

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, you may be eligible to receive benefits from class action settlements.

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 District 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 new settlements (the “Settlements”) that have been reached on behalf of Direct Purchaser Plaintiffs with Defendants Agri Stats, Inc. (“Agri Stats”); House of Raeford Farms, Inc. (“House of Raeford”); Prestage Farms, Inc., Prestage Foods, Inc., and Prestage Farms of South Carolina, LLC (“Prestage” or “the Prestage Defendants”); Hormel Foods Corporation and Jennie-O Turkey Store, Inc. (“JOTS”); Butterball, LLC (“Butterball”); Foster Farms LLC and Foster Poultry Farms LLC (“Foster Farms” or “the Foster Farms Defendants”); and Perdue Farms, Inc. and Perdue Foods LLC (“Perdue” or “the Perdue Defendants”) (together, “the Settling Defendants”). If approved by the Court, these Settlements will fully resolve the lawsuit.
- 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 10 below. The Settlements between the Direct Purchaser Plaintiffs and the Settling Defendants on behalf of the Certified Class only apply to the Settling Defendants.
- The House of Raeford Settlement requires that House of Raeford pay \$3,700,000. The Prestage Settlement requires that Prestage pay \$15,000,000. The JOTS Settlement requires that JOTS pay \$37,500,000. The Butterball Settlement requires that Butterball pay \$34,000,000. The Agri Stats 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. House of Raeford, Prestage, JOTS, Butterball, and Agri Stats have also agreed to provide specific cooperation to Direct Purchaser Plaintiffs in the unlikely event one or more of the Settlements is not granted final approval and a trial occurs.
- In July 2026, the Court granted summary judgment in favor of Foster Farms and Perdue and against the Certified Class. The Foster Farms and Perdue Settlements provide that neither the Certified Class nor Foster Farms or Perdue will seek to continue litigating this case, including but not limited to, appeals of the Court’s Summary Judgment decision. In exchange, the Certified Class and Foster Farms, and the Certified Class and Perdue each agree they will not seek or assert against each other claims for costs, fees, attorney’s fees, or any other form of recovery in connection with this case.
- This notice provides Certified Class members with notice of the Settlements and an opportunity to object or submit a claim to receive money. Because the time to opt out of the Certified Class has already passed, you may not submit an exclusion request for these Settlements.
- The Settlements will avoid litigation costs and risks to Direct Purchaser Plaintiffs and the Settling Defendants and release the Settling Defendants from liability to members of the Certified Class.
- The Court has not decided whether Agri Stats, House of Raeford, Prestage, JOTS, or Butterball did anything wrong, and the Settling Defendants deny any wrongdoing. The Court has decided in favor of Foster Farms and Perdue and has granted summary judgment in favor of Foster Farms and Perdue.
- Your legal rights are affected whether you act or do not act. Please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS	
FILE A CLAIM TO RECEIVE MONEY	To receive money from certain Settlements and the Cooper Farms, Inc. (“Cooper Farms”) and Farbest Foods, Inc. (“Farbest Foods”) settlements (“Certified Class settlement proceeds”), you must submit a claim by [Month 00, 2026] (see Questions 19-27). Even if you already filed a claim in this lawsuit, you <u>must</u> submit another claim if you are a Certified Class member and want to be eligible to receive a payment Certified Class settlement proceeds. If you are confirmed to be a Certified Class member and file a valid claim, you will be eligible to receive payment from the Certified Class settlement proceeds. Instructions for filing a claim are available in Question 21 of this notice, on the claim form, and at the settlement website www.TurkeyLitigation.com.
OBJECT TO THE SETTLEMENTS	Write to the Court about why you do not like the Settlements. Objections must be postmarked or received by [Month 00, 2026] .
ATTEND THE FAIRNESS HEARING	Ask to speak in Court about the fairness of the Settlements.
DO NOTHING	If you do nothing, you will benefit from the proposed Settlements through: conduct reform (or changes to Agri Stats’ future reporting practices); cooperation by Agri Stats, House of Raeford, Prestage, JOTS, and Butterball in response to specific requests made by Direct Purchaser Plaintiffs in the unlikely event of their continued prosecution of the litigation; and a mutual waiver between the Certified Class and Foster Farms and the Certified Class and Perdue to not further litigate this case or seek costs and fees from one another. If you do not file a claim and you are a Certified Class member, you will not get a payment from the Certified Class settlement proceeds. The Settlements will resolve your claims against Agri Stats, House of Raeford, Prestage, JOTS, and Butterball. You will give up your rights to sue or to continue to sue Agri Stats, House of Raeford, Prestage, JOTS, and Butterball about the Released Claims (as defined by the Settlement Agreements). You will further give up your rights to appeal the Court’s Summary Judgment decision in favor of Foster Farms and Perdue as to the Certified Class’s claims against Foster Farms and Perdue.

- Your rights and options – and the deadlines to exercise them – are explained in this notice.
- The Court in charge of these cases still must decide whether to finally approve the Settlements with the Settling Defendants and will do so following the Fairness Hearing described in Question 35.
- Payments will only be made if the Court approves the Settlements and after any appeals, if any, are resolved. Please be patient.
- **Questions? Read on and visit www.TurkeyLitigation.com or call toll-free 1-877-777-9637.**

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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, details about the proposed Settlements with the Settling Defendants, and your legal rights, including how to submit a claim to receive a payment from the Certified Class settlement proceeds. You do not have an opportunity to exclude yourself from the Settlements 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 Settlements with the Settling Defendants, and your rights and options, before the Court decides whether to approve the Settlements.

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 these are new Settlements with Agri Stats, House of Raeford, Prestage, Foster Farms, Perdue, JOTS, and Butterball. This notice explains the lawsuit, the Certified Class, the Settlements, 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 also alleges that Agri Stats created reports that helped the Defendant turkey producers restrict supply and raise the price of turkey.

Defendant Agri Stats collected data and published reports about the turkey industry. Sometime after 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; Cooper Farms; Farbest Foods; Foster Farms; JOTS; House of Raeford Farms; Perdue; Prestage; 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 Protein – North America f/k/a Cargill Meat Solutions Corporation (“Cargill”) in 2025; and settlements with Cooper Farms and Farbest Foods in 2025.

The Court granted summary judgment in favor of Foster Farms and Perdue as to the Direct Purchaser Plaintiff’s claims against Foster Farms, and Perdue in July 2026.

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 judgments 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 are there new Settlements?

The Court did not decide in favor of either Direct Purchaser Plaintiffs or Agri Stats, House of Raeford, Prestage, JOTS, or Butterball. Direct Purchaser Plaintiffs believe they may have won at trial and possibly obtained a greater recovery. Agri Stats, House of Raeford, Prestage, JOTS, and Butterball believe 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, House of Raeford, Prestage, JOTS, and Butterball have agreed to the Settlements. The Settlement with House of Raeford requires House of Raeford to pay \$3,700,000 to the Certified Class. The Settlement with Prestage requires Prestage to pay \$15,000,000 to the Certified Class. The Settlement with JOTS requires JOTS to pay \$37,500,000 to the Certified Class. The Settlement with Butterball requires Butterball pay \$34,000,000 to the Certified Class. The Settlement with Agri Stats 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. In addition, Agri Stats, House of Raeford, Prestage, JOTS, and Butterball must respond to specific requests made by the Direct Purchaser Plaintiffs if one or more of the Settlements is not granted final approval and a trial occurs in this lawsuit.

The Court did decide in favor of Foster Farms and Perdue at summary judgment and entered summary judgment as to the Direct Purchaser Plaintiffs’ claims against Foster Farms and Perdue. Direct Purchaser Plaintiffs agree not to appeal or otherwise challenge the summary judgment order. In exchange, Foster Farms and Perdue agree to waive their right to request any and all fees and costs against the Certified Class related to this action.

Direct Purchaser Plaintiffs and their attorneys believe the Settlements are 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 settlement class members previously submitted claims by the April 21, 2025 deadline, and once the appeal from the order approving the Cargill lawsuit is resolved, claims from the Tyson and Cargill settlements will be paid to the settlement class members.

The settlements with Farbest Foods and Cooper Farms received final approval on July 29, 2025. If the Settlements are approved, the Cooper Farms and Farbest Foods settlement proceeds will be distributed to the Certified Class along with the proceeds from the Settlements with House of Raeford, Prestage, JOTS, and Butterball.

7. Is the lawsuit over now?

Yes, if the Court approves the Settlements, then the lawsuit will be concluded as Direct Purchaser Plaintiffs have settled with all remaining Defendants. There will not be a trial unless one or more of the Settlements is not granted final approval.

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 also 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 and entities 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 Agreements, 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 30 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 Settlements with the Settling Defendants now.

THE BENEFITS OF THE SETTLEMENT AGREEMENTS WITH AGRI STATS, HOUSE OF RAEFORD, PRESTAGE, JOTS, BUTTERBALL, FOSTER FARMS, AND PERDUE

15. What does the Settlement with Agri Stats provide?

If the Settlement with Agri Stats 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

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.

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.
- 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 the unlikely event that one or more of the Settlements is not granted final approval and a trial occurs in this lawsuit). In exchange for the conduct reform measures described above, the Certified Class is releasing claims against Agri Stats through January 30, 2025. The specific claims being released, called the "Released Claims" are defined in the Agri Stats Settlement Agreement.

16. What do the Settlements with House of Raeford, Prestage, JOTS, and Butterball provide?

If the Settlements are approved, House of Raeford will pay \$3,700,000, Prestage will pay \$15,000,000, JOTS will pay \$37,500,000, and Butterball will pay \$34,000,000 to resolve the claims against them. In addition, House of Raeford, Prestage, JOTS, and Butterball have also agreed that, in the unlikely event one of the Settlements is not granted final approval and a trial occurs in this lawsuit, they will respond to specific requests for cooperation made by the Direct Purchaser Plaintiffs in their continued prosecution of the litigation. In exchange for the financial settlement and cooperation described above, the Certified Class is releasing claims against House of Raeford, Prestage, JOTS, and Butterball through January 30, 2025. The specific claims being released, called the "Released Claims" are defined in the House of Raeford, Prestage, JOTS, and Butterball Settlement Agreements.

17. What do the Settlements with Foster Farms and Perdue provide?

The Foster Farms and Perdue Settlements each provide that neither the Direct Purchaser Plaintiffs nor Foster Farms or Perdue will seek to further adjudicate this case. In exchange, the Direct Purchaser Plaintiffs and Foster Farms, and Direct Purchaser Plaintiffs and Perdue will not be able to recover any fees or costs against each other in conjunction with this case. Because the Certified Class's claims were disposed of as to Foster Farms and Perdue by the summary judgment order, there is no separate release of claims for the Foster Farms and Perdue Settlements.

18. What are the Settlements' benefits being used for?

The combined settlement proceeds from the Cooper Farms, Farbest Foods, House of Raeford, Prestage, JOTS, and Butterball Settlements will pay eligible Certified Class members (*see* Questions 19-24); attorneys' fees not to exceed 33 1/3% of these settlement amounts in fees (including interest, net of costs); reimbursement of litigation expenses (not to exceed \$6,000,000); and service awards for the two Class Representatives (not to exceed \$25,000 per Class Representative) (subject to Court approval) (*see* Question 35).

HOW TO GET A PAYMENT

19. What settlement proceeds will be distributed?

The first claims process was completed in 2025 for the proceeds of settlements with Cargill (\$32,500,000) and Tyson (\$4,625,000). However, due to an appeal of the Court's final approval order, payments for the first claims process have not yet been paid to the settlement class. Once the appeal is resolved, Co-Lead Counsel will ask the Court to approve a plan of distribution and then make payments to eligible settlement class members who filed timely and valid claims.

There is now a second claims process for the proceeds from the settlements with Cooper Farms (\$1,687,500), Farbest Foods (\$1,687,500), House of Raeford (\$3,700,000), Prestage (\$15,000,000), JOTS (\$37,500,000), and Butterball (\$34,000,000). In total, these settlements total \$93,575,000 in recovery for the Certified Class. Any attorneys' fees, expenses, notice and administration costs, and service awards approved by the Court will be deducted from these settlement proceeds before they are paid to qualified claimants. The net settlement proceeds will be distributed to eligible Certified Class Members who file valid claims (see Question 21) by **[Month 00, 2026]**. Please visit www.TurkeyLitigation.com for more information and updates.

20. How much will my payment be from the Certified Class settlement proceeds?

At this time, it is unknown how much each Certified Class member who submits a valid claim will receive. Payments to qualified claimants from the net Certified Class settlement proceeds will be calculated based on the proportional (or *pro rata*) amount of their approved Turkey Certified Class products during the Class Period. Purchases and transaction amounts will be based on the review of Defendants' records and updated based on any audits for information obtained during the settlement distribution process. A distribution plan, to be approved by the Court at a later date, will determine the *pro rata* amount, if any, that each eligible claimant will receive. No matter how many claims are filed, no settlement proceeds will be returned to the Settling Defendants.

21. How can I get a payment?

Even if you previously filed a claim as part of the settlement class, and if you did not exclude yourself from the Certified Class, you must complete and submit a claim form by **[Month 00, 2026]** to be eligible to get a payment from the Certified Class settlement proceeds. Submit your claim form online at www.TurkeyLitigation.com by **[Month 00, 2026]** or fill out the claim form and mail it to the address below, postmarked no later than **[Month 00, 2026]**. You can get a claim form at the settlement website, or you can write to the Settlement Administrator by mail: *In re Turkey Antitrust Litigation*, c/o A.B. Data, Ltd., P.O. Box 173015 Milwaukee, WI 53217 or email: info@TurkeyLitigation.com to ask for one to be mailed to you.

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

You may use your unique identifier (or access code) listed on the top of the notice that was mailed to you to login at the settlement website, www.TurkeyLitigation.com and review your eligible purchase amounts.

If you disagree with or want to supplement your purchase amounts, you can complete a purchase audit request form (available on the settlement website) and provide supporting documentation by **[Month 00, 2026]**. Instructions on how to complete and submit a purchase audit request form can be found on the settlement website. All revised Turkey purchase amounts will be subject to review by the Settlement Administrator, Co-Lead Counsel, and ultimately the Court.

23. When will I get my payment?

Payments from the settlement proceeds will be distributed once all of the claims are processed, any claim disputes are resolved, the Court approves the distribution plan, and any related issues are resolved. It is uncertain when this process will be completed. Settlement updates will be provided on the settlement website, www.TurkeyLitigation.com, or may be obtained by contacting the Settlement Administrator by phone toll-free at 1-877-777-9637. Please be patient.

24. What happens if there are funds remaining?

In the event that after completing the distribution, the Settlement Administrator determines that there are sufficient settlement funds remaining to support a redistribution to qualified claimants, it will be recommended to the Court. If the Settlement Administrator determines there are not sufficient settlement funds remaining to support a redistribution to qualified claimants, it will be recommended to the Court that the remaining settlement proceeds be distributed to the American Antitrust Institute. If this charitable organization is not approved by the Court, the remaining settlement proceeds shall be distributed to a recipient appointed by the Court, in its sole discretion. This information will be posted to www.TurkeyLitigation.com once available.

25. Do I need to file another claim if I already filed a claim in this litigation?

Yes. Certified Class members need to submit a new claim form to claim funds from the settlements with Cooper Farms, Farbest Foods, House of Raeford, Prestage, JOTS, and Butterball. Those settlements were made based on the Certified Class definition of Turkey, which is different than the broader settlement class definition of turkey reached before the Court's Class Certification Order with Tyson and Cargill and that claims process.

26. 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.

27. Can I file a claim if I excluded myself from the Certified Class?

No. If you excluded yourself from the Certified Class, you will continue to be excluded and cannot file a claim for payment from the Certified Class settlement proceeds.

28. What happens if I do nothing at all?

If you do nothing, you will not get a payment from the Certified Class settlement proceeds unless you file a claim in this second claims process. The Settlements will resolve your claims against the Settling Defendants about the released claims (as defined in the Settlement Agreements).

29. What am I giving up with these Settlements?

Unless you excluded yourself in 2025, you are still in the Certified Class. This means that if the Settlements are approved by the Court, you cannot sue, continue to sue, or be part of any other lawsuit against Agri Stats, House of Raeford, Prestage, Foster Farms, Perdue, JOTS, or Butterball related to the Released Claims in this lawsuit. You will be releasing the "Agri Stats Released Parties," the "House of Raeford Released Parties," the "Prestage Released Parties," the "JOTS Released Parties," and the "Butterball Released Parties" from the "Released Claims" as those terms are used in the Settlement Agreements. The Settlement Agreements are available at www.TurkeyLitigation.com. If the Settlements with Foster Farms and Perdue are approved, you will also give up the right to appeal the Court's summary judgment order which granted summary judgment in favor of Foster Farms and Perdue as to the claims against Foster Farms and Perdue. Because the Certified Class's claims were disposed of as to Foster Farms and Perdue by the summary judgment order, there is no separate release of claims for the Foster Farms and Perdue Settlements.

OBJECTING TO THE SETTLEMENTS

30. How do I tell the Court that I don't like the Settlements?

If you are a Certified Class Member and did not file a timely exclusion request from the Certified Class, you can object to the Settlements with Agri Stats, House of Raeford, Prestage, Foster Farms, Perdue, JOTS, and/or Butterball if you don't like part or all of them. The Court will consider your views.

To object, you must send a letter or other written statement saying that you object to the Settlements with Agri Stats, House of Raeford, Prestage, Foster Farms, Perdue, JOTS, and/or Butterball in *In re Turkey Antitrust Litigation* and the reasons

why you object to the Settlements. 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, House of Raeford, Prestage, Foster Farms, Perdue, JOTS, and Butterball at the addresses listed below. Your objection must be postmarked no later than **[Month 00, 2026]**.

<u>Settlement Administrator:</u> Turkey Antitrust Litigation ATTN: OBJECTIONS c/o A.B. Data, Ltd. P.O. Box 173001 Milwaukee, WI 53217	<u>Direct Purchaser Plaintiffs’ Co-Lead Class Counsel:</u> 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	<u>Counsel for Agri Stats:</u> William L. Monts Justin W. Bernick HOGAN LOVELLS US LLP 555 Thirteenth Street, NW Washington, D.C. 20004 william.monts@hoganlovells.com justin.bernick@hoganlovells.com
<u>Counsel for House of Raeford:</u> Gregory G. Wrobel VEDDER PRICE P.C. 22 North LaSalle Street Chicago, Illinois 60601 gwrobel@vedder.com Henry W. Jones Jr. JORDAN PRICE WALL GRAY JONES & CARLTON, PLLC 1951 Clark Avenue Raleigh, NC 27605 hjones@jordanprice.com	<u>Counsel for Prestage:</u> Nathan C. Chase, Jr. Benjamin C. DeCelle ROBINSON, BRADSHAW & HINSON, P.A. 600 S. Tryon Street, Suite 2300 Charlotte, North Carolina 28202 nchase@rbh.com bdecelle@rbh.com	<u>Counsel for Foster Farms:</u> Aaron Gott BONA LAW PC 331 2nd Avenue South Suite 420 Minneapolis, MN 55401 Aaron.gott@bonalawpc.com
<u>Counsel for Perdue:</u> Danielle R. Foley Kristin M. Koger VENABLE LLP 600 Massachusetts Avenue, NW Washington, DC 20004 drfoley@venable.com kmkoger@venable.com	<u>Counsel for JOTS:</u> Craig S. Coleman Emily E. Chow FAEGRE DRINKER BIDDLE & REATH LLP 90 S. Seventh Street Suite 2200 Minneapolis, MN 55402 Craig.Coleman@faegredrinker.com Emily.Chow@faegredrinker.com Jacob Bylund FAEGRE DRINKER BIDDLE & REATH LLP 801 Grand Avenue 33rd Floor Des Moines, IA 50309 Jacob.Bylund@faegredrinker.com	<u>Counsel for Butterball:</u> Christopher E. Ondeck Colin R. Kass Stephen R. Chuk PROSKAUER ROSE LLP 1001 Pennsylvania Avenue NW, Suite 600 Washington, DC 20004 condeck@proskauer.com ckass@proskauer.com schuk@proskauer.com

31. 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.

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

Objecting is telling the Court that you do not like something about the Settlements. You can object to these Settlements 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

33. 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 30. If you want to be represented by another lawyer, you may hire one at your own expense.

34. How will the lawyers be paid?

Subject to approval by the Court, Co-Lead Counsel will ask for an award of attorneys' fees, reimbursement of litigation expenses, and Class Representative service awards from the Cooper Farms, Farbest Foods, House of Raeford, Prestage, JOTS, and Butterball Settlement Proceeds. Plaintiffs and their Counsel will seek amounts not to exceed 33 1/3% of the settlement amounts in fees (including interest, net of costs); reimbursement of litigation expenses (not to exceed \$6,000,000); and service awards for the Class Representatives (not to exceed \$25,000 per Class Representative). You will not have to pay any fees or costs out-of-pocket. Certified Class members may object to this request if they choose, and may do so based on the instructions and deadline in Question 30. A copy of the motion by Co-Lead Counsel will be posted to the settlement website, www.TurkeyLitigation.com.

THE COURT'S FAIRNESS HEARING

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

The Court will hold a hearing to decide whether to approve the Settlements (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 Settlements are 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 Settlements and the request for litigation expenses and service awards. 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.

36. 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 the 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.

37. 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, 2026]**, and it must be sent to the Clerk of the Court, Co-Lead Class Counsel, and Counsel for Agri Stats, House of Raeford, Prestage, Foster Farms, Perdue, JOTS, and Butterball. 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, House of Raeford, Prestage, Foster Farms, Perdue, JOTS, and Butterball are provided in Question 30. You cannot ask to speak at the hearing if you excluded yourself from the Certified Class.

GETTING MORE INFORMATION

38. How do I get more information?

This notice is only a summary. More details about the proposed Settlements are in the Settlement Agreements. 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 30.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE.