

**UNITED STATES DISTRICT COURT  
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST  
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER  
PLAINTIFF CLASS ACTION

Case No. 0:18-cv-01776 (JRT-JFD)

**DECLARATION OF ERIC  
SCHACHTER IN SUPPORT OF  
MOTION TO PRELIMINARILY  
APPROVE THE DIRECT  
PURCHASER PLAINTIFF  
CLASS'S PROPOSED  
SETTLEMENTS WITH THE  
TYSON, CLEMENS, AND  
TRIUMPH DEFENDANTS, AND  
TO APPROVE CLASS NOTICE**

I, Eric Schachter, declare and state as follows:

1. I am a Senior Vice President with A.B. Data, Ltd. (“A.B. Data”). A.B. Data was selected by Direct Purchaser Plaintiffs to act as the Settlement Administrator to inform potential Class Members that proposed Settlements have been reached with Defendants Clemens Food Group, LLC and The Clemens Family Corporation (“Clemens”); Triumph Foods, LLC (“Triumph”); and Tyson Foods, Inc., Tyson Prepared Foods, Inc., and Tyson Fresh Meats, Inc. (“Tyson”) (“Settling Defendants”).<sup>1</sup> 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. In consultation with Co-Lead Class Counsel, I prepared a proposed notice plan for the Settlements with Clemens, Triumph, and Tyson. This Declaration will describe the proposed 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 Certified Class. This Declaration is based upon my personal knowledge and information provided to me by Co-Lead Class Counsel, my associates, and A.B. Data staff members.

3. I have implemented and coordinated some of the largest and most complex class action notice and administration plans in the country. The scope of my work includes notification, claims processing, and distribution plans in all types of class actions, including

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<sup>1</sup> Unless otherwise noted, all capitalized terms shall have the same meaning as in the Settlement Agreements between Direct Purchaser Plaintiffs and each Settling Defendant.

but not limited to consumer, antitrust, securities, ERISA, insurance, and government agency settlements.

4. A.B. Data has also been appointed as notice, claims, and/or settlement administrator in hundreds of high-volume consumer, antitrust, civil rights, insurance, ERISA, securities, and wage and hour class action cases. An updated profile of A.B. Data's background and capabilities, including representative case and client lists, is included as **Exhibit F**.

5. In connection with the previous settlements in this litigation with JBS USA Food Company Holdings ("JBS"), Smithfield Foods, Inc. ("Smithfield"), Seaboard Foods, LLC ("Seaboard"), and Hormel Foods Corporation ("Hormel Foods"), I submitted the *Declaration of Eric Schachter in Support of Motion for Preliminary Approval of the Class Action Settlement Between Direct Purchaser Plaintiffs and JBS* (on December 1, 2020) (ECF No. 547), *Declaration of Eric Schachter in Support of Motion for Preliminary Approval of the Class Action Settlement Between Direct Purchaser Plaintiffs and Smithfield* (on July 13, 2021) (ECF No. 832), *Declaration of Eric Schachter in Support of Motion for Preliminary Approval of the Direct Purchaser Class Action Settlement with Seaboard Foods LLC and Motion for Approval of Class Notice* (on June 22, 2023) (ECF No. 1937), and *Declaration of Eric Schachter in Support of Motion for Preliminary Approval of the Direct Purchaser Class Action Settlement with Hormel Foods Corporation* (on April 5, 2024) (ECF No. 2180). The notice plan for the settlement with JBS was approved by the Court on January 13, 2021 (ECF No. 631), Smithfield on August 5, 2021

(ECF No. 870), Seaboard on August 25, 2023 (ECF No. 2014<sup>2</sup>), and Hormel Foods on May 6, 2024 (ECF. No. 2218). A.B. Data subsequently implemented the approved notice plans.

6. The objective of the proposed notice plan is to provide the best practicable notice under the circumstances to potential Class Members. The Certified Class (*see* ECF No. 1887) is defined as follows:

All persons and entities who directly purchased one or more of the following types of pork, or products derived from the following types of pork, from Defendants, or their respective subsidiaries or affiliates, for use or delivery in the United States from June 29, 2014, through June 30, 2018: fresh or frozen loins, shoulders, ribs, bellies, bacon, or hams. For this lawsuit, pork excludes any product that is marketed as organic or as no antibiotics ever (NAE); any product that is fully cooked or breaded; any product other than bacon that is marinated, flavored, cured, or smoked; and ready-to-eat bacon.

Excluded from this Class are the Defendants, the officers, directors or employees of any Defendant; any entity in which any Defendant has a controlling interest; and any affiliate, legal representative, heir or assign of any Defendant. Also excluded from this Class are any federal, state or local governmental entities, any judicial officer presiding over this action and the members of his/her immediate family and judicial staff, any juror assigned to this action, and any Co-Conspirator identified in this action.

#### **NOTICE PLAN**

7. The proposed notice plan (which is substantially similar to the previous notice disseminated in this case) includes direct notice by mail and/or email to approximately 55,000 addresses associated with potential Class Members identified through the previous notice plans related to this litigation. To supplement this direct notice

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<sup>2</sup> This notice also included notice of the Court's certification of the DPP Class and was the final opportunity for Class members to exclude themselves from the DPP Class litigation.

and reach the potential Class Members who may not receive direct notice, A.B. Data will implement a print and digital media campaign as discussed below.

8. Direct notice will be provided via a Long-Form Notice, attached as **Exhibit A**, that will be mailed to approximately 55,000 addresses associated with potential Class Members with a known mailing address and posted on the case-specific website, [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com). A Short-Form Notice, attached as **Exhibit B**, will be formatted as an email and sent to the approximately 3,000 addresses associated with potential Class Members with a known email address.

9. The Long-Form Notice and Short-Form Notice sent directly to potential Class Members will include summary information concerning the Certified Class and the Settlements, including: that this is a class action; the Certified Class definition in plain and engaging language (“If you purchased any Pork product directly from a Pork producer for use or delivery in the United States from June 29, 2014, through June 30, 2018, a class action may affect your rights); that the Action alleges antitrust violations and price-fixing claims; that a Class Member may appear through an attorney; that Class Members can no longer request exclusion from the Certified Class; that Class Members can object to the Settlements and/or the request for payment of attorneys’ fees and service awards; that Class Members can submit a Claim Form (attached as **Exhibit C**), but if they filed a claim in the earlier settlements (or received a payment from the previous distribution), they will automatically be included, do not have to file another claim, and have the option to submit a Purchase Audit Request Form (attached as **Exhibit D**) to supplement or correct their known purchase information; the time and manner for submitting an objection, claim, and

purchase audit request; important dates and deadlines; and the binding effect of a judgment on the Certified Class. The Short-Form Notice will also include a hyperlink to [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com), so Class Members can access the more detailed Long-Form Notice and additional important documents and information.

10. For emailed notice, A.B. Data implements certain best practices to increase deliverability and bypass SPAM and junk filters, and we will verify how many emails were successfully delivered. For mailed notice, A.B. Data will track any mail returned as undeliverable by the United States Postal Service (“USPS”), and using third-party information providers to which we subscribe, attempt to ascertain an updated address and resend the Long-Form Notice accordingly.

11. To supplement the direct notice efforts, A.B. Data will publish the Short-Form Notice one time in *Supermarket News* and *Nation’s Restaurant News*. *Supermarket News* is a trade journal targeting retail grocer executives and wholesale buyers. *Nation’s Restaurant News* is a trade journal targeting management in large multi-unit national chain restaurants and onsite food service facilities like hotels, clubs, and healthcare. A.B. Data will also implement a digital media banner ad campaign that will run for four weeks on the websites for each of these trade journals ([www.supermarketnews.com](http://www.supermarketnews.com) and [www.nrn.com](http://www.nrn.com)). A sample banner ad is attached as **Exhibit E**. Comparable alternatives will be considered if any of these proposed platforms will not accept legal notices or inventory is not available at the time of placement.

### **WEBSITE AND TELEPHONE**

12. To assist potential Class Members understanding their rights about the litigation and the Settlements, the current case-specific toll-free telephone number and website from the previous settlements in this matter will continue to be maintained and updated with information about the Settlements with Clemens, Triumph, and Tyson. A.B. Data will respond to any and all email inquiries regarding these Settlements as necessary. With regards to the toll-free telephone line, A.B. Data will receive calls and respond to any and all inquiries regarding the Settlements as necessary.

### **CONCLUSION**

13. It is my opinion, based on my individual expertise and experience and that of my A.B. Data colleagues, that the proposed notice plan is designed to effectively reach potential Class Members, will deliver plain language notices that will capture the attention of the reader, and will provide relevant information in an informative and easy to understand manner that is necessary to effectively understand the rights and options associated with these Settlements. This proposed 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 reach narrowly defined entities and demographic targets. For all these reasons, in my opinion, the proposed notice plan satisfies the requirements of Rule 23 and due process.

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

Executed this 22 day of April 2025 in Milwaukee, Wisconsin.

A handwritten signature in black ink, appearing to read 'Eric Schachter', written over a horizontal line.

Eric Schachter



# EXHIBIT A

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

**If you purchased any Pork product directly from a Pork producer for use or delivery in the United States from June 29, 2014, through June 30, 2018, a class action may affect your rights.**

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

- The purpose of this notice is to inform you that new settlements (the “Settlements”) have been reached in the class action, *In re Pork Antitrust Litigation*, D. Minn. Case No. 0:18-cv-01776. Direct Purchaser Plaintiffs allege that Defendants combined and conspired to suppress competition and allow them and other Pork producers to charge supra-competitive prices for Pork products, violating federal law.
- The new Settlements are with Defendants Clemens Food Group, LLC and The Clemens Family Corporation (“Clemens”); Triumph Foods, LLC (“Triumph”); and Tyson Foods, Inc., Tyson Prepared Foods, Inc., and Tyson Fresh Meats, Inc. (“Tyson”) (“Settling Defendants”).
- Previous settlements were reached on behalf of Direct Purchaser Plaintiffs and Defendants JBS USA Food Company Holdings (“JBS”), Smithfield Foods, Inc. (“Smithfield”), Seaboard Foods, LLC (“Seaboard”) and Hormel Foods Corporation (“Hormel Foods”). The Court gave final approval to these settlements.
- On March 29, 2023, Judge John R. Tunheim issued an Order certifying a class of direct purchasers defined as: “All persons and entities who directly purchased one or more of the following types of pork, or products derived from the following types of pork, from Defendants, or their respective subsidiaries or affiliates, for use or delivery in the United States from June 29, 2014 through June 30, 2018: fresh or frozen loins, shoulders, ribs, bellies, bacon, or hams. For this lawsuit, pork excludes any product that is marketed as organic or as no antibiotics ever (NAE); any product that is fully cooked or breaded; any product other than bacon that is marinated, flavored, cured, or smoked; and ready-to-eat bacon.” (the “Certified Class”).
- If the Court approves the proposed Settlements, the lawsuit will be resolved between the Direct Purchaser Plaintiffs and these Settling Defendants. The lawsuit will continue against the remaining non-settling Defendant, Agri Stats, Inc. (“Agri Stats”).
- These new Settlements require Tyson to pay \$50,000,000, Clemens to pay \$10,000,000, and Triumph to pay \$4,000,000. Tyson will also separately pay up to \$2,000,000 for notice and administration costs. In addition, Settling Defendants agreed to authenticate certain business records.
- The Settling Defendants strongly deny that they are liable or did anything wrong and deny the claims in this lawsuit. The Court has not determined who is right. The Settlements will avoid litigation costs and risks to both the Certified Class and the Settling Defendants.
- Your legal rights are affected whether you act or don’t act. Please read this notice carefully.

**YOUR LEGAL RIGHTS AND OPTIONS IN THESE SETTLEMENTS**

**PARTICIPATE IN THE SETTLEMENTS**

If you already filed a claim in this lawsuit and received a payment from the previous distribution (*see* Question 14), you do not need to submit another claim. You will be automatically eligible to get a payment from the settlement proceeds.

If you did not file a claim in this lawsuit previously, you must submit a claim by [**Month 00, 2025**] to get a payment from the settlement proceeds.

	<p>If you previously submitted a claim, you may submit additional information about your eligible purchases to supplement your claim, but it is not required. The deadline to submit additional information is [Month 00, 2025].</p> <p>The Settlements will resolve your claims against the Settling Defendants about the released claims (as defined in the Settlement Agreements).</p>
<b>ATTEND THE FAIRNESS HEARING</b>	Ask to speak in Court about the fairness of the Settlements.
<b>OBJECT</b>	<p>If you did not exclude yourself from the Certified Class, you may write to the Court about why you don't like the Settlements with the Settling Defendants and/or the request for payment of attorneys' fees and service awards. Objections must be postmarked by [Month 00, 2025].</p>

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**1. Why did I receive a notice?**

The Court has directed this notice to be sent to provide details about the proposed Settlements with the Settling Defendants. Defendants in this lawsuit produce Pork products. Defendants’ records show that you may have purchased Pork products directly from one or more of the Defendants for use or delivery in the United States between June 29, 2014, and June 30, 2018. The Defendants are described in Question 2 below. The Court authorized this notice because you have a right to know about the new proposed Settlements and your rights and options before the Court decides whether to approve the Settlements. If the Court approves the Settlements, you will be bound by the judgment and Settlements’ terms after any objections and appeals are resolved.

You may have received notices and submitted claims in prior settlements reached in this litigation. The prior notices and claims only relate to those settling Defendants. You are receiving this notice because Settlements have now been reached with Clemens, Triumph, and Tyson.

**2. What is this lawsuit about?**

This class action is called *In re Pork Antitrust Litigation*, D. Minn. Case No. 0:18-cv-01776, and is pending in the United States District Court for the District of Minnesota. U.S. District Court Judge John R. Tunheim is overseeing this class action.

Direct Purchaser Plaintiffs allege that Defendants and their co-conspirators conspired and combined to fix, raise, maintain, and stabilize the price of pork products, beginning at least as early as June 29, 2014, with the intent and expected result of increasing prices of pork products in the United States, in violation of federal antitrust laws.

Direct Purchaser Plaintiffs previously reached settlements with Defendants JBS, Smithfield, Seaboard, and Hormel Foods. The Court granted final approval to the JBS settlement on July 27, 2021, the Smithfield settlement on January 31, 2022, the Seaboard settlement on March 5, 2024, and the Hormel Foods settlement on October 2, 2024.

Direct Purchaser Plaintiffs have now reached new proposed Settlements with Defendants Clemens, Triumph, and Tyson. These Settling Defendants deny all allegations of wrongdoing in this lawsuit and would allege numerous defenses to Direct Purchaser Plaintiffs’ claims if the case against them were to proceed. If the Court approves the proposed Settlements, the lawsuit will be fully resolved between the Direct Purchaser Plaintiffs and these Settling Defendants.

The lawsuit is proceeding against the non-settling Defendant, Agri Stats. Agri Stats may be subject to a separate settlement or judgment.

**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 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 are there Settlements?**

The Court did not decide in favor of Direct Purchaser Plaintiffs or the Settling Defendants. Direct Purchaser Plaintiffs believe they may have won at trial and possibly obtained a greater recovery. The Settling Defendants believe the Direct Purchaser Plaintiffs would not have succeeded at a trial. But litigation involves risks to both sides, and therefore, Direct Purchaser Plaintiffs and the Settling Defendants agreed to Settlements. The Settlements require the Settling Defendants to pay money for the benefit of the Certified Class. Direct Purchaser Plaintiffs and their attorneys believe the Settlements are in the best interests of the Certified Class.

**5. Am I part of the Certified Class?**

The Certified Class<sup>1</sup> is defined as:

**All persons and entities who directly purchased one or more of the following types of pork, or products derived from the following types of pork, from Defendants, or their respective subsidiaries or affiliates, for use or delivery in the United States from June 29, 2014, through June 30, 2018: fresh or frozen loins, shoulders, ribs, bellies, bacon, or hams. For this lawsuit, pork excludes any product that is marketed as organic or as no antibiotics ever (NAE); any product that is fully cooked or breaded; any product other than bacon that is marinated, flavored, cured, or smoked; and ready-to-eat bacon.**

**6. Are there exceptions to being included?**

Yes. Specifically excluded from the Certified Class are the Defendants; the officers, directors, or employees of any Defendant; any entity in which any Defendant has a controlling interest; and any affiliate, legal representative, heir, or assign of any Defendant. Also excluded from the Certified Class are any federal, state, or local governmental entities, any judicial officer presiding over this action and the members of his/her immediate family and judicial staff, and any juror assigned to this action.

Anyone who previously excluded themselves from the Certified Class is also not included. The Court approved the list of those entities who excluded themselves from the Certified Class on January 24, 2024 (ECF No. 2086).

If you are in one of these categories described above, you are not a member of the Certified Class and not eligible to participate in these Settlements.

**7. I'm still not sure if I'm included.**

If you are still not sure if you are included, please review the details in the Settlement Agreements, available on the settlement website, [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com). You may also call the Settlement Administrator at 1-866-797-0864 or call or write to Co-Lead Class Counsel at the phone numbers or addresses listed in Question 21.

**8. Can I still exclude myself?**

No. The option to exclude yourself from the Certified Class, these Settlements, and previous settlements has passed. If you did not exclude yourself from the Certified Class previously, you are a Class Member and cannot ask to be excluded now.

**9. If I didn't exclude myself from the Certified Class, can I sue Settling Defendants for the same thing later?**

No. Unless you previously excluded yourself from the Certified Class, you gave up the right to sue Settling Defendants for the claims that are subject to the releases in the Settlement Agreements. You can access the Settlement Agreements, including the release language, on the settlement website: [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com).

<sup>1</sup> The Court dismissed Indiana Packers Corporation from this lawsuit with prejudice, but if you purchased Pork directly from Indiana Packers between June 29, 2014, and June 30, 2018, your purchases may be included in the claims process.

## SETTLEMENT BENEFITS

### 10. What do the Settlements provide?

If the Settlements are approved, Tyson will pay \$50,000,000, Clemens will pay \$10,000,000, and Triumph will pay \$4,000,000 to resolve all Certified Class Members' claims against them for the released claims (as defined in the Settlement Agreements). Tyson will also separately pay up to \$2,000,000 for notice and administration costs. In addition, Settling Defendants agreed to authenticate certain business records and make their personnel available for trial to the same extent those witnesses are made available to the non-settling Defendant.

### 11. What are the Settlement benefits being used for?

The combined settlement proceeds from these Settlements and the Hormel Foods and Seaboard settlements will pay eligible Class Members (*see* Questions 12-13), attorneys' fees (subject to Court approval), excess notice and administration costs (other than the \$2 million to be paid separately by Tyson), and \$25,000 in service awards to each of the three Class Representative Plaintiffs (subject to Court approval) (*see* Question 23).

## HOW TO GET A PAYMENT

### 12. What settlement proceeds will be distributed?

On October 18, 2023, payments from previous settlements with JBS and Smithfield were made to class members who submitted claim forms with validated qualifying pork purchases. These distributions are now complete, and all payments were negotiated or voided.

Proceeds from the settlements with Seaboard and Hormel Foods were not part of that distribution. Seaboard paid \$9,750,000, and Hormel Foods paid \$4,856,000 to settle the claims in this lawsuit.

The total (gross) amount of the Hormel Foods and Seaboard settlements combined with the new Settlements (if approved) will be \$78,606,000 (plus interest). Any attorneys' fees, excess notice and administration costs (other than the \$2 million to be paid separately by Tyson), and service awards approved by the Court will be deducted from these settlement proceeds before they are paid to qualified claimants.

The net settlement proceeds will be distributed to eligible Class Members who have filed or will file valid claims (*see* Question 13) by [Month 00, 2025].

### 13. How much will my payment from the Settlements be?

Payments to qualified claimants from the net settlement proceeds will be calculated based on the proportional (or *pro rata*) amount of their approved pork purchases during the Class Period. Purchases and transaction amounts will be based on the review of Defendants' records and updated based on any audits for information obtained during the previous and current settlement distribution process. A distribution plan, to be approved by the Court at a later date, will determine the *pro rata* amount, if any, that each eligible claimant will receive. No matter how many claims are filed, no settlement proceeds will be returned to the Settling Defendants.

### 14. How can I get a payment?

If you filed a claim and/or received a payment from the previous distribution, you do not need to submit another claim. You will be automatically eligible to get a payment from the settlement proceeds. You may submit additional information about your eligible purchases to supplement your prior claim, but it is not required. The deadline to submit additional information is [Month 00, 2025].

If you did not file a claim in this lawsuit previously, and if you did not exclude yourself from the Seaboard settlement or Certified Class, you must complete and submit a claim form by [Month 00, 2025] to be eligible to get a payment from the settlement proceeds.

Submit your claim form online at [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.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].

You can get a claim form at the website, or you can write to the Settlement Administrator by mail: *In re Pork Antitrust Litigation*, c/o A.B. Data, Ltd., PO Box 173117 Milwaukee, WI 53217 or email: [info@PorkAntitrustLitigation.com](mailto:info@PorkAntitrustLitigation.com) to ask for one to be mailed to you.

**15. How do I review or update my eligible purchase amount?**

You can review your eligible purchase amounts on the settlement website: [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com). You should use your unique identifier (or access code) listed on the top of the notice that was mailed to you to login and review these amounts.

If you disagree with or want to supplement your purchase amounts, you can complete a purchase audit request form (posted on the website) and provide supporting documentation by [Month 00, 2025]. Instructions to complete and submit a purchase audit request form can be found on the settlement website.

All revised pork purchase amounts will be subject to review by the Settlement Administrator, Co-Lead Counsel, and ultimately the Court.

**16. When will I get my payment?**

Payments from the settlement proceeds 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.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com) or may be obtained by contacting the Settlement Administrator by phone toll-free at 1-866-797-0864. Please be patient.

**17. What happens if there are funds remaining?**

If there are any funds remaining after all claims are processed, the Court will decide if the remaining funds will be redistributed to qualified claimants (if there are sufficient funds) or distributed to a Court-approved non-profit. No settlement proceeds will be returned to the Settling Defendants. This information will be posted to [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com) once available.

**18. Do I need to file another claim if I already filed a claim or received a payment in this litigation?**

No. If you already submitted a claim in the previous settlements and/or received a payment from the previous distribution (*see* Question 14), you will be automatically eligible to get a payment from the settlement proceeds and do not need to submit another claim.

**19. Can I file a claim for the settlement proceeds that were already distributed?**

No. The deadline to submit a claim to share in proceeds from the JBS and Smithfield settlements that were already distributed has passed. You are no longer able to submit a claim for payment from the JBS and Smithfield settlement proceeds.

**20. What happens if I do nothing at all?**

If you do nothing and you already filed a claim in this lawsuit and/or received a payment in the previous distribution (*see* Question 14), you will automatically be eligible to get a payment from the settlement proceeds.

If you do nothing and you did not previously file a claim, you will not get a payment from the settlement proceeds. The Settlements will resolve your claims against the Settling Defendants about the released claims (as defined in the Settlement Agreements).

**OBJECTING TO THE SETTLEMENTS****21. How do I tell the Court that I don't like the Settlements?**

You can object to the Settlements if you don't like part or all of them. You can also object to the request for payment of attorneys' fees and service awards. The Court will consider your views.

To object, you must send a letter or other written statement saying that you object to the Settlements and/or the request for payment of attorneys' fees and service awards in *In re Pork Antitrust Litigation*, what you are objecting to, and the reasons why you object. Be sure to include your full name, the name of your business that purchased pork, 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. By submitting an objection, you agree to be bound by the jurisdiction of the district court presiding over the case for the purpose of your objection, including for the purpose of any appropriate discovery. Do not send your written objection to the Court or the judge. Instead, mail the objection to the Settlement Administrator, Co-Lead Class Counsel, and

counsel for the Settling Defendants at the addresses listed below. Your objection must be postmarked no later than [Month 00 2025].

Settlement Administrator	Direct Purchaser Plaintiffs' Co-Lead Class Counsel:	Counsel for Clemens
Pork Antitrust Litigation ATTN: OBJECTIONS c/o A.B. Data, Ltd. P.O. Box 173001 Milwaukee, WI 53217	W. Joseph Bruckner Brian D. Clark LOCKRIDGE GRINDAL NAUEN PLLP 100 Washington Ave. S., Ste. 2200 Minneapolis, MN 55401 (612) 339-6900 wjbruckner@locklaw.com bdclark@locklaw.com  Clifford H. Pearson Bobby Pouya PEARSON WARSHAW, LLP 15165 Ventura Blvd., Ste. 400 Sherman Oaks, CA 91403 (818) 788-8300 cpearson@pwfirm.com bpouya@pwfirm.com	Christa C. Cottrell Daniel Laytin Amarto Bhattacharyya Nicholas M. Ruge KIRKLAND & ELLIS LLP 333 West Wolf Point Plaza, Chicago, IL 60654
Counsel for Triumph	Counsel for Tyson	
Christopher A. Smith HUSCH BLACKWELL LLP 8001 Forsyth Boulevard, Ste. 1500 St. Louis, MO 63105	Tiffany Rider Rohrbaugh AXINN, VELTROP & HARKRIDER LLP 1901 L Street Northwest Washington, D.C. 20036  John M. Tanski TYSON FOODS INC. 2200 W Don Tyson Pkwy, Springdale, AR 72762	

**22. Can I object to the previous settlements?**

No. The deadline to object to the JBS, Smithfield, Seaboard, and Hormel Foods settlements has passed.

**23. What is the difference between excluding myself and objecting?**

Objecting is telling the Court that you do not like something about the Settlements. You can object only if you did not exclude yourself from the Certified Class. Excluding yourself is telling the Court that you do not want to be part of a class or the lawsuit. The time to exclude yourself has already passed. If you previously excluded yourself, you cannot object because the case no longer affects you.

**THE LAWYERS REPRESENTING YOU**

**24. Do I have a lawyer in this case?**

The Court has appointed Lockridge Grindal Nauen PLLP and Pearson Warshaw, LLP as Co-Lead Class Counsel for the Certified Class. Their contact information is provided above in Question 21. If you are a Class Member, you do not need to hire your own lawyer because Co-Lead Class Counsel is working on your behalf.



**25. How will the lawyers be paid?**

You will not have to pay any attorneys' fees or costs out-of-pocket. Co-Lead Counsel will file a motion by [Month 00, 2025], in which they will request up to 33⅓% of the Seaboard, Hormel Foods, Tyson, Clemens, and Triumph settlement proceeds, plus interest, in attorneys' fees and up to \$25,000 in service awards for each of the three Class Representative Plaintiffs. A copy of the motion for payment of attorneys' fees and service awards will be available on the settlement website, [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com), and the Court docket. The Court will determine the amount to be paid for attorneys' fees and service awards.

**THE COURT'S FAIRNESS HEARING****26. When and where will the Court decide whether to approve the Settlements?**

The Court will hold a hearing to decide whether to approve the Settlements (the "Fairness Hearing"). You may attend and you may ask to speak, but you don't have to.

The Court will hold a Fairness Hearing on [Month 00, 2025], at [XX:00 a.m.] Central Time, at the United States District Court for the District of Minnesota, Courtroom 14E, 300 South Fourth Street, Minneapolis, MN 55415. At this hearing, the Court will consider whether the Settlements are fair, reasonable, and adequate, and Co-Lead Counsel's request for payment of attorneys' fees and service awards. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the Settlements. We do not know how long these decisions will take. The Fairness Hearing may take place remotely, including via telephone or video conference. The Court may also move the Fairness Hearing to a later date without providing additional notice to the Certified Class. Updates will be posted to the settlement website regarding any changes to the hearing date or conduct of the Fairness Hearing.

**27. Do I have to come to the hearing?**

No. Co-Lead Class Counsel will answer any questions the Court may have. However, you are welcome to attend in person (or attend via telephone or video conference, if the Court holds a telephone or video hearing) 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 mail your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

**28. May I speak at the hearing?**

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 Pork Antitrust Litigation*." Be sure to include your name, including the name of your business which purchased pork, current mailing address, telephone number, and signature. Your Notice of Intention to Appear must be postmarked no later than [Month XX, 2025], and it must be sent to the Clerk of the Court, Co-Lead Class Counsel, and Settling Defendants' counsel. The address for the Clerk of the Court is: 300 South Fourth Street, Courtroom 14E, Minneapolis, MN 55415. The addresses for Co-Lead Class Counsel and Settling Defendants' counsel are provided in Question 21. You cannot ask to speak at the hearing if you excluded yourself from the Certified Class.

**GETTING MORE INFORMATION****29. How do I get more information?**

This notice summarizes the proposed Settlements. More details are in the Settlement Agreements. You can find copies of the Settlement Agreements, other important documents, and information about the current status of the litigation by visiting [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com). You may contact the Settlement Administrator at *In re Pork Antitrust Litigation*, c/o A.B. Data, Ltd., PO Box 173117, Milwaukee, WI 53217; [info@PorkAntitrustLitigation.com](mailto:info@PorkAntitrustLitigation.com) or 1-866-797-0864 (toll-free). You may also contact Co-Lead Class Counsel at the addresses, phone numbers, and email addresses provided in Question 21.

**PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE.**

# EXHIBIT B

**COURT-APPROVED LEGAL NOTICE**

**If you purchased any Pork product directly from a Pork producer for use or delivery in the United States from June 29, 2014, through June 30, 2018, a class action may affect your rights.**

*Para una notificación en español, llame gratis al 1-866-797-0864 o visite nuestro website [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com).*

The purpose of this notice is to inform you that new settlements (the “Settlements”) have been reached in a class action lawsuit on behalf of Direct Purchaser Plaintiffs with Defendants Clemens Food Group, LLC and The Clemens Family Corporation (“Clemens”); Triumph Foods, LLC (“Triumph”); and Tyson Foods, Inc., Tyson Prepared Foods, Inc., and Tyson Fresh Meats, Inc. (“Tyson”). (“Settling Defendants”). The lawsuit is called *In re Pork Antitrust Litigation*, D. Minn. Case No. 0:18-cv-01776. **A more detailed notice is available at [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.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 pork products, beginning at least as early as June 29, 2014, with the intent and expected result of increasing prices of pork products in the United States, in violation of federal antitrust laws. Direct Purchaser Plaintiffs previously reached settlements with Defendants JBS, Smithfield, Seaboard, and Hormel Foods. The Court granted final approval to the JBS settlement on July 27, 2021, the Smithfield settlement on January 31, 2022, the Seaboard settlement on March 5, 2024, and the Hormel Foods settlement on October 2, 2024.

Direct Purchaser Plaintiffs have now reached new proposed Settlements with Defendants Tyson, Clemens, and Triumph. If the Court approves the proposed Settlements, the lawsuit will be resolved between the Direct Purchaser Plaintiffs and these Settling Defendants. The Court has not decided whether Settling Defendants did anything wrong, and they deny any wrongdoing.

The lawsuit is proceeding against the non-settling Defendant, Agri Stats, Inc. (“Agri Stats”). Agri Stats may be subject to a separate settlement or judgment.

**WHO IS INCLUDED?**

On March 29, 2023, Judge John R. Tunheim issued an Order certifying a class of direct purchasers defined as: “All persons and entities who directly purchased one or more of the following types of pork, or products derived from the following types of pork, from Defendants, or their respective subsidiaries or affiliates, for use or delivery in the United States from June 29, 2014 through June 30, 2018: fresh or frozen loins, shoulders, ribs, bellies, bacon, or hams. For this lawsuit, pork excludes any product that is marketed as organic or as no antibiotics ever (NAE); any product that is fully cooked or breaded; any product other than bacon that is marinated, flavored, cured, or smoked; and ready-to-eat bacon.” (the “Certified Class”). The Court dismissed Indiana Packers Corporation from this lawsuit with prejudice, but if you purchased Pork directly from Indiana Packers between June 29, 2014, and June 30, 2018, your purchases may be included in the claims process.

Specifically excluded from the Certified Class are the Defendants; the officers, directors, or employees of any Defendant; any entity in which any Defendant has a controlling interest; and any affiliate, legal representative, heir, or assign of any Defendant. Also excluded from the Certified Class are any federal, state, or local governmental entities, any judicial officer presiding over this action and the members of his/her immediate family and judicial staff, and any juror assigned to this action. Anyone who previously excluded themselves from the Certified Class is also not included. The deadline to exclude yourself from the Certified Class was January 8, 2024.

If you are not sure if you are included, you can get more information, including a detailed notice, at [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com) or by calling toll-free 1-866-797-0864.

**WHAT DO THE SETTLEMENTS PROVIDE?**

If the Settlements are approved, Tyson will pay \$50,000,000, Clemens will pay \$10,000,000, and Triumph will pay \$4,000,000 to resolve all Certified Class Members’ claims against them for the released claims (as defined in the Settlement Agreements). Tyson will also separately pay up to \$2,000,000 for notice and administration costs. Also, the Settling Defendants will assist the Direct Purchaser Plaintiffs in their ability to prove their claims at trial as the case proceeds against Agri Stats.

The combined settlement proceeds from these Settlements and the Hormel Foods and Seaboard settlements, totaling \$78,606,000 (plus interest), will pay eligible claimants and any Court-approved attorneys’ fees, excess notice and administration costs (other than the \$2 million to be paid separately by Tyson), and service awards.

**HOW CAN I GET A PAYMENT?**

If you filed a claim and/or received a payment from the previous distribution, you do not need to submit another claim. You will be automatically eligible to get a payment from the settlement proceeds. You may submit additional information about your eligible purchases by [Month 00, 2025] to supplement your prior claim, but it is not required. If you did not file a claim in this lawsuit previously, and if you did not exclude yourself from the Seaboard settlement or Certified Class, you must complete and submit a claim form online at [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com) or by mail by [Month 00, 2025] to be eligible to get a payment from the settlement proceeds. Payment amounts will depend on the number of valid claims and the proportional (or *pro rata*) amount of approved pork purchases you made from June 29, 2014, through June 30, 2018.

**WHAT ARE YOUR RIGHTS AND OPTIONS?**

As a Certified Class Member, will be bound by the Settlements (even if you do nothing), and you will be able to participate in any future settlement or judgment obtained by Direct Purchaser Plaintiffs against Agri Stats in this lawsuit.

If you did not exclude yourself from the Certified Class, you may object to the Settlements by [Month 00, 2025]. The detailed notice available at [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com) explains how to object. The Court will hold a hearing on [Month 00, 2025], to consider whether to approve the Settlements and the request for attorneys' fees up to 33⅓% of the Seaboard, Hormel Foods, Tyson, Clemens, and Triumph settlement proceeds, plus interest, and up to \$25,000 in service awards for each of the three Class Representative Plaintiffs. You (or your attorney) may appear and ask to speak at the hearing (at your own expense), but you do not have to.

**This notice is only a summary. You can find more details about the litigation or the Settlements at [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com) or by calling toll-free 1-866-797-0864. Please do not contact the Court.**

# EXHIBIT C

Pork Direct Antitrust Litigation  
 c/o A.B. Data, Ltd.  
 P.O. Box 173117  
 Milwaukee, WI 53217  
[www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com)

## DIRECT PURCHASER ANTITRUST CLAIM FORM



If you already filed a claim in this lawsuit and received a payment from the previous distribution, you **do not** need to submit another Claim Form. You will be automatically eligible to receive a payment.

If you did not previously file a claim in this lawsuit, review your known purchase information at [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com). If you **agree** with the purchase information in the records, complete this Claim Form and submit it by [Month 00, 2025] (postmarked or online).

If you **disagree** with the purchase information in the records, no purchase information exists for you, or you want to update your previous claim with additional purchase data, complete the Purchase Audit Request form posted on [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com), attach your supporting documents, and submit them by [Month 00, 2025].

You only need to complete this claim form if you did not previously file a claim for the previous distribution, and you want to participate in the distribution of the Seaboard, Hormel Foods, Tyson, Clemens, and Triumph settlement proceeds. These proceeds, minus any Court-approved attorneys' fees, notice and administration costs (other than the \$2 million to be paid separately by Tyson), and service awards, will be distributed to qualified claimants based on the proportional (or *pro rata*) amount of their approved pork purchases from June 29, 2014, through June 30, 2018.

If you already filed a claim and/or received a payment from the previous distribution, you will be automatically eligible to get a payment from the settlement proceeds and **do not** need to submit another Claim Form. **If you did not previously file a claim, and did not exclude yourself from the Certified Class, you must submit this Claim Form at [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com), or mail your completed form to the address listed above by [Month 00, 2025], to be eligible to receive a payment.**

Distribution payments from the JBS and Smithfield settlements are now complete, and you cannot file a claim for a distribution from those proceeds.

### STEP 1: REVIEW YOUR PURCHASE INFORMATION

The total award amount you receive will be calculated based on the purchase information from records available from Defendants. The records show the qualifying purchases you made from Defendants in the United States from June 29, 2014, through June 30, 2018. You will receive a proportional (*pro rata*) share of the settlement proceeds based on your purchase information as compared to other eligible claimants.

To review your purchase information, go to the website, [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com). Under Claim Form, use the Unique ID number (listed at the top of your notice) to log in. You will be able to review your purchase information and submit a claim electronically. If your organization received more than one notice, you need to file one Claim Form for each Unique ID. If you did not receive a Unique ID, contact the Settlement Administrator for more information.

If you **agree** with your recorded purchase information, you just need to complete and submit this Claim Form. You do not need to complete additional forms or submit supporting documents.

If you **disagree** with your recorded purchase information or no purchase information exists, you need to complete and submit the Purchase Audit Request Form, attach your supporting documents, and submit them by [Month 00, 2025]. You can access the Purchase Audit Request Form and instructions on the website: [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com).

**STEP 2: ENTER CLAIMANT INFORMATION**

Please complete the Claimant Information form below.

**UNIQUE ID** (printed on your notice): \_\_\_\_\_

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

**STEP 3: SIGN STATEMENT**

Sign the statement below:

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; any entity in which any Defendant has a controlling interest; an affiliate, legal representative, heir, or assign of any Defendant, 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: \_\_\_\_\_

**STEP 4: SUBMIT YOUR CLAIM FORM BY [MONTH 00, 2025]**

Please submit your completed Claim Form to the Settlement Administrator by [Month 00, 2025] (postmarked to the address above or submitted online at [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com)).

# EXHIBIT D



Pork Direct Antitrust Litigation  
 c/o A.B. Data, Ltd.  
 P.O. Box 173117  
 Milwaukee, WI 53217  
[www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com)

**DIRECT PURCHASER ANTITRUST PURCHASE AUDIT REQUEST FORM**

Please use this form if you do not agree with your recorded purchase data (available at [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com)) and want that information audited, no known purchase information is available for you, or you want to update the information on your previous claim. Please fill out your contact information, provide annualized purchase information (on page 2), and attach your supporting documents.

You must submit your completed Purchase Audit Request Form (and your supporting documents) to the mailing address listed at the top of this form or on the website, [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com), by **[Month 00, 2025]**.

**STEP 1: ENTER CLAIMANT INFORMATION**

Please complete the Claimant Information form below.

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

Pork Direct Antitrust Litigation  
 c/o A.B. Data, Ltd.  
 P.O. Box 173117  
 Milwaukee, WI 53217  
[www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com)

**STEP 2: ENTER YOUR PURCHASE INFORMATION**

Enter the purchase information for **ALL** qualifying Pork products you bought from Defendants (or their subsidiaries or affiliates) in the United States from June 29, 2014, through June 30, 2018, in the form below.

**UNIQUE ID** (printed on your notice): \_\_\_\_\_

DEFENDANT/ CO-CONSPIRATOR	2014	2015	2016	2017	2018
Clemens					
Hormel					
JBS					
Seaboard <sup>1</sup>					
Smithfield					
Triumph <sup>1</sup>					
Tyson					
Indiana Packers					

**Total Purchase Amount** \$ \_\_\_\_\_

**STEP 3: ATTACH SUPPORTING DOCUMENTS**

Please attach (or submit) documents to support your updated claim and/or audit request. Supporting documents must include actual receipts or invoices that include the product name, Defendant manufacturer name, purchase date, and net purchase amount.

*Please submit legible copies. Do not send originals. Keep the originals for your records.*

<sup>1</sup> Purchases for Seaboard Triumph Foods, if any, should be included in purchases from Seaboard or Triumph.

Pork Direct Antitrust Litigation  
c/o A.B. Data, Ltd.  
P.O. Box 173117  
Milwaukee, WI 53217  
[www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com)

### STEP 4: SIGN STATEMENT

Sign the statement below.

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; any entity in which any Defendant has a controlling interest; an affiliate, legal representative, heir, or assign of any Defendant, 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 updated claim and audit request.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Full Name (First, Middle, and Last): \_\_\_\_\_

Title: \_\_\_\_\_

### STEP 5: SUBMIT FORM AND DOCUMENTS BY (MONTH 00, 2025]

Please submit your completed Audit Request Form, along with additional documents that support your updated claim and purchase audit request (e.g., invoices, purchase information, etc.), to the Settlement Administrator by **[Month 00, 2025]** (postmarked to the address above or submitted online at [www.PorkAntitrustLitigation.com](http://www.PorkAntitrustLitigation.com)).

# EXHIBIT E

**If You Purchased Any Pork Products**

**directly from a Pork producer  
for use or delivery in the U.S.  
from 6/29/14 through 6/30/18**

**A CLASS ACTION SETTLEMENT  
MAY AFFECT YOUR RIGHTS**

**File a  
Claim Here >>** [PorkAntitrustLitigation.com](http://PorkAntitrustLitigation.com)

The advertisement features a dark wood background. At the top, a yellow banner contains the text 'If You Purchased Any Pork Products'. Below this, a light-colored wooden sign with a dark border contains the text 'directly from a Pork producer for use or delivery in the U.S. from 6/29/14 through 6/30/18'. Underneath the sign, the text 'A CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS' is displayed. At the bottom, a yellow banner contains a call to action: 'File a Claim Here >>' followed by the website 'PorkAntitrustLitigation.com'.

# EXHIBIT F

**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  
32<sup>nd</sup> Floor  
New York, NY 10004  
P: 646-290-9137

**Washington DC**

915 15<sup>th</sup> St., NW, Ste. 300  
Washington, DC 20005  
P: 202-618-2900  
F: 202-462-2085

**Florida**

5080 PGA Boulevard, Ste. 209  
Palm Beach Gardens, FL 33418  
P: 561-336-1801  
F: 561-252-7720

**Israel**

19 Weissburg Street  
Tel Aviv 69358  
Israel  
P: +972 (3) 720-8782


**London**

71-75 Shelton Street  
Covent Garden  
London, WC2H 9JQ  
P: +44 20 4586 1892




# CAPABILITIES

## About A.B. Data


 Founded in 1981, **A.B. Data has earned a reputation** for expertly managing the complexities of class action administration in consumer, antitrust, securities, Securities and Exchange Commission (SEC) enforcement actions, and ERISA, Attorneys General, employment, civil rights, insurance, environmental, wage and hour, and other class action cases. **A.B. Data's work in all aspects of class action administration** has been perfected by decades of experience in hundreds of class action cases involving billions of dollars in total settlements. Dedicated professionals deliver **A.B. Data's all-inclusive services**, working in partnership with its clients to administer their class action cases effectively, efficiently, and affordably, regardless of size or scope.

**A.B. Data offers unmatched resources and capacity** and is capable of expertly administering any class action notice, settlement, and/or fund administration. Whether notifying millions of class members in the United States or throughout the world, processing millions of claims, distributing payments digitally via A.B. Data's Digital PayPortal<sup>SM</sup>, or printing and distributing millions of checks, **A.B. Data matches its talent and technology** to the specific needs of its clients, delivering unparalleled service on time and on budget without ever compromising quality.

## Location, Ownership Structure

 **A.B. Data is an independently owned**, more than 40-year-old, Milwaukee, Wisconsin-based company that prides itself on its vast expertise and industry-leading innovations. We like to remind our clients and partners that we're not just a class action administration company, but a group of experienced, dedicated professionals who believe that relationships are just as important as the accurate and timely management of class action administrations. In other words, we are people who do business with people.

## Services

 **Every A.B. Data client is deserving of the best job we can put forward.** A.B. Data makes class action administration easy for our clients with clarity, convenience, and efficiency. Our priority is to navigate the intricacies of our clients' matters and deliver successful results by using our solid expertise, advanced technology, and top-quality products and services. We pay attention to the details and get it right the first time.

We aim to provide our clients the full experience of a truly collaborative working relationship. It is why we believe much of our success originates from our philosophy of "people doing business with people."



## Services

### All Digital — From Notice to Distribution

**A.B. Data is uniquely positioned to design, implement, and maintain notice and settlement administration programs** using an innovative, "all-digital" approach that replaces the more traditional and less efficient methods of administration, such as newspaper ads, mailed notices, and paper checks. Many of our recent proposed notice plans and claim programs utilize the latest technologies such as microtargeted digital ads for notice, streamlined online claims, and distributing settlement funds electronically using a digital paywall. These methods provide significant cost savings, are consistent with the amendments to Rule 23 that are now in effect, and importantly provide much-needed alignment of class action notice and administration with current consumer behaviors.

### Pre-Settlement Consultation

**The pre-settlement consultation is a collaborative session** designed to help A.B. Data clients prepare a stronger case. Our support teams simplify the task of sorting through a maze of documents during investigation and discovery, streamlining the process and preserving fund assets. From there, we assist with fully interactive media packages for court presentations and settlement negotiations. A.B. Data works closely with our clients, offering expert testimony on documents, processing, class and notice manageability, and proposed plans of allocation.

### Media Services

**A.B. Data continues to earn our reputation** as the early innovator in integrating advanced micro-targeting techniques, including contextual targeting, behavioral targeting, and predictive modeling. Coupled with inventive digital media strategies to drive claims, case-specific banner ad development, class member research, and comScore analysis services, our multi-tiered media programs are designed to cost-effectively deliver notice to potential class members and increase claims rates.

### Notice Administration

**In A.B. Data, clients have a comprehensive resource** with a depth of experience in direct notice. Our compliance and understanding of Rule 23 of the Federal Rules of Civil Procedure are crucial in meeting the "plain language" legal requirements for any campaign. From our sophisticated digital media capabilities and extensive global experience with class member research, our experts create notice documents that are easily understandable and cost-efficient to produce. We consult with our clients to deliver notice documents from multi-page, mailed, or emailed notice packets to concise postcards that establish the most influential and cost-effective means of communicating with potential claimants.

## Claims Processing

**A.B. Data continues to bring game-changing technologies** to improve the speed and precision in claims processing. Our robust system for online claims submissions allows us to meticulously verify data and documentation, preserve and authenticate claims, and calculate and verify settlement amounts. In addition, our data network infrastructure includes on-site data storage, backup, contingency plans, and security for electronic and hard copy claim filings. It is all part of a total commitment to be the most innovative and comprehensive resource in the industry. At A.B. Data, we take pride in having the in-house capacity to process millions of pages, as well as the organizational integrity to treat every claim as if it were the only one.

## Contact Center

**A.B. Data's Contact Center is comprised of a full staff** that is trained on and equipped with online and telecommunication systems to monitor and connect with class members. Associates routinely monitor class member communication for all class action administrations, including antitrust, consumer, and securities.

Utilizing monitoring software, associates watch multiple social media channels simultaneously, allowing for instantaneous routing of inquiries and interaction with claimants. Detailed and concise analytical reports outlining Contact Center activities are always provided.

Our Contact Center and case websites are capable of handling millions of class member engagements, as recently displayed in a campaign which garnered over 1.2 million website visits in two months and had more than 72,500 Facebook engagements. Facebook comments and threads are monitored and claimants are guided to the website for more information. Google AdWords and display advertising have also brought hundreds of thousands of visitors to various case websites.

A.B. Data's Contact Center also has Spanish language associates in-house and we can accommodate any language, given proper lead time. Traditional call center facilities are also available, if needed.

## Case Websites

**We offer a state-of-the-art technology platform** that supports every step of our class action administration process. Our expert marketing professionals design customized case-specific websites that provide potential class members easy access to case information, critical documents, important deadlines, as well as the capability to file claim forms and register for future mailings about the case. Claimants can use the website to elect to receive their settlement payments by mail or by one of several digital payment options, all accessible by mobile devices.

## Settlement Fund Distribution

**From complete escrow services to establishment of qualified settlement funds**, check printing and mailing, electronic cash or stock distribution and tax services, A.B. Data has always provided a full-service solution to Settlement Fund Distribution. Our IT team has decades of experience in developing and implementing fast, secure databases and claims administration systems that ensure class members receive the correct amount in their settlement disbursement. Today's digital capabilities allow even greater convenience for class members. In certain instances, claimants can now elect to

instantaneously receive settlement payments through popular digital-payment options, such as PayPal, Amazon, and virtual debit cards.

## A.B. Data's Leadership



A.B. Data's administration team is composed of the following key executives, who collectively have decades of experience settling and administering class actions:

**Bruce A. Arbit, Co-Managing Director** and one of the founders of the A.B. Data Group, serves as Chairman of the Board and oversees the day-to-day operations of the A.B. Data Group of companies, employing almost 400 people in the United States and Israel. Mr. Arbit is also Chairman of the Board of Integrated Mail Industries, Ltd. and has served as a member of the Board of Directors of University National Bank and State Financial Bank. He is the past Chairman of Asset Development Group, Inc., Home Source One, and American Deposit Management and is a member of the National Direct Marketing Association, the Direct Marketing Fundraising Association, and the American Association of Political Consultants. He was named 1996 Direct Marketer of the Year by the Wisconsin Direct Marketing Association.

A.B. Data's work in class action litigation support began with the Court selecting A.B. Data to oversee the restitution effort in the now-famous Swiss Banks Class Action Case, the International Commission on Holocaust Era Insurance Claims, and every other Holocaust Era Asset Restitution program, in which it was the company's job to identify, contact, and inform survivors of the Holocaust. A.B. Data delivered by reaching out to millions of people in 109 countries who spoke more than 30 languages. Since those days, Mr. Arbit has guided the class action division through phenomenal growth and success. Today, A.B. Data manages hundreds of administrations annually that distributes billions of dollars to class members.

**Thomas R. Glenn, President**, Mr. Glenn's management of A.B. Data's Class Action Administration Company includes designing and implementing notice plans and settlement administration programs for antitrust, securities, and Securities and Exchange Commission settlements and SEC disgorgement fund distributions, as well as consumer, employment, insurance, and civil rights class actions. Mr. Glenn previously served as Executive Vice President at Rust Consulting and has more than 30 years of executive leadership experience.

**Eric Miller, Senior Vice President**, as a key member of A.B. Data's Class Action Administration Leadership Team, oversees the Case Management Department and supervises the operations and procedures of all of A.B. Data's class action administration cases. Mr. Miller is recognized in the class action administration industry as an expert on securities, SEC, consumer, product recall, product liability, general antitrust, pharmaceutical antitrust, and futures contract settlements, to name a few settlement types. Prior to joining A.B. Data, Mr. Miller served as the Client Service Director for Rust Consulting, responsible there for its securities practice area. He has more than 20 years of operations, project management, quality assurance, and training experience in the class action administration industry. In addition, Mr. Miller manages A.B. Data's office in Palm Beach Gardens, Florida.

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

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

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

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

**Steve Straub, Vice President, Operations**, started with A.B. Data in 2012 as a Claims Administrator. He moved through the ranks within the company where he spent the past five years as Senior Project Manager managing many of the complex commodities cases such as *In re LIBOR-Based Financial Instruments Antitrust Litigation*, *In re London Silver Fixing, Ltd. Antitrust Litigation*, and *Laydon v. Mizuho Bank, Ltd., et al.* Mr. Straub's performance in these roles over the past ten years, along with his comprehensive knowledge of company and industry practices and first-person experience leading the project management team, has proven him an invaluable member of the A.B. Data team.

In his role as Vice President of Operations, his responsibilities include developing efficiencies within the operations center, which includes mailroom, call center, and claims processing areas. His areas of expertise include business process development, strategic/tactical operations planning and implementation, risk analysis, budgeting, business expansion, growth planning and implementation, cost reduction, and profit, change, and project management. Mr. Straub is well-versed in the administration of securities, consumer, and antitrust class action settlements. He earned his Juris Doctor degree from Seton Hall University School of Law in Newark, New Jersey.

**Jack Ewashko, Director of Client Services**, brings twenty years of industry and brokerage experience to his role with A.B. Data. He is an accomplished client manager adept at facilitating proactive communications between internal and outside parties to ensure accurate and timely deliverables. Mr. Ewashko previously held positions at two claim administration firms where he oversaw the securities administration teams and actively managed numerous high-profile matters, including the \$2.3 billion foreign exchange litigation. He notably served as Vice President, FX and Futures Operations at Millennium Management, a prominent global alternative investment management firm. As he progressed through trading, analytic, management, and consultancy roles at major banks and brokerage firms, Mr. Ewashko gained hands-on experience with vanilla and exotic securities products, including FX, commodities, mutual funds, derivatives, OTC, futures, options, credit, debt, and equities products. In the financial sector, he also worked closely with compliance and legal teams to ensure accuracy and conformity with all relevant rules and regulations regarding the marketing and sale of products, as well as the execution and processing of trades. He has held Series 4, Series 6, Series 7, and Series 63 licenses, and has been a member of the Futures Industry Association (FIA) and Financial Industry Regulatory Authority (FINRA). Mr. Ewashko earned his Bachelor of Business Administration from Long Island University, Brooklyn, New York.

**Brian Devery, Director of Client Services**, brings more than a decade of experience in class action administration and project management, as well as over two decades of experience as an attorney (ret.). Mr. Devery currently focuses on consumer, antitrust, employment, and other non-securities based administrations. In addition to driving project administration, he is focused on the implementation of process improvement, streamlining, and automation. Mr. Devery is admitted to practice law in State and Federal Courts of New York with his Juris Doctorate earned from the Maurice A. Deane School of Law at Hofstra University, Hempstead, New York.

**Adam Walter, PMP, Director of Client Services**, has nearly fifteen years of experience managing the administration of securities class action settlements and SEC disgorgements totaling more than \$4 billion. He has managed settlement programs in engagements involving some of the largest securities class action settlements and is a key contributor to the development of administration strategies that meet the evolving needs of our clients. His responsibilities include developing case administration strategies to ensure that all client and court requirements and objectives are met, overseeing daily operations of case administrations, ensuring execution of client deliverables, providing case-related legal and administration support to class counsel, overseeing notice dissemination programs, implementing complex claims-processing and allocation methodologies, establishing quality assurance and quality control procedures, and managing distribution of settlement funds. Mr. Walter holds a bachelor's degree in business administration from Florida Atlantic University, Boca Raton, Florida. He also has been an active member of the Project Management Institute since 2010 and is PMP®-certified.

**Eric Nordskog, Director of Client Services**, started with A.B. Data in 2012 on the operations team, managing dozens of team leads and claims administrators in the administration of legal cases and actions. In 2017, Mr. Nordskog was promoted to Project Manager, due in part to his proven ability to add consistency and efficiency to the e-claim filing process with new streamlined processes and audit practices. Today, as Senior Project Manager, he directs many of A.B. Data's securities, insurance, and

consumer cases. He regularly oversees the administration of large insurance cases, such as two recent Cigna Insurance matters that involved complex calculations and over one million class members each. He is also the primary hiring and training manager for new project managers and coordinators. Mr. Nordskog earned his Juris Doctor degree from Marquette University Law School, Milwaukee, in 2001.

**Eric Schultz, MCSE, Information Technology Manager and Security Team Chairperson**, has been with A.B. Data for more than 19 years, and is currently responsible for overseeing all information technology areas for all A.B. Data divisions across the United States and abroad, including network infrastructure and architecture, IT operations, data security, disaster recovery, and all physical, logical, data, and information systems security reviews and audits required by our clients or otherwise. As a Microsoft Certified Systems Engineer (MCSE) with more than 25 years of experience in information technology systems and solutions, Mr. Schultz has developed specializations in network security, infrastructure, design/architecture, telephony, and high-availability network systems.

## Secure Environment



**A.B. Data's facilities provide the highest level of security** and customization of security procedures, including:

- A Secure Sockets Layer server
- Video monitoring
- Limited physical access to production facilities
- Lockdown mode when checks are printed
- Background checks of key employees completed prior to hire
- Frequency of police patrol – every two hours, with response time of five or fewer minutes
- Disaster recovery plan available upon request

## Data Security



**A.B. Data is committed to protecting the confidentiality, integrity, and availability of personal identifying information** and other information it collects from our clients, investors, and class members and requires that its employees, subcontractors, consultants, service providers, and other persons and entities it retains to assist in distributions do the same. A.B. Data has developed an Information Security Policy, a suite of policies and procedures intended to cover all information security issues and bases for A.B. Data, and all of its divisions, departments, employees, vendors, and clients. A.B. Data has also recently taken the necessary, affirmative steps toward compliance with the EU's General Data Protection Regulation and the California Consumer Privacy Act.

A.B. Data has a number of high-profile clients, including the Securities and Exchange Commission (SEC), the United States Department of Justice, the Attorneys General of nearly all 50 states, other agencies of the United States government, and the Government of Israel, as well as direct banking and payment services companies with some of the most recognized brands in United States financial services and some of the largest credit card issuers in the world.

We are therefore frequently subjected to physical, logical, data, and information systems security reviews and audits. We have been compliant with our clients' security standards and have also been determined to be compliant with ISO/IEC 27001/2 and Payment Card Industry (PCI) data-security standards, the Gramm-Leach-Bliley Act (GLB) of 1999, the National Association of Insurance Commissioners (NAIC) Regulations, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and the Health Information Technology for Economic and Clinical Health Act (HITECH).

The Government of Israel has determined that A.B. Data is compliant with its rigorous security standards in connection with its work on Project HEART (Holocaust Era Asset Restitution Taskforce).

A.B. Data's fund distribution team has been audited by EisnerAmper LLP and was found compliant with class action industry standards and within 99% accuracy. EisnerAmper LLP is a full-service advisory and accounting firm and is ranked the 15th-largest accounting firm in the United States.

In addition, as part of PCI compliance requirements, A.B. Data has multiple network scans and audits from third-party companies, such as SecurityMetrics and 403 Labs, and is determined to be compliant with each of them.

## Fraud Prevention and Detection



**A.B. Data is at the forefront of class action fraud prevention.**

A.B. Data maintains and utilizes comprehensive proprietary databases and procedures to detect fraud and prevent payment of allegedly fraudulent claims.

We review and analyze various filing patterns across all existing cases and claims. Potential fraudulent filers are reported to our clients as well as to the appropriate governmental agencies where applicable.

## Representative Class Action Engagements



**A.B. Data and/or its team members have successfully administered** hundreds of class actions, including many major cases. Listed below are just some of the most representative or recent engagements.

### Consumer & Antitrust Cases

- *In re EpiPen Marketing, Sales Practices and Antitrust Litigation*
- *In re Broiler Chicken Antitrust Litigation - Commercial (Indirect)*
- *In re Broiler Chicken Antitrust Litigation - Indirect*
- *In re Broiler Chicken Antitrust Litigation - Direct*
- *In re Pork Antitrust Litigation - Directs*
- *In re Pork Antitrust Litigation - Indirects*

- *Peter Staley, et al. v. Gilead Sciences, Inc., et al.*
- *In re: Opana ER Antitrust Litigation*
- *In re Ranbaxy Generic Drug Application Antitrust Litigation*
- *In re Valeant Pharmaceuticals Int'l, Inc. Third-Party Payor Litigation*
- *Staley, et al., v. Gilead Sciences*
- *In Re: Generic Pharmaceuticals Pricing Antitrust Litigation – Direct Purchasers*
- *Beef Direct Purchaser Antitrust Litigation*
- *BCBSM, Inc. v. Vyera Pharmaceuticals, et al. (Daraprim)*
- *In re Automobile Antitrust Cases I and II*
- *Olean Wholesale Grocery Cooperative, Inc., et al. v. Agri Stats, Inc., et al. (Turkey)*
- *Integrated Orthopedics, Inc., et al. v. UnitedHealth Group, et al.*
- *In Re: Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litigation*
- *Vista Healthplan, Inc., et al. v. Cephalon, Inc., et al. (Provigil)*
- *Jeffrey Koenig, et al. v. Vizio, Inc.*
- *Wit, et al. v. United Behavioral Health*
- *Weiss, et al. v. SunPower Corporation*
- *Smith, et al. v. FirstEnergy Corp., et al.*
- *Resendez, et al. v. Precision Castparts Corp. and PCC Structural, Inc.*
- *Julian, et al. v. TTE Technology, Inc., dba TCL North America*
- *Eugenio and Rosa Contreras v. Nationstar Mortgage LLC*
- *Phil Shin, et al. v. Plantronics, Inc.*
- *In re: Qualcomm Antitrust Litigation*
- *In re Resistors Antitrust Litigation*
- *The Hospital Authority of Metropolitan Government of Nashville and Davidson County, Tennessee v. Momenta Pharmaceuticals, Inc. and Sandoz Inc. ("Lovenox Antitrust Matter")*
- *William Kivett, et al. v. Flagstar Bank, FSB, and DOES 1-100, inclusive*
- *Adelphia, Inc. v. Heritage-Crystal Clean, Inc.*
- *LLE One, LLC, et al. v. Facebook, Inc.*
- *Bach Enterprises, Inc., et al. v. Advanced Disposal Services South, Inc., et al.*
- *JWG Inc., et al. v. Advanced Disposal Services Jacksonville, L.L.C., et al.*
- *State of Washington v. Motel 6 Operating L.P. and G6 Hospitality LLC*
- *In re GSE Bonds Antitrust Litigation*
- *Wave Lengths Hair Salons of Florida, Inc., et al. v. CBL & Associates Properties, Inc., et al.*
- *In re Loestrin 24 FE Antitrust Litigation*
- *Office of the Attorney General, Department of Legal Affairs, State of Florida v. Pultegroup, Inc. and Pulte Home Company, LLC*
- *In re Cigna-American Specialties Health Administration Fee Litigation*
- *In re: Intuniv Antitrust Litigation*
- *High Street, et al. v. Cigna Corporation, et al.*
- *Gordon Fair, et al. v. The Archdiocese of San Francisco, San Mateo, and Marin County*
- *Bizzarro, et al. v. Ocean County Department of Corrections, et al.*
- *Meeker, et al. v. Bullseye Glass Co.*
- *MSPA Claims 1, LLC v. Ocean Harbor Casualty Insurance Company*
- *Tennille v. Western Union Company - Arizona*
- *Garner, et al. v. Atherotech Holdings, Inc. and Garner, et al. v. Behrman Brothers IV, LLC, et al.*
- *Robinson, et al. v. Escallate, LLC*
- *Josefina Valle and Wilfredo Valle, et al. v. Popular Community Bank f/k/a Banco Popular North America*
- *Vision Construction Ent., Inc. v. Waste Pro USA, Inc. and Waste Pro USA, Inc. and Waste Pro of Florida, Inc.*



- *Plumley v. Erickson Retirement Communities, et al.*
- *In re London Silver Fixing, Ltd. Antitrust Litigation*
- *Ploss v. Kraft Foods Group, Inc. and Mondelēz Global LLC*
- *In re Mexican Government Bonds Antitrust Litigation*
- *In re Ready-Mixed Concrete Antitrust Litigation*
- *In re: Marine Hose Antitrust Litigation*
- *Iowa Ready Mixed Concrete Antitrust Litigation*
- *In re Potash Antitrust Litigation (II)*
- *In re Evanston Northwestern Healthcare Corp. Antitrust Litigation*
- *In re Polyurethane Foam Antitrust Litigation*
- *In re LIBOR-Based Financial Instruments Antitrust Litigation*
- *In re Lorazepam and Clorazepate Antitrust Litigation*
- *In re Cardizem CD Antitrust Litigation*
- *Vista Healthplan, Inc., and Ramona Sakiestewa v. Bristol-Myers Squibb Co., and American BioScience, Inc.*
- *In re Lupron Marketing and Sales Practices Litigation*
- *In re Terazosin Hydrochloride Antitrust Litigation*
- *In re Warfarin Sodium Antitrust Litigation*
- *Rosemarie Ryan House, et al. v. GlaxoSmithKline PLC and SmithKline Beecham Corporation*
- *Carpenters and Joiners Welfare Fund, et al. v. SmithKline Beecham*
- *New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, et al. v. Purdue Pharma L.P.*
- *In Re Pharmaceutical Industry Average Wholesale Price Litigation*
- *Alma Simonet, et al. v. SmithKline Beecham Corporation, d/b/a GlaxoSmithKline*
- *In re Relafen Antitrust Litigation*
- *In Re Remeron Direct Purchaser Antitrust Litigation*
- *In re TriCor Indirect Purchasers Antitrust Litigation*
- *Nichols, et al., v. SmithKline Beecham Corporation*
- *In re: DDAVP Indirect Purchaser Antitrust Litigation*

## Securities Cases

- *Plymouth County Retirement Association v. Spectrum Brands Holdings, Inc., et al.*
- *Tung, et al. v. Dycom Industries, Inc., et al.*
- *Boutchard., et al. v. Gandhi, et al. ("Tower/e-Minis")*
- *MAZ Partners LP v. First Choice Healthcare Solutions, Inc.*
- *SEB Investment Management AB, et al. v. Symantec Corporation, et al.*
- *In re Impinj, Inc. Securities Litigation*
- *In re Netshoes Securities Litigation*
- *Yellowdog Partners, LP, et al. v. Curo Group Holdings Corp., et al.*
- *In re Brightview Holdings, Inc. Securities Litigation*
- *In re Obalon Therapeutics, Inc. Securities Litigation*
- *In re Willis Towers Watson PLC Proxy Litigation*
- *In re Blue Apron Holdings, Inc. Securities Litigation*
- *In re: Qudian Inc. Securities Litigation*
- *Plymouth County Contributory Retirement System v. Adamas Pharmaceuticals, et al.*
- *In re Perrigo Company PLC Securities Litigation*
- *Enriquez, et al. v. Nabriva Therapeutics PLC, et al.*
- *Teamsters Local 456 Pension Fund, et al. v. Universal Health Services, Inc., et al.*
- *Olenik, et al. v. Earthstone Energy, Inc.*

- *Shenk v. Mallinckrodt plc, et al.*
- *In re The Allstate Corp. Securities Litigation*
- *Christopher Vataj v. William D. Johnson, et al.* (PG&E Securities II)
- *Kirkland v. WideOpenWest, Inc.*
- *Oklahoma Police Pension and Retirement System v. Sterling Bancorp, Inc.*
- *In re Uxin Limited Securities Litigation*
- *City of Hallandale Beach Police Officers' & Firefighters' Personnel Retirement Trust v. Ergen, et al.* (Echostar)
- *Lewis v. YRC Worldwide Inc., et al.*
- *Tomaszewski v. Trevena, Inc., et al.*
- *In re Restoration Robotics, Inc. Securities Litigation*
- *Public Employees' Retirement Systems of Mississippi, et al. v. Treehouse Foods, Inc., et al.*
- *Ronald L. Jackson v. Microchip Technology, Inc., et al.*
- *In re Micro Focus International plc Securities Litigation*
- *In re Dynagas LNG Partners LP Securities Litigation*
- *Weiss, et al. v. Burke, et al.* (Nutraceutical)
- *Yaron v. Intersect ENT, Inc., et al.*
- *Utah Retirement Systems v. Healthcare Services Group, Inc., et al.*
- *In re PPDAl Group Inc. Securities Litigation*
- *In re: Evoqua Water Technologies Corp. Securities Litigation*
- *In re Aqua Metals, Inc. Securities Litigation*
- *St. Lucie County Fire District Firefighters' Pension Trust Fund v. Southwestern Energy Company*
- *In re CPI Card Group Inc. Securities Litigation*
- *Arkansas Teacher Retirement System, et al. v. Alon USA Energy, Inc., et al.*
- *In re TAL Education Group Securities Litigation*
- *GCI Liberty Stockholder Litigation*
- *In re SciPlay Corporation Securities Litigation*
- *In re Allergan Generic Drug Pricing Securities Litigation*
- *In re Vivint Solar, Inc. Securities Litigation*
- *In re YayYo Securities Litigation*
- *In re JPMorgan Treasury Futures Spoofing Litigation*
- *Searles, et al. v. Crestview Partners, LP, et al.* (Capital Bank)
- *In re Lyft, Inc. Securities Litigation*
- *In re Aegean Marine Petroleum Network, Inc. Securities Litigation*
- *In re JPMorgan Precious Metals Spoofing Litigation*
- *In re Pivotal Software, Inc. Securities Litigation*
- *Longo, et al. v. OSI Systems, Inc., et al.*
- *In re Homefed Corporation Stockholder Litigation*
- *Pierrelouis v. Gogo Inc., et al.*
- *Pope v. Navient Corporation, et al.*
- *In re Merit Medical Systems, Inc. Securities Litigation*
- *In re Frontier Communications Corporation Stockholder Litigation*
- *Holwill v. AbbVie Inc.*
- *Budicak, Inc., et al. v. Lansing Trade Group, LLC, et al.* (SRW Wheat Futures)
- *Yannes, et al. v. SCWorx Corporation*
- *In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations*
- *In re Myriad Genetics, Inc. Securities Litigation*
- *In re Chicago Bridge & Iron Co. N.V. Securities Litigation*
- *The Arbitrage Fund, et al. v. William Petty, et al.* (Exactech)
- *In re Columbia Pipeline Group, Inc. Merger Litigation*

- *Martinek v. AmTrust Financial Services, Inc.*
- *City of Pittsburgh Comprehensive Municipal Pension Trust Fund, et al. v. Benefitfocus, Inc., et al.*
- *In re: Evoqua Water Technologies Corp. Securities Litigation*
- *Laydon v. Mizuho Bank, Ltd., et al.*
- *Lomingkit, et al. v. Apollo Education Group, Inc., et al.*
- *In re Caraco Pharmaceutical Laboratories, Ltd. Shareholder Litigation*
- *Norfolk County Retirement System, et al. v. Community Health Systems, Inc., et al.*
- *Chester County Employees' Retirement Fund v. KCG Holdings, Inc., et al.*
- *Oklahoma Law Enforcement Retirement System, et al. v. Adeptus Health Inc., et al.*
- *Di Donato v. Insys Therapeutics, Inc., et al.*
- *Lundgren-Wiedinmyer, et al. v. LJM Partners, Ltd, et al.*
- *Martin, et al. v. Altisource Residential Corporation, et al.*
- *Stephen Appel, et al. v. Apollo Management, et al.*
- *In re Medley Capital Corporation Stockholder Litigation*
- *Forman, et al. v. Meridian BioScience, Inc., et al.*
- *Public Employees' Retirement System of Mississippi, et al. v. Endo International PLC, et al.*
- *In Re Flowers Foods, Inc. Securities Litigation*
- *Jiangchen, et al. v. Rentech, Inc., et al.*
- *In re Liberty Tax, Inc. Stockholder Litigation*
- *In re RH, Inc. Securities Litigation*
- *Lazan v. Quantum Corporation, et al.*
- *Nabhan v. Quantum Corporation, et al.*
- *Edmund Murphy III, et al. v. JBS S.A.*
- *Public Employees' Retirement System of Mississippi, et al. v. Sprouts Farmers Market, Inc., et al.*
- *In re Starz Stockholder Litigation*
- *Judith Godinez, et al. v. Alere Inc., et al.*
- *Rahman and Giovagnoli, et al. v. GlobalSCAPE, Inc., et al.*
- *Arthur Kaye, et al. v. ImmunoCellular Therapeutics, Ltd., et al.*
- *In re CPI Card Group Inc. Securities Litigation*
- *Daniel Aude, et al. v. Kobe Steel, Ltd., et al.*
- *In re Quality Systems, Inc. Securities Litigation*
- *Cooper, et al. v. Thoratec Corporation, et al.*
- *Washtenaw County Employees' Retirement System, et al. v. Walgreen Co., et al.*
- *Elkin v. Walter Investment Management Corp., et al.*
- *In Re CytRx Corporation Securities Litigation*
- *Ranjit Singh, et al. v. 21Vianet Group, Inc., et al.*
- *In re PTC Therapeutics, Inc. Securities Litigation*
- *Securities and Exchange Commission v. Mark A. Jones*
- *In re Sequans Communications S.A. Securities Litigation*
- *In re Henry Schein, Inc. Securities Litigation*
- *Ronge, et al. v. Camping World Holdings, Inc., et al.*
- *Oklahoma Firefighters Pension & Retirement System v. Lexmark International, Inc.*
- *Christakis Vrakas, et al. v. United States Steel Corporation, et al.*
- *Emerson et al. v. Mutual Fund Series Trust, et al. ("Catalyst")*
- *In re Fannie Mae 2008 Securities Litigation*
- *In re Anadarko Petroleum Corporation Class Action Litigation*
- *Ge Dandong, et al., v. Pinnacle Performance Limited, et al.*
- *In Re: Rough Rice Commodity Litigation*
- *Xuechen Yang v. Focus Media Holding Limited et al.*
- *In re Massey Energy Co. Securities Litigation*

- *In re Swisher Hygiene, Inc.*
- *The City of Providence vs. Aeropostale, Inc., et al.*
- *In re Metrologic Instruments, Inc. Shareholders Litigation*
- *Public Pension Fund Group v. KV Pharmaceutical Company et al.*
- *Pension Trust Fund for Operating Engineers, et al. v. Assisted Living Concepts, Inc., et al.*
- *In re Lehman Brothers Equity/Debt Securities Litigation*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Physical Action)*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Futures Action)*
- *In re General Electric Co. Securities Litigation*
- *In re CNX Gas Corporation Shareholders Litigation*
- *Oscar S. Wyatt, Jr. et al. v. El Paso Corporation, et al.*
- *In re Par Pharmaceutical Securities Litigation*
- *In re Par Pharmaceutical Companies, Inc. Shareholders Litigation*
- *In re Delphi Financial Group Shareholders Litigation*
- *In re SLM Corporation Securities Litigation*
- *In re Del Monte Foods Company Shareholder Litigation*
- *Leslie Niederklein v. PCS Edventures!.com, Inc. and Anthony A. Maher*
- *In re Beckman Coulter, Inc. Securities Litigation*
- *Michael Rubin v. MF Global, Ltd., et al.*
- *Allen Zametkin v. Fidelity Management & Research Company, et al.*
- *In re BP Prudhoe Bay Royalty Trust Securities Litigation*
- *Police and Fire Retirement System of the City of Detroit et al. v. SafeNet, Inc., et al.*
- *In re Limelight Networks, Inc. Securities Litigation*
- *In re Gilead Sciences Securities Litigation*
- *In re ACS Shareholder Litigation, Consolidated C.A. No. 4940-VCP*
- *Lance Provo v. China Organic Agriculture, Inc., et al.*
- *In re LDK Solar Securities Litigation*

### Labor & Employment Cases

- *Verizon OFCCP Settlement*
- *Alvarez, et al. v. GEO Secure Services, LLC*
- *Sartena v. Meltwater FLSA*
- *Carmen Alvarez, et al. v. Chipotle Mexican Grill, Inc., et al.*
- *Turner, et al. v. Chipotle Mexican Grill, Inc.*
- *Long, et al. v. Southeastern Pennsylvania Transportation Authority*
- *Matheson, et al. v. TD Bank, N.A.*
- *Ludwig, et al. v. General Dynamics Information Technology, Inc., et al.*
- *Bedel, et al. v. Liberty Mutual Group Inc.*
- *Irene Parry, et al. v. Farmers Insurance Exchange, et al.*
- *Maldonado v. The GEO Group, Inc.*
- *Alderman and Maxey v. ADT, LLC*
- *Albaceet v. Dick's Sporting Goods*
- *Rodriguez v. The Procter & Gamble Company*
- *Adekunle, et al. v. Big Bang Enterprises, Inc. d/b/a The Revenue Optimization Companies*
- *Gorski, et al. v. Wireless Vision, LLC*
- *Lopez, et al. v. New York Community Bank, et al.*
- *Hamilton, et al. v. The Vail Corporation, et al.*
- *Eisenman v. The Ayco Company L.P.*
- *Matheson v. TD Bank, N.A.*

- *Simon v. R.W. Express LLC, d/b/a Go Airlink NYC*
- *Perez v. Mexican Hospitality Operator LLC, d/b/a Cosme*
- *Shanahan v. KeyBank, N.A.*
- *Loftin v. SunTrust Bank*
- *Alvarez v. GEO Secure Services, LLC*
- *Weisgarber v. North American Dental Group, LLC*
- *Talisa Borders, et al. v. Wal-mart Stores, Inc.*
- *Reale v. McClain Sonics Inc., et al.*
- *Larita Finisterre and Songhai Woodard, et al. v. Global Contact Services, LLC*
- *Adebisi Bello v. The Parc at Joliet*
- *Garcia, et al. v. Vertical Screen, Inc.*
- *Brook Lemma and Matthieu Hubert, et al. v. 103W77 Partners LLC, et al. ("Dovetail Settlement")*
- *American Federation of Government Employees, Local 1145 v. Federal Bureau of Prisons, U.S. Penitentiary, Atlanta, Georgia*
- *Lisa Ferguson, Octavia Brown, et al. v. Matthew G. Whitaker, Acting AG, DOJ Bureau of Prisons ("USP Victorville")*
- *American Federation of Government Employees, Local 2001 v. Federal Bureau of Prisons, Federal Correctional Institution, Fort Dix, New Jersey*
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- *Vargas v. Sterling Engineering*
- *Rosenbohm v. Verizon*
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- *American Federation of Government Employees, Local 408 v. U.S. Dept. of Justice, Federal Bureau of Prisons, Federal Correctional Complex, Butner, NC*
- *In re 2014 Avon Products, Inc. ERISA Litigation*
- *In re Eastman Kodak ERISA Litigation*
- *Taronica White, et al. v. Attorney General Loretta Lynch, Department of Justice*
- *Lisa Ferguson, et al. v. Acting Attorney General Matthew Whitaker, Department of Justice*
- *Melissa Compere v. Nusret Miami, LLC, et al.*
- *Abelar v. American Residential Services, L.L.C., Central District of California*
- *Flores, et al. v. Eagle Diner Corp., et al., Eastern District of Pennsylvania*
- *Michael Furman v. Godiva Chocolatier, Inc., 15<sup>th</sup> Judicial Circuit, Palm Beach County, Florida*
- *Finisterre et. al v. Global Contact Services, LLC, New York State Supreme Court, Kings County*
- *McGuire v. Intelident Solutions, LLC, et al., Middle District of Florida, Tampa Division*
- *Duran De Rodriguez, et al. v. Five Star Home Health Care Agency, Inc. et al., Eastern District of New York*

### Data Breach/BIPA Cases

- *Hunter v. J.S.T. Corp. BIPA Settlement*
- *Atkinson, et al. v. Minted, Inc.*
- *Rosenbach, et al. v. Six Flags Entertainment Corporation and Great America LLC*
- *Pratz, et al. v. MOD Super Fast Pizza, LLC*
- *The State of Indiana v. Equifax Data Breach Settlement*
- *In re: Vizio, Inc. Consumer Privacy Litigation*
- *In re: Google, Inc. Street View Electronic Communications Litigation*
- *Devin Briggs and Bobby Watson, et al. v. Rhinoag, Inc. ("Briggs Biometric Settlement")*
- *Trost v. Pretium Packaging L.L.C.*

- *In re: Barr, et al. v. Drizly, LLC f/k/a Drizly, Inc., et al.*

### Telephone Consumer Protection Act (TCPA) Cases

- *Perrong, et al. v. Orbit Energy & Power, LLC*
- *Baldwin, et al. v. Miracle-Ear, Inc.*
- *Floyd and Fabricant, et al. v. First Data Merchant Services LLC, et al.*
- *Hoffman, et al. v. Hearing Help Express, Inc., et al.*
- *Lowe and Kaiser, et al. v. CVS Pharmacy, Inc., et al.*
- *Johansen v. HomeAdvisor, Inc., et al.*
- *Charvat, et al. v. National Holdings Corporation*
- *Hopkins, et al. v. Modernize, Inc.*
- *Diana Mey vs. Frontier Communications Corporation*
- *Matthew Donaca v. Dish Network, L.L.C.*
- *Matthew Benzion and Theodore Glaser v. Vivint, Inc.*
- *John Lofton v. Verizon Wireless (VAW) LLC, et al.*
- *Lori Shamblin v. Obama for America, et al.*
- *Ellman v. Security Networks*

## For More Information

For more detailed information regarding A.B. Data's experience, services, or personnel, please see our website at [www.abdataclassaction.com](http://www.abdataclassaction.com).