

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

IN RE TURKEY ANTITRUST LITIGATION

This Document Relates To:

Direct Purchaser Plaintiff Action

Civil Action No. 19-cv-08318

Hon. Sunil R. Harjani

Hon. Keri L Holleb Hotaling

**ORDER GRANTING DIRECT PURCHASER PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT WITH DEFENDANT CARGILL AND
APPROVAL OF A CLAIMS PROCESS AND PLAN OF NOTICE**

This Court, having reviewed the Motion for Preliminary Approval of Settlement With Defendant Cargill And Approval Of A Claims Process And Plan Of Notice (“Motion”), finds that Direct Purchaser Plaintiffs (“DPPs”) have reached a proposed settlement of their claims with Defendants Cargill, Incorporated and Cargill Meat Solutions Corporation. All capitalized terms used in this Order that are defined in the Parties’ Long-form Settlement Agreement Between Direct Purchaser Plaintiffs and Cargill (“Settlement Agreement”) are, unless otherwise defined herein, used as defined in the Settlement Agreement. The Court, having reviewed the Motion, its accompanying memorandum, declarations and exhibits thereto, the proposed Settlement Agreement, and the file, hereby **ORDERS AND ADJUDGES:**

Preliminary Approval of Settlement Agreement

1. This Court has jurisdiction over this Action and each of the Parties to the Settlement Agreement. Upon review of the record, the Court finds that the proposed Settlement Agreement, which was arrived at by arm’s-length negotiations by highly experienced counsel, meets all factors under the Federal Rule of Civil Procedure (“Rule”) 23(e)(2) and will likely be granted Final Approval by the Court, subject to further consideration at the Court’s Fairness Hearing. The Court

finds that the Settlement set forth in the Settlement Agreement is preliminarily determined be fair, reasonable, adequate, and in the best interests of the Settlement Class, raises no obvious reasons to doubt its fairness, and raises a reasonable basis for presuming that the Settlement and its terms satisfy the requirements of Rules 23(c)(2) and 23(e) and due process so that Notice of the Settlement should be given.

Class Certification

2. For Settlement purposes, the Settlement Class meets the requirements of rule 23(a) as well as the requirements of Rule 23(b)(3). As to the requirements of Rule 23(a), the Court expressly finds that (1) the Settlement Class certified herein numbers thousands of entities, and joinder of all such entities would be impracticable; (2) there are questions of law and fact common to the Settlement Class; (3) Plaintiffs' claims are typical of the claims of the Settlement Class they seek to represent for purposes of settlement; and (4) Plaintiffs are adequate representatives of the Settlement Class. As to the requirements of Rule 23(b)(3), the Court expressly finds that the questions of law and fact common to the Settlement Class predominate over any questions affecting any individual Settlement Class member, and that a class action on behalf of the Settlement Class is superior to other available means of adjudicating this dispute.

3. This Court certifies a Settlement Class defined as:

All persons and entities who directly purchased Turkey from any Defendant or alleged co-conspirator in the United States at any time during the Settlement Class Period. Specifically excluded from the Settlement Class are Defendants and any alleged co-conspirators identified in the Action; the officers, directors or employees of any Defendant or alleged co-conspirator; any entity in which any Defendant or alleged co-conspirator has a controlling interest; and any affiliate, legal representative, heir or assign of any Defendant or alleged co-conspirator. Also excluded from the Settlement Class are any federal, state or local governmental entities, any judicial officer presiding over the Action and the members of his/her

immediate family and judicial staff, and any juror assigned to the Action.

4. In the event that the Settlement is not granted Final Approval by this Court or is otherwise terminated by the Parties in accordance with the terms of their Settlement Agreement, this Order granting Preliminary Approval of the Settlement and the Court's certification of the Settlement Class for settlement purposes shall be vacated, all findings made herein as to the certification of the Settlement Class shall be null and void, and the Parties will be restored to their respective positions as if no Settlement had occurred.

5. The Settlement Class Period is January 1, 2010, through January 1, 2017.

6. This Court previously certified a substantially identical settlement class and settlement class period for DPPs' settlement with Defendants Tyson Foods, Inc, Tyson Fresh Meats, Inc., Tyson Prepared Foods, Inc., and the Hillshire Brands Company (collectively "Tyson"). (See ECF No. 265.) This Court granted final approval to DPP's settlement with Tyson on February 3, 2022. (See ECF No. 406.)

7. The Court appoints the law firms of Lockridge Grindal Nauen PLLP and Hagens Berman Sobol Shapiro LLP ("Interim Co-Lead Counsel") as co-lead counsel for the Settlement Class pending Final Approval of the Settlement. Similarly, the Court appoints as named class representatives John Gross and Company, Inc. and Maplevale Farms, Inc pending Final Approval of the Settlement.

8. The Court appoints A.B. Data Ltd. to serve as the Settlement Administrator for the Settlement Class. Previously, this Court appointed A.B. Data Ltd as the notice and claims administrator for the DPPs' settlement with Tyson and directed notice of the Tyson Settlement to be distributed to Settlement Class members pursuant to Rule 23(c)(2). (See ECF No. 265.)

9. The Court appoints The Huntington Bank to serve as the Escrow Agent and provide

escrow services for the Settlement Class. Previously, this Court appointed The Huntington Bank to serve as escrow agent and provide escrow services to the Settlement Class in connection with the Tyson settlement. (ECF No. 265.)

Class Notice

10. The notice to the Settlement Class proposed in the Motion not only includes notice of the Settlement preliminarily approved in paragraphs 2-4, it also includes notice of the claims process for distribution of the proceeds of the Tyson settlement referenced in paragraph 5.

11. The Court hereby directs notice to be distributed to the Settlement Class pursuant to Rules 23(e)(1) and (c)(2), including with respect to the claims process for distribution of the proceeds of the Tyson settlement.

12. The proposed notice plan set forth in the Motion, and the supporting documents, is substantially similar to the notice plan approved by this Court to provide notice of the Tyson settlement. (*See* ECF No. 265). The notice plan complies with Rule 23(c)(2)(B) and due process as it constitutes the best notice that is practicable under the circumstances, including individual notice via mail and email to all Settlement Class members who can be identified through reasonable effort. The direct mail and email notice will be supported by reasonable publication notice to reach potential members of the Settlement Class who could not be individually identified.

13. The attached proposed notice documents: Long Form Notice (**Exhibit A**), Short Form Notice (**Exhibit B**), Claim Form (**Exhibit C**), Purchase Audit Request Form (**Exhibit D**), Sample Media Banner Advertisement (**Exhibit E**), (collectively, “Settlement Class Notice”), and their manner of transmission, comply with Rule 23(c)(2)(B) and due process because the notices, forms, and manner of transmission are reasonably calculated to adequately apprise Settlement Class members of (i) the nature of the action; (ii) the definition of the class certified; (iii) the class

claims, issues, or defenses; (iv) that a Settlement Class member may enter an appearance through an attorney if the member so desires; and (v) the binding effect of a class judgment on Settlement Class members under Rule 23(c)(3). Additionally, the notices adequately notify the class regarding a claims process for the Cargill and Tyson settlements and of how to object to the forthcoming motion for interim payment of interim attorneys' fees, current and ongoing expenses, and service awards. Non-substantive changes, such as typographical errors, can be made to the notice documents by agreement of the Parties without leave from the Court.

14. The Settlement Administrator shall cause Settlement Class Notice to be mailed by first class mail, postage prepaid, to all members of the Settlement Class whose names and addresses can be derived from information provided by the Defendants in this Action. The Long Form Notice shall be provided to all persons who request it in response to the Short Form Notice. The Settlement Administrator is hereby directed to cause the banner ad to be published for four weeks in digital ad campaigns on websites for Supermarket News (www.supermarketnews.com) and Nation's Restaurant News (www.nrn.com). Comparable alternative websites relevant to the Settlement Class may be used if any of these websites will not accept such ads or if advertising space or inventory are not available at the time the advertisements are placed.

Schedule of Class Notice and Final Approval Hearing

15. The Court hereby sets the schedule below for the dissemination of notice to the Settlement Class; for Settlement Class members to object to or request exclusion from the Settlement; the timing for and hearing of Interim Co-Lead Counsel's motion for an interim payment of attorneys' fees, current and on-going costs, and class representative service awards; and the Court's Fairness Hearing to determine whether the Settlement Agreement is fair, reasonable, and adequate, and whether it should be finally approved by the Court. This Court may

order the Fairness Hearing to be postponed, adjourned, or continued. If that occurs, the updated hearing date shall be posted on the Settlement Website, but other than the Website posting the Parties will not be required to provide any additional notice to Settlement Class members. The hearing may take place remotely, including via telephone or video conference.

<u>DATE</u>	<u>EVENT</u>
February 20, 2025	Settlement Administrator to provide direct mail and email notice, and commence implementation of publication notice plan
April 7, 2025	Interim Co-Lead Counsel to file petition seeking an interim payment of attorneys' fees, current and ongoing expenses, and named representative service awards
April 21, 2025	Last day for Settlement Class Members to: (1) request exclusion from the Settlement Class; (2) file claim or audit request forms, (3) file objections to the Settlement, (4) file objections to the motion for an interim payment of attorneys' fees, current and ongoing expenses, and service awards; or (5) file notices to appear at the Fairness Hearing
April 28, 2025	Interim Co-Lead Counsel to provide Cargill with a list of all persons and entities who have timely and validly requested exclusion from the Settlement Class
June 4, 2025	Interim Co-Lead Counsel shall file a motion for Final Approval of the Settlement and all supporting papers, update the Court regarding the status of the claims process, and disclose any reduction in the Settlement Sum based on the Opt-Out Percentage, and Interim Co-Lead Counsel and Cargill may respond to any objections to the proposed Settlement Interim Co-Lead Counsel shall file an update with the Court regarding any objections to the request for an interim payment of attorneys' fees, current and ongoing expenses, and service awards.
June 18, 2025 at 10:00 a.m. Central via video and telephone conference	Hearing regarding (1) Final Approval of the Settlement, (2) motion for an interim payment of attorneys' fees, current and ongoing expenses, and service awards, and (3) status of claims process.

Other Provisions

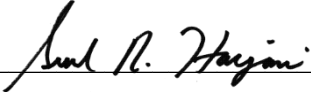
16. In aid of the Court's jurisdiction to implement and enforce the proposed Settlement,

DPPs and all members of the Settlement Class who do not timely and validly request exclusion from the Settlement shall be preliminarily enjoined from commencing or prosecuting any action or other proceeding against Cargill and from asserting any of the Released Claims against the Cargill Released Parties pending Final Approval of the Settlement or until such time as this Court lifts such injunction by subsequent order.

17. If the Settlement is not granted Final Approval by this Court or is otherwise terminated by the Parties in accordance with the terms of their Settlement Agreement, the Court will modify any existing scheduling orders as necessary to ensure that the DPPs and Cargill will have sufficient time to prepare for the resumption of litigation.

IT IS SO ORDERED

DATED: January 30, 2025



Honorable Sunil R. Harjani
United States District Court
Northern District of Illinois

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

If you purchased any Turkey product directly from a Turkey producer for use or delivery in the United States from January 1, 2010 through January 1, 2017, you may be eligible to receive benefits from class action settlements.

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

- A new Settlement Agreement (“Settlement” or “Cargill Settlement”) has been reached in a class action antitrust lawsuit filed on behalf of Direct Purchaser Plaintiffs with Cargill, Incorporated and Cargill Meat Solutions Corporation (“Cargill” or “Settling Defendant”). The Settlement requires Cargill to pay \$32,500,000. In addition to this monetary payment, Cargill has agreed to respond to specific requests made by the Direct Purchaser Plaintiffs’ in their continued prosecution of the litigation.
- If approved by the Court, the Cargill Settlement will resolve the claims in the lawsuit about whether Cargill combined and conspired in restraint of trade, the purpose and effect of which was to suppress competition and to allow Cargill and other Turkey producers to charge supra-competitive prices for Turkey products during the Settlement Class Period, in violation of federal law. If approved, the Settlement will avoid litigation costs and risks to Direct Purchaser Plaintiffs and Cargill and will release Cargill from liability to members of the Settlement Class. The Court has not decided whether Cargill did anything wrong, and Cargill denies any wrongdoing.
- This new Settlement only applies to Cargill and does not dismiss claims against other Defendants in the case entitled *In re Turkey Antitrust Litigation*, No. 1:19-cv-08318, (N.D. Ill.). You may have seen a previous notice about a \$4,625,000 settlement in this lawsuit between Direct Purchaser Plaintiffs and Tyson Foods, Inc., Tyson Fresh Meats, Inc., Tyson Prepared Foods, Inc. and the Hillshire Brands Company (“Tyson”). The Direct Purchaser Plaintiffs’ lawsuit is continuing against the Defendants who have not settled.
- This notice informs Settlement Class members how to make a claim to receive money from both the Cargill Settlement and the prior settlement with Tyson (collectively, the “Settlements”). Please follow the claims instructions in this notice and the attached Claim Form to receive money from the Settlements. Your legal rights are affected whether you act or do not act. Please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

FILE A CLAIM TO RECEIVE MONEY FROM THE SETTLEMENTS	In order to receive money from the Settlements you must submit a Claim Form by April 21, 2025. If you are confirmed to be a Settlement Class member and file a valid Claim Form, you will be eligible to receive payment from the Settlements. Instructions for filing a claim are available in Question 12 of this notice, on the Claim Form, and at the Settlement Website www.TurkeyLitigation.com .
ASK TO BE EXCLUDED	This is the only option that allows you ever to be part of any <i>other</i> lawsuit against Cargill about the Released Claims (as defined in the Settlement Agreement). Requests for Exclusion must be postmarked or received by April 21, 2025.
OBJECT	Write to the Court about why you do not like the Settlement. Objections must be postmarked or received by April 21, 2025.
ATTEND THE FAIRNESS HEARING	Ask to speak in Court about the fairness of the Settlement.
DO NOTHING	If you do not file a claim, you will receive no payment from the Settlements.

- Your options are explained in this notice. To file a claim or ask to be excluded, you must act before April 21, 2025.
- **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?

Defendants, including Cargill, produce Turkey products. Defendants' records show that you may have purchased Turkey products directly from one or more of the Defendants for use and delivery in the United States between January 1, 2010, and January 1, 2017 (the "Settlement Class Period"). The list of Defendants is in Question 2 below.

The Court authorized this notice because you have a right to know about the Settlement of certain claims against Cargill in this class action lawsuit and your options before the Court decides whether to approve the Settlement between Cargill and Direct Purchaser Plaintiffs. If the Court approves it, and after any objections and appeals are resolved, you will be bound by the judgment and Settlement terms. This notice also explains the lawsuit, the Settlement, and your legal rights including how to submit a claim to receive a payment.

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.

Direct Purchaser Plaintiffs allege that Defendants and their alleged co-conspirators conspired and combined to fix, raise, maintain, and stabilize the price of Turkey products, beginning at least as early as January 1, 2010 and continuing at least until January 1, 2017, with the intent and expected result of increasing prices of Turkey products in the United States, in violation of federal antitrust laws. For purposes of the Settlement, the term "Turkey" and means turkey meat, which may be sold in a variety of forms, including fresh or frozen, ground or parts, and raw or cooked. "Turkey" includes, but is not limited to: breasts, wings, drums, legs, thighs, tenderloins, necks, tails, gizzards, feet, trim, tenders, mechanically separated turkey ("MST"), ground turkey, and further processed and value added turkey products. "Turkey" also includes, but is not limited to, products containing turkey such as lunch meat, deli meat, sausage, franks, bacon, and corn dogs.

The Defendants named in Direct Purchaser Plaintiffs' Amended Class Action Complaint are producers of Turkey products in the United States, as well as Agri Stats, Inc. For the purpose of the Settlement, "Defendants" refers to Butterball, LLC; Cargill; Cooper Farms, Inc.; Farbest Foods, Inc.; Foster Farms LLC; Foster Poultry Farms; 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; Tyson; and Agri Stats, Inc. Defendants' "co-conspirators" include Dakota Provisions, LLC, Kraft Heinz, Kraft Foods Group Brands LLC, Michigan Turkey Producers LLC, Norbest LLC, and West Liberty Foods LLC.

Direct Purchaser Plaintiffs have reached this Settlement with Cargill, and a previous settlement with Tyson, but the Direct Purchasers Plaintiffs' case is proceeding against other Defendants. Those other Defendants may be subject to separate settlements, judgments, or class certification orders. If applicable, you will receive a separate notice regarding the progress of the litigation and any resolution of claims against other Defendants.

Cargill has denied all allegations of wrongdoing in this lawsuit and would continue to assert numerous defenses to Direct Purchasers Plaintiffs' claims if the case against it were to proceed.

3. 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.

4. Why is there a Settlement?

The Court did not decide in favor of either Direct Purchaser Plaintiffs or Cargill. Direct Purchaser Plaintiffs believe they may have won at trial and possibly obtained a greater recovery. Cargill believes the Direct Purchaser Plaintiffs would not have succeeded at class certification or won at a trial. But litigation involves risks to both sides, and therefore Direct Purchaser Plaintiffs and Cargill have agreed to the Settlement. The Settlement requires Cargill 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 Settlement is in the best interests of all Settlement Class members.

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

You may have received a notice, authorized by the Court, about the Direct Purchaser Plaintiffs' previous settlement with Tyson. That settlement was approved by the Court on February 3, 2022.

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 Counsel.

If you are a Direct Purchaser Settlement Class member and you have not opted out of the Settlements, you must submit a Claim Form by April 21, 2025, to receive money from the Settlements.

WHO IS IN THE CLASS?

6. Am I part of the Class?

The Court decided that, for settlement purposes, members of the Settlement Class are defined as:

All persons and entities who directly purchased Turkey from any Defendant or any alleged co-conspirator in the United States at any time from, January 1, 2010, through January 1, 2017.

If you satisfy these criteria, and you do not file a timely and valid exclusion, then you are a member of the Settlement Class, subject to the exceptions listed in Question 7 below.

While this Settlement is only with Cargill, the Settlement Class includes persons who purchased Turkey products (as defined in the Settlement Agreement) from *any* of the Defendants or their co-conspirators.

7. Are there exceptions to being included?

Yes. Specifically excluded from the Settlement 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; and any affiliate, legal representative, heir or assign of any Defendant or co-conspirator. Also excluded from the Settlement 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 anyone who timely and validly excludes themselves from the Settlement Class.

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

8. 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 Settlement Agreement, available for download at www.TurkeyLitigation.com. You may also call the Settlement Administrator at 1-877-777-9637 or call or write to Co-Lead Counsel at the phone numbers or addresses listed in Question 20 below.

THE BENEFITS OF THE SETTLEMENT AGREEMENT WITH CARGILL

9. What does the Settlement with Cargill provide?

If the Settlement is approved, Cargill will pay \$32,500,000 into a Settlement fund to resolve all Released Claims that Settlement Class members ever had, now have, or may ever have against the Cargill Released Parties (all as defined in the Settlement Agreement). This amount may be reduced if the total sales by Cargill to Settlement Class members who timely and validly request exclusion from the Settlement exceeds a certain threshold as set forth in the Settlement Agreement. In

addition to this monetary benefit, Cargill has also agreed to respond to specific requests made by in the Direct Purchaser Plaintiffs in their continued prosecution of the litigation.

10. What are the Settlement benefits being used for?

A portion of the Settlement Fund proceeds are being used for the administration of the notice of the Settlement to potential members of the Settlement Class by the Settlement Administrator. Except as provided below regarding a motion related to attorney's fees and expenses, the remainder of the Settlement Fund proceeds will remain available for any future notice, distribution to eligible members of the Settlement Class, or attorneys' fees, litigation expenses, and incentive awards to Direct Purchaser Plaintiffs and their counsel.

In an upcoming motion, Class Counsel will request up to 33 and 1/3% of the Settlement Fund in fees, current and ongoing litigation expenses for up to \$4,500,000, service awards of up to \$25,000 per Direct Purchaser Plaintiff, and up to \$250,000 to pay the costs for notice, approval, and administration of the claims process. A copy of this motion will be made available on the Settlement Website at least 14 days before the deadline to file an exclusion request.

The remainder of the Settlement Fund proceeds will be distributed to Settlement Class members who submit a timely and valid Claim Form and who have not excluded themselves from the Settlement on a *pro rata* basis pursuant to their verified Turkey purchases during the Settlement Class Period.

11. How much will my payment from the Settlements be?

To be eligible to receive a payment from the Cargill Settlement and the prior settlement with Tyson (collectively, "Settlement Proceeds"), you must complete and submit a timely Claim Form by April 21, 2025. The instructions for submitting a claim are set forth in the attached Claim Form and Question 12 below.

The amount of the Settlement Proceeds received by a qualified claimant will be based on a number of factors, including the number of Settlement Class members who have filed valid claims and the amount of approved Turkey purchases by each participating Settlement Class member during the Settlement Class Period.

In accordance with the Settlements, the combined Settlement Proceeds, net of Court-approved attorneys' fees, litigation expenses, and any class representative service awards and settlement administration and notice expenses, will be distributed to Settlement Class members who have submitted valid Claim Forms on a *pro rata* basis based on the amount of approved Turkey purchases by each participating Settlement Class member.

The distribution plan, to be approved by the Court at a later date, will determine the *pro rata* amount, if any, that each Settlement Class member will receive. The anticipated distribution plan for the Settlement Proceeds is to make a *pro rata* distribution to each qualifying Settlement Class member based on the dollar value of approved purchases of Turkey per Settlement Class member during the Settlement Class Period.

HOW YOU GET A PAYMENT FROM THE SETTLEMENTS

12. How can I file a Claim Form to get a payment from the Settlements?

To be eligible to receive a payment from any of the Settlements, you must complete and submit a timely Claim Form by April 21, 2025. Submit your Claim Form online at www.TurkeyLitigation.com, by April 21, 2025. Or fill out the Claim Form and mail it to the address below, postmarked no later than April 21, 2025. If you do not submit a valid Claim Form by the deadline, you will not receive a payment from any of the Settlements, but you will be bound by the Court's judgment in these actions.

Your Claim Form is attached and is pre-populated to reflect the amount of your Turkey purchases from each Defendant, based on a review of Defendants' records. You may use your personal Access Code listed on your Claim Form to log in at www.TurkeyLitigation.com, where you can submit a claim and review your purchase information electronically. You can accept the purchase amounts that are pre-populated or, if you disagree with or want to supplement those amounts, you can provide additional purchase information by completing the Purchase Audit Request form posted on the Settlement Website

and providing supporting documentation. All revised Turkey purchaser amounts will be subject to a review process by the Settlement Administrator, Co-Lead Counsel, and ultimately the Court.

You can also request that a Claim Form be sent to you by visiting the Settlement Website or by sending a written request to the Settlement Administrator by mail: Turkey Antitrust Litigation, c/o A.B. Data, Ltd., P.O. Box 173015, Milwaukee, WI 53217; or by email: info@turkeylitigation.com.

If you received multiple Claim Forms, you must submit each one or take other steps to ensure that all of the purchases reflected in the Claim Forms are accounted for in your submission.

If you have questions regarding your Claim Form or participating in the Settlements, contact Co-Lead Counsel or the Settlement Administrator using the contact information set forth in Question 20 below.

13. When will I get a payment from the Settlements?

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

14. What am I giving up by staying in the Settlement?

Unless you exclude yourself, you will stay in the Settlement Class in this Settlement, which means that you can't sue, continue to sue, or be part of any other lawsuit against the Cargill Released Parties that pertains to the Released Claims (as defined in the Settlement Agreement). Importantly, the Released Claims cover acts or omissions within the scope of the release through January 30, 2025, while claims made under the Settlement are for purchases between January 1, 2010, and January 1, 2017. The Released Claims are detailed in the Settlement Agreement, available at www.TurkeyLitigation.com. Additionally, paragraph 12 of the Settlement Agreement removes Cargill's sales of turkey from any damages award resulting from any verdict and Final Judgment DPPs obtain against any other Defendant who is a signatory to a judgment-sharing agreement.

If you stay in the Settlement Class in this Settlement, you are releasing your claims against Cargill.

EXCLUDING YOURSELF FROM THE SETTLEMENT

15. How do I exclude myself from the Settlement with Cargill?

If you do not want the benefits offered by the Settlement and to be legally bound by the terms of the Settlement, or if you wish to pursue your own separate lawsuit against Cargill, you must exclude yourself by submitting a written request to the Settlement Administrator stating your intent to exclude yourself from the Settlement Class (an "Exclusion Request"). If you submit a timely and valid Exclusion Request, then you will not be eligible to receive any payment from the Settlement.

Your Exclusion Request must include the following: (a) your name, including the name of your business which purchased Turkey products, and address; (b) a statement that you want to be excluded from the Settlement Class in the Settlement with Cargill 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 Turkey purchases during the Class Period from each Defendant or co-conspirator that is subject to the assignment, and (d) your signature. 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 member of the Settlement Class, you must include the assignor's name; whether the assignor fully or partially assigned their Turkey claims; the annual value of Turkey 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 April 21, 2025, to: *Turkey Antitrust Litigation*, Attn: EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217; or info@TurkeyLitigation.com.

16. If I don't exclude myself, can I sue Cargill for the same thing later?

No. Unless you exclude yourself, you give up the right to sue Cargill for the same claims that this Settlement resolves. If you have a pending lawsuit against Cargill, speak to your lawyer in that lawsuit immediately to determine whether you must exclude yourself from this Settlement Class to continue your own lawsuit against Cargill.

By staying in this Settlement, you are releasing your claims in this case against Cargill.

17. If I exclude myself, can I still get a payment from the Settlement in the future?

No. If you exclude yourself, you may not make a claim in the future for this Settlement with Cargill. You will not be eligible to receive money from the Settlement when money is distributed to members of the Settlement Class.

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

Yes. If you do not want to be part of this Settlement with Cargill, you need to exclude yourself again now even if you excluded yourself from the previous settlement with Tyson.

19. Can I still exclude myself from the previous settlement?

No. The deadline to exclude yourself from the previous settlement with Tyson has passed.

OBJECTING TO THE SETTLEMENT

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

If you are a member of the Settlement Class and have not excluded yourself from this Settlement, you can object to the Settlement with Cargill if you don't like part or all of it. The Court will consider your views.

To object, you must send a letter or other written statement saying that you object to the Settlement with Cargill in *In re Turkey Antitrust Litigation* and the reasons why you object to this Settlement. Be sure to include your full name, the name of your business which purchased Turkey, current mailing address, and email address. Your objection must be signed. You may include or attach any documents that you would like the Court to consider. Do not send your written objection to the Court or judge. Instead, mail your objection to the Settlement Administrator, Interim Co-Lead Counsel, and Counsel for Cargill at the addresses listed below. Your objection must be postmarked no later than April 21, 2025.

Settlement Administrator:

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

**Direct Purchaser Plaintiffs'
Co-Lead Counsel:**

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

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

Counsel for Cargill:

Britt M. Miller
Matthew D. Provance
MAYER BROWN LLP
71 South Wacker Drive
Chicago, IL 60606
bmiller@mayerbrown.com
mprovance@mayerbrown.com

21. Can I object to the previous settlement?

No. The deadline to object to the previous settlement with Tyson has passed.

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

Objecting is telling the Court that you do not like something about the Settlement. You can object only if you do not exclude yourself from the Settlement Class in a settlement. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you have no standing to object because the Settlement no longer affects you.

THE LAWYERS REPRESENTING YOU

23. Do I have a lawyer in this case?

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

24. Should I hire my own lawyer?

If you wish to remain a member of the Settlement Class, you do not need to hire your own lawyer because Co-Lead 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 Settlement 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 Cargill.

25. How will the lawyers be paid?

In an upcoming motion, Class Counsel will also request up to 33 and 1/3% of amounts paid by Cargill and Tyson pursuant to the Settlements in fees, current and ongoing litigation expenses for up to \$4,500,000, service awards of the up to \$25,000 per Direct Purchaser Plaintiff, and up to \$250,000 to pay the costs for notice, approval, and administration of the claims process. A copy of this motion will be made available on the Settlement Website at least 14 days before the deadline to file an Exclusion Request. Class members who have not excluded themselves from the Class maybe object to this request if they choose, and may do so pursuant to the instructions and deadline in Question 20. You will not have to pay any fees or costs out-of-pocket.

THE COURT'S FAIRNESS HEARING

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

The Court will hold a hearing to decide whether to approve the Settlement (the "Fairness Hearing"). You may attend and you may ask to speak, but you don't have to. The Court will hold a Fairness Hearing on June 18, 2025 at 10:00 a.m. Central. The hearing will be conducted by video conference. A telephone call-in number is also available: (855) 244-8681 and the access code is 2319 163 9975###. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the Settlement and the request for litigation expenses. We do not know how long these decisions will take.

The Court will 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 Settlement Class. Updates will be posted to the Settlement website.

27. Do I have to come to the hearing?

No. Co-Lead Counsel will answer any questions the Court may have. However, you are welcome to come at your own expense. 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.

28. 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 Turkey, current mailing address, telephone number, and signature. Your Notice of Intention to Appear must be postmarked no later than April 21, 2025, and it must be sent to the Clerk of the Court, Co-Lead Counsel, and Counsel for Cargill. The address for the Clerk of the Court is: Dirksen U.S. Courthouse, 219 S. Dearborn Street, Chicago, IL 60604. The addresses for Co-Lead Counsel and Counsel for Cargill are provided in Question 20. You cannot ask to speak at the hearing if you excluded yourself from the Settlement Class.

GETTING MORE INFORMATION

29. How do I get more information about the Settlement?

This notice summarizes the proposed Settlement with Cargill. More details are in the Settlement Agreement. You can find a copy of the Settlement Agreement, 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 Counsel at the addresses, phone numbers, and email addresses provided in Question 20.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE.

COURT-APPROVED LEGAL NOTICE

If you purchased any Turkey product directly from a Turkey producer for use or delivery in the United States from January 1, 2010 through January 1, 2017, you may be eligible to receive benefits from class action settlements.

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

A new proposed Settlement Agreement totaling \$32,500,00 (the “Settlement” or “Cargill Settlement”) has been reached in a class action antitrust lawsuit filed on behalf of Direct Purchaser Plaintiffs with Cargill, Incorporated, and Cargill Meat Solutions Corporation (“Cargill”). The Court previously approved a \$4,625,000 settlement with Tyson Foods, Inc., Tyson Fresh Meats, Inc., Tyson Prepared Foods, Inc. and the Hillshire Brands Company (“Tyson”).

The United States District Court for the Northern District of Illinois authorized this notice because you have a right to know about the Settlement with Cargill and your options before the Court decides whether to approve it, and to inform Settlement Class members how to make a claim to receive money from the Cargill Settlement and the prior Tyson Settlement (collectively, the “Settlements”). Please review this notice and follow the instructions carefully.

WHO IS INCLUDED?

For settlement purposes, members of the Settlement Class are defined as all persons and entities who directly purchased Turkey directly from any Defendants or alleged co-conspirator in the United States at any time from January 1, 2010, through January 1, 2017. Specifically excluded from the Settlement Class are the Defendants and their co-conspirators; the officers, directors or employees of any Defendant or co-conspirators; any entity in which any Defendant or co-conspirator has a controlling interest; and any affiliate, legal representative, heir or assign of any Defendant or co-conspirators. Also excluded from the Settlement 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 anyone who timely and validly excludes themselves from the Settlement Class. The Defendants in this lawsuit include Butterball, LLC; Cargill; Cooper Farms, Inc.; Farbest Foods, Inc.; Foster Farms LLC; Foster Poultry Farms; 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; Tyson; 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.

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.

HOW CAN I FILE A CLAIM TO GET A PAYMENT FROM THE SETTLEMENTS?

To be eligible to receive a payment from the Settlements, you must complete and submit a timely Claim Form by April 21, 2025. If you do not submit a valid Claim Form by the deadline, you will not be eligible to receive a payment from the Settlements, but you will be bound by the Settlement and the Court’s judgment in these actions.

Claim Forms for known Settlement Class members are being sent by U.S. mail and are pre-populated to reflect the amount of your Turkey purchases from each Defendant, based on a review of Defendants’ records. You may use your personal Unique ID listed on your Claim Form to log in at www.TurkeyLitigation.com, where you can submit a claim and review your purchase information electronically. You can accept the purchase amounts that are pre-populated or, if you disagree with those amounts, you can challenge them by completing the Purchase Audit Request form posted on the Settlement Website and providing supporting documentation. All revised Turkey purchase amounts will be subject to a review process by the Settlement Administrator, Co-Lead Counsel, and ultimately the Court.

You can also request that a Claim Form be sent to you on either the Settlement Website or by sending a written request to the Settlement Administrator by mail: Turkey Antitrust Litigation, c/o AB Data, Ltd. PO Box 173015, Milwaukee, WI 53217; or by email: info@turkeylitigation.com.

WHAT IS THIS LAWSUIT ABOUT?

Direct Purchaser Plaintiffs allege that Defendants and their co-conspirators conspired and combined to fix, raise, maintain, and stabilize the price of Turkey, beginning at least as early as January 1, 2010, and continuing through at least January 1, 2017, with the intent and expected result of increasing prices of Turkey in the United States, in violation of federal antitrust laws.

For purposes of this case, the term “Turkey” means turkey meat, which may be sold in a variety of forms, including fresh or frozen,

ground or parts, and raw or cooked. “Turkey” includes, but is not limited to: breasts, wings, drums, legs, thighs, tenderloins, necks, tails, gizzards, feet, trim, tenders, mechanically separated turkey (“MST”), ground turkey, and further processed and value added turkey products. “Turkey” also includes, but is not limited to, products containing turkey such as lunch meat, deli meat, sausage, franks, bacon, and corn dogs.

Cargill denies it did anything wrong. The Court did not decide who is right. Instead, Direct Purchaser Plaintiffs and Cargill agreed to a Settlement to resolve the case, which provides benefits to the Settlement Class.

The case is still proceeding on behalf of the Direct Purchaser Plaintiffs against the other non-settling Defendants who may be subject to separate settlements, judgments, or class certification orders.

WHAT DOES THE SETTLEMENT PROVIDE?

Cargill will pay \$32,500,000 into a Settlement Fund to resolve all Released Claims that Settlement Class members ever had, now have, or may ever have against the Cargill Released Parties (all as defined in the Settlement Agreement). This amount may be reduced if the total sales by Cargill to Settlement Class members who timely and validly request exclusion from the Settlement exceeds a certain threshold as set forth in the Settlement Agreement. In addition, Cargill has also agreed to respond to specific requests made by the Direct Purchaser Plaintiffs in their continued prosecution of the litigation. In an upcoming motion, Class Counsel will also request up to 33 and 1/3% of the amounts paid by Cargill and Tyson pursuant to the Settlements in fees, ongoing and future litigation expenses of up to \$4,500,000, service awards of up to \$25,000 per Direct Purchaser Plaintiff, and up to \$250,000 to pay the costs for notice, approval, and administration of the claims process. A copy of this motion for attorneys’ fees, litigation expenses, and service awards will be available on the Settlement Website.

WHAT ARE YOUR RIGHTS AND OPTIONS?

If you want to be eligible to receive a payment, you must submit a timely and valid Claim Form by April 21, 2025. If you don’t want to be legally bound by this Settlement, you must exclude yourself by April 21, 2025, or you won’t be able to sue or continue to sue Cargill for the Released Claims (as defined in the Settlement Agreement). If you already excluded yourself from the previous settlement with Tyson, and do not want to stay in the proposed settlement with Cargill, you need to exclude yourself from the Cargill Settlement. If you exclude yourself, you can’t get money from the settlement with Cargill.

If you don’t exclude yourself from the Settlement Class, you may object to the Settlement Agreement by April 21, 2025. The detailed notice and the FAQs page of the settlement website explain how to exclude yourself or object.

The Court will hold a hearing in this case (*In re Turkey Antitrust Litigation*, No. 1:19-cv-08318 (N.D. Ill.)) on June 18, 2025 at 10:00 a.m. Central to consider whether to approve the Settlement Agreement, approve the claims process for the Tyson and Cargill Settlements, and the request for interim payment of attorneys’ fee, current and ongoing expenses, and service awards. You or your own lawyer may ask to speak at the hearing, but you don’t have to.

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

Turkey Antitrust Litigation
c/o A.B. Data, Ltd., P.O. Box 173015, Milwaukee, WI 53217
Or Submit Online at www.TurkeyLitigation.com

UNIQUE ID: _____

DIRECT PURCHASER TURKEY ANTITRUST CLAIM FORM

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

Our records indicate you may be a member of the Settlement Class in this action for the newly reached settlement with Defendants Cargill, Incorporated. and Cargill Meat Solutions Corporation (“Cargill”), and a previously reached settlement with Tyson Foods, Inc., Tyson Fresh Meats, Inc., Tyson Prepared Foods, Inc. and the Hillshire Brands Company (“Tyson”) (collectively, the “Settlements”). The Settlement Class, subject to certain exclusions, is defined as “All persons and entities who directly purchased Turkey from any Defendant or alleged co-conspirator in the United States at any time from January 1, 2010, through January 1, 2017.” For purposes of the Settlement, the term “Turkey” means turkey meat, which may be sold in a variety of forms, including fresh or frozen, ground or parts, and raw or cooked. “Turkey” includes, but is not limited to: breasts, wings, drums, legs, thighs, tenderloins, necks, tails, gizzards, feet, trim, tenders, mechanically separated turkey (“MST”), ground turkey, and further processed and value added turkey products. “Turkey” also include, but is not limited to, products containing turkey such as lunch meat, deli meat, sausage, franks, bacon, and corn dogs.

The Defendants in this lawsuit include Butterball, LLC; Cargill; Cooper Farms, Inc.; Farbest Foods, Inc.; Foster Farms LLC; Foster Poultry Farms; 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; Tyson; 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.

The Court has now approved a claims process to distribute the Net Settlement Funds to eligible Settlement Class members. In accordance with the Settlement, the combined proceeds from both Settlements, minus Court-approved attorneys’ fees and litigation expenses, any service awards to Direct Purchaser Plaintiffs approved by the Court, and Settlement administration and notice expenses (the “Net Settlement Funds”), will be distributed to Settlement Class members on a *pro rata* basis based on the amount of Turkey purchases by each participating Settlement Class member compared to the combined Turkey purchases of all participating Settlement Class members. **To be eligible to receive a payment, you must submit this Claim Form to the mailing address listed at the top of this form or on the Settlement Website www.TurkeyLitigation.com by April 21, 2025.**

You can complete and submit by mail this form, or you may use your Unique ID number listed at the top of this page to log in at www.TurkeyLitigation.com, where you can submit a claim and review your purchase information electronically. If your organization received more than one notice, you only need to file one Claim Form for each Unique ID.

Review your purchase information

The total award amount you receive will be calculated based on the purchase information from records available from Defendants. Your total known Settlement qualifying purchases from Defendants for the period between January 1, 2010 through January 1, 2017 are \$<<Total Purchases>>. The details concerning the amount of your qualifying purchases are set forth on page 2.



If you agree with the purchase information listed on Page 2, you simply need to complete the Claimant Information section on Page 3 of this Claim Form, affirm and sign the attestation also on Page 3, and submit it by April 21, 2025 (postmarked or submitted online).

If you do not agree with the purchase information on Page 2, you may complete the Purchase Audit Request form posted on www.TurkeyLitigation.com and submit it with your Claim Form.

PURCHASE INFORMATION

UNIQUE ID: _____

DEFENDANT	2010	2011	2012	2013	2014	2015	2016	2017
Butterball								
Cargill								
Cooper Farms								
Farbest Foods								
Foster Farms								
Hormel								
House of Raeford								
Perdue								
Prestage								
Tyson								

Total Purchase Amount \$<<Total Purchases>>

Note: In order to file a claim relating to purchases from a co-conspirator you must submit the Purchase Audit Request Form and provide the requested information.



If you **agree** with the purchase information listed above, you simply need to complete the Claimant Information section on Page 3 of this Claim Form, affirm and sign the attestation also on Page 3, and submit it by April 21, 2025 (postmarked or submitted online).

If you do **not agree** with the purchase information above, you may complete the Purchase Audit Request form posted on www.TurkeyLitigation.com and submit it with your Claim Form.

Turkey Antitrust Litigation
 c/o A.B. Data, Ltd., P.O. Box 173015, Milwaukee, WI 53217
 Or Submit Online at www.TurkeyLitigation.com

DIRECT PURCHASER ANTITRUST CLAIM FORM

UNIQUE ID: _____

If you **agree** with the purchase information on page 2, please complete the Claimant Information below and submit it by April 21, 2025, (postmarked or submitted online) to the Settlement Administrator at the address listed above.

If you do **not agree** with the purchase information listed on page 2, please complete the Claimant Information below, as well as the **Purchase Audit Request form posted on the Settlement Website www.TurkeyLitigation.com**, and submit them by April 21, 2025, (postmarked or submitted online) to the Settlement Administrator at the address listed above, along with additional documentation to support your claim (e.g., invoices, purchase information, etc.).

Documentation must include actual receipts or invoices that include the product name, name of Defendant manufacturer, date of purchase, and net purchase amount. Please submit legible copies. Do not send originals but maintain the originals in your records.

<u>CLAIMANT INFORMATION</u>			
<u>CONTACT NAME:</u>	First	M.I.	Last
<u>COMPANY NAME:</u>	Company Name		
<u>CURRENT MAILING ADDRESS:</u>	Address 1		
	Address 2		
	City		
	State/Province		
	Postal Code	Country	
<u>CONTACT TELEPHONE:</u>	_ _ _ _ - _ _ _ _ - _ _ _ _ _		
<u>CONTACT EMAIL ADDRESS:</u>			

By signing below I/we certify that (1) the above and foregoing information is true and correct; (2) I warrant that I am duly authorized and have the legal capacity to sign this Claim Form on behalf of the direct purchaser entity; (3) I/we are not officers, directors, or employees of any Defendant or co-conspirator; any entity in which any Defendant or co-conspirator has a controlling interest; an affiliate, legal representative, heir, or assign of any Defendant or co-conspirator, or a federal, state, or local governmental entity; and (4) I/we agree to submit additional information, if requested, in order for the Settlement Administrator to process my/our claim.

Signature: _____ Date: _____

Printed Full Name (First, Middle, and Last): _____ Title: _____

Turkey Antitrust Litigation
 c/o A.B. Data, Ltd., P.O. Box 173015, Milwaukee, WI 53217
 Or Submit Online at www.TurkeyLitigation.com

UNIQUE ID (printed on your Claim Form): _____

DIRECT PURCHASER ANTITRUST PURCHASE AUDIT REQUEST FORM

Please use this form if you do not agree with the purchase information pre-printed on page 2 of your Claim Form and you would like to have that information audited or you purchased Turkey products from one of Defendants' alleged co-conspirators during the Settlement Class Period. Please fill out your contact information below and provide annualized purchase information on page 2.

You must submit this Purchase Audit Request Form to the mailing address listed at the top of this form or on the Settlement Website, www.TurkeyLitigation.com, along with your Claim Form, by April 21, 2025.

<u>CLAIMANT INFORMATION</u>			
<u>CONTACT NAME:</u>	First	M.I.	Last
<u>COMPANY NAME:</u>	Company Name		
<u>CURRENT MAILING ADDRESS:</u>	Address 1		
	Address 2		
	City		
	State/Province		
	Postal Code	Country	
<u>CONTACT TELEPHONE:</u>	- -		
<u>CONTACT EMAIL ADDRESS:</u>			

If you do not agree with the purchase information provided on page 2 of the Claim Form, you must complete the purchase information table on page 2 of this form with all Settlement Class period purchase information from January 1, 2010, through January 1, 2017. This form must reflect ALL of the purchases from the Defendants and co-conspirators that you are claiming during the relevant time periods (including any purchase amounts prepopulated on your Claim Form).

You must submit this form along with your Claim Form by April 21, 2025, (postmarked or submitted online) to the Settlement Administrator at the address listed above, along with additional documentation to support your dispute or supplementation. Documentation must include actual receipts or invoices that include the product name, name of Defendant or co-conspirator that directly sold the Turkey Products to you, date of purchase, and net purchase amount. Please submit legible copies. Do not send originals but maintain the originals in your records.

PURCHASE INFORMATION

UNIQUE ID: _____

DEFENDANT	2010	2011	2012	2013	2014	2015	2016	2017
Butterball								
Cargill								
Cooper Farms								
Farbest Foods								
Foster Farms								
Hormel								
House of Raeford								
Perdue								
Prestage								
Tyson								

Note: If you have qualifying Turkey purchases from a co-conspirator, then please attach a table (and supporting documentation) providing annual purchase information by co-conspirator, as shown above.

By signing below I/we certify that (1) the above and foregoing information is true and correct; (2) I warrant that I am duly authorized and have the legal capacity to sign this Purchase Audit Request Form on behalf of the direct purchaser entity; (3) I/we are not officers, directors, or employees of any Defendant or co-conspirator; any entity in which any Defendant or co-conspirator has a controlling interest; an affiliate, legal representative, heir, or assign of any Defendant or co-conspirator, or a federal, state, or local governmental entity; and (4) I/we agree to submit additional information, if requested, in order for the Settlement Administrator to process my/our claim and audit request.

Signature: _____ Date: _____

Printed Full Name (First, Middle, and Last): _____

Title: _____

EXHIBIT E



**If You Purchased Any
Turkey Product**
Directly From a
Turkey Producer

.....

A Class Action
Settlement
May Affect
Your Rights

[Learn More Here >>](#)

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