

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

IN RE TURKEY ANTITRUST LITIGATION

Civil No. 1:19-cv-08318

This Document Relates To:

Hon. Sunil R. Harjani

Hon. Keri L. Holleb Hotaling

Direct Purchaser Plaintiff Actions

**DECLARATION OF ERIC SCHACHTER IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT WITH CARGILL AND APPROVAL
OF A CLAIMS PROCESS AND NOTICE PLAN**

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 for the previous settlement with the Tyson Defendants. A profile of A.B. Data’s background and capabilities, including representative case and client lists, is included as **Exhibit A**.

3. In consultation with Interim Co-Lead Counsel, I prepared a proposed settlement notice and administration plan (“Notice Plan”) for this litigation for the Settlement with Cargill, Incorporated. and Cargill Meat Solutions Corporation (“Cargill”), as well as to provide a claims process for distribution of the Cargill and Tyson settlements. The Notice Plan is substantially similar to the plan used to successfully notify Settlement Class members in the previous settlement with the Tyson Defendants.

4. This Declaration will describe the Notice Plan and how it will meet the requirements of Rule 23 of the Federal Rules of Civil Procedure (“Rule 23”) and provide due process to the potential members of the Settlement Class. This Declaration is based upon my personal knowledge and upon information provided to me by Interim Co-Lead Counsel, my associates, and A.B. Data staff members.

5. The objective of the Notice Plan is to provide the best practicable notice under the circumstances of the proposed settlement to potential members of the Settlement Class. The Settlement Class is defined as follows:

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

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.

NOTICE PLAN

6. The Notice Plan includes direct notice by mail and/or email to Settlement Class members using the contact information previously provided by Defendants and used to provide notice of the settlement with Tyson. Direct notice will be provided via a Long-Form Notice, attached as **Exhibit B**, and claim packet (the “Notice Packet”) that will be mailed to all members of the Settlement Class with a known mailing address and posted on the case-specific website. A Short-Form Notice, attached as **Exhibit C**, will be formatted as an email (the “Email Notice”) and sent to all members of the Settlement Class with a known email address.

7. The Notice Packet and Email Notice sent directly to potential members of the Settlement Class will include summary information concerning the claims process. The Claim Form (attached as **Exhibit D**) will be included in the Notice Packet and personalized to include each Settlement Class member’s annual purchase information with respect to each Defendant based on the Defendants’ records. Settlement Class members who disagree with or wish to supplement the known purchase information will be able to do so by completing a Purchase Audit Request Form, attached as **Exhibit E**. The Claim Form will also contain a personal Unique ID number that can be utilized to file claims online through the case website. Prepopulating the Claim Form with known purchase information will simplify the claims process for most Settlement Class members by eliminating the need for them to

independently verify all Settlement Class purchases. No data for Settlement Class members' purchases from Defendant's alleged co-conspirators' (Dakota Provisions, LLC, Kraft Heinz, Kraft Foods Group, Michigan Turkey Producers, Norbest LLC, and West Liberty LLC) is available, so the Claim Form will note this lack of data and the purchase audit request form will include an invitation to provide such information if applicable to the Settlement Class member.

8. The Long-Form Notice and Short Form Notice will also include summary information concerning the Settlement Agreement, including: this is a class action, the Settlement Class definition in plain and engaging language ("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, a class action settlement may affect your rights."), the Action alleges antitrust violations and price-fixing claims, a member of the Settlement Class may appear through an attorney if the member wants, members of the Settlement Class can be excluded from the Settlement Class or object to the Settlement if they so choose, the time and manner for requesting exclusion or submitting an objection, and the binding effect of a judgment on the Settlement Class. The Email Notice will also include a hyperlink to the case website on which A.B. Data will post the more detailed Long-Form Notice and additional important documents and information.

9. For the Email Notice, A.B. Data implements certain best practices to increase deliverability and bypass SPAM and junk filters and verifies how many emails were successfully delivered. For the mailed Long-Form Notice, A.B. Data will track any mail returned as undeliverable by the United States Postal Service ("USPS"). If the returned mail includes a forwarding address, the Long-Form Notice will be mailed to the updated address. If the returned mail does not include a forwarding address, A.B. Data will use third-party information providers to which it subscribes to attempt to ascertain an updated address and resend the Long-Form Notice accordingly.

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

WEBSITE AND TELEPHONE

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

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

13. The case-specific website will provide, among other things, a summary of the case, all relevant documents including the Settlement Agreement and Preliminary Approval Order, important dates, and any pertinent updates concerning the litigation or the Settlement approval process. The website will also include a copy of the Claim Form, Audit Request Form, and functionality for Settlement Class members to review their know purchases and submit their claims electronically.

EXCLUSION PROCESSING

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

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.

CONCLUSION

15. 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 Settlement Class, will deliver plain language notices that will capture readers' attention, and will provide relevant information in an informative and easy to understand manner that is necessary for those affected to effectively understand their rights and options under the Settlement Agreement terms. This Notice Plan conforms to the standards employed by A.B. Data in notification plans designed to reach potential class members of settlement groups or classes that are national in scope and narrowly defined entities and demographic targets. For all these reasons, in my opinion, the proposed notice plan satisfies Rule 23 and due process requirements.

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

Executed this 15th day of January 2025 in Milwaukee, Wisconsin.

/s Eric Schachter

Eric Schachter

EXHIBIT A

**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




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, Senior Director of 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 Claimant Operations Director, 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*
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For More Information

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

EXHIBIT B

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 Month 00, 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 [Month 00, 2025] .
OBJECT	Write to the Court about why you do not like the Settlement. Objections must be postmarked or received by [Month 00, 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 **Month 00, 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 **Month 00, 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 **Month 00, 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 **Month 00, 2025**. Submit your Claim Form online at www.TurkeyLitigation.com, by **Month 00, 2025**. Or fill out the Claim Form and mail it to the address below, postmarked no later than **Month 00, 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 [DATE OF PRELIMINARY APPROVAL ORDER], 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 [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.

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 **Month 00, 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 [Month 00, 2025], at [X:00 x.m.], at the United States District Court for the Northern District of Illinois, Courtroom 1925, Dirksen U.S. Courthouse, 219 S. Dearborn Street, Chicago, IL 60604. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the Settlement and the request for litigation expenses. We do not know how long these decisions will take.

The Court may hold the Fairness Hearing remotely, including via telephone or video conference, 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 [Month 00, 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.

EXHIBIT C

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 **[Month 00, 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 [Month 00, 2025]. If you don’t want to be legally bound by this Settlement, you must exclude yourself by [Month 00, 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 [Month 00, 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 [Month 00, 2025], at [X:00 x.m.] 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.

EXHIBIT D

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 **Month 00, 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 **Month 00, 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 **Month 00, 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 **Month 00, 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 **Month 00, 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: _____

EXHIBIT E

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 **Month 00, 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 **Month 00, 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 F



If You Purchased Any
Turkey Product
Directly From a
Turkey Producer
.....
A Class Action
Settlement
May Affect
Your Rights

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