

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

IN RE TURKEY ANTITRUST LITIGATION

Civil No. 1:19-cv-08318

This Document Relates To:

Hon. Sunil R. Harjani

Hon. Keri L. Holleb Hotaling

Direct Purchaser Plaintiff Actions

**DECLARATION OF BRIAN DEVERY IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT WITH AGRI STATS, INC., APPROVAL OF THE MANNER AND
FORM OF CLASS NOTICE PLAN, AND RELATED RELIEF**

I, Brian Devery, declare and state as follows:

1. I am Director of Case Management with A.B. Data, Ltd. (“A.B. Data”). 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. A.B. Data was appointed by the Court to act as the Notice, Claims, and Settlement Administrator¹ in the above-captioned action (the “Action”). In these roles, A.B. Data, completed notice to inform Class Members about the settlement with Tyson Foods, Inc., Tyson Fresh Meats, Inc., Tyson Prepared Foods, Inc. and the Hillshire Brands Company (“Tyson”) (ECF. No. 352); the settlement with Cargill, Incorporated and Cargill Meat Solutions Corporation (“Cargill”) and claims process for the settlements with Tyson and Cargill (ECF No, 1128); and class certification and settlements with Cooper Farms, Inc. (“Cooper Farms”) and Farbest Foods, Inc. (“Farbest”) (ECF No. 1230). An updated profile of A.B. Data’s background and capabilities, including representative case and client lists, is included as **Exhibit 3**.

Class Certification

3. On January 22, 2025, the Court granted Direct Purchaser Plaintiffs’ motion for class certification. The Certified Class is generally defined as “All persons and entities who directly purchased fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products (the “Class Products”) from Defendants in the United States during the Class Period.” (*See* Class Certification Order (ECF No. 1107) at 4.)

4. Specifically excluded from the Certified Class are Defendants and their Co-conspirators; the officers, directors or employees of any Defendant or Co-conspirator; any entity in which any Defendant or their Co-conspirator has a controlling interest; any entity with an interest, controlling or non-controlling, in a Defendant or their Co-conspirator; any entity where an individual owner, trust, and/or holding company also had an interest in any Defendant (whether as an individual, member, trust, trustee, legal representative, heir or assign) of greater than 5%

¹ Unless otherwise noted, all capitalized terms shall have the same meaning as in the Settlement Agreement between Direct Purchaser Plaintiffs and Agri Stats.

during any year of the Class Period; any (in whole or in part) affiliate, legal representative, heir, or assign of any Defendant or their Co-conspirator. Also excluded from this 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 Co-conspirator identified in this action.

5. The Class Products have the following exclusions:

a. Turkey breast products exclude: (1) turkey breasts used to make ground turkey; (2) turkey breast tenderloins; (3) organic turkey breast products; (4) NAE or ABF turkey breast products; and (5) cooked or RTE turkey breast products;

b. Ground turkey products exclude: (1) ground turkey products made from turkey breast; (2) ground turkey products made from turkey wings; (3) burgers, sausages, and patties; (4) organic ground turkey products; (5) NAE or ABF ground turkey products; and (6) cooked or RTE ground turkey products; and

c. Whole bird turkey products exclude: (1) organic turkey whole bird products; (2) NAE or ABF turkey whole bird products; and (3) cooked or RTE turkey whole bird products.

6. The Certified Class Period is January 1, 2010, through December 31, 2016.

Settlement with Agri Stats, Inc.

7. On March 30, 2026, Co-Lead Counsel for the Certified Class reached a Settlement Agreement with Defendant Agri Stats, Inc. (“Agri Stats”) on behalf of the Certified Class.

Notice Plan

8. Co-Lead Counsel have asked me to develop a multi-method notice plan to inform the Certified Class about the Settlement Agreement with Agri Stats (“Class Notice Plan”). The plan must comport with requirements of Federal Rule of Civil Procedure 23 (“Rule 23”).

9. In consultation with Co-Lead Counsel, I prepared the proposed Class Notice Plan described below to provide notice of the Settlement Agreement to the Certified Class. The Class Notice Plan utilizes direct notice and earned media similar to the notice plans used to successfully

notify class members about the certified litigation class and in the previous settlements with the Tyson Defendants (*see* Amended Order and Final Judgment (ECF No. 406, ¶ 10), Cargill Defendants (ECF 1362, ¶ 10), and the Farbest Foods and Cooper Farms Defendants (ECF 1355, ¶10).

10. This Declaration will describe the Class Notice Plan and how it will meet the requirements of Rule 23 and provide due process to the potential members of the Certified Class. This Declaration is based upon my personal knowledge and upon information provided to me by Co-Lead Counsel, my associates, and A.B. Data staff members. The objective of the Class Notice Plan is to provide the best practicable notice under the circumstances of the proposed settlement to potential members of the Certified Class.

11. The Class Notice Plan includes direct notice by mail and/or email to potential Certified Class members using the contact information previously provided by Defendants and used to provide notice of the previous settlements and certified litigation class. Direct notice will be provided via a Long-Form Notice, attached as **Exhibit 1**, that will be mailed to all members of the Certified Class with a known mailing address via first-class mail and posted on the case-specific website. A Short-Form Notice, attached as **Exhibit 2**, will be formatted as an email (the “Email Notice”) and sent to all members of the Certified Class with a known email address. A.B. Data anticipates that direct-mail notice will be sent via first-class mail to approximately 3,357 potential Certified Class members. A.B. Data anticipates that direct-email notice will be sent to approximately 351 potential Certified Class members.

12. The Long Form Notice and Short Form Notice will include summary information concerning the Settlement Agreement, including: (i) this is a class action and the nature of the Settlement Agreements;(2) the Certified Class definition in plain and engaging language (“If you purchased frozen, uncooked turkey breast, ground turkey, or whole bird turkey products (the “Class Products”) directly from a Turkey producer for use or delivery in the United States from January 1, 2010 through December 31, 2016, a class action settlement may affect your rights.”) as well as the relevant member and product exclusions; (3) that the Action alleges antitrust violations

and price-fixing claims (4) a member of the Certified Class may appear through an attorney if the member wants; (5) the time and manner for submitting an objection; and (6) and the binding effect of a judgment on the Certified Class. The Email Notice will also include a hyperlink to the case website on which A.B. Data will post the more detailed Long-Form Notice and additional important documents and information.

13. For the Email Notice, A.B. Data implements certain best practices to increase deliverability and bypass SPAM and junk filters and verifies 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”). If the returned mail includes a forwarding address, the Long-Form Notice will be mailed to the updated address. If the returned mail does not include a forwarding address, A.B. Data will use third-party information providers to which it subscribes to attempt to ascertain an updated address and resend the Long Form Notice accordingly.

14. As stated above, there have been three prior rounds of notice in this Action that informed class members about the Tyson settlement, Cargill settlement, and Certified Class and Farbest Foods and Cooper Farms settlements. These notice plans included robust direct notice to class members via mail and email and supplemental published notice. Given the previous notice and because direct notice is comprehensive, the additional cost of supplemental published notice is not necessary and consistent with Rule 23 guidelines related to injunctive relief-only settlements.

WEBSITE AND TELEPHONE

15. To assist potential members of the Certified Class in understanding the terms of the Settlement Agreement and their rights, A.B. Data will update the case-specific toll-free telephone number, 877-777-9637, and website, www.turkeylitigation.com.

16. The toll-free telephone number is equipped with an automated interactive voice response system in both English and Spanish. The automated interactive voice response system will present callers with a series of choices to hear prerecorded information about the Settlement

Agreement. If callers need further help, they have an option to speak with a live operator during business hours.

17. The case-specific website will provide, among other things, a summary of the case, all relevant documents including the Settlement Agreement, Preliminary Approval Order, important dates, and any pertinent updates concerning the litigation or the Settlement approval process.

OBJECTION PROCESSING

18. The notices provide that members of the Certified Class may submit an objection by sending a written, mailed request to the Settlement Administrator as well as Counsel for the parties. A.B. Data will promptly circulate to the parties a copy of any such objections.

CONCLUSION

19. It is my opinion, based on my individual expertise and experience and that of my A.B. Data colleagues, that the Notice Plan is designed to effectively reach potential members of the Certified Class, will deliver plain language notices that will capture readers' attention, and will provide relevant information in an informative and easy to understand manner that is necessary for those affected to effectively understand their rights and options under the Settlement Agreement terms. This 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 narrowly defined entities and demographic targets. For all these reasons, in my opinion, the proposed notice plan satisfies Rule 23 and due process requirements.

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

Executed this 31st day of March 2026 in Oakdale, New York.

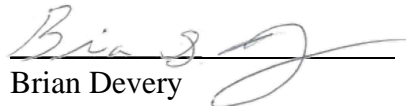

Brian Devery

EXHIBIT 1

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

If you directly purchased certain turkey products from a turkey producer in the United States from January 1, 2010, through December 31, 2016, a class action may affect your rights.

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

- There is an update regarding *In re Turkey Antitrust Litigation*, No. 1:19-cv-08318, a class action lawsuit pending in the United States Court for the Northern District of Illinois in which you previously received notices. The purpose of this new notice is to inform you of your rights related to a new settlement (the “Settlement”) that has been reached on behalf of Direct Purchaser Plaintiffs with Defendant Agri Stats, Inc. (“Agri Stats” or “Settling Defendant”).
- On January 22, 2025, the Court issued an order certifying a class of direct purchasers defined as: “[a]ll persons and entities who directly purchased fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products (the “Class Products”) from Defendants in the United States during the Class Period.” This class of direct purchasers is called the “Certified Class.” The Class Period is January 1, 2010, through December 31, 2016.
- Certain categories of persons and entities are specifically excluded from the Certified Class. These exclusions are explained in Question 11 below. Certain categories of products are excluded from the Class Products. These exclusions are explained in Question 11 below. The Settlement between the Direct Purchaser Plaintiffs and Agri Stats are on behalf of the Certified Class, only apply to the Agri Stats, and do not dismiss claims against the other defendants in this lawsuit.
- The Settlement requires that if Agri Stats ever again offers its reporting to the turkey industry (it stopped doing so after this lawsuit was filed), then Agri Stats will make extensive changes to its Agri Stats report. Agri Stats has also agreed to provide specific cooperation in the Direct Purchaser Plaintiffs’ continued prosecution of this action.
- This notice provides Certified Class members with notice of the Settlement and an opportunity to object. Because the time period for opting out of the Certified Class has already passed, you may not submit an exclusion request for this Settlement. At this time there is no new claim form, plan of distribution, or request for Co-Lead Class Counsel fees or expenses.
- If approved by the Court, the Settlement will resolve the claims in the lawsuit against Agri Stats. The Settlement will avoid litigation costs and risks to Direct Purchaser Plaintiffs and Agri Stats and release the Agri Stats from liability to members of the Certified Class.
- The Court has not decided whether Agri Stats did anything wrong, and Agri Stats denies any wrongdoing.
- Your legal rights are affected whether you act or do not act. Please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS	
OBJECT TO THE SETTLEMENT	Write to the Court about why you do not like the Settlement. Objections must be postmarked or received by [Month 00, 2026] .
ATTEND THE FAIRNESS HEARING	Ask to speak in Court about the fairness of the Settlement.
DO NOTHING	If you do nothing, you will benefit from the proposed Settlement through conduct reform (or changes to Agri Stats’ future reporting practices). The Settlement will resolve your claims against Agri Stats and you will give up your rights to sue or to continue Agri Stats about the Released Claims (as defined by the Settlement Agreement).

- Your rights and options – and the deadlines to exercise them – are explained in this notice.
- The Court in charge of these cases still has to decide whether to finally approve the Settlement with Agri Stats.

- **Questions? Read on and visit www.TurkeyLitigation.com or call toll-free 1-877-777-9637.**

What This Notice Contains

What This Notice Contains 2

BASIC INFORMATION 4

1. Why did I receive a notice? 4

2. What is this lawsuit about? 4

3. Who are the Defendants? 4

4. What is a class action, and who is involved? 4

5. Why is there a new Settlement? 5

6. Have there been other settlements in this lawsuit? 5

7. Why is the lawsuit continuing if there are Settlements? 5

8. What if I received previous communications regarding this lawsuit? 5

WHO IS IN THE CLASS? 5

9. Am I part of the Certified Class? 5

10. What are the Class Products? 6

11. Are there exceptions to being included? 6

12. I’m still not sure if I’m included. 6

13. If I excluded myself previously from the Certified Class, do I need to exclude myself again?
..... 6

14. Can I still exclude myself? 6

THE BENEFITS OF THE SETTLEMENT AGREEMENT WITH AGRI STATS 7

15. What does the Settlement with Agri Stats provide? 7

16. Do I need to file a claim? 9

17. Can I file a claim in the previous settlements in this case? 9

18. What am I giving up with this Settlement? 9

19. What happens if I do nothing at all? 9

OBJECTING TO THE SETTLEMENT 9

20. How do I tell the Court that I don’t like the Settlement? 9

21. Can I object to the previous settlements? 10

22. What is the difference between excluding myself and objecting? 10

THE LAWYERS REPRESENTING YOU 10

23. Do I have a lawyer in this case? 10

24. How will the lawyers be paid? 10

THE COURT’S FAIRNESS HEARING 10

25. When and where will the Court decide whether to approve the Settlement? 10

26. Do I have to come to the hearing? 11

27. May I speak at the hearing? 11

THE TRIAL..... 11

28. How and when will the Court decide if the Plaintiffs or remaining non-settling Defendants are right? 11

29. Will I get money after the trial?..... 11

GETTING MORE INFORMATION 11

30. How do I get more information?..... 11

BASIC INFORMATION

1. Why did I receive a notice?

The Court has directed notice to be sent to the Certified Class, as this lawsuit may affect your rights. This notice provides you with the status of the litigation, including details about the proposed Settlement with Agri Stats and the opportunity to object to that Settlement. You do not have an opportunity to exclude yourself from the Settlement because the time to exclude yourself from the Certified Class has already passed.

Defendants (other than Agri Stats) produce turkey products, including fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products (“Class Products”). Defendants’ records show that you may have directly purchased Class Products from Defendants in the United States from January 1, 2010, through December 31, 2016 (the “Certified Class Period”). The list of Defendants is in Question 3 below.

The Court authorized this notice because you have a right to know about the proposed Settlement with Agri Stats, and your rights and options, before the Court decides whether to approve the Settlement.

You may have received notices and submitted claims with respect to prior settlements reached in this litigation. The prior notices and claims only relate to those settling Defendants. You are receiving this Notice because this is a new Settlement with Agri Stats. This notice explains the lawsuit, the Certified Class, the Settlement, and your legal rights.

2. What is this lawsuit about?

This class action lawsuit is called *In re Turkey Antitrust Litigation*, No. 1:19-cv-08318 and is pending in the United States District Court for the Northern District of Illinois. U.S. District Court Judge Sunil R. Harjani is in charge of this class action.

The Defendants are producers of turkey products in the United States, as well as Agri Stats. Direct Purchaser Plaintiffs allege that Defendants and their co-conspirators conspired and combined to fix, raise, maintain, and stabilize the price of certain turkey products, beginning at least as early as January 1, 2010, and continuing at least until December 31, 2016, with the intent and expected result of increasing prices of Class Products in the United States, in violation of federal antitrust laws. The lawsuit alleges that Agri Stats created reports that helped the Defendant turkey producers restrict supply and raise the price of turkey.

Defendant Agri Stats is a company that collected and published data about the turkey industry. Sometime after it did this and other lawsuits against Agri Stats were filed in the meat industry, Agri Stats stopped publishing its reports about the turkey industry. Plaintiffs alleged that the reports facilitated anti-competitive behavior because they were so detailed that the other Defendant companies could monitor one another’s supply and prices in a way that harmed the Certified Class.

The Defendants deny all allegations of wrongdoing in this lawsuit.

3. Who are the Defendants?

On January 22, 2025, the Court approved (or certified) the lawsuit to proceed as a class action against Defendants Butterball, LLC; Cooper Farms, Inc. (“Cooper Farms”); Farbest Foods, Inc. (“Farbest Foods”); Foster Farms LLC; Foster Poultry Farms; Hormel Foods Corporation; Jennie-O Turkey Store, Inc.; House of Raeford Farms, Inc.; Perdue Farms, Inc.; Perdue Foods LLC; Prestage Farms, Inc., Prestage Foods, Inc., Prestage Farms of South Carolina, LLC; and Agri Stats. Defendants’ “co-conspirators” include Dakota Provisions, LLC, Kraft Heinz Company, Kraft Foods Group Brands LLC, Michigan Turkey Producers LLC, Norbest LLC, and West Liberty Foods LLC.

The Court previously approved a settlement with Tyson Foods, Inc., Tyson Fresh Meats, Inc., Tyson Prepared Foods, Inc. and the Hillshire Brands Company (“Tyson”) in 2022, a settlement with Cargill, Incorporated and Cargill Meat Solutions Corporation (“Cargill”); in 2025, and settlements with Cooper Farms and Farbest Foods in 2025.

4. 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 themselves and 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.

5. Why is there a new Settlement?

The Court did not decide in favor of either Direct Purchaser Plaintiffs or Agri Stats. Direct Purchaser Plaintiffs believe they may have won at trial and possibly obtained a greater recovery. Agri Stats believes the Direct Purchaser Plaintiffs would not have won at a trial. But litigation involves risks to both sides, and therefore, Direct Purchaser Plaintiffs and Agri Stats have agreed to the Settlement. The Settlement requires Agri Stats to restrict its ability to publish the same type of reports about the turkey industry if it restarts publishing such reports in the future, as well as respond to specific requests made by the Direct Purchaser Plaintiffs in their continued prosecution of the litigation. Direct Purchaser Plaintiffs and their attorneys believe the Settlement is in the best interests of all Certified Class members.

6. Have there been other settlements in this lawsuit?

Yes. Previously, you may have received notice about settlements in this lawsuit with Tyson, Cargill, Farbest Foods, and Cooper Farms. The settlement with Tyson received final approval from the Court on February 3, 2022. The settlement with Cargill received final approval on July 31, 2025 but is currently being appealed. Eligible Certified Class members previously submitted claims by the April 21, 2025 deadline, and once the appeal of the Cargill lawsuit is resolved, claims from the Tyson and Cargill settlements will be paid.

The settlements with Farbest Foods and Cooper Farms received final approval on July 29, 2025. The Cooper Farms and Farbest Foods settlement proceeds will not be distributed until a later date. If you are a Certified Class member, you will be provided notice when it is time to file a claim for those settlements.

Please visit the website, www.TurkeyLitigation.com for more information and updates.

7. Why is the lawsuit continuing if there are Settlements?

Direct Purchaser Plaintiffs reached this Settlement with Agri Stats and previous settlements with Tyson, Cargill, Farbest Foods, and Cooper Farms.

However, the Direct Purchaser Plaintiffs' case is proceeding against the other remaining non-settling Defendants. These Defendants deny the claims in the lawsuit. The Court has not decided whether the Plaintiffs or the remaining non-settling Defendants are right. Direct Purchaser Plaintiffs will have to prove their claims in Court. Additional money or benefits may become available in the future as a result of a trial or future settlements with these remaining non-settling Defendants. It is also possible that the lawsuit against the remaining non-settling Defendants may be resolved in their favor and no additional money may become available. There is no guarantee as to what will happen. If applicable, you will receive a separate notice regarding the progress of the litigation and any resolution of claims against the non-settling Defendants. The non-settling Defendants are Butterball LLC; Foster Farms, LLC; Foster Poultry Farms LLC; Hormel Foods Corporation; Jennie-O Turkey Store, Inc.; House of Raeford, Inc.; Perdue Farms, Inc.; Perdue Farms, LLC; Prestage Farms of South Carolina, LLC; Prestage Farms, Inc.; and Prestage Foods, Inc.

8. What if I received previous communications regarding this lawsuit?

You may have received notice, authorized by the Court, about Direct Purchasers Plaintiffs' previous settlements in this lawsuit with Tyson, Cargill, Farbest Foods, and Cooper Farms and the Court's order approving the Certified Class.

You may have received other communications about this lawsuit, including solicitations by other attorneys seeking to represent you as a plaintiff in an individual (or "direct action") lawsuit against Defendants. These communications were not approved by the Court and did not come from Court-appointed Co-Lead Class Counsel.

WHO IS IN THE CLASS?

9. Am I part of the Certified Class?

The Certified Class is defined as:

All persons and entities who directly purchased fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products ("Class Products") from Defendants in the United States from January 1, 2010, through December 31, 2016 ("Class Period").

If you satisfy these criteria, you are a member of the Certified Class, subject to the exceptions listed in Question 11 below.

The Certified Class includes persons who purchased Class Products from *any* of the Defendants.

The Court-approved class definition, or group of people included, in the Certified Class is different from the settlement classes the Court approved in the settlements with Cargill and Tyson. Please visit www.TurkeyLitigation.com for more information about those settlement classes.

10. What are the Class Products?

The Class Products include fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products.

Turkey breast products do not include: turkey breasts used to make ground turkey, turkey breast tenderloins, organic turkey breast products, No Antibiotics Ever (“NAE”) or Antibiotic-Free (“ABF”) turkey breast products, and cooked or ready-to-eat (“RTE”) turkey breast products.

Ground turkey products do not include: ground turkey products made from turkey breasts; ground turkey products made from turkey wings; burgers, sausages, and patties; organic ground turkey products NAE or ABF ground turkey products; and cooked or RTE ground turkey products.

Whole bird turkey products do not include: organic turkey whole bird products, NAE or ABF turkey whole bird products, and cooked or RTE turkey whole bird products.

11. Are there exceptions to being included?

Yes. Specifically excluded from the Certified Class are Defendants and their Co-conspirators; the officers, directors or employees of any Defendant or Co-conspirator; any entity in which any Defendant or their Co-conspirator has a controlling interest; any entity with an interest, controlling or non-controlling, in a Defendant or their Co-conspirator; any entity where an individual owner, trust, and/or holding company also had an interest in any Defendant (whether as an individual, member, trust, trustee, legal representative, heir or assign) of greater than 5% during any year of the Class Period; any (in whole or in part) affiliate, legal representative, heir, or assign of any Defendant or their Co-conspirator; 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 Co-conspirator identified in this action. Anyone who previously excluded themselves from the Certified Class is also not included.

If you are in one of these categories, you are not a member of the Certified Class and not eligible to participate in these Settlements.

12. 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 Court’s Memorandum and Order dated January 22, 2025, and the Settlement Agreement, available for download at www.TurkeyLitigation.com. You may also call the Settlement Administrator at 1-877-777-9637 or call or write to Co-Lead Class Counsel at the phone numbers or addresses listed in Question 20 below.

13. If I excluded myself previously from the Certified Class, do I need to exclude myself again?

No. If you previously excluded yourself from the Certified Class, then you do not need to take further action.

14. Can I still exclude myself?

No. The deadlines to exclude yourself from the Certified Class and the previous settlements have passed. The exclusion deadline for the Certified Class was April 21, 2025. If you did not exclude yourself from the Certified Class previously, you are a Certified Class member and cannot ask to be excluded from the Certified Class or the Settlement with Agri Stats now.

THE BENEFITS OF THE SETTLEMENT AGREEMENT WITH AGRI STATS

15. What does the Settlement with Agri Stats provide?

If the Settlement is approved and Agri Stats decides to restart its reporting to the turkey industry (it stopped doing so after this lawsuit was filed), Agri Stats will make extensive changes to any reports it publishes about the turkey industry. For instance, Agri Stats will be prohibited from listing the names of the participants in each report on the front page, including competitor- or plant-level price or production volume data in its reports, and assisting with the deanonymization of turkey report subscriber data. The Settlement Agreement has more details on Agri Stats' agreed conduct reform (or changes to their future reporting practices). Please visit www.TurkeyLitigation.com to review the entire Settlement Agreement.

The Settlement provides for a significant degree of conduct reform that Direct Purchaser Plaintiffs believe will address the concerns involving Agri Stats' turkey industry reports, including requiring that if Agri Stats restarts its turkey industry reports, for a period of five years it must:

- a. Retain an experienced outside attorney with responsibility for antitrust compliance.
- b. Conduct annual employee antitrust compliance training.
- c. Implement a written antitrust compliance policy and training:
 - i) Prohibiting Agri Stats and its employees from disclosing to a competitor of a turkey subscriber, orally or in writing (including through custom reports), any non-public information collected from a turkey subscriber other than the anonymized information disclosed in Agri Stats' reports;
 - ii) Prohibiting any Agri Stats turkey report from containing actual competitor- or plant-level price or production volume data.
 - iii) Implementing data security measures to prevent turkey customer employees who transition from firm A to firm B from accessing firm A data.
 - iv) Implementing data security measures to prevent Agri Stats employees who transition to a customer firm from accessing non-public or non-anonymized Agri Stats data.
 - v) Prohibiting Agri Stats and its employees from assisting with identifying and/or de-anonymizing turkey subscriber data in Agri Stats' reports;
 - vi) Ensuring that all data values within all data fields in Agri Stats turkey reports consist of data from at least three entities¹ with no entity representing more than 70% of the data, except for quartile data fields and plant-level data fields (that are not removed as set forth in Exhibit A, as discussed below);
 - vii) Agri Stats will suppress any fields that have categorical values (for example a field that takes on values of YES and NO, or a plant shift field which lists the shifts a plant operates, or the breed processed at a particular plant) if any given value of that category has fewer than three firms. If, at any time, the number of plants increases or the number of firms that take on a particular value increases, the field no longer needs to be suppressed. Conversely if the number of plants decreases or the number of firms that take on a particular value decreases such that fewer than three firms take on a particular value, the field will be suppressed even if it had not been in the past; and
 - viii) Requiring that, other than data available for anyone to purchase as set forth below, every data field in Agri Stats turkey reports shall be composed of data that is at least 45 days old on average.

¹ If the unit of the report is the plant, the 3- count rule should apply to plants; if the unit of the report is the firm, the 3-count rule should apply to firms.

- d. Implement provisions protecting confidentiality of competitor data in Agri Stats turkey customer contracts.
- e. Remove all participant lists in turkey reports.
- f. Remove all flags in turkey reports.
- g. Remove in the turkey reports made available to a report recipient all plant-level production-related data fields identified in Exhibit A for turkey subscribers other than the report recipient. Notwithstanding the foregoing, Agri Stats may provide to a subscriber a subscriber's rank and percentile for these data fields.
- h. Modify the turkey reports as necessary to (1) delete variance fields and/or (2) suppress "linking" of data fields across reports that would otherwise disclose the plant-level data field identified in Exhibit A.
- i. Nothing in this Settlement Agreement prohibits or limits EMI's ability to provide nationwide average price data by product category for anyone (including consumers) to purchase. Agri Stats also shall publish a turkey performance report containing the production-related data fields identified in Exhibit B for anyone (including consumers) to purchase. Neither Agri Stats nor EMI may refuse a purchase of such reports on the basis that the purchaser is not a protein producer unless the persons or entities have unresolved claims pending against Agri Stats. The prices for such reports shall be no more than the average price being charged to Agri Stats' or EMI's regular customers as of the date of purchase. Except as set forth in this paragraph, nothing in this Settlement Agreement shall prohibit Agri Stats or EMI from adjusting or altering prices to any customer or adjusting other terms and conditions of purchase from time to time in its sole discretion. Such reports shall be made available without requiring the submission of data from subscribers, except that Agri Stats and EMI may continue to require processors to submit data.
- j. Agri Stats will not introduce any averages in any turkey reports or subsections that do not comply with the 3 entity / 70% rule set forth above.
- k. Agri Stats will give class counsel two weeks' notice in the unforeseen event that turkey reports resume.
- l. No non-public export data collected from a subscriber will be provided to any competitor other than the information disclosed in Agri Stats' regular turkey reports.
- m. Agri Stats will provide no forward-looking industry forecasts to turkey processors, including regarding how future industry production decisions might impact future prices or profitability. For the avoidance of doubt, nothing in the Settlement Agreement prohibits or limits EMI's ability to provide forward-looking industry forecasts based on publicly available data for anyone (including consumers) to purchase and EMI may not refuse such a purchase on the basis that the purchaser is not a protein producer unless the persons or entities have unresolved claims pending against Agri Stats.
- n. In the unforeseen event that Agri Stats resumes publication of turkey processing reports in the future, Agri Stats agrees that it will not re-add the plant-level data fields set forth in Exhibit A for subscribers other than the report recipient under a different numbering system, report, or mechanism for delivery to a report recipient. For the avoidance of doubt, nothing in the Settlement Agreement prohibits or limits 1) subscriber disclosure of data to Agri Stats or Agri Stats' addition of new reports or services, so long as such reports or services incorporate corresponding restrictions to those set forth herein; or 2) the renumbering and reordering of reports or data fields.
- o. Agri Stats will not disclose any non-public data collected from a turkey subscriber to any competitor of the subscriber other than the anonymized information disclosed in Agri Stats' regular reports, including through electronic tools like the sales data miner, web application programming interfaces ["API"] services, or other web services provided by Agri Stats

and/or its parents, subsidiaries, owners, or contractors. For the avoidance of doubt, nothing in the Settlement Agreement prohibits Agri Stats from providing turkey reports to subscribers in different electronic formats, so long as the format complies with the other provisions of this Settlement Agreement.

- p. Agri Stats shall cease, and will not resume in the future, publication of any and all sales reports. Agri Stats shall cease, and will not resume in the future, publication of any and all price data for product categories that are not otherwise available to the public from EMI pursuant to Paragraph i.
- q. With the exception of Paragraph p, this conduct relief shall remain in effect for five years, starting from the unforeseen date that Agri Stats resumes the turkey reports.
- r. Nothing in this Settlement Agreement shall be construed to prohibit Agri Stats from petitioning the Court for modification of the Conduct Relief for good cause shown.

In addition, Agri Stats has also agreed to respond to specific requests for cooperation made by the Direct Purchaser Plaintiffs in their continued prosecution of the litigation. In exchange for the conduct reform measures described above, the Certified Class is releasing claims against Agri Stats through January 22, 2025. The specific claims being released, called the “Released Claims” are defined in the Settlement Agreement.

16. Do I need to file a claim?

No. Because this Settlement with Agri Stats offers only conduct reform and cooperation, you do not need to submit a claim to benefit from the Settlement. Please visit www.TurkeyLitigation.com for more information and updates.

17. Can I file a claim in the previous settlements in this case?

No. The deadline to submit a claim in the previous settlements with Tyson and Cargill was April 21, 2025. You cannot file a claim for a payment from the Tyson or Cargill settlements.

The claims process for the Cooper Farms and Farbest Foods settlements has not started. You will be provided notice when it is time to file a claim in those settlements.

18. What am I giving up with this Settlement?

Unless you excluded yourself in 2025, you are still in the Certified Class. This means that if the Settlement is approved by the Court, you cannot sue, continue to sue, or be part of any other lawsuit against Agri Stats related to the Released Claims in this lawsuit. You will be releasing the “Agri Stats Released Parties” from the “Released Claims” as those terms are used in the Settlement Agreement available at www.TurkeyLitigation.com.

19. What happens if I do nothing at all?

If you do nothing, you will automatically benefit from this Settlement and will be able to file a claim for payment from the previous Cooper Farms and Farbest Foods settlements at a later date. This Settlement will resolve your claims against Agri Stats, and you will give up your rights to sue them about the Released Claims (as defined in the Settlement Agreement) (see Question 18). You may also have the opportunity to participate in any future settlements or judgments obtained by Direct Purchaser Plaintiffs. You are legally bound by all Court orders affecting the Certified Class, good or bad,

OBJECTING TO THE SETTLEMENT

20. How do I tell the Court that I don’t like the Settlement?

If you are a Certified Class Member and did not file a timely exclusion request from the Certified Class, you can object to the Settlement with Agri Stats if you don’t like part or all of it. The Court will consider your views.

To object, you must send a letter or other written statement saying that you object to the Settlement with Agri Stats in *In re Turkey Antitrust Litigation* and the reasons why you object to the Settlement. Be sure to include your full name, the name of your business which purchased the Class Products, 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 judge. Instead, mail your objection to the Settlement Administrator, Co-Lead Class Counsel, and Counsel for Agri Stats at the addresses listed below. Your objection must be postmarked no later than **Month 00, 2026**.

Settlement Administrator:

Turkey Antitrust Litigation
ATTN: OBJECTIONS
c/o A.B. Data, Ltd.
P.O. Box 173001
Milwaukee, WI 53217

Direct Purchaser Plaintiffs'

Co-Lead Class Counsel:

Brian D. Clark
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Ave. South, Suite 2200
Minneapolis, MN 55401
(612) 339-6900
bdclark@locklaw.com

Shana E. Scarlett
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 300
Berkeley, CA 94710
T: (510) 725-3000
F: (510) 725-3001
shanas@hbsslaw.com

Counsel for Agri Stats:

William L. Monts
Justin W. Bernick
HOGAN LOVELLS US LLP
555 Thirteenth Street, NW
Washington, D.C. 20004
(202) 637-5600
william.monts@hoganlovells.com
justin.bernick@hoganlovells.com

21. Can I object to the previous settlements?

No. The deadlines to object to the previous settlements with Tyson, Cargill, Farbest Foods, and Cooper Farms have passed. Visit www.TurkeyLitigation.com to learn more.

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

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

THE LAWYERS REPRESENTING YOU

23. Do I have a lawyer in this case?

Yes. The Court appointed the law firms Lockridge Grindal Nauen PLLP and Hagens Berman Sobol Shapiro LLP as Co-Lead Class Counsel for the Certified Class. You will not be charged for these lawyers. Their contact information is provided above in Question 20. If you want to be represented by another lawyer, you may hire one at your own expense.

24. How will the lawyers be paid?

Co-Lead Class Counsel are not asking the Court to award any attorneys' fees or reimburse litigation expenses related to this Settlement, as it does not provide monetary relief. In the future, Co-Lead Class Counsel will ask the Court to award attorneys' fees and reimbursement of reasonable and necessary litigation expenses from any other settlement or recovery in this litigation. At such time, and prior to any Court approval, members of the Certified Class will be provided with notice of the amount of fees or expenses Co-Lead Class Counsel is seeking and the opportunity to be heard by the Court. You will not have to pay any fees or costs out-of-pocket.

THE COURT'S FAIRNESS HEARING

25. When and where will the Court decide whether to approve the Settlement?

The Court will hold a hearing to decide whether to approve the Settlement (the “Fairness Hearing”). You may attend and you may ask to speak, but you don’t have to. The Court will hold the Fairness Hearing on **[Month 00, 2026]**, at **XX:00 x.m.** at the United States District Court for the Northern District of Illinois, Courtroom 1925, Dirksen U.S. Courthouse, 219 S. Dearborn Street, Chicago, IL 60604. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. 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 Settlement. We do not know how long these decisions will take.

The Court may hold the Fairness Hearing remotely via telephone or video conference and may change call-in details or move the Fairness Hearing to a later date without providing additional notice to Certified Class members. Updates will be posted to the Settlement Website, www.TurkeyLitigation.com.

26. Do I have to come to the hearing?

No. Co-Lead Class Counsel will answer any questions the Court may have. However, you are welcome to come at your own expense or attend via telephone or video conference, if Court holds a telephone or video hearing. 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.

27. May I speak at the hearing?

Yes, 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 Turkey Antitrust Litigation*.” Be sure to include your name, the name of your business which purchased Class Products, current mailing address, telephone number, and signature. Your Notice of Intention to Appear must be postmarked no later than **[Month 00, 2025]**, and it must be sent to the Clerk of the Court, Co-Lead Class Counsel, and Counsel for Agri Stats. The address for the Clerk of the Court is: Everett McKinley Dirksen U.S. Courthouse, 219 S. Dearborn Street, Chicago, IL 60604. The addresses for Co-Lead Class Counsel and Counsel for Agri Stats are provided in Question 20. You cannot ask to speak at the hearing if you excluded yourself from the Certified Class.

THE TRIAL

28. How and when will the Court decide if the Plaintiffs or remaining non-settling Defendants are right?

If the lawsuit against the remaining non-settling Defendants is not dismissed or settled, the Direct Purchaser Plaintiffs will have to prove their claims at a trial that will take place at the United States District Court for the Northern District of Illinois, Courtroom 2503, Everett McKinley Dirksen U.S. Courthouse, 219 S. Dearborn Street, Chicago, IL 60604. During the trial, a jury and/or judge will hear evidence and decide whether the Direct Purchaser Plaintiffs or the remaining non-settling Defendants are right about the claims in the lawsuit. There is no guarantee that the Direct Purchaser Plaintiffs will win any money or benefits for the Certified Class. Trial is set to begin on October 8, 2026.

29. Will I get money after the trial?

If the Direct Purchaser Plaintiffs obtain money or benefits as a result of a trial or settlement with the remaining non-settling Defendants, you will be notified about how to get a payment or benefits and your other options at that time. These things are not known right now. Important information about the case will be posted on the website, www.TurkeyLitigation.com, as it becomes available.

GETTING MORE INFORMATION

30. How do I get more information?

This notice is only a summary. More details about the proposed Settlement are in the Settlement Agreement. You can find copies of the Settlement Agreements, the certification order, other important documents, and information about the current status of the litigation by visiting www.TurkeyLitigation.com. You may contact the Settlement Administrator at info@TurkeyLitigation.com or toll-free at 1-877-777-9637. You may also contact Co-Lead Class Counsel at the addresses, phone numbers, and email addresses provided in Question 20.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE.

EXHIBIT 2

COURT-APPROVED LEGAL NOTICE

If You Directly Purchased Certain Turkey Products from a Turkey Producer in the United States from January 1, 2010, Through December 31, 2016, a Class Action May Affect Your Rights.

*Para una notificación en español, llame gratis al 1-877-777-9637
o visite nuestro website, www.TurkeyLitigation.com.*

There is an update regarding *In re Turkey Antitrust Litigation*, No. 1:19-cv-08318, a class action lawsuit pending in the United States Court for the Northern District of Illinois in which you previously received notice. The purpose of this new notice is to inform you of your rights related to a new settlement (the “Settlement”) that has been reached on behalf of Direct Purchaser Plaintiffs with Defendant Agri Stats, Inc. (“Agri Stats”). **A more detailed notice is available at www.TurkeyLitigation.com.**

On January 22, 2025, the Court issued an order certifying a class of direct purchasers defined as: “[a]ll persons and entities who directly purchased fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products (the “Class Products”) from Defendants in the United States during the Class Period.” This class of direct purchasers is called the “Certified Class.” The Class Period is January 1, 2010, through December 31, 2016.

The Settlement is on behalf of the Certified Class, applies only to Agri Stats, and does not dismiss the claims against other remaining Defendants in this lawsuit. The Settlement requires that if Agri Stats ever again offers its reporting to the turkey industry (it stopped doing so after this lawsuit was filed), then Agri Stats will make extensive changes to its Agri Stats report. Agri Stats has also agreed to provide specific cooperation in the Direct Purchaser Plaintiffs’ continued prosecution of this action.

This notice provides Certified Class members with notice of the Settlement and the opportunity to object. Because the time period for opting out of the Certified Class has already passed, you may not submit an exclusion request for this Settlement. **At this time there is no new claim form, plan of distribution, or request for Co-Lead Class Counsel fees or expenses.**

The United States District Court for the Northern District of Illinois (the “Court”) authorized this notice because you have a right to object to the Settlement, and know your rights and options. Please review this notice and follow the instructions carefully.

WHO IS INCLUDED?

The Certified Class is defined as all persons and entities who directly purchased fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products (“Class Products”) from Defendants in the United States from January 1, 2010, through December 31, 2016 (“Class Period”).

The Class Products include fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products. Turkey breast products do not include: turkey breasts used to make ground turkey, turkey breast tenderloins, organic turkey breast products, No Antibiotics Ever (“NAE”) or Antibiotic-Free (“ABF”) turkey breast products, and cooked or ready-to-eat (“RTE”) turkey breast products. Ground turkey products do not include: ground turkey products made from turkey breasts; ground turkey products made from turkey wings; burgers, sausages, and patties; organic ground turkey products NAE or ABF ground turkey products; and cooked or RTE ground turkey products. Whole bird turkey products do not include: organic turkey whole bird products, NAE or ABF turkey whole bird products, and cooked or RTE turkey whole bird products.

Specifically excluded from the Certified Class are the Defendants and their co-conspirators; the officers, directors, or employees of any Defendant or co-conspirator; any entity in which any Defendant or co-conspirator has a controlling interest; any entity with an interest, controlling or non-controlling, in a Defendant or their co-conspirator; any entity where an individual owner, trust, and/or holding company also had an interest in any Defendant (whether as an individual, member, trust, trustee, legal representative, heir or assign) of greater than 5% during any year of the Class Period; any affiliate, legal representative, heir, or assign of any Defendant or co-conspirator; 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 timely and validly excludes themselves from the Certified Class. Anyone who previously excluded themselves from the Certified Class is also not included.

If you are not sure you are included, you can get more information, including a detailed notice, at www.TurkeyLitigation.com (the “Settlement Website”) or by calling toll-free 1-877-777-9637.

WHAT IS THIS LAWSUIT ABOUT?

The Defendants are producers of turkey products in the United States, as well as Agri Stats. Direct Purchaser Plaintiffs allege that Defendants and their co-conspirators conspired and combined to fix, raise, maintain, and stabilize the price of the Class Products beginning at least as early as January 1, 2010, and continuing through at least December 31, 2016, with the intent and expected result of increasing prices for those products in the United States, in violation of federal antitrust laws. It says that Agri Stats created reports

that helped the Defendant turkey product producers do this. The Defendants deny they did anything wrong. The Court did not decide who is right.

The Court previously approved a settlement with Tyson Foods, Inc., Tyson Fresh Meats, Inc., Tyson Prepared Foods, Inc. and the Hillshire Brands Company (“Tyson”) in 2022 and a settlement with Cargill, Incorporated and Cargill Meat Solutions Corporation (“Cargill”) in 2025. Also, in 2025, the Court issued the order certifying a class of direct purchasers and approved settlements with Cooper Farms, Inc. (“Cooper Farms”) and Farbest Foods, Inc. (“Farbest Foods”) and a motion for attorneys’ fees, reimbursement of expenses, and class representative service awards. The total settlement proceeds are \$40.5 million. However, approval of the Cargill settlement is currently being appealed. The Tyson and Cargill settlements will not be distributed until that appeal is resolved. The Cooper Farms and Farbest Foods settlement claim process has not started. If you are a Certified Class member, you will be provided notice when it is time to file a claim for those settlements. Please visit www.TurkeyLitigation.com for updates.

Now, Direct Purchaser Plaintiffs and Agri Stats have agreed to a Settlement that will resolve the lawsuit against Agri Stats and provide benefits to the Certified Class. The lawsuit is still proceeding against the remaining non-settling Defendants who may be subject to separate settlements or judgments. The non-Settling Defendants in this lawsuit are Butterball LLC; Foster Farms, LLC; Foster Poultry Farms LLC; Hormel Foods Corporation; Jennie-O Turkey Store, Inc.; House of Raeford, Inc.; Perdue Farms, Inc.; Perdue Farms, LLC; Prestage Farms of South Carolina, LLC; Prestage Farms, Inc.; and Prestage Foods, Inc.

WHAT DOES THE SETTLEMENT PROVIDE?

Agri Stats already stopped producing reports about the turkey industry after this and other lawsuits were filed alleging that the reports were anti-competitive. However, because t Agri Stats could resume these reports after this lawsuit ends, Direct Purchaser Plaintiffs negotiated extensive conduct reform (or changes to Agri Stats future reporting practices) to address concerns about the information that would be contained in any future reports published by Agri Stats concerning the turkey industry. In addition, Agri Stats has also agreed to respond to specific requests for cooperation made by the Direct Purchaser Plaintiffs in their continued prosecution of the litigation. In return, the Certified Class members’ will release certain claims, called the “Released Claims” against Agri Stats (as defined in the Settlement Agreement).

WHAT ARE YOUR RIGHTS AND OPTIONS?

If you are a Certified Class member (and did not exclude yourself in 2025):

- You will be bound by the Settlement if it is approved. You will be able to participate in the Cooper Farms and Farbest Foods settlements and future settlements or judgments obtained by Direct Purchaser Plaintiffs against the non-settling Defendants in this lawsuit, if any.
- You may object to the Settlement by [date], 2026. The detailed notice and FAQs, available at www.TurkeyLitigation.com, explain how to object.

The Court will hold a hearing in this lawsuit on [Month 00, 2026], at [XX:00 x.m.] Central to consider whether to approve the Settlement with Agri Stats. You or your own lawyer may ask to speak at the hearing at your own expense.

This notice is only a summary. You can find more details about the Settlement at www.TurkeyLitigation.com or by calling toll-free 1-877-777-9637. Please do not contact the Court.

EXHIBIT 3

**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


London

71-75 Shelton Street
Covent Garden
London, WC2H 9JQ
P: +44 20 4586 1892




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.

Justin Parks, Senior 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.

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.

Steve Straub, Vice President, 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 Vice President of Operations, 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.*
- *In re Loestrin 24 FE Antitrust Litigation*
- *Office of the Attorney General, Department of Legal Affairs, State of Florida v. Pultegroup, Inc. and Pulte Home Company, LLC*
- *In re Cigna-American Specialties Health Administration Fee Litigation*
- *In re: Intuniv Antitrust Litigation*
- *High Street, et al. v. Cigna Corporation, et al.*
- *Gordon Fair, et al. v. The Archdiocese of San Francisco, San Mateo, and Marin County*
- *Bizzarro, et al. v. Ocean County Department of Corrections, et al.*
- *Meeker, et al. v. Bullseye Glass Co.*
- *MSPA Claims 1, LLC v. Ocean Harbor Casualty Insurance Company*
- *Tennille v. Western Union Company - Arizona*
- *Garner, et al. v. Atherotech Holdings, Inc. and Garner, et al. v. Behrman Brothers IV, LLC, et al.*
- *Robinson, et al. v. Escallate, LLC*
- *Josefina Valle and Wilfredo Valle, et al. v. Popular Community Bank f/k/a Banco Popular North America*
- *Vision Construction Ent., Inc. v. Waste Pro USA, Inc. and Waste Pro USA, Inc. and Waste Pro of Florida, Inc.*
- *Plumley v. Erickson Retirement Communities, et al.*
- *In re London Silver Fixing, Ltd. Antitrust Litigation*
- *Ploss v. Kraft Foods Group, Inc. and Mondelēz Global LLC*
- *In re Mexican Government Bonds Antitrust Litigation*
- *In re Ready-Mixed Concrete Antitrust Litigation*
- *In re: Marine Hose Antitrust Litigation*
- *Iowa Ready Mixed Concrete Antitrust Litigation*
- *In re Potash Antitrust Litigation (II)*
- *In re Evanston Northwestern Healthcare Corp. Antitrust Litigation*
- *In re Polyurethane Foam Antitrust Litigation*

- *In re LIBOR-Based Financial Instruments Antitrust Litigation*
- *In re Lorazepam and Clorazepate Antitrust Litigation*
- *In re Cardizem CD Antitrust Litigation*
- *Vista Healthplan, Inc., and Ramona Sakiestewa v. Bristol-Myers Squibb Co., and American BioScience, Inc.*
- *In re Lupron Marketing and Sales Practices Litigation*
- *In re Terazosin Hydrochloride Antitrust Litigation*
- *In re Warfarin Sodium Antitrust Litigation*
- *Rosemarie Ryan House, et al. v. GlaxoSmithKline PLC and SmithKline Beecham Corporation*
- *Carpenters and Joiners Welfare Fund, et al. v. SmithKline Beecham*
- *New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, et al. v. Purdue Pharma L.P.*
- *In Re Pharmaceutical Industry Average Wholesale Price Litigation*
- *Alma Simonet, et al. v. SmithKline Beecham Corporation, d/b/a GlaxoSmithKline*
- *In re Relafen Antitrust Litigation*
- *In Re Remeron Direct Purchaser Antitrust Litigation*
- *In re TriCor Indirect Purchasers Antitrust Litigation*
- *Nichols, et al., v. SmithKline Beecham Corporation*
- *In re: DDAVP Indirect Purchaser Antitrust Litigation*

Securities Cases

- *Plymouth County Retirement Association v. Spectrum Brands Holdings, Inc., et al.*
- *Tung, et al. v. Dycom Industries, Inc., et al.*
- *Boutchard., et al. v. Gandhi, et al. ("Tower/e-Minis")*
- *MAZ Partners LP v. First Choice Healthcare Solutions, Inc.*
- *SEB Investment Management AB, et al. v. Symantec Corporation, et al.*
- *In re Impinj, Inc. Securities Litigation*
- *In re Netshoes Securities Litigation*
- *Yellowdog Partners, LP, et al. v. Curo Group Holdings Corp., et al.*
- *In re Brightview Holdings, Inc. Securities Litigation*
- *In re Obalon Therapeutics, Inc. Securities Litigation*
- *In re Willis Towers Watson PLC Proxy Litigation*
- *In re Blue Apron Holdings, Inc. Securities Litigation*
- *In re: Qudian Inc. Securities Litigation*
- *Plymouth County Contributory Retirement System v. Adamas Pharmaceuticals, et al.*
- *In re Perrigo Company PLC Securities Litigation*
- *Enriquez, et al. v. Nabriva Therapeutics PLC, et al.*
- *Teamsters Local 456 Pension Fund, et al. v. Universal Health Services, Inc., et al.*
- *Olenik, et al. v. Earthstone Energy, Inc.*
- *Shenk v. Mallinckrodt plc, et al.*
- *In re The Allstate Corp. Securities Litigation*
- *Christopher Vataj v. William D. Johnson, et al. (PG&E Securities II)*
- *Kirkland v. WideOpenWest, Inc.*
- *Oklahoma Police Pension and Retirement System v. Sterling Bancorp, Inc.*
- *In re Uxin Limited Securities Litigation*
- *City of Hallandale Beach Police Officers' & Firefighters' Personnel Retirement Trust v. Ergen, et al. (Echostar)*
- *Lewis v. YRC Worldwide Inc., et al.*
- *Tomaszewski v. Trevena, Inc., et al.*

- *In re Restoration Robotics, Inc. Securities Litigation*
- *Public Employees' Retirement Systems of Mississippi, et al. v. Treehouse Foods, Inc., et al.*
- *Ronald L. Jackson v. Microchip Technology, Inc., et al.*
- *In re Micro Focus International plc Securities Litigation*
- *In re Dynagas LNG Partners LP Securities Litigation*
- *Weiss, et al. v. Burke, et al. (Nutraceutical)*
- *Yaron v. Intersect ENT, Inc., et al.*
- *Utah Retirement Systems v. Healthcare Services Group, Inc., et al.*
- *In re PPDAl Group Inc. Securities Litigation*
- *In re: Evoqua Water Technologies Corp. Securities Litigation*
- *In re Aqua Metals, Inc. Securities Litigation*
- *St. Lucie County Fire District Firefighters' Pension Trust Fund v. Southwestern Energy Company*
- *In re CPI Card Group Inc. Securities Litigation*
- *Arkansas Teacher Retirement System, et al. v. Alon USA Energy, Inc., et al.*
- *In re TAL Education Group Securities Litigation*
- *GCI Liberty Stockholder Litigation*
- *In re SciPlay Corporation Securities Litigation*
- *In re Allergan Generic Drug Pricing Securities Litigation*
- *In re Vivint Solar, Inc. Securities Litigation*
- *In re YayYo Securities Litigation*
- *In re JPMorgan Treasury Futures Spoofing Litigation*
- *Searles, et al. v. Crestview Partners, LP, et al. (Capital Bank)*
- *In re Lyft, Inc. Securities Litigation*
- *In re Aegean Marine Petroleum Network, Inc. Securities Litigation*
- *In re JPMorgan Precious Metals Spoofing Litigation*
- *In re Pivotal Software, Inc. Securities Litigation*
- *Longo, et al. v. OSI Systems, Inc., et al.*
- *In re Homefed Corporation Stockholder Litigation*
- *Pierrelouis v. Gogo Inc., et al.*
- *Pope v. Navient Corporation, et al.*
- *In re Merit Medical Systems, Inc. Securities Litigation*
- *In re Frontier Communications Corporation Stockholder Litigation*
- *Holwill v. AbbVie Inc.*
- *Budicak, Inc., et al. v. Lansing Trade Group, LLC, et al. (SRW Wheat Futures)*
- *Yannes, et al. v. SCWorx Corporation*
- *In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations*
- *In re Myriad Genetics, Inc. Securities Litigation*
- *In re Chicago Bridge & Iron Co. N.V. Securities Litigation*
- *The Arbitrage Fund, et al. v. William Petty, et al. (Exactech)*
- *In re Columbia Pipeline Group, Inc. Merger Litigation*
- *Martinek v. AmTrust Financial Services, Inc.*
- *City of Pittsburgh Comprehensive Municipal Pension Trust Fund, et al. v. Benefitfocus, Inc., et al.*
- *In re: Evoqua Water Technologies Corp. Securities Litigation*
- *Laydon v. Mizuho Bank, Ltd., et al.*
- *Lomingkit, et al. v. Apollo Education Group, Inc., et al.*
- *In re Caraco Pharmaceutical Laboratories, Ltd. Shareholder Litigation*
- *Norfolk County Retirement System, et al. v. Community Health Systems, Inc., et al.*
- *Chester County Employees' Retirement Fund v. KCG Holdings, Inc., et al.*
- *Oklahoma Law Enforcement Retirement System, et al. v. Adeptus Health Inc., et al.*
- *Di Donato v. Insys Therapeutics, Inc., et al.*

- *Lundgren-Wiedinmyer, et al. v. LJM Partners, Ltd, et al.*
- *Martin, et al. v. Altisource Residential Corporation, et al.*
- *Stephen Appel, et al. v. Apollo Management, et al.*
- *In re Medley Capital Corporation Stockholder Litigation*
- *Forman, et al. v. Meridian BioScience, Inc., et al.*
- *Public Employees' Retirement System of Mississippi, et al. v. Endo International PLC, et al.*
- *In Re Flowers Foods, Inc. Securities Litigation*
- *Jiangchen, et al. v. Rentech, Inc., et al.*
- *In re Liberty Tax, Inc. Stockholder Litigation*
- *In re RH, Inc. Securities Litigation*
- *Lazan v. Quantum Corporation, et al.*
- *Nabhan v. Quantum Corporation, et al.*
- *Edmund Murphy III, et al. v. JBS S.A.*
- *Public Employees' Retirement System of Mississippi, et al. v. Sprouts Farmers Market, Inc., et al.*
- *In re Starz Stockholder Litigation*
- *Judith Godinez, et al. v. Alere Inc., et al.*
- *Rahman and Giovagnoli, et al. v. GlobalSCAPE, Inc., et al.*
- *Arthur Kaye, et al. v. ImmunoCellular Therapeutics, Ltd., et al.*
- *In re CPI Card Group Inc. Securities Litigation*
- *Daniel Aude, et al. v. Kobe Steel, Ltd., et al.*
- *In re Quality Systems, Inc. Securities Litigation*
- *Cooper, et al. v. Thoratec Corporation, et al.*
- *Washtenaw County Employees' Retirement System, et al. v. Walgreen Co., et al.*
- *Elkin v. Walter Investment Management Corp., et al.*
- *In Re CytRx Corporation Securities Litigation*
- *Ranjit Singh, et al. v. 21Vianet Group, Inc., et al.*
- *In re PTC Therapeutics, Inc. Securities Litigation*
- *Securities and Exchange Commission v. Mark A. Jones*
- *In re Sequans Communications S.A. Securities Litigation*
- *In re Henry Schein, Inc. Securities Litigation*
- *Ronge, et al. v. Camping World Holdings, Inc., et al.*
- *Oklahoma Firefighters Pension & Retirement System v. Lexmark International, Inc.*
- *Christakis Vrakas, et al. v. United States Steel Corporation, et al.*
- *Emerson et al. v. Mutual Fund Series Trust, et al. ("Catalyst")*
- *In re Fannie Mae 2008 Securities Litigation*
- *In re Anadarko Petroleum Corporation Class Action Litigation*
- *Ge Dandong, et al., v. Pinnacle Performance Limited, et al.*
- *In Re: Rough Rice Commodity Litigation*
- *Xuechen Yang v. Focus Media Holding Limited et al.*
- *In re Massey Energy Co. Securities Litigation*
- *In re Swisher Hygiene, Inc.*
- *The City of Providence vs. Aeropostale, Inc., et al.*
- *In re Metrologic Instruments, Inc. Shareholders Litigation*
- *Public Pension Fund Group v. KV Pharmaceutical Company et al.*
- *Pension Trust Fund for Operating Engineers, et al. v. Assisted Living Concepts, Inc., et al.*
- *In re Lehman Brothers Equity/Debt Securities Litigation*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Physical Action)*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Futures Action)*
- *In re General Electric Co. Securities Litigation*
- *In re CNX Gas Corporation Shareholders Litigation*

- *Oscar S. Wyatt, Jr. et al. v. El Paso Corporation, et al.*
- *In re Par Pharmaceutical Securities Litigation*
- *In re Par Pharmaceutical Companies, Inc. Shareholders Litigation*
- *In re Delphi Financial Group Shareholders Litigation*
- *In re SLM Corporation Securities Litigation*
- *In re Del Monte Foods Company Shareholder Litigation*
- *Leslie Niederklein v. PCS Edventures!.com, Inc. and Anthony A. Maher*
- *In re Beckman Coulter, Inc. Securities Litigation*
- *Michael Rubin v. MF Global, Ltd., et al.*
- *Allen Zametkin v. Fidelity Management & Research Company, et al.*
- *In re BP Prudhoe Bay Royalty Trust Securities Litigation*
- *Police and Fire Retirement System of the City of Detroit et al. v. SafeNet, Inc., et al.*
- *In re Limelight Networks, Inc. Securities Litigation*
- *In re Gilead Sciences Securities Litigation*
- *In re ACS Shareholder Litigation, Consolidated C.A. No. 4940-VCP*
- *Lance Provo v. China Organic Agriculture, Inc., et al.*
- *In re LDK Solar Securities Litigation*

Labor & Employment Cases

- *Verizon OFCCP Settlement*
- *Alvarez, et al. v. GEO Secure Services, LLC*
- *Sartena v. Meltwater FLSA*
- *Carmen Alvarez, et al. v. Chipotle Mexican Grill, Inc., et al.*
- *Turner, et al. v. Chipotle Mexican Grill, Inc.*
- *Long, et al. v. Southeastern Pennsylvania Transportation Authority*
- *Matheson, et al. v. TD Bank, N.A.*
- *Ludwig, et al. v. General Dynamics Information Technology, Inc., et al.*
- *Bedel, et al. v. Liberty Mutual Group Inc.*
- *Irene Parry, et al. v. Farmers Insurance Exchange, et al.*
- *Maldonado v. The GEO Group, Inc.*
- *Alderman and Maxey v. ADT, LLC*
- *Albaceet v. Dick's Sporting Goods*
- *Rodriguez v. The Procter & Gamble Company*
- *Adekunle, et al. v. Big Bang Enterprises, Inc. d/b/a The Revenue Optimization Companies*
- *Gorski, et al. v. Wireless Vision, LLC*
- *Lopez, et al. v. New York Community Bank, et al.*
- *Hamilton, et al. v. The Vail Corporation, et al.*
- *Eisenman v. The Ayco Company L.P.*
- *Matheson v. TD Bank, N.A.*
- *Simon v. R.W. Express LLC, d/b/a Go Airlink NYC*
- *Perez v. Mexican Hospitality Operator LLC, d/b/a Cosme*
- *Shanahan v. KeyBank, N.A.*
- *Loftin v. SunTrust Bank*
- *Alvarez v. GEO Secure Services, LLC*
- *Weisgarber v. North American Dental Group, LLC*
- *Talisa Borders, et al. v. Wal-mart Stores, Inc.*
- *Reale v. McClain Sonics Inc., et al.*
- *Larita Finisterre and Songhai Woodard, et al. v. Global Contact Services, LLC*
- *Adebisi Bello v. The Parc at Joliet*

- *Garcia, et al. v. Vertical Screen, Inc.*
- *Brook Lemma and Matthieu Hubert, et al. v. 103W77 Partners LLC, et al.* ("Dovetail Settlement")
- *American Federation of Government Employees, Local 1145 v. Federal Bureau of Prisons, U.S. Penitentiary, Atlanta, Georgia*
- *Lisa Ferguson, Octavia Brown, et al. v. Matthew G. Whitaker, Acting AG, DOJ Bureau of Prisons* ("USP Victorville")
- *American Federation of Government Employees, Local 2001 v. Federal Bureau of Prisons, Federal Correctional Institution, Fort Dix, New Jersey*
- *American Federation of Government Employees, Local 506 v. U.S. Department of Justice, Federal Bureau of Prisons, U.S. Penitentiary Coleman II, Coleman, Florida*
- *Vargas v. Sterling Engineering*
- *Rosenbohm v. Verizon*
- *Alex Morgan, et al. v. United States Soccer Federation, Inc.*
- *Iskander Rasulev v. Good Care Agency, Inc.*
- *Kyndl Buzas, et al., v. Phillips 66 Company and DOES 1 through 10*
- *American Federation of Government Employees, Local 408 v. U.S. Dept. of Justice, Federal Bureau of Prisons, Federal Correctional Complex, Butner, NC*
- *In re 2014 Avon Products, Inc. ERISA Litigation*
- *In re Eastman Kodak ERISA Litigation*
- *Taronica White, et al. v. Attorney General Loretta Lynch, Department of Justice*
- *Lisa Ferguson, et al. v. Acting Attorney General Matthew Whitaker, Department of Justice*
- *Melissa Compere v. Nusret Miami, LLC, et al.*
- *Abelar v. American Residential Services, L.L.C., Central District of California*
- *Flores, et al. v. Eagle Diner Corp., et al., Eastern District of Pennsylvania*
- *Michael Furman v. Godiva Chocolatier, Inc., 15th Judicial Circuit, Palm Beach County, Florida*
- *Finisterre et. al v. Global Contact Services, LLC, New York State Supreme Court, Kings County*
- *McGuire v. Intelident Solutions, LLC, et al., Middle District of Florida, Tampa Division*
- *Duran De Rodriguez, et al. v. Five Star Home Health Care Agency, Inc. et al., Eastern District of New York*

Data Breach/BIPA Cases

- *Hunter v. J.S.T. Corp. BIPA Settlement*
- *Atkinson, et al. v. Minted, Inc.*
- *Rosenbach, et al. v. Six Flags Entertainment Corporation and Great America LLC*
- *Pratz, et al. v. MOD Super Fast Pizza, LLC*
- *The State of Indiana v. Equifax Data Breach Settlement*
- *In re: Vizio, Inc. Consumer Privacy Litigation*
- *In re: Google, Inc. Street View Electronic Communications Litigation*
- *Devin Briggs and Bobby Watson, et al. v. Rhinoag, Inc.* ("Briggs Biometric Settlement")
- *Trost v. Pretium Packaging L.L.C.*
- *In re: Barr, et al. v. Drizly, LLC f/k/a Drizly, Inc., et al.*

Telephone Consumer Protection Act (TCPA) Cases

- *Perrong, et al. v. Orbit Energy & Power, LLC*
- *Baldwin, et al. v. Miracle-Ear, Inc.*
- *Floyd and Fabricant, et al. v. First Data Merchant Services LLC, et al.*
- *Hoffman, et al. v. Hearing Help Express, Inc., et al.*
- *Lowe and Kaiser, et al. v. CVS Pharmacy, Inc., et al.*
- *Johansen v. HomeAdvisor, Inc., et al.*

- *Charvat, et al. v. National Holdings Corporation*
- *Hopkins, et al. v. Modernize, Inc.*
- *Diana Mey vs. Frontier Communications Corporation*
- *Matthew Donaca v. Dish Network, L.L.C.*
- *Matthew Benzion and Theodore Glaser v. Vivint, Inc.*
- *John Lofton v. Verizon Wireless (VAW) LLC, et al.*
- *Lori Shamblin v. Obama for America, et al.*
- *Ellman v. Security Networks*

For More Information

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