

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 \$32,500,000 (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 A.B. Data, Ltd. P.O. 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.