

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

IN RE BROILER CHICKEN ANTITRUST  
LITIGATION,

Case No.: 1:16-cv-08637

The Honorable Thomas M. Durkin

This Document Relates To:

THE DIRECT PURCHASER PLAINTIFF  
ACTION

**DIRECT PURCHASER PLAINTIFFS' NOTICE OF 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**

Please take notice that the Direct Purchaser Plaintiffs hereby move the Court for an Order granting their Motion for Preliminary Approval of the Settlements with Defendants Foster Farms,<sup>1</sup> Perdue,<sup>2</sup> Case,<sup>3</sup> Claxton,<sup>4</sup> Wayne Farms,<sup>5</sup> Agri Stats,<sup>6</sup> and Sanderson Farms,<sup>7</sup> and approval of the proposed notice plan. This motion is based on this notice of motion and motion, Federal Rule of Civil Procedure 23, the concurrently filed Memorandum and supporting declarations, and all other evidence and arguments presented in the briefings and at the hearing on this motion.

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<sup>1</sup> Defendants Foster Farms, LLC and Foster Poultry Farms LLC are collectively referred to herein as "Foster Farms."

<sup>2</sup> Defendants Perdue Farms, Inc. and Perdue Foods LLC are collectively referred to herein as "Perdue."

<sup>3</sup> Defendants Case Foods, Inc., Case Farms Processing, Inc., and Case Farms, LLC are collectively referred to herein as "Case."

<sup>4</sup> Defendant Norman W. Fries, Inc. d/b/a Claxton Poultry Farms is referred to herein as "Claxton."

<sup>5</sup> Defendant Wayne Farms, LLC is referred to herein as "Wayne Farms."

<sup>6</sup> Defendant Agri Stats, Inc. is referred to herein as "Agri Stats."

<sup>7</sup> Defendants 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)) are collectively referred to herein as "Sanderson Farms."

Pursuant to the United States District Court for the Northern District of Illinois' Local Rule

5.3(b), the undersigned counsel will not request an in-person presentment of this Motion.

Date: March 6, 2024

/s/ Bobby Pouya

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