

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

*IN RE TURKEY ANTITRUST LITIGATION*

Case No. 1:19-cv-08318

This Document Relates To:

Hon. Sunil R. Harjani  
Hon. Keri L. Holleb Hotaling

COMMERCIAL AND INSTITUTIONAL  
INDIRECT PURCHASER PLAINTIFF  
ACTIONS

**COMMERCIAL AND INSTITUTIONAL INDIRECT PURCHASER PLAINTIFFS’  
MOTION FOR AN AWARD OF ATTORNEYS’ FEES, REIMBURSEMENT OF  
LITIGATION EXPENSES, AND CLASS REPRESENTATIVE SERVICE AWARDS**

Pursuant to Federal Rules of Civil Procedure 23(h) and 54(d)(2), Co-Lead Counsel for the Commercial and Institutional Indirect Purchaser Plaintiffs (“CIIPPs”) move the Court for an Order: (1) awarding attorneys’ fees, (2) allowing reimbursement of current and ongoing litigation expenses, and (3) awarding a service award to the CIIPP Class Representatives in connection with the CIIPPs’ settlements with Defendants Cargill Inc. and Cargill Meat Solutions Corporation (together and separately, “Cargill”); Cooper Farms, Inc.; Farbest Foods, Inc.; and Tyson Foods, Inc., The Hillshire Brands Company, Tyson Fresh Meats, Inc., and Tyson Prepared Foods, Inc. (together and separately “Tyson”). This motion is based on this motion, the concurrently filed Memorandum of Law and supporting declarations, and any other evidence and arguments presented in the briefings and at the hearing on this motion.

Dated: October 23, 2025

Respectfully submitted,

By: /s/ Michael J. Flannery

Michael J. Flannery

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***Co-Lead Counsel for Commercial and  
Institutional Indirect Purchaser Plaintiffs***

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on October 23, 2025, a copy of the foregoing was filed electronically with the Clerk of the Court using the Court's CM/ECF system, which will send notification of the filing to all counsel of record.

By: /s/ Michael J. Flannery

Michael J. Flannery