Straub, Senior Director of Operations, started with A.B. Data in 2012 as a Claims Administrator. He moved through the ranks within the company where he spent the past five years as Senior Project Manager managing many of the complex commodities cases such as *In re LIBOR-Based Financial Instruments Antitrust Litigation*, *In re London Silver Fixing, Ltd. Antitrust Litigation*, and *Laydon v. Mizuho Bank, Ltd., et al.* Mr. Straub's performance in these roles over the past ten years, along with his comprehensive knowledge of company and industry practices and first-person experience leading the project management team, has proven him an invaluable member of the A.B. Data team.

In his role as Claimant Operations Director, his responsibilities include developing efficiencies within the operations center, which includes mailroom, call center, and claims processing areas. His areas of expertise include business process development, strategic/tactical operations planning and implementation, risk analysis, budgeting, business expansion, growth planning and implementation, cost reduction, and profit, change, and project management. Mr. Straub is well-versed in the administration of securities, consumer, and antitrust class action settlements. He earned his Juris Doctor degree from Seton Hall University School of Law in Newark, New Jersey.

Jack Ewashko, Director of Client Services, brings twenty years of industry and brokerage experience to his role with A.B. Data. He is an accomplished client manager adept at facilitating proactive communications between internal and outside parties to ensure accurate and timely deliverables. Mr. Ewashko previously held positions at two claim administration firms where he oversaw the securities administration teams and actively managed numerous high-profile matters, including the \$2.3 billion foreign exchange litigation. He notably served as Vice President, FX and Futures Operations at Millennium Management, a prominent global alternative investment management firm. As he progressed through trading, analytic, management, and consultancy roles at major banks and brokerage firms, Mr. Ewashko gained hands-on experience with vanilla and exotic securities products, including FX, commodities, mutual funds, derivatives, OTC, futures, options, credit, debt, and equities products. In the financial sector, he also worked closely with compliance and legal teams to ensure accuracy and conformity with all relevant rules and regulations regarding the marketing and sale of products, as well as the execution and processing of trades. He has held Series 4, Series 6, Series 7, and Series 63 licenses, and has been a member of the Futures Industry Association (FIA) and Financial Industry Regulatory Authority (FINRA). Mr. Ewashko earned his Bachelor of Business Administration from Long Island University, Brooklyn, New York.

Brian Devery, Director of Client Services, brings more than a decade of experience in class action administration and project management, as well as over two decades of experience as an attorney (ret.). Mr. Devery currently focuses on consumer, antitrust, employment, and other non-securities based administrations. In addition to driving project administration, he is focused on the implementation of process improvement, streamlining, and automation. Mr. Devery is admitted to practice law in State and Federal Courts of New York with his Juris Doctorate earned from the Maurice A. Deane School of Law at Hofstra University, Hempstead, New York.

Adam Walter, PMP, Director of Client Services, has nearly fifteen years of experience managing the administration of securities class action settlements and SEC disgorgements totaling more than \$4 billion. He has managed settlement programs in engagements involving some of the largest securities class action settlements and is a key contributor to the development of administration strategies that meet the evolving needs of our clients. His responsibilities include developing case administration strategies to ensure that all client and court requirements and objectives are met, overseeing daily operations of case administrations, ensuring execution of client deliverables, providing case-related legal and administration support to class counsel, overseeing notice dissemination programs, implementing complex claims-processing and allocation methodologies, establishing quality assurance and quality control procedures, and managing distribution of settlement funds. Mr. Walter holds a bachelor's degree in business administration from Florida Atlantic University, Boca Raton, Florida. He also has been an active member of the Project Management Institute since 2010 and is PMP®-certified.

Eric Nordskog, Director of Client Services, started with A.B. Data in 2012 on the operations team, managing dozens of team leads and claims administrators in the administration of legal cases and actions. In 2017, Mr. Nordskog was promoted to Project Manager, due in part to his proven ability to add consistency and efficiency to the e-claim filing process with new streamlined processes and audit practices. Today, as Senior Project Manager, he directs many of A.B. Data's securities, insurance, and

consumer cases. He regularly oversees the administration of large insurance cases, such as two recent Cigna Insurance matters that involved complex calculations and over one million class members each. He is also the primary hiring and training manager for new project managers and coordinators. Mr. Nordskog earned his Juris Doctor degree from Marquette University Law School, Milwaukee, in 2001.

Eric Schultz, MCSE, Information Technology Manager and Security Team Chairperson, has been with A.B. Data for more than 19 years, and is currently responsible for overseeing all information technology areas for all A.B. Data divisions across the United States and abroad, including network infrastructure and architecture, IT operations, data security, disaster recovery, and all physical, logical, data, and information systems security reviews and audits required by our clients or otherwise. As a Microsoft Certified Systems Engineer (MCSE) with more than 25 years of experience in information technology systems and solutions, Mr. Schultz has developed specializations in network security, infrastructure, design/architecture, telephony, and high-availability network systems.

Secure Environment



A.B. Data's facilities provide the highest level of security and customization of security procedures, including:

- A Secure Sockets Layer server
- Video monitoring
- Limited physical access to production facilities
- Lockdown mode when checks are printed
- Background checks of key employees completed prior to hire
- Frequency of police patrol – every two hours, with response time of five or fewer minutes
- Disaster recovery plan available upon request

Data Security



A.B. Data is committed to protecting the confidentiality, integrity, and availability of personal identifying information and other information it collects from our clients, investors, and class members and requires that its employees, subcontractors, consultants, service providers, and other persons and entities it retains to assist in distributions do the same. A.B. Data has developed an Information Security Policy, a suite of policies and procedures intended to cover all information security issues and bases for A.B. Data, and all of its divisions, departments, employees, vendors, and clients. A.B. Data has also recently taken the necessary, affirmative steps toward compliance with the EU's General Data Protection Regulation and the California Consumer Privacy Act.

A.B. Data has a number of high-profile clients, including the Securities and Exchange Commission (SEC), the United States Department of Justice, the Attorneys General of nearly all 50 states, other agencies of the United States government, and the Government of Israel, as well as direct banking and payment services companies with some of the most recognized brands in United States financial services and some of the largest credit card issuers in the world.

We are therefore frequently subjected to physical, logical, data, and information systems security reviews and audits. We have been compliant with our clients' security standards and have also been determined to be compliant with ISO/IEC 27001/2 and Payment Card Industry (PCI) data-security standards, the Gramm-Leach-Bliley Act (GLB) of 1999, the National Association of Insurance Commissioners (NAIC) Regulations, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and the Health Information Technology for Economic and Clinical Health Act (HITECH).

The Government of Israel has determined that A.B. Data is compliant with its rigorous security standards in connection with its work on Project HEART (Holocaust Era Asset Restitution Taskforce).

A.B. Data's fund distribution team has been audited by EisnerAmper LLP and was found compliant with class action industry standards and within 99% accuracy. EisnerAmper LLP is a full-service advisory and accounting firm and is ranked the 15th-largest accounting firm in the United States.

In addition, as part of PCI compliance requirements, A.B. Data has multiple network scans and audits from third-party companies, such as SecurityMetrics and 403 Labs, and is determined to be compliant with each of them.

Fraud Prevention and Detection



A.B. Data is at the forefront of class action fraud prevention.

A.B. Data maintains and utilizes comprehensive proprietary databases and procedures to detect fraud and prevent payment of allegedly fraudulent claims.

We review and analyze various filing patterns across all existing cases and claims. Potential fraudulent filers are reported to our clients as well as to the appropriate governmental agencies where applicable.

Representative Class Action Engagements



A.B. Data and/or its team members have successfully administered hundreds of class actions, including many major cases. Listed below are just some of the most representative or recent engagements.

Consumer & Antitrust Cases

- *In re EpiPen Marketing, Sales Practices and Antitrust Litigation*
- *In re Broiler Chicken Antitrust Litigation - Commercial (Indirect)*
- *In re Broiler Chicken Antitrust Litigation - Indirect*
- *In re Broiler Chicken Antitrust Litigation - Direct*
- *In re Pork Antitrust Litigation - Directs*
- *In re Pork Antitrust Litigation - Indirects*

- *Peter Staley, et al. v. Gilead Sciences, Inc., et al.*
- *In re: Opana ER Antitrust Litigation*
- *In re Ranbaxy Generic Drug Application Antitrust Litigation*
- *In re Valeant Pharmaceuticals Int'l, Inc. Third-Party Payor Litigation*
- *Staley, et al., v. Gilead Sciences*
- *In Re: Generic Pharmaceuticals Pricing Antitrust Litigation – Direct Purchasers*
- *Beef Direct Purchaser Antitrust Litigation*
- *BCBSM, Inc. v. Vyera Pharmaceuticals, et al. (Daraprim)*
- *In re Automobile Antitrust Cases I and II*
- *Olean Wholesale Grocery Cooperative, Inc., et al. v. Agri Stats, Inc., et al. (Turkey)*
- *Integrated Orthopedics, Inc., et al. v. UnitedHealth Group, et al.*
- *In Re: Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litigation*
- *Vista Healthplan, Inc., et al. v. Cephalon, Inc., et al. (Provigil)*
- *Jeffrey Koenig, et al. v. Vizio, Inc.*
- *Wit, et al. v. United Behavioral Health*
- *Weiss, et al. v. SunPower Corporation*
- *Smith, et al. v. FirstEnergy Corp., et al.*
- *Resendez, et al. v. Precision Castparts Corp. and PCC Structural, Inc.*
- *Julian, et al. v. TTE Technology, Inc., dba TCL North America*
- *Eugenio and Rosa Contreras v. Nationstar Mortgage LLC*
- *Phil Shin, et al. v. Plantronics, Inc.*
- *In re: Qualcomm Antitrust Litigation*
- *In re Resistors Antitrust Litigation*
- *The Hospital Authority of Metropolitan Government of Nashville and Davidson County, Tennessee v. Momenta Pharmaceuticals, Inc. and Sandoz Inc. ("Lovenox Antitrust Matter")*
- *William Kivett, et al. v. Flagstar Bank, FSB, and DOES 1-100, inclusive*
- *Adelphia, Inc. v. Heritage-Crystal Clean, Inc.*
- *LLE One, LLC, et al. v. Facebook, Inc.*
- *Bach Enterprises, Inc., et al. v. Advanced Disposal Services South, Inc., et al.*
- *JWG Inc., et al. v. Advanced Disposal Services Jacksonville, L.L.C., et al.*
- *State of Washington v. Motel 6 Operating L.P. and G6 Hospitality LLC*
- *In re GSE Bonds Antitrust Litigation*
- *Wave Lengths Hair Salons of Florida, Inc., et al. v. CBL & Associates Properties, Inc., et al.*
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For More Information

For more detailed information regarding A.B. Data's experience, services, or personnel, please see our website at www.abdataclassaction.com.

EXHIBIT B

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

If you purchased Broiler chicken directly from a Broiler chicken producer for use or delivery in the United States, a class action may affect your rights.

A federal court authorized this notice. This is not a solicitation from a lawyer.

- The purpose of this notice is to inform you of your rights related to the class action lawsuit entitled *In re Broiler Chicken Antitrust Litigation*, Case No. 1:16-cv-08637, pending in the United States District Court for the Northern District of Illinois (the “Court”).
- Additional settlements – referred to in this notice as the New Settlements – have been reached in a class action antitrust lawsuit filed on behalf of Direct Purchaser Plaintiffs (“Plaintiffs”) of Broiler chicken. The new settlements are with Defendants: • House of Raeford Farms, Inc. (“HRF”); • Koch Foods, Inc.; JCG Foods of Alabama, LLC; JCG Foods of Georgia, LLC; and Koch Meat Co., Inc. (collectively, “Koch”); • Foster Farms, LLC and Foster Poultry Farms LLC (collectively, “Foster Farms”); • Perdue Farms, Inc. and Perdue Foods LLC (collectively, “Perdue”); • Case Foods, Inc., Case Farms Processing, Inc., and Case Farms, LLC (collectively, “Case”); • Norman W. Fries, Inc. d/b/a Claxton Poultry Farms (“Claxton”); • Wayne Farms, LLC (“Wayne Farms”); • Agri Stats, Inc. (“Agri Stats”); and • Sanderson Farms, LLC (f/k/a Sanderson Farms, Inc.), Sanderson Farms Foods, LLC (f/k/a Sanderson Farms, Inc. (Foods Division)), Sanderson Farms Production, LLC (f/k/a Sanderson Farms, Inc. (Production Division)), and Sanderson Farms Processing, LLC (f/k/a Sanderson Farms, Inc. (Processing Division)) (collectively, “Sanderson Farms”) (collectively, the “New Settling Defendants” and “New Settlements”).
- Previous settlements were reached on behalf of Plaintiffs with Defendants • Tyson Foods, Inc., Tyson Chicken, Inc., Tyson Breeders, Inc., and Tyson Poultry, Inc. (collectively, “Tyson”); • Pilgrim’s Pride Corporation (“Pilgrim’s Pride”); • Peco Foods, Inc. (“Peco”); • George’s, Inc. and George’s Farms, Inc. (collectively, “George’s”); • Amick Farms, LLC (“Amick”); • Fieldale Farms Corporation (“Fieldale Farms”); • Mar-Jac Poultry, Inc., Mar-Jac Poultry MS, LLC, Mar-Jac Poultry AL, LLC, Mar-Jac AL/MS, Inc., Mar-Jac Poultry, LLC, and Mar-Jac Holdings, Inc. (collectively, “Mar-Jac”); • Harrison Poultry, Inc. (“Harrison Poultry”); • Simmons Foods, Inc. and Simmons Prepared Foods, Inc. (collectively, “Simmons”)¹; • Mountaire Farms Inc., Mountaire Farms of Delaware, Inc., and Mountaire Farms, LLC (collectively, “Mountaire”); and • O.K. Foods, Inc., O.K. Farms, Inc., and O.K. Industries, Inc. (collectively, “O.K. Foods”) (collectively, the “Previous Settling Defendants”). The settlements with the Previous Settling Defendants have been given final approval by the Court.
- The New Settlements, along with the Previous Settlements, will resolve the litigation in full between the Direct Purchaser Plaintiff Class (“DPP Class”) and all Defendants.
- The New Settlements require HRF to pay \$27,500,000 and Koch to pay \$47,500,000 to benefit the certified Direct Purchaser Plaintiff Class, in exchange for a release from liability to the Class members. Together with the amounts paid by the Previous Settling Defendants (Tyson \$79,340,000; Pilgrim’s Pride \$75,000,000; Peco \$4,964,600; George’s \$4,097,000; Amick \$3,950,000; Fieldale Farms \$2,250,000; Mar-Jac \$7,975,000; Harrison Poultry \$3,300,000; Simmons \$8,018,991; Mountaire \$15,899,826; and O.K. Foods \$4,856,333), the total monetary recovery in the Direct Purchaser Plaintiffs’ case is \$284,651,750 (the “Settlement Proceeds”).

¹ Certain Direct-Action Plaintiffs have appealed the settlement with Simmons. This appeal is currently pending and has not yet been resolved.

- On June 30, 2023, the Court granted summary judgment in favor of Defendants Foster Farms, Perdue, Case, Claxton, Wayne Farms, and Agri Stats and against the DPP Class. In the New Settlements, the DPP Class agrees to not appeal or otherwise challenge the summary judgment order. In exchange, these Defendants agree to waive their right to recover any and all fees and costs against the DPP Class related to this action.
- On October 25, 2023, a jury returned a verdict for Sanderson Farms and against the DPP Class. In the New Settlements, the DPP Class agrees to not appeal or otherwise challenge the October 25, 2023, jury verdict in exchange for a waiver by Sanderson Farms of its right to recover any and all fees and costs against the DPP Class related to this action.
- The New Settling Defendants have not admitted any liability and continue to deny the legal claims alleged in this lawsuit. If approved, the New Settlements will avoid litigation costs and risks to the DPP Class and the New Settling Defendants.
- Your legal rights are affected whether you act or don't act. Please read this notice carefully.

<p>PARTICIPATE IN THE SETTLEMENTS</p>	<p>If you already filed a claim in this lawsuit and received a payment from the previous distribution (see Question 11), you <u>do not</u> need to submit another claim and you will be automatically eligible to receive a payment from the remaining Settlement Proceeds.</p> <p>If you did not previously file a claim in this lawsuit, you need to submit a claim to receive a payment from the remaining Settlement Proceeds. If you have not done so previously, the deadline to file a claim is June 1, 2024.</p> <p>If you previously submitted a claim, you may submit additional information regarding your eligible purchases to supplement your claim, but you are not required to do so. The deadline to submit any additional information is June 1, 2024.</p> <p>The deadline to submit a claim to share in the Settlement Proceeds from the Previous Settling Defendants (Tyson, Pilgrim's Pride, Peco, George's, Amick, and Fieldale Farms) that were already distributed has passed. You are no longer able to submit a claim for payment from the Settlement Proceeds that were already distributed.</p>
<p>OBJECT</p>	<p>You may write to the Court about why you don't like the New Settlements or the motion for attorneys' fees, reimbursement of litigation expenses, and payment of Class Representative service awards. Objections must be postmarked by June 1, 2024. The deadline to object to the substantive terms of the settlements with the Previous Settling Defendants has already passed.</p>
<p>ATTEND THE FAIRNESS HEARING</p>	<p>You may request to speak in Court about the fairness of the New Settlements by providing notice by June 1, 2024.</p>

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BASIC INFORMATION

1. Why did I receive a notice?

All Defendants, including the New Settling Defendants except Agri Stats, produce Broiler chicken. Records from all Defendants (listed on page 1 of this notice) show that you may have purchased qualifying Broiler chicken products directly from one or more Defendants or alleged Co-Conspirators for use and delivery in the United States between December 1, 2008, and July 31, 2019. The complete list of Defendants and alleged Co-Conspirators is in the operative Complaint and may be downloaded at www.broilerchickenantitrustlitigation.com.

The Court authorized this notice because you have a right to know about the proposed New Settlements (see Question 8), how eligible Class members can participate in the benefits (see Question 11), Co-Lead Class Counsel's upcoming motion to request attorneys' fees, reimbursement of litigation expenses, and payment of Class Representative service awards (see Question 20), and about your options as the Court considers these matters.

You may have already received notice regarding settlements or the certification of the Litigation Class. This notice explains the lawsuit, the New Settlements, and your legal rights under the New Settlements and the other requests explained herein.

2. What is this lawsuit about?

If the Court approves the New Settlements, and after any objections or appeals are resolved, you will be bound by the judgments and terms of the New Settlements.

This class action, *In re Broiler Chicken Antitrust Litigation*, Case No. 1:16-cv-08637, is pending in the United States District Court for the Northern District of Illinois. U.S. District Court Judge Thomas M. Durkin presides over this class action.

Plaintiffs allege that Defendants and their Co-Conspirators conspired to fix, raise, maintain, and stabilize the price of Broilers, beginning at least as early as January 1, 2008. Plaintiffs allege that Defendants implemented their conspiracy in various ways, including via coordinated supply restrictions, sharing competitively sensitive price and production information, and otherwise manipulating Broiler prices, with the intent and expected result of increasing prices of Broilers in the United States, in violation of federal antitrust laws.

The Court previously gave final approval to settlements between the Plaintiffs and Tyson, Pilgrim's Pride, Fieldale Farms, Peco, George's, Amick, Mar-Jac, Harrison Poultry, Simmons, Mountaire, and O.K. Foods. The Court has now preliminarily approved the New Settlements with HRF, Koch, Foster Farms, Perdue, Case, Claxton, Wayne Farms, Agri Stats, and Sanderson Farms. If the Court gives final approval to these New Settlements, it will resolve the litigation in full between the Plaintiffs and all Defendants.

The New Settling Defendants have not admitted any liability, deny the legal claims alleged in this lawsuit, and if applicable would allege numerous defenses to the Plaintiffs' claims if the case against them were to proceed. Nevertheless, the New Settling Defendants have agreed to settle this action to avoid the further expense, inconvenience, disruption, and burden of this litigation and any other present or future litigation arising out of the facts that gave rise to this litigation, to avoid the risks inherent in uncertain complex litigation, trial, and appeal, and to thereby put to rest this controversy.

3. What is a class action, and who is involved?

In a class action lawsuit, one or more people or businesses called class representatives sue on behalf of others who have similar claims, all of whom together are a "class." Individual class members do not have to file a lawsuit to participate in the class action settlement or be bound by the judgment in the class action. One court resolves the issues for everyone in the class, except for those who exclude themselves from the class.

All of the settlements with the New Settling Defendants are on behalf of members of the DPP Class (as defined in Question 5).

4. Why are there settlements in this case?

HRF has agreed to pay \$27,500,000 and Koch has agreed to pay \$47,500,000 to end the DPP Class case against them. HRF and Koch believed they could win at trial and that Plaintiffs might recover nothing against them. DPPs believe they could win at trial and possibly obtain a greater recovery. But trials involve risks to both sides, and therefore DPPs and HRF and Koch have agreed to settle the case.

On June 30, 2023, the Court granted summary judgment in favor of Defendants Foster Farms, Perdue, Case, Claxton, Wayne Farms, and Agri Stats and against the DPP Class. The DPP Class has agreed to not appeal or otherwise challenge the summary judgment order as to these Defendants, and in exchange these Defendants agree to waive their right to recover any and all fees and costs against the DPP Class related to this action.

On October 25, 2023, a jury returned a verdict for Sanderson Farms and against the DPP Class. The DPP Class has agreed to not appeal or otherwise challenge the jury verdict, and in exchange Sanderson Farms agrees to waive its right to recover any and all fees and costs against the DPP Class related to this action.

THE CLASS

5. Am I part of the Class?

On May 27, 2022, the Court certified the following DPP Class:

All persons who purchased raw Broilers directly from any of the Defendants or their respective subsidiaries or affiliates either fresh or frozen, in the form of: whole birds (with or without giblets), whole cut-up birds, or parts (boneless or bone in) derived from the front half of the whole bird, for use or delivery in the United States from December 1, 2008, until July 31, 2019.

If you satisfy these criteria, and did not previously exclude yourself from the DPP Class, then you are a DPP Class member, subject to the exceptions listed in Question 6. All of the New Settlements were entered into on behalf of the DPP Class. The settlements with the Previous Settling Defendants were on behalf of settlement classes, as set forth in prior notices, which are available at www.broilerchickenantitrustlitigation.com.

6. Are there exceptions to being included in the Class?

Yes. If you are a DPP Class member and did not exclude yourself in response to prior class certification notices, you will be bound by and eligible to participate in the New Settlements.

However, specifically excluded from this DPP Class are the Defendants; the officers, directors, or employees of any Defendant; any entity in which any Defendant has a controlling interest; and any affiliate, legal representative, heir, or assign of any Defendant. Also excluded from this DPP Class are any federal, state, or local governmental entities; any judicial officer presiding over this action and the members of his/her immediate family and judicial staff; any juror assigned to this action; and any alleged Co-Conspirator identified in this action. If you are in one of these categories, you are not a DPP Class member and not eligible to participate in the New Settlements.

7. I'm still not sure if I'm included.

If you are still not sure if you are included, please review the detailed information contained in the New Settlement Agreements, available at the settlement website, www.broilerchickenantitrustlitigation.com (the "Settlement Website"). You may also call the Settlement Administrator at 1-866-552-1178 or call or write to Class Counsel at the phone numbers or addresses listed in Question 17.

THE SETTLEMENT BENEFITS

8. What do the HRF and Koch Settlements provide?

Under the settlements, HRF will pay \$27,500,000, and Koch will pay \$47,500,000. HRF and Koch also agreed to provide testimony, where they reasonably could, to authenticate and provide foundation for admissibility of documents to assist Plaintiffs. A portion of the HRF and Koch Settlement Proceeds has been and will be used for notice and administration costs. A portion of the HRF and Koch Settlement Proceeds will also be used to pay attorneys' fees, litigation expenses, and Class Representative service awards, as determined by the Court.

Under the HRF and Koch settlements, all Class members who did not previously file valid exclusions from the DPP Class are subject to and bound by the Released Claims that are detailed in the HRF and Koch Settlement Agreements. A copy of the HRF and Koch settlements, including the language of the settlement releases, is available at www.broilerchickenantitrustlitigation.com.

9. What do the Other New Settlements provide?

The settlements with Foster Farms, Perdue, Case, Claxton, Wayne Farms, Agri Stats, and Sanderson Farms ensure that these defendants who prevailed in the litigation at summary judgment or trial will not be able to recover any fees or costs against the DPP Class in conjunction with this action.

Under the settlement with Agri Stats, Class members can also receive free access to 6 months of price reporting services from Agri Stats subsidiary Express Markets Inc. (EMI). Class members can obtain this service by emailing dppsettlement@expressmarketsinc.com by [DATE].

As previously set forth in the class certification notice, DPP Class members are bound by all judgments and orders in the case. Because the DPP Class claims were disposed of as to Defendants Sanderson Farms, Foster Farms, Perdue, Case Farms, Claxton, Wayne Farms, and Agri Stats by the summary judgment order and the Sanderson Farms verdict, there is no separate release of claims for the settlements with these Defendants.

Class counsel are not seeking to recover any litigation expenses or attorneys' fees from these settlements.

HOW TO GET A PAYMENT FROM THE SETTLEMENTS

10. What are the Settlement Proceeds to be Distributed to the Class?

On March 31, 2022, payments from the Previous Settlements with Fieldale, Amick, George's, Peco, Pilgrim's Pride, and Tyson were made to Class members who submitted Claim Forms with validated qualifying Broiler purchases. These distributions are now complete, and all payments were negotiated or voided.

The gross amounts for the settlements that were not part of the previous distribution are as follows: HRF (\$27,500,000), Koch (\$47,500,00), Mar-Jac (\$7,975,000), Harrison Poultry (\$3,300,000), Simmons (\$8,018,991), Mountaire (\$15,899,826), and O.K. Foods (\$4,856,333). The gross amount of these settlements is \$115,050,150. All attorneys' fees, costs, and other expenses approved by the Court will be deducted from the settlements before they are paid to qualified claimants. The net settlement amounts will be distributed to eligible Class members who have filed or will file valid claims (see Question 11 below).

11. How can I get a Settlement payment?

If you previously filed a claim and/or received a payment from the previous distribution, you will be automatically eligible to receive payment from the remaining Settlement Proceeds and **do not** need to submit another claim. You may submit additional information to supplement your prior claim, but are not required to do so. The deadline to submit any additional information is **June 1, 2024**.

If you did not previously file a claim, and if you did not exclude yourself from the Class in response to the class certification notice, you must complete and submit a timely Claim Form by **June 1, 2024** to be eligible to receive a payment from the remaining Settlement Proceeds. You can submit your Claim Form online at www.broilerchickenantitrustlitigation.com by **June 1, 2024**, or fill out the Claim Form and mail it to the address below, postmarked no later than **June 1, 2024**. You can also request that a Claim Form be sent to you on the Settlement Website or by sending a written request to the Settlement Administrator by mail: Broiler Chicken Antitrust Litigation Settlements, c/o A.B. Data, Ltd., P.O. Box 173134, Milwaukee, WI 53217 or by email: info@broilerchickenantitrustlitigation.com.

12. If I filed a claim previously, do I need to file a claim to get a payment from the remaining Settlement Proceeds?

No. If you already submitted a claim in the Previous Settlements and/or received a payment from the previous distribution (see Question 11), you will be automatically eligible to receive payment from the remaining Settlement Proceeds and do not need to submit another claim.

13. How Will my Settlement Payment Be Calculated?

Payments to qualified claimants from the HRF, Koch, Mar-Jac, Harrison Poultry, Simmons, Mountaire, and O.K. Foods

settlements will be calculated for all qualified claimants based on the proportional (or *pro rata*) amount of their eligible Broiler purchaser from all Defendants for the period from 2008 through 2019. The purchases and transaction amounts will be based on the review of Defendants' records, as updated based on any audits for information obtained during the previous settlement distribution process.

14. How do I review or update my eligible purchase amount?

You can review your eligible purchase amounts on the settlement website: www.broilerchickenantitrustlitigation.com. You will be able to use your unique identifier listed on the top of the notice that was mailed to you to access these amounts. If you want to dispute your purchase amounts, you can complete a Purchase Audit Request form and provide supporting documentation by **June 1, 2024**. The purchase audit request form and instructions for completion and submission can be found at the settlement website: www.broilerchickenantitrustlitigation.com.

15. When will I get a payment?

Payments from the remaining Settlement Proceeds will not be distributed until the Court grants final approval of the New Settlements and any objections or appeals are resolved, the appeal to the Simmons settlement is resolved, and the Settlement Administrator finalizes the claims approval and audit process. We do not know and cannot predict when this process will be completed. Settlement updates will be provided on the Settlement Website at www.broilerchickenantitrustlitigation.com or by calling the Settlement Administrator by phone toll-free at 1-866-552-1178. Please be patient.

In the event that after completing the distribution, the Settlement Administrator determines that there are sufficient settlement funds remaining to support a redistribution to qualified claimants, it will be recommended to the Court. If the Settlement Administrator determines there are not sufficient settlement funds remaining to support a redistribution to qualified claimants, it will be recommended to the Court that the remaining settlement proceeds be distributed equally to American Antitrust Institute and No Kid Hungry. If either of these charitable organizations is not approved by the Court, the remaining settlement proceeds shall be distributed to the remaining organization. If both organizations are not approved by the Court, then the Court, in its sole discretion, may appoint a recipient. This information will be posted to www.broilerchickenantitrustlitigation.com once available.

16. Can I file a claim for the Settlement Proceeds that were already distributed?

No. The deadline to submit a claim to share in the Settlement Proceeds that were already distributed has passed. You are no longer able to submit a claim for payment from the Settlement Proceeds that were already distributed.

OBJECTION PROCEDURES

17. How do I object to the New Settlements or motion for attorneys' fees, reimbursement of litigation expenses, and Class Representative service awards?

If you are a Class member and have not excluded yourself from the Class, you can object to the New Settlements with HRF, Koch, Foster Farms, Perdue, Case, Claxton, Wayne Farms, Agri Stats, and Sanderson Farms if you don't like part or all of the terms of the Settlements or Co-Lead Class Counsel's motion for attorneys' fees, reimbursement of litigation expenses, and Class Representative service awards. You can only object to or comment on these matters if you did not exclude yourself from the Class. The Court will consider your views.

To object, you must send a letter or other written statement saying that you object to the New Settlements or the motion for attorneys' fees, reimbursement of litigation expenses, or Class Representative service awards in *In re Broiler Chicken Antitrust Litigation*, what you are objecting to, and the reasons why you object. Be sure to include your full name, the name of your business (if applicable) that purchased Broiler chicken, current mailing address, and email address. Your objection must be signed. You may include or attach any documents that you would like the Court to consider. Do not send your written objection to the Court or the judge. Instead, mail the objection to the Settlement Administrator, Class Counsel, and Counsel for the New Settling Defendants at the addresses listed below. Your objection must be postmarked no later than **June 1, 2024**. By filing an objection, you consent to the jurisdiction of the Court for the purposes of any proceeding relating to your objection, including any appropriate discovery or other orders issued by the court relating to the objection. The deadline to object to the Previous Settlements with the Previous Settling Defendants has already passed.

Settlement Administrator	Class Counsel	Class Counsel
Broiler Chicken Antitrust Litigation Settlements Attn: OBJECTIONS c/o A.B. Data, Ltd. P.O. Box 173001 Milwaukee, WI 53217 (866) 552-1178	W. Joseph Bruckner Brian D. Clark Lockridge Grindal Nauen P.L.L.P. 100 Washington Ave. S., Ste. 2200 Minneapolis, MN 55401 (612) 339-6900	Clifford H. Pearson Bobby Pouya Pearson Warshaw, LLP 15165 Ventura Blvd., Suite 400 Sherman Oaks, CA 91403 (818) 788-8300
Counsel for HRF	Counsel for Koch	Counsel for Sanderson and Wayne Farms
Henry W. Jones, Jr. Jordan Price Wall Gray Jones & Carlton, PLLC 1951 Clark Avenue Raleigh, NC 27605	Stephen Novack Stephen J. Siegel Andrew D. Campbell Elizabeth C. Wolicki Julie Johnston-Ahlen Armstrong Teasdale LLP 100 N. Riverside Plaza, Suite 1500 Chicago, IL 60606	Christopher E. Odeck Proskauer Rose, LLP 1001 Pennsylvania Avenue, NW Suite 600 South Washington, DC 20004
Counsel for Agri Stats	Counsel for Perdue	Counsel for Foster Farms
William L. Monts III Justin W. Bernick Hogan Lovells US LLP 555 Thirteenth St., N.W. Washington, DC 2004	Danielle Foley Lisa Jose Fales Andrew Hernacki Venable LLP 600 Massachusetts Avenue, NW Washington, DC 20001	Carmine R. Zarlenga Oral D. Pottinger Mayer Brown LLP 1999 K Street, NW Washington, DC 20006
Counsel for Claxton	Counsel for Case	
James F. Herbison Michael P. Mayer Winston & Strawn LLP 35 West Wacker Drive Chicago, IL 60601 Charles C. Murphy, Jr. Vaughan & Murphy 690 S. Ponce Court NE Atlanta, GA 30307	Joseph D. Carney Joseph D. Carney & Associates LLC <i>Office Address:</i> 159 Crocker Park Blvd., Suite 400 Westlake, OH 44145 <i>Mailing Address:</i> 1540 Peach Drive Avon, OH 44011	

18. What is the difference between excluding myself and objecting?

Objecting is telling the Court that you do not like something about the New Settlements. You can object only if you did not exclude yourself from the Class. Excluding yourself is telling the Court that you do not want to be part of the Class or the lawsuit. The time to exclude yourself has already passed. If you previously excluded yourself, you have no standing to object because the case no longer affects you.

THE LAWYERS REPRESENTING YOU

19. Do I have a lawyer in this case?

The Court has appointed Lockridge Grindal Nauen P.L.L.P. and Pearson Warshaw, LLP as Co-Lead Class Counsel on behalf of Plaintiffs and DPP Class members. Their contact information is provided in Question 17. If you are a Class member, you do not need to hire your own lawyer because Co-Lead Class Counsel is working on your behalf, but you may do so at your own expense.

If you excluded yourself from the Class, these lawyers no longer represent you. You may need to hire your own lawyer if you wish to pursue your own lawsuit against the Settling Defendants.

20. How will the lawyers be paid?

You will not have to pay any attorneys' fees or costs out-of-pocket. By May 1, 2024, Plaintiffs and their counsel will ask the Court for an award of attorneys' fees, reimbursement of litigation expenses, and Class Representative service awards from the Mar Jac, Harrison Poultry, Simmons, Mountaire, O.K. Foods, HRF, and Koch Settlement Proceeds. Plaintiffs and their Counsel will seek amounts not to exceed 33 1/3% of the settlement amounts in fees (including interest, net of costs), reimbursement of litigation expenses (not to exceed \$4 million), payment of up to \$250,000 for ongoing and future litigation expenses, and service awards for the Class Representatives (not to exceed \$15,000 per Class Representative). A copy of the motion for attorneys' fees, reimbursement of litigation expenses, and Class Representative service awards will be available on the Settlement Website at the time it is filed with the Court. Class members who have not excluded themselves from the Class, as well as Mar Jac and Harrison Poultry Settlement Class members, may object to this request if they choose, and may do so pursuant to the instructions and deadline in Question 17.

THE COURT'S FAIRNESS HEARING

21. When and where will the Court decide whether to approve the New Settlements?

The Court will hold a Fairness Hearing to decide whether to approve the New Settlements at **X:XX x.m. Central Time** on **[Month 00, 202X]**. The hearing may be held via telephone or videoconference, and dial in or other connection information will be available on the Court's docket and the case website. Do not go to the Court in person unless there is notice that the hearing will be conducted in person. At this hearing, the Court will consider whether the New Settlements are fair, reasonable, and adequate. The Court will also consider Co-Lead Class Counsel's motion for attorneys' fees, reimbursement of litigation expenses, and Class Representative service awards. If there are objections to either the New Settlements or motion for attorneys' fees, reimbursement of litigation expenses, or Class Representative service awards, the Court will consider them. You may attend and you may ask to speak, if you make a request as instructed in Question 23, but you do not have to. The Court will listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the New Settlements. We do not know how long the Court will take to decide. The date of the hearing may change without further notice to the Class, so please check the Settlement Website for updates.

22. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to come at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

23. May I speak at the hearing?

You may ask to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intention to Appear in *In re Broiler Chicken Antitrust Litigation*." Be sure to include your name, the name of your business that purchased Broiler chicken (if applicable), current mailing address, telephone number, and signature. Your Notice of Intention to Appear must be postmarked no later than **[Month 00, 2024]**, and it must be sent to the Clerk of the Court, Class Counsel, and Defense Counsel. The address for the Clerk of the Court is: Clerk of the United States District Court, Dirksen Federal Building, 219 South Dearborn Street, Chicago, IL 60604. The addresses for Class Counsel and Defense Counsel are provided in Question 17. You cannot ask to speak at the hearing if you previously excluded yourself from the Class.

GETTING MORE INFORMATION

24. How do I get more information?

This notice summarizes the proposed New Settlements and the upcoming distribution process for the remaining Settlement Proceeds. More details are in the Settlement Agreements. You can find copies of the Settlement Agreements, other important documents, and information about the current status of the litigation by visiting www.broilerchickenantitrustlitigation.com. You may contact the Settlement Administrator at Broiler Chicken Antitrust Litigation Settlements, c/o A.B. Data, Ltd., P.O. Box 173134, Milwaukee, WI 53217; info@broilerchickenantitrustlitigation.com; or toll-free at 1-866-552-1178. You may also contact Class Counsel at the addresses and phone numbers provided in Question 17.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE.

EXHIBIT C

COURT-APPROVED LEGAL NOTICE

**If you purchased Broiler chicken directly from a
Broiler chicken producer for use or delivery in the United States,
a class action may affect your rights.**

*Para una notificación en español, llame gratis al 1-866-552-1178
o visite nuestro website www.broilerchickenantitrustlitigation.com.*

Additional settlements – referred to in this notice as the New Settlements - have been reached in a class action antitrust lawsuit filed on behalf of Direct Purchaser Plaintiffs of Broiler Chicken. The new settlements are with Defendants House of Raeford Farms, Inc. (“HRF”); Koch Foods, Inc.; JCG Foods of Alabama, LLC; JCG Foods of Georgia, LLC; and Koch Meat Co., Inc. (“Koch”); Foster Farms, LLC and Foster Poultry Farms LLC (“Foster Farms”); Perdue Farms, Inc. and Perdue Foods LLC (“Perdue”); Case Foods, Inc., Case Farms Processing, Inc., and Case Farms, LLC (“Case”); Norman W. Fries, Inc. d/b/a Claxton Poultry Farms (“Claxton”); Wayne Farms, LLC (“Wayne Farms”); Agri Stats, Inc. (“Agri Stats”); and Sanderson Farms, LLC (f/k/a Sanderson Farms, Inc.), Sanderson Farms Foods, LLC (f/k/a Sanderson Farms, Inc. (Foods Division)), Sanderson Farms Production, LLC (f/k/a Sanderson Farms, Inc. (Production Division)), and Sanderson Farms Processing, LLC (f/k/a Sanderson Farms, Inc. (Processing Division)) (“Sanderson Farms”) (collectively, “New Settling Defendants”). The United States District Court for the Northern District of Illinois authorized this notice, and it may affect your rights. Please review it carefully.

WHO IS INCLUDED?

Members of the Direct Purchaser Plaintiff Class (“DPP Class”) are defined as “all persons who purchased raw Broilers directly from any of the Defendants or their respective subsidiaries or affiliates either fresh or frozen, in the form of: whole birds (with or without giblets), whole cut-up birds, or parts (boneless or bone in) derived from the front half of the whole bird, for use or delivery in the United States from December 1, 2008, until July 31, 2019.” Specifically excluded from the DPP Class are the Defendants; the officers, directors, or employees of any Defendant; any entity in which any Defendant has a controlling interest; and any affiliate, legal representative, heir, or assign of any Defendant. Also excluded from the DPP Class are any federal, state, or local governmental entities, any judicial officer presiding over this action and the members of his/her immediate family and judicial staff, any juror assigned to this action; and anyone who previously excluded themselves from the DPP Class. If you are not sure if you are included, you can get more information, including a detailed notice, at www.broilerchickenantitrustlitigation.com or by calling toll-free 1-866-552-1178.

WHAT IS THIS LAWSUIT ABOUT?

Plaintiffs allege that Defendants and their Co-Conspirators conspired to fix, raise, maintain, and stabilize the price of Broilers, beginning at least as early as January 1, 2008. Plaintiffs allege that Defendants implemented their conspiracy in various ways, including via coordinated supply restrictions, sharing competitively sensitive price and production information, and otherwise manipulating Broiler prices, with the intent and expected result of increasing prices of Broilers in the United States, in violation of federal antitrust laws. The New Settling Defendants have not admitted any liability and deny the legal claims alleged in this lawsuit. Both sides agreed to the New Settlements to resolve the case. If the Court gives final approval to these New Settlements, it will resolve the litigation in full between the Plaintiffs and all Defendants.

You may have already received notices or correspondence related to this litigation and previous settlements in this case that were reached with Defendants Tyson Foods, Inc., Tyson Chicken, Inc., Tyson Breeders, Inc., and Tyson Poultry, Inc. (“Tyson”); Pilgrim’s Pride Corporation (“Pilgrim’s Pride”); Peco Foods, Inc. (“Peco”); George’s, Inc. and George’s Farms, Inc. (“George’s”); Amick Farms, LLC (“Amick”); Fieldale Farms Corporation (“Fieldale Farms”); Mar-Jac Poultry, Inc., Mar-Jac Poultry MS, LLC, Mar-Jac Poultry AL, LLC, Mar-Jac AL/MS, Inc., Mar-Jac Poultry, LLC, and Mar-Jac Holdings, Inc. (“Mar-Jac”), Harrison Poultry, Inc. (“Harrison Poultry”); Simmons Foods, Inc. and Simmons Prepared Foods, Inc. (“Simmons”)¹; Mountaire Farms Inc., Mountaire Farms of Delaware, Inc., and Mountaire Farms, LLC (“Mountaire”); and O.K. Foods, Inc., O.K. Farms, Inc., and O.K. Industries, Inc. (“O.K. Foods”). For more information on the previous settlements, please visit www.broilerchickenantitrustlitigation.com.

WHAT DO THE NEW SETTLEMENTS PROVIDE?

The New Settlements require HRF to pay \$27,500,000 and Koch to pay \$47,500,000 to benefit the DPP Class, in exchange for a release from liability. Unless you excluded yourself previously, you are bound by all Court orders and decision. The claims you release against HRF and Koch are detailed in the Settlement Agreements, available at www.broilerchickenantitrustlitigation.com.

Together with the amounts paid by the Previous Settling Defendants (Tyson \$79,340,000; Pilgrim’s Pride \$75,000,000; Peco \$4,964,600; George’s \$4,097,000; Amick \$3,950,000; Fieldale Farms \$2,250,000; Mar-Jac \$7,975,000; Harrison Poultry \$3,300,000; Simmons \$8,018,991; Mountaire \$15,899,826; and O.K. Foods \$4,856,333), the total monetary recovery in the Direct Purchaser Plaintiffs’ case is

¹ Certain Direct-Action Plaintiffs have appealed the settlement with Simmons. This appeal is currently pending and has not yet been resolved.

\$284,651,750 (the “Settlement Proceeds”). HRF and Koch also agreed to provide certain assistance to Direct Purchaser Plaintiffs.

Distribution payments from previous settlements with Fieldale, Amick, George’s, Peco, Pilgrim’s Pride, and Tyson are now complete. The remaining Settlement Proceeds are \$115,050,150. In an upcoming motion, Co-Lead Class Counsel will also request up to 33 1/3% of the settlement amounts in fees, litigation expenses (up to \$4 million), up to \$250,000 for ongoing and future litigation expenses, and service awards for the Class Representatives (up to \$15,000 per Class Representative) from the Mar Jac, Harrison Poultry, Simmons, Mountaire, O.K. Foods, HRF, and Koch settlement proceeds proportionally (*pro rata*). A copy of this motion will be available on the website. A portion of the HRF and Koch settlement proceeds has been and will be used for notice and administration costs.

The Court granted summary judgment in favor of Foster Farms, Perdue, Case, Claxton, Wayne Farms, and Agri Stats, and a jury returned a verdict in favor of Sanderson Farms. In the New Settlements, these Defendants will not recover any fees or costs against the DPP Class related to this action. Under the New Settlement with Agri Stats, DPP Class members can also receive free access to 6 months of price reporting services from Express Markets Inc. Because the DPP class claims were disposed of as to Defendants Sanderson Farms, Foster Farms, Perdue, Case Farms, Claxton, Wayne Farms, and Agri Stats by the summary judgment order and the Sanderson Farms verdict, there is no separate release of claims for the settlements with these Defendants. Co-Lead Class Counsel will not request any litigation expenses or attorneys’ fees from these settlements.

Before any money is paid, the Court will hold a hearing to decide whether to approve the New Settlements and any objections and appeals will be resolved. All attorneys’ fees, costs, and other expenses approved by the Court will be deducted before the remaining Settlement Proceeds are paid to qualified claimants.

For information, please visit www.broilerchickenantitrustlitigation.com.

HOW CAN I GET A PAYMENT?

If you previously filed a claim and/or received a payment from the previous distribution, you will be automatically eligible to get a payment from the remaining Settlement Proceeds and **do not** need to submit another claim. You may submit additional information by **June 1, 2024** to supplement your prior claim, but you are not required to do so. If you did not previously file a claim and did not exclude yourself from the DPP Class, you need to submit a claim form online at www.broilerchickenantitrustlitigation.com or by mail by **June 1, 2024** to receive a payment from the remaining Settlement Proceeds. Payment amounts will depend on the number of valid claims and the proportional (or *pro rata*) amount of eligible broilers you purchased.

WHAT ARE YOUR RIGHTS AND OPTIONS?

If you are a DPP Class member and did not exclude yourself from the DPP Class, you can object to the New Settlements by **June 1, 2024** if you don’t like part or all of the terms of these settlements. Regarding Co-Lead Class Counsel’s request for fees, litigation expenses, and service awards, DPP Class members and Mar Jac and Harrison Poultry Settlement Class members who have not excluded themselves may also object to this request. The Court will consider your views. The detailed notice, available on www.broilerchickenantitrustlitigation.com, explains how to object. The Court will hold a hearing in this case (*In re Broiler Chicken Antitrust Litigation*, Case No. 16-cv-08637) on **Month 00, 2024**, to consider whether to approve the New Settlements. You may ask to speak at the hearing, but you don’t have to.

This notice is only a summary. You can find more details at www.BroilerChickenAntitrustLitigation.com or by calling toll-free 1-866-552-1178. Please do not contact the Court.

EXHIBIT D



If You Purchased
BROILER CHICKEN

Directly from a
Broiler Chicken
Producer for Use or
Delivery in the U.S.

A Class Action
May Affect Your Rights

CLICK HERE 

BroilerChickenAntitrustLitigation.com

EXHIBIT E

Broiler Chicken Antitrust Litigation Settlements

c/o A.B. Data, Ltd.

P.O. Box 173134

Milwaukee, WI 53217

www.broilerchickenantitrustlitigation.com

DIRECT PURCHASER ANTITRUST CLAIM FORM



If you already filed a claim in this lawsuit and received a payment from the previous distribution, you **do not** need to submit another Claim Form. You will be automatically eligible to receive a payment.

If you did not previously file a claim in this lawsuit, review your known purchase information at www.broilerchickenantitrustlitigation.com. If you **agree** with the purchase information in the records, complete this Claim Form and submit it by June 1, 2024 (postmarked or online).

If you **disagree** with the purchase information in the records or no purchase information exists or you want to supplement your previous claim to include additional purchase data, complete the Purchase Audit Request form posted on www.broilerchickenantitrustlitigation.com, attach your supporting documents, and submit it by June 1, 2024.

You only need to complete this claim form if you are a class member who did not previously file a claim for distribution, and you want to participate in the distribution of the Mar Jac, Harrison Poultry, Simmons, Mountaire, O.K. Foods, HRF, and Koch settlement proceeds. These proceeds, minus any Court-approved attorneys' fees, litigation expenses, and service awards and notice and administration expenses ("remaining Settlement Proceeds"), will be distributed to DPP Class Members based on the number of valid claims and the proportional (or *pro rata*) amount of eligible Broilers they purchased.

If you previously filed a claim and/or received a payment from the previous distribution, you will be automatically eligible to get a payment from the remaining Settlement Proceeds and **do not** need to submit another Claim Form. **If you did not previously file a claim, did not exclude yourself from the DPP Class, you need to submit this Claim Form at www.broilerchickenantitrustlitigation.com or by mailing your completed form to the address listed above by June 1, 2024 to be eligible to receive a payment.**

Distribution payments from previous settlements with Fieldale, Amick, George's, Peco, Pilgrim's Pride, and Tyson are now complete, and you cannot file a claim for a distribution from those proceeds. The New Settlements with Foster Farms, Perdue, Case, Claxton, Wayne Farms, and Agri Stats do not require these Defendants to make any payments.

STEP 1: REVIEW YOUR PURCHASE INFORMATION

If you did not previously file a claim and/or received a payment from the previous distribution for the DPP Class, complete this Claim Form and submit it by **June 1, 2024** (postmarked or online).

The total award amount you receive from the available settlement proceeds will be calculated based on your qualifying Broiler purchase information from the Defendants' records. The records show the qualifying Broiler purchases you made in the United States from December 1, 2008, until December 31, 2019. You will receive a pro rata share of the available settlement proceeds based on your purchase information as compared to other eligible participating class members.

To receive your purchase information, go to the settlement website: www.broilerchickenantitrustlitigation.com. On the Purchase Information Page, enter your Unique ID (listed on your notice). If you did not receive a Unique ID or purchase information is not available to you should contact the settlement administrator to obtain further information.

Broiler Chicken Antitrust Litigation Settlements

c/o A.B. Data, Ltd.

P.O. Box 173134

Milwaukee, WI 53217

www.broilerchickenantitrustlitigation.com

If you **agree** with your calculated purchase information, you do not need to complete additional forms or submit additional documentation in addition to your Claim Form.

If you **disagree** with the purchase information or no purchase information exists, you need to also complete the Purchase Audit Request Form, attach your supporting documents (including any proof of assignments), and submit it by **June 1, 2024**. You can access the Purchase Audit Request Form and instructions on the settlement website: www.broilerantitrustlitigation.com.

STEP 2: ENTER CLAIMANT INFORMATION & SIGN

Please complete the Claimant Information form and sign the statement below:

<u>CLAIMANT INFORMATION</u>			
<u>CONTACT NAME:</u>	First	M.I.	Last
<u>COMPANY NAME:</u>	Company Name		
<u>CURRENT MAILING ADDRESS:</u>	Address 1		
	Address 2		
	City		
	State/Province		
	Postal Code	Country	
<u>CONTACT TELEPHONE:</u>	- -		
<u>CONTACT EMAIL ADDRESS:</u>	,		
<u>UNIQUE ID (LISTED ON YOUR NOTICE):</u>			

By signing below I/we certify that (1) the above and foregoing information is true and correct; (2) I warrant that I am duly authorized and have the legal capacity to sign this Claim Form on behalf of the direct purchaser entity; (3) I/we are not officers, directors, or employees of any Defendant; any entity in which any Defendant has a controlling interest; an affiliate, legal representative, heir, or assign of any Defendant, or a federal, state, or local governmental entity; and (4) I/we agree to submit additional information, if requested, in order for the Settlement Administrator to process my/our claim.

Signature: _____ Date: _____

Printed Full Name (First, Middle, and Last): _____ Title: _____

STEP 3: SUBMIT YOUR CLAIM FORM BY JUNE 1, 2024

Please submit your completed Claim Form to the Settlement Administrator by **June 1, 2024**, (postmarked to the address above or submitted online at www.broilerchickenantitrustlitigation.com).

EXHIBIT F

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UNIQUE ID (printed on your notice): _____

DIRECT PURCHASER ANTITRUST PURCHASE AUDIT REQUEST FORM

Use this form if you want to have your purchase data audited because you disagree with your recorded Broiler purchase information (available at www.broilerchickenantitrustlitigation.com), no known purchase information is available for you, or you want to update the information on your previous claim. Please fill out your contact information, provide annualized purchase information, and attach your supporting documentation. You must submit your completed Purchase Audit Request Form (and your supporting documents) to the mailing address listed at the top of this form or on the website, www.broilerchickenantitrustlitigation.com by **June 1, 2024**.

STEP 1: ENTER CLAIMANT INFORMATION

Please complete the Claimant Information form below.

<u>CLAIMANT INFORMATION</u>			
<u>CONTACT NAME:</u>	First	M.I.	Last
<u>COMPANY NAME:</u>	Company Name		
<u>CURRENT MAILING ADDRESS:</u>	Address 1		
	Address 2		
	City		
	State/Province		
	Postal Code	Country	
<u>CONTACT TELEPHONE:</u>	_ _ _ - _ _ _ - _ _ _ _		
<u>CONTACT EMAIL ADDRESS:</u>			

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Milwaukee, WI 53217

www.broilerchickenantitrustlitigation.com**STEP 2: ENTER YOUR PURCHASE INFORMATION**

Enter the purchase information for **ALL** of the qualifying broiler purchases you made in the United States from December 1, 2008, until December 31, 2019 in the form below. You may not seek Settlement Proceeds with respect to any Settlement(s) from which you have opted out.

UNIQUE ID: _____

DEFENDANT/ CO-CONSPIRATOR/OTHER AFFECTED ENTITIES	2008 (12/1 – 12/31)	2009	2010	2011	2012	2013	2014
Allen Harim							
Amick Farms							
Case Farms							
Claxton Poultry							
Fieldale Farms							
Foster Farms							
George's							
Harrison Poultry							
House of Raeford							
Keystone Foods							
Koch Foods							
Mar-Jac Poultry							
Mountaire							
O.K. Foods							
Peco Foods							
Perdue							
Pilgrim's Pride							
Sanderson Farms							
Simmons Foods							
Tyson							
Wayne Farms, LLC							

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DEFENDANT/ CO-CONSPIRATOR/OTHER AFFECTED ENTITIES	2015	2016	2017	2018	2019
Allen Harim					
Amick Farms					
Case Farms					
Claxton Poultry					
Fieldale Farms					
Foster Farms					
George's					
Harrison Poultry					
House of Raeford					
Keystone Foods					
Koch Foods					
Mar-Jac Poultry					
Mountaire					
O.K. Foods					
Peco Foods					
Perdue					
Pilgrim's Pride					
Sanderson Farms					
Simmons Foods					
Tyson					
Wayne Farms, LLC					

Previous Total Purchase Amount \$ _____

UPDATED Total Purchase Amount \$ _____

STEP 3: ATTACH DOCUMENTATION

Please attach (or submit) documents to support your updated claim and/or audit request (e.g., invoices, purchase information, etc.). Supporting documents must include actual receipts or invoices that include the product name, name of Defendant/producer, date of purchase, and net purchase amount.

Questions? Call the Settlement Administrator toll-free at 1-866-552-1178 or visit www.broilerchickenantitrustlitigation.com.

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If your claim is based upon any full or partial assignment of a claim from another entity, and that assignment was not addressed in the prior claims process, then by the claim deadline of June 1, 2024, you must provide: (1) A signed copy of the assignment agreement executed by all parties, (2) if less than a full assignment of an entity's claims is made (i.e., a partial assignment of claims), then provide substantiation of the actual amount of purchases assigned by the assignor to the assignee, and (3) all entity names relevant to the assignment of claims for both the assignor and assignee.

Please submit legible copies. *Do not send originals. You should maintain the originals in your records.*

STEP 4: SIGN STATEMENT

Sign the statement below.

By signing below I/we certify that (1) the above and foregoing information is true and correct; (2) I warrant that I am duly authorized and have the legal capacity to sign this purchase Audit Request Form on behalf of the direct purchaser entity; (3) I/we are not officers, directors, or employees of any Defendant; any entity in which any Defendant has a controlling interest; an affiliate, legal representative, heir, or assign of any Defendant, or a federal, state, or local governmental entity; and (4) I/we agree to submit additional information, if requested, in order for the Settlement Administrator to process my/our updated claim and audit request.

Signature: _____ Date: _____

Printed Full Name (First, Middle, and Last): _____

Title: _____

STEP 5: SUBMIT STATEMENT BY JUNE 1, 2024

Please submit your completed Audit Request Form, along with additional documentation to support your updated claim and audit request (e.g., invoices, purchase information, etc.), to the Settlement Administrator by **June 1, 2024**, (postmarked to the address above or submitted online at www.broilerchickenantitrustlitigation.com).