

**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

Direct Purchaser Plaintiff Actions

Hon. Keri L. Holleb Hotaling

**DECLARATION OF ERIC SCHACHTER IN SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENTS WITH
COOPER FARMS, INC. AND FARBEST FOODS, INC., APPROVAL OF THE
MANNER AND FORM OF CLASS NOTICE PLAN AND RELATED RELIEF**

I, Eric Schachter, declare and state as follows:

1. I am a Senior Vice President 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. As detailed in my Declaration of Eric Schachter in Support of Motion for Final Approval of the Class Action Settlement Between Direct Purchaser Plaintiffs and the Tyson Defendants (ECF No. 352), A.B. Data was approved by the Court to act as a Settlement Administrator¹ and completed notice to the Settlement Class members in connection with the previous settlement with the Tyson Defendants. Additionally, A.B. Data was approved by the Court to act as Settlement Administrator and provide notice to the Settlement Class in connection with the previous settlement with the Cargill Defendants (ECF No. 1128). A profile of A.B. Data’s background and capabilities, including representative case and client lists, is included as **Exhibit 4**.

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 Cargill.

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 breasts; (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.

Settlements with Cooper Farms, Inc. and Farbest Foods, Inc.

7. On March 6, 2025, Co-Lead Counsel for the Certified Class reached settlement agreements with Defendants Cooper Farms, Inc. (“Cooper Farms”) and Farbest Foods, Inc. (“Farbest Foods”) on behalf of the Certified Class (collectively, “Settlement Agreements”).

8. Co-Lead Counsel inform me that they are not requesting distribution of the proceeds from the Settlement Agreements or seeking payment of attorneys’ fees, litigation costs or service awards at this time, but will do so at a later date.

Notice Plan

9. Co-Lead Counsel have asked me to develop a multi-method notice plan to inform the Certified Class about the Court’s order certifying the litigation class and the Settlement

Agreements (“Class Notice Plan”). The plan must comport with the requirements of Federal Rule of Civil Procedure 23 (“Rule 23”).

10. In consultation with Co-Lead Counsel, I prepared the proposed Class Notice Plan described below to provide Class Notice and notice of the Settlement Agreements to the Certified Class. The Class Notice Plan is the same plan used to successfully notify class members in the previous settlement with the Tyson Defendants (*see* Amended Order and Final Judgment (ECF No. 406) ¶ 10) and the plan approved by the Court to provide notice to the class members in the previous settlement with the Cargill Defendants (*see* ECF No. 1128).

11. 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 to potential members of the Certified Class.

12. 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 settlements with Defendants Tyson and Cargill. 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 2,500 potential Certified Class members. A.B. Data anticipates that direct-email notice will be sent to approximately 780 potential Certified Class members.

13. The Long Form Notice and Short Form Notice will include summary information concerning the Certified Class and the Settlement Agreements, including: (i) this is a class action and the nature of the Settlement Agreements; (2) the Certified Class definition and headline in

plain and engaging language (“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.”) as well as the relevant member and product exclusions; (3) that the Action alleges antitrust violations and price-fixing claims; (4) members of the Certified Class may appear through an attorney if they want; (5) members of the Certified Class can be excluded from the Certified Class or object to the Settlement Agreements if they so choose; (6) the time and manner for requesting exclusion or submitting an objection; (7) and the binding effect of a judgment on the Certified Class. The Long-Form Notice and Short-Form Notice will also explain that Co-Lead Counsel will not be seeking to make a distribution of the proceeds of the Settlements or payment of attorneys’ fees, litigation costs, or service awards at this time, but will do so at a later date. 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.

14. 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.

15. 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.

16. To supplement direct notice efforts, A.B. Data will publish the Short-Form Notice in *Supermarket News* and *Nation’s Restaurant News*,² trade journals targeting supply chain executives and food industry professionals. A.B. Data will also implement a digital media banner

² A.B. Data will make every effort to publish notice in this trade publication but will make substitutions as necessary due to lack of inventory or if the advertisement is not accepted.

ad campaign on www.supermarketnews.com and www.nrn.com. A sample banner ad is attached as **Exhibit 3**.

WEBSITE AND TELEPHONE

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

18. 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 presents callers with a series of choices to hear prerecorded information about the Settlement Agreements. If callers need further help, they have an option to speak with a live operator during business hours.

19. The case-specific website will provide, among other things, a summary of the case, all relevant documents including the Court's Class Certification Order, the Settlement Agreements, Preliminary Approval Order, important dates, and any pertinent updates concerning the litigation or the Settlement approval process.

EXCLUSION PROCESSING

20. The notices provide that members of the Certified Class may request exclusion by sending a written, mailed request to the Settlement Administrator. A.B. Data will promptly circulate to the plaintiffs copies of all such requests and a report that tracks each request and whether the required information was included.

CONCLUSION

21. 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 Agreements'

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 25th day of March, 2025, in Milwaukee, Wisconsin.

/s Eric Schachter
Eric Schachter

Exhibit 1

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

If you directly purchased certain turkey products from a turkey processor 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 in *In re Turkey Antitrust Litigation*, No. 1:19-cv-08318, pending in the United States Court for the Northern District of Illinois, the lawsuit in which you previously received notices. The purpose of this new notice is to inform you of your rights related to (i) the Court formally certifying the class action lawsuit on January 22, 2025, and (ii) two new settlements (the “Settlements”) that have been reached on behalf of Direct Purchaser Plaintiffs with Defendants Cooper Farms, Inc. (“Cooper Farms”) and Farbest Foods, Inc. (“Farbest Foods”) (together, “Settling Defendants”).
- 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 are on behalf of the Certified Class, only apply to the Settling Defendants, and do not dismiss claims against the other defendants in this case.
- The Settlements require the Settling Defendants to pay \$1,687,500 each. In addition to these monetary payments, the Settling Defendants have agreed to provide specific cooperation in the Direct Purchaser Plaintiffs’ continued prosecution of this action.
- This notice provides Certified Class members with an opportunity to opt out of the Certified Class, as defined above. If you exclude yourself from the Certified Class, you will be excluded from the Settlements and will not receive any of the Settlement benefits, cannot participate in any future settlements on behalf of the Certified Class, and will not be bound any future judgments. You may not exclude yourself from only the Certified Class but not the Settlements. You may not exclude yourself from the Settlements but remain in the Certified Class. **At this time, there is no claim form, plan of distribution, or request for Co-Lead Class Counsel fees or expenses. The Certified Class does not affect the previous settlements reached in this litigation.**
- If approved by the Court, the Settlements will resolve the claims in the lawsuit against the Settling Defendants. The Settlements will avoid litigation costs and risks to Direct Purchaser Plaintiffs and these Settling Defendants and will release the Settling Defendants from liability to members of the Certified Class.
- The Court has not decided whether the Settling Defendants did anything wrong, and the Settling Defendants deny any wrongdoing.
- Your legal rights are affected whether you act or do not act. Please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS	
ASK TO BE EXCLUDED FROM THE CERTIFIED CLASS AND SETTLEMENTS	You must submit a valid request for exclusion to remove yourself from the Certified Class. Your legal rights are explained in Question 19 below. Requests for Exclusion must be postmarked or received by [Month 00, 2025] .
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, 2025] .

ATTEND THE FAIRNESS HEARING	Ask to speak in Court about the fairness of the Settlements.
DO NOTHING	If you do nothing, you will remain a member of the Certified Class and may participate in the Settlements and in any monetary distribution to qualified purchasers if there are other settlements or judgments. The Settlements will resolve your claims against Cooper Farms and Farbest Foods, and you will give up your rights to sue or to continue to sue Cooper Farms or Farbest Foods about the Released Claims (as defined in the Settlement Agreements). You will be bound by any future judgments or settlements with the non-settling Defendants.

- 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 Settlements with Cooper Farms and Farbest Foods.
- **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 directed notice to be sent to the Certified Class because this lawsuit may affect your rights. This notice provides you with the status of the litigation, including details about the proposed Settlements with Cooper Farms and Farbest Foods on behalf of the Certified Class, and the opportunity to exclude yourself from the Certified Class.

Defendants, including Cooper Farms and Farbest Foods, 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 the answer to Question 3 below.

The Court authorized this notice because you have a right to know that a direct purchaser class was “certified” in this class action lawsuit, about the proposed Settlements with Cooper Farms and Farbest Foods on behalf of the Certified Class, and your rights and options, before the Court decides whether to approve the Settlements and holds a trial to decide if the claims being made against the remaining non-settling Defendants are correct.

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 the Court certified a Class regarding the non-settling Defendants (which included Cooper Farms and Farbest Foods at the time of certification) and because proposed Settlements have been reached with Cooper Farms and Farbest Foods. 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 processors of turkey products in the United States, as well as Agri Stats, Inc. 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 Defendants deny all allegations of wrongdoing in this lawsuit.

3. Who are the Defendants?

On January 22, 2025, the Court approved the lawsuit to proceed as a class action against Defendants Butterball, LLC;; Cooper Farms; Farbest Foods; Foster Farms LLC; Foster Poultry Farms LLC; Jennie-O Turkey Stores, Inc.; Hormel Foods Corporation; 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, Inc. 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.

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 are there Settlements?

The Court did not decide in favor of either Direct Purchaser Plaintiffs or Cooper Farms and Farbest Foods. Direct Purchaser Plaintiffs believe they may have won at trial and possibly obtained a greater recovery. Cooper Farms and Farbest Foods 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 Cooper Farms and Farbest Foods have agreed to Settlements. The Settlements require Cooper Farms and Farbest Foods to pay money, 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 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 and Cargill. The settlement with Tyson received final approval from the Court on February 3, 2022. The Court will hold a hearing on June 18, 2025, to decide whether to approve the settlement with Cargill. Payments from these settlements will be made to eligible class members if the Court approves the Cargill settlement and after any appeals are resolved. Eligible class members can file a claim for payment from these settlements until April 21, 2025. 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 these Settlements with Cooper Farms and Farbest Foods and previous settlements with Tyson and Cargill.

However, the Direct Purchasers 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 Purchasers 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 Agri Stats, Inc.; Butterball LLC; Foster Farms LLC; Foster Poultry Farms LLC; Hormel Foods Corporation; Jennie-O Turkey Store, Inc.; House of Raeford Farms, Inc.; Perdue Farms, Inc.; Perdue Foods 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 and Cargill.

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").

There are additional details about the Class Products definition in the answer to Question 10 below. If you satisfy these criteria, and you do not file a timely and valid exclusion, then you are a member of the Certified Class, subject to the exceptions listed in Question 11 below.

While these Settlements are only with Cooper Farms and Farbest Foods, the Certified Class includes persons who purchased Class Products from *any* of the Defendants or their co-conspirators.

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. 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.

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 24 below.

THE BENEFITS OF THE SETTLEMENT AGREEMENTS

13. What do the Settlements with Cooper Farms and Farbest Foods provide?

If the Settlements are approved, Cooper Farms and Farbest Foods will each pay \$1,687,500 to resolve the claims against them. The specific claims being released, called the “Released Claims” are defined in the Settlement Agreements. In addition, Cooper Farms and Farbest Foods have also agreed to respond to specific requests for cooperation made by the Direct Purchaser Plaintiffs in their continued prosecution of the litigation.

14. What are the Settlement benefits being used for?

Subject to approval by the Court, a portion of the proceeds from the Settlements (up to \$250,000 from each Settlement) will be used by the Settlement Administrator to provide notice of class certification and the Settlements to potential Certified Class Members. The remainder of the proceeds from the Settlements will remain available for any future notice, distribution to members of the Certified Class, or attorneys’ fees, litigation expenses, and service awards. At this time, Direct Purchaser Plaintiffs and the counsel are not seeking any attorneys’ fees, non-administration expenses, or service awards to be paid from the proceeds of the Settlements. However, they will do so in the future, subject to additional notice to your and approval by the Court.

The proceeds from these Settlements will not be distributed to qualifying Certified Class Members at this time. Instead, Co-Lead Class Counsel intend to combine the Settlements’ proceeds with proceeds from future settlements or other recoveries in the litigation before distribution. You will receive notice of any such future settlements or recoveries and when it is time to file a valid claim.

15. What should I do if I already filed a claim in this lawsuit?

Any claims filed in the settlements with Tyson and Cargill are unaffected by the Settlements with Cooper Farms and Farbest Foods. The Court will hold a hearing on June 18, 2025, to consider whether to approve the claims process for the Tyson and Cargill settlements. Payments for the Tyson and Cargill settlements' proceeds will not be made until after that time and any appeals are resolved. Please be patient.

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.

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

Eligible class members in the settlements with Tyson and Cargill are able to file a claim for a payment in those settlements until April 21, 2025. Please visit www.TurkeyLitigation.com for more information and updates.

17. What am I giving up by staying in the Certified Class?

Unless you exclude yourself by following the directions in Question 19 below, you will stay in Certified Class and participate in the Settlements. This means that you cannot sue, continue to sue, or be part of any other lawsuit against Cooper Farms, Farbest Foods, or the non-settling Defendants and their affiliates pertaining to the claims in this case.

You will be releasing the "Cooper Farms Released Parties" and "Farbest Foods Released Parties" from the "Released Claims" described in the Settlements available at www.TurkeyLitigation.com.

If you stay in the Certified Class, it also means that should additional settlements be reached, or a judgment be issued by the Court, regardless of whether it is in favor of the Certified Class or the non-settling Defendants, the Court's orders will apply to you and legally bind you.

18. What happens if I do nothing at all?

If you do nothing, you will stay in Certified Class and be able to file a claim for payment from the Settlements with Cooper Farms and Farbest Foods at a later date. The Settlements will resolve your claims against Cooper Farms and Farbest Foods, and you will give up your rights to sue them about the Released Claims (as defined in the Settlement Agreements). You also give up any rights to sue the non-settling Defendants on your own about the claims in this lawsuit, but you may also have the opportunity to participate any future settlements or judgments obtained by Direct Purchaser Plaintiffs. You will be legally bound by all Court orders affecting the Certified Class, good or bad.

EXCLUDING YOURSELF FROM THE CERTIFIED CLASS AND SETTLEMENTS

19. How do I exclude myself from the Certified Class?

- As noted in Question 18, you do not need to take any action to remain a member of the Certified Class and participate in the Settlements. As a Certified Class member, you will also be able to participate in any future settlement or judgment obtained by Direct Purchaser Plaintiffs against the non-settling Defendants in this case.
- If you do not wish to remain a member of the Certified Class and do not want to be legally bound by or participate in the Settlements, then you must exclude yourself from the Certified Class by **[date]**, 2025.
- If you exclude yourself from the Certified Class, you will be excluded from the Settlements and from any future settlement or judgment obtained by the Direct Purchaser Plaintiffs against the non-settling Defendants in this case. Please also see the answer to Question No. 21 below.

In any request to exclude yourself from either the Certified Class, you must submit a written request to the Class Notice Administrator stating: (a) your name, including the name of your business which purchased Class Products, and address; (b) a statement that you want to be excluded from the Certified Class and the Settlements with Cooper Farms and Farbest Foods in *In re Turkey Antitrust Litigation*; (c) if your exclusion involves an assignment of claims, then you must identify the assignor, the assignee, and the total value of direct Class Product purchases during the Class Period from each Defendant or co-conspirator that is subject to the assignment; and (d) your signature. Note that if you previously submitted this

information in connection with the claims process for the Cargill and Tyson settlements, you must do so again because the definition of Turkey is different in the certified class as described in Question 9 above.

If you intend to exclude subsidiaries, affiliates, divisions, related or controlled entities, entities under common control, predecessors in interest, or any other related entity, such entities must be expressly identified by name and address in your request. Additionally, if you intend to exclude claims that were assigned to you from another potential Certified Class Member, you must include the assignor's name; whether the assignor fully or partially assigned their Class Product claims; the annual value of Class Product purchases assigned, identified by Defendant or Co-Conspirator from whom the purchases were made; and a copy of the executed assignment agreement or a statement outlining the assignment signed by both the assignor and assignee.

You must mail or email your Exclusion Request, postmarked or received by [Month 00, 2025], to: *Turkey Antitrust Litigation*, Attn: EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217; or info@TurkeyLitigation.com.

20. If I don't exclude myself, can I sue non-settling Defendants, Cooper Farms, or Farbest Foods for the same thing later?

No. Unless you exclude yourself as indicated in Question 19 above, you give up the right to sue the non-settling Defendants, Cooper Farms, or Farbest Foods (depending on which exclusion you choose) for claims set forth in the litigation and the Settlements. If you do not exclude yourself from the Certified Class, you will be bound by any judgment or future settlement with non-settling Defendants and may not have another opportunity to exclude yourself. If you have a pending lawsuit against Cooper Farms, Farbest Foods, or the remaining non-settling Defendants, speak to your lawyer in that lawsuit immediately to determine whether you must exclude yourself from the Certified Class to continue your own lawsuit.

21. If I exclude myself, can I still get a payment from these Settlements or future settlements or judgments?

No. If you exclude yourself from the Certified Class, you will be excluded from the Settlements. You will not be eligible to receive any proceeds from the Settlements, and you will not be able to participate in any future settlement or judgment obtained by the Direct Purchaser Plaintiffs against the non-settling Defendants in this case.

22. If I excluded myself previously, do I need to exclude myself again?

Yes. Even if you previously excluded yourself from the previous settlements with Tyson and/or Cargill, you must exclude yourself now if you do not want to be part of the Certified Class and the Settlements with Cooper Farms and Farbest Foods.

23. Can I still exclude myself from the previous settlements?

The deadline to exclude yourself from the previous settlement with Tyson has passed. However, the deadline to exclude yourself from the previous settlement with Cargill is April 21, 2025. Visit the website, www.TurkeyLitigation.com to learn more.

OBJECTING TO THE SETTLEMENTS

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

If you are a Certified Class Member and have not excluded yourself, you can object to the Settlements with Cooper Farms and Farbest Foods 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 Settlement(s) with Cooper Farms and/or Farbest Foods in *In re Turkey Antitrust Litigation* and the reasons why you object to those Settlement(s). 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 Class Notice Administrator, Co-Lead Class Counsel, and Counsel for Cooper Farms and Farbest Foods at the addresses listed below. Your objection must be postmarked no later than [Month 00, 2025].

Settlement Administrator:

Direct Purchaser Plaintiffs'

Counsel for Cooper Farms:

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

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

Jennifer A. L. Battle
CARPENTER LIPPS LLP
280 N. High Street, Suite 1300
Columbus, Ohio 43215
battle@carpenterlipps.com

Counsel for Farbest Foods:

Gaspare J. Bono
Leslie A. Barry
DENTONS US LLP
1900 K Street NW Washington,
DC 20006
(202) 496-7500
gap.bono@dentons.com
leslie.barry@dentons.com

25. Can I object to the previous settlements?

No, the deadline to object to the prior settlements with Tyson and Cargill has passed. Visit, www.TurkeyLitigation.com to learn more.

26. 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 only if you do not exclude yourself from the Certified Class. Excluding yourself is telling the Court that you do not want to be part of the Certified Class. If you exclude yourself from the Certified Class, you have no standing to object because the Settlements no longer affect you.

THE LAWYERS REPRESENTING YOU

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

28. Should I hire my own lawyer?

If you remain a member of the Certified Class, you do not need to hire your own lawyer because Co-Lead Class Counsel is working on your behalf.

If you wish to pursue your own case separate from this one, or if you exclude yourself from the Certified Class, these lawyers will no longer represent you. You will need to hire your own lawyer if you wish to pursue your own lawsuit against Cooper Farms, Farbest Foods, or the remaining non-settling Defendants.

29. How will the lawyers be paid?

Co-Lead Class Counsel are not asking the Court to award any attorneys' fees or reimburse litigation expenses from the Settlements at this time. However, subject to approval by the Court, a portion of the proceeds from the Settlements (up to \$250,000 from each Settlement) will be used by the Settlement Administrator to provide notice of class certification and the Settlements to potential Certified Class Members. In the future, Co-Lead Class Counsel will ask the Court to award attorneys' fees and reimbursement of reasonable and necessary litigation expenses from the Settlements or 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 sought by Co-Lead Class Counsel 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

30. 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, 2025]**, at **XX:00 x.m.** at the United States District Court for the Northern District of Illinois, Courtroom 1925, Everett McKinley 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 fees, expenses, administration costs, 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 members of the Certified Class. Updates will be posted to the Settlement Website.

31. 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.

32. 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 Cooper Farms and Farbest Foods. 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 Cooper Farms and Farbest Foods are provided in the answer to Question 24. You cannot ask to speak at the hearing if you excluded yourself from the Certified Class.

THE TRIAL

33. 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 13, 2026.

34. 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

35. 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 24.

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 Processor 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 in *In re Turkey Antitrust Litigation*, No. 1:19-cv-08318, pending in the United States Court for the Northern District of Illinois, the lawsuit in which you previously received notices. The purpose of this new notice is to inform you of your rights related to (i) the Court formally certifying the class action lawsuit on January 22, 2025, and (ii) two new settlements (the “Settlements”) that have been reached on behalf of Direct Purchaser Plaintiffs with Defendants Cooper Farms, Inc. (“Cooper Farms”) and Farbest Foods, Inc. (“Farbest Foods”) (together, “Settling Defendants”). **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 Settlements between the Direct Purchaser Plaintiffs and the Settling Defendants are on behalf of the Certified Class, only apply to the Settling Defendants, and do not dismiss claims against the other defendants in this case. The Settlements require the Settling Defendants to pay \$1,687,500 each. In addition to these monetary payments, the Settling Defendants have agreed to provide specific cooperation in the Direct Purchaser Plaintiffs’ continued prosecution of this action.

This notice provides Certified Class members with an opportunity to opt out of the Certified Class as defined above. If you exclude yourself from both the the Certified Class, you will be excluded from the Settlements and will not receive any of the Settlement benefits, cannot participate in any future settlements on behalf of the Certified Class, and will not be bound by any future judgments. **At this time, there is no claim form, plan of distribution, or request Co-Lead Class Counsel fees or expenses. The Certified Class does not affect the previous settlements reached in this litigation.**

The United States District Court for the Northern District of Illinois (the “Court”) authorized this notice because you have a right to know (a) that a direct purchaser class was “certified” in this class action lawsuit, (b) about the proposed Settlements with Cooper Farms and Farbest Foods, and (c) 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”). 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; and any (in whole or in part) affiliate, legal representative, heir, or assign of any Defendant or Co-conspirator. Also excluded from the Certified 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, any Co-conspirator identified in this action, and anyone who timely and validly excludes themselves from the Certified Class.

The Court certified the Class regarding the non-settling Defendants (which included Cooper Farms and Farbest Foods at the time of certification). The remaining non-settling Defendants in this lawsuit, for purposes of this notice, include Agri Stats, Inc., 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 Foods, LLC, Prestage Farms of South Carolina, LLC, Prestage Farms, Inc., and Prestage Foods, Inc.

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?

Defendants are processors of turkey products in the United States. 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 (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.

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.

Cooper Farms, Farbest Foods, and the other non-settling Defendants deny they did anything wrong. The Court did not decide who is right. Instead, Direct Purchaser Plaintiffs and Cooper Farms and Farbest Foods agreed to Settlements to resolve the case, which provide benefits to the Certified Class. The case is still proceeding on behalf of the Direct Purchaser Plaintiffs against the non-settling Defendants who may be subject to separate settlements or judgments. The lawyers for the Certified Class will have to prove their claims against the non-settling Defendants in Court at a trial that is set to begin on October 13, 2026. There is no guarantee additional money or benefits will become available.

WHAT DOES THE SETTLEMENT PROVIDE?

Cooper Farms and Farbest Foods will pay \$1,687,500 each to resolve all the Certified Class members’ claims against the Cooper Farms Released Parties and Farbest Foods Released Parties, respectively, for the Released Claims (defined in the Settlements). In addition to the monetary benefit, the Settling Defendants have agreed to provide specified cooperation in the Direct Purchaser Plaintiffs’ continued prosecution of this litigation.

HOW DO I GET A PAYMENT?

Proceeds from the Cooper Farms and Farbest Foods Settlements will not be distributed to qualifying Certified Class Members at this time. Instead, Co-Lead Class Counsel intend to combine the Settlements’ proceeds with proceeds from future settlements or other recoveries in the litigation before distribution. You will receive notice when it is time to file a valid claim.

WHO REPRESENTS THE CLASS?

The Court appointed the law firms Lockridge Grindal Nauen PLLP and Hagens Berman Sobol Shapiro LLP to represent members of the Certified Class as “Co-Lead Class Counsel.” You do not have to pay Co-Lead Counsel or anyone else to participate. If you want to be represented by another lawyer, you may hire one at your own expense.

WHAT ARE YOUR RIGHTS AND OPTIONS?

- You do not need to take any action to remain both a member of the Certified Class and participate in, and be bound by, the Settlements. As a Certified Class member, you will also be able to participate in any future settlement or judgment obtained by Direct Purchaser Plaintiffs against the non-settling Defendants in the case.
- If you do not wish to remain a member of the Certified Class, and do not want to be legally bound by or participate in the Settlements, any future settlements, and any judgments in this case, you must exclude yourself from both the Certified Class [date] 2025.
- If you exclude yourself from the Certified Class, you must also exclude yourself from the Settlements.

If you exclude yourself from the Certified Class, you cannot get money from the Settlements. If you do not exclude yourself from the Certified Class, you may still object to the Settlements by [date], 2025. A detailed notice that explains how to exclude yourself or object is available at www.TurkeyLitigation.com. Details may also be found on the FAQs page of the litigation website. The Court will hold a hearing in this case (*In re Turkey Antitrust Litigation*, No. 1:19-cv-08318 (N.D. Ill.)) on [Month 00, 2025], at [XX:00 x.m.] Central to consider whether to approve the Settlement Agreements. 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 Settlements at www.TurkeyLitigation.com or by calling toll-free 1-877-777-9637. Please do not contact the Court.

Exhibit 3



If You Purchased
Certain
TURKEY PRODUCTS
Directly From a
Turkey Processor

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**A CLASS ACTION
MAY AFFECT
YOUR RIGHTS**

Learn More Here

TurkeyLitigation.com

Exhibit 4

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.

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

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

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

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

Steve Straub, 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*
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- *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

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