

## **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](http://www.TurkeyLitigation.com).*

There is an update in *In re Turkey Antitrust Litigation*, No. 1:19-cv-08318, pending in the United States District 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](http://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 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 from Co-Lead Class Counsel for fees or expenses** (but Co-Lead Class Counsel will later seek reimbursement of additional expenses and up to one-third of the net settlement proceeds for attorneys’ fees). **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](http://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 each pay \$1,687,500 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 Class 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 MY 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 the Certified Class by **May 22, 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 **May 22, 2025**. A detailed notice that explains how to exclude yourself or object is available at [www.TurkeyLitigation.com](http://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 **July 10, 2025, at 10:00 a.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](http://www.TurkeyLitigation.com) or by calling toll-free 1-877-777-9637. Please do not contact the Court.**