

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

If you purchased fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products in the United States from January 1, 2010, to December 31, 2016, for use in commercial food preparation, a class action lawsuit may affect your rights.

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

- Settlements have been reached in a class action antitrust lawsuit filed on behalf of Commercial and Institutional Indirect Purchaser Plaintiffs against Defendant Agri Stats, Inc., and Processor Defendants Butterball, Cargill, Inc. and Cargill Meat Solutions Corporation (“Cargill”), Cooper Farms, Inc. (“Cooper Farms”), Farbest Foods, Inc. (“Farbest Foods”), Foster Farms, Hormel, Jennie-O Turkey Store, House of Raeford, Perdue, and Prestage (together, “Defendants”).
- The lawsuit alleges Defendants and their coconspirators entered into an agreement to exchange competitively sensitive and non-public information about production plans and pricing data through Defendant Agri Stats and Express Markets International, Inc. (EMI) (a wholly-owned subsidiary of Agri Stats) to limit supply and increase prices in the turkey market. The Court has not decided whether Defendants did anything wrong and Defendants deny any wrongdoing.
- This Notice is being provided because Cargill, Cooper Farms, and Farbest Foods (together, “Settling Defendants”) have each reached a settlement in the lawsuit. Cargill has reached a \$4,000,000 settlement and Cooper Farms and Farbest Foods have each reached separate \$562,500 settlements in the lawsuit (collectively, “the Settlements”). In addition to these monetary payments, Settling Defendants have agreed to certain nonmonetary relief. There will be no payments to class members from the Settlements at this time. You will be notified later of an opportunity to file a claim form. The remaining Defendants Agri Stats, Inc., and Processor Defendants Butterball, Foster Farms, Hormel, Jennie-O Turkey Store, House of Raeford, Perdue, and Prestage (“non-settling Defendants”) **have not** settled.
- Recently, notice was provided because the Court established, or “certified,” the lawsuit as a class action. The Court “certified” a class of commercial and institutional purchasers defined as: “All entities in the Indirect Purchaser States that indirectly purchased fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products sold by Defendants in the United States during the Class Period for their own use in commercial food preparation.”
- Your legal rights are affected whether you act or do not act. Please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
OBJECT	Write to the Court about why you do not like the Cooper Farms, Farbest Foods, and/or the Cargill Settlements.	Postmarked by: November 6, 2025
ATTEND A HEARING	Ask to speak to the Court about the fairness of the Settlements.	Notice of Appearance: November 6, 2025
DO NOTHING	If you do nothing, and you are a member of the Damages Class, you may be entitled to money or benefits if available later for the Cooper Farms, Farbest Foods, and/or Cargill Settlements. You will give up your rights to sue the Defendants. You will be bound by any future judgments regarding the Defendants.	

- These rights and options **and the deadlines to exercise them** are explained in this notice.
- The Court in charge of this lawsuit must still decide whether to approve the Settlements and the requested attorneys’ fees, cost reimbursement, and service awards.

Questions? Go to www.TurkeyCommercialCase.com or call 1-800-403-3089.

BASIC INFORMATION

1. What is this lawsuit about?

This class action is called *In re Turkey Antitrust Litigation*, Case No. 19-cv-08318, and is pending in the United States District Court for the Northern District of Illinois, Eastern Division. United States District Court Judge Sunil R. Harjani is overseeing this class action.

Commercial and Institutional Indirect Purchaser Plaintiffs allege that Defendants and their coconspirators conspired and combined to fix, raise, maintain, and stabilize the price of Turkey. Specifically, Defendants and their coconspirators are alleged to have exchanged competitively sensitive and non-public information about production plans and pricing data through Defendant Agri Stats to limit supply and increase prices of Turkey products in the United States, in violation of federal antitrust laws and various state antitrust, consumer protection and unfair trade practices, and unjust enrichment laws.

In this notice, “Defendants” refers to Agri Stats, Inc., and Processor Defendants Butterball, Cargill, Inc. and Cargill Meat Solutions (“Cargill”), Cooper Farms, Inc. (“Cooper Farms”), Farbest Foods, Inc. (“Farbest Foods”), Foster Farms, Hormel, Jennie-O Turkey Store, House of Raeford, Perdue, Prestage, and Tyson Foods, Inc., Tyson Fresh Meats, Inc., Tyson Prepared Foods, Inc., and the Hillshire Brands Company (“Tyson”).

Cooper Farms, Farbest Foods, and Cargill together are “Settling Defendants” and the remaining Defendants Agri Stats, Inc., and Processor Defendants, Butterball, Foster Farms, Hormel, Jennie-O Turkey Store, House of Raeford, Perdue, and Prestage are “non-settling Defendants.”

Please register at the case website, TurkeyCommercialCase.com, to receive updates regarding the progress of the litigation, the Settlements, and any resolution of legal claims against the non-settling Defendants. The case website will be updated as circumstances change, so check back regularly for updates.

Commercial and Institutional Indirect Purchaser Plaintiffs previously reached a Settlement with Tyson. The Defendants have denied all allegations of wrongdoing in this lawsuit.

2. Why is this class action a lawsuit?

In a class action lawsuit, one or more businesses called class representatives sue on behalf of others who have similar legal claims, all of whom together are a “class.” Individual Class Members do not have to file a lawsuit to participate in the class action lawsuit 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.

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

Recently, notice was provided because the Court established, or “certified”, the lawsuit as a class action. The Court “certified” a class of commercial and institutional purchasers defined as: “All entities in the Indirect Purchaser States that indirectly purchased fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products sold by Defendants in the United States during the Class Period for their own use in commercial food preparation.”

In 2021, notice was provided regarding a settlement with Defendants Tyson Foods, Inc., Tyson Prepared Foods, Inc., Tyson Fresh Meats, Inc., and The Hillshire Brands Company (collectively, “Tyson”). You may be a member of the Settlement Class in the Tyson settlement with separate rights; you may also be included in Certified Class for the Cooper Farms, Farbest Foods, and Cargill Settlements, as well as against the remaining non-settling Defendants Agri Stats, Butterball, Foster Farms, Hormel, Jennie-O Turkey Store, House of Raeford, Perdue, and Prestage.

You may have received other communications regarding this lawsuit, including solicitations by other attorneys seeking to represent you as a plaintiff in an individual (or “direct action”) lawsuit against Defendants. These communications were not approved by the Court and did not come from Court-appointed Class Counsel.

WHO IS IN THE LAWSUIT?

4. How do I know if I am part of the lawsuit?

The Commercial and Institutional Indirect Purchaser Plaintiffs class represent indirect purchasers who are not end users of Turkey products. The Court certified an Injunctive Class and a Damages Class (together, “Certified Class”). The Certified Class applies to and is the same for the Cooper Farms, Farbest Foods, and Cargill Settlements and ongoing class litigation against the non-settling Defendants. The Certified Class is defined as:

Injunctive Class: All entities in the Indirect Purchaser States that indirectly purchased fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products sold by Defendants in the United States during the Class Period, January 1, 2010, through December 31, 2016, for their own use in commercial food preparation.

Damages Class: All entities in the Indirect Purchaser States that indirectly purchased fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products sold by Defendants in the United States during the Class Period, January 1, 2010, through December 31, 2016, for their own use in commercial food preparation.

The Indirect Purchaser States are Arizona, Arkansas, California, the District of Columbia, Florida, Illinois, Iowa, Kansas, Maine, Michigan, Minnesota, Missouri, Mississippi, North Carolina, North Dakota, Nebraska, New Hampshire, New Mexico, Nevada, New York, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, Wisconsin, and West Virginia.

In this lawsuit, injunctive relief means the Defendants would be required to stop the activities associated with any ongoing conspiracy to inflate Turkey prices on a nationwide basis. If granted, the injunctive relief will continue until it is clear that the alleged misconduct will not recur.

5. What Turkey products are included in the lawsuit?

Turkey is defined as fresh or frozen, uncooked turkey breast products, ground turkey, or whole bird turkey products.

Turkey breast products exclude: (1) turkey breasts used to make ground turkey; (2) turkey breast tenderloins; (3) organic turkey breast products; (4) NAE or ABF turkey breast products; and (5) cooked or RTE turkey breast products.

Ground turkey products exclude: (1) ground turkey products made from turkey breasts; (2) ground turkey products made from turkey wings; (3) burgers, sausages, and patties; (4) organic ground turkey products; (5) NAE or ABF ground turkey products; and (6) cooked or RTE ground turkey products.

Whole bird turkey products exclude: (1) organic turkey whole bird products; (2) NAE or ABF turkey whole bird products; and (3) cooked or RTE turkey whole bird products.

6. How do I know if I am part of the Cooper Farms, Farbest Foods, and/or Cargill Settlements?

The Certified Classes definition described above applies to the Cooper Farms, Farbest Foods and Cargill Settlements:

Injunctive Class: All entities in the Indirect Purchaser States that indirectly purchased fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products sold by Defendants in the United States during the Class Period, January 1, 2010, through December 31, 2016, for their own use in commercial food preparation.

Damages Class: All entities in the Indirect Purchaser States that indirectly purchased fresh or frozen, uncooked turkey breast, ground turkey, or whole bird turkey products sold by Defendants in the United States during the Class Period, January 1, 2010, through December 31, 2016, for their own use in commercial food preparation.

7. Is anyone excluded from the Certified Class?

Yes. Excluded from the Certified Class are the Defendants and their alleged coconspirators; the officers, directors or employees of any Defendant or alleged coconspirator; any entity in which any Defendant or their alleged coconspirator has a controlling interest; any entity with an interest, controlling or non-controlling, in a Defendant or their alleged coconspirator; any (in whole or in part) affiliate, legal representative, heir or assign of any Defendant or their alleged coconspirator. Also excluded from the Certified Classes are any federal, state, or local governmental entities, any judicial officer presiding over this lawsuit and the members of their immediate family and judicial staff, any juror assigned to this lawsuit, and any alleged coconspirator identified in this lawsuit.

8. What if I am still not sure whether I am included in the Certified Classes?

If you are still not sure if you are included, please review the detailed information contained in the Class Certification Order, available at TurkeyCommercialCase.com, or call the Settlement Administrator toll-free at 1-800-403-3089.

YOUR RIGHTS AND OPTIONS

9. What does the Cooper Farms settlement provide?

If the Cooper Farms settlement is approved, Cooper Farms will pay \$562,500 to resolve all Certified Class Members' legal claims against Cooper Farms for the Released Claims (as defined in the Cooper Farms Settlement Agreement). In addition to this monetary benefit, Cooper Farms has agreed to provide specified cooperation in the Commercial and Institutional Indirect Purchaser Plaintiffs' continued prosecution of the lawsuit. The Cooper Farms Settlement Agreement is available at TurkeyCommercialCase.com.

10. What does the Farbest Foods settlement provide?

If the Farbest Foods settlement is approved, Farbest Foods will pay \$562,500 to resolve all Certified Class Members' legal claims against Farbest Foods for the Released Claims (as defined in the Farbest Foods Settlement Agreement). In addition to this monetary benefit, Farbest Foods has agreed to provide specified cooperation in the Commercial and Institutional Indirect Purchaser Plaintiffs' continued prosecution of the lawsuit. The Farbest Foods Settlement Agreement is available at TurkeyCommercialCase.com.

11. What does the Cargill Foods settlement provide?

If the Cargill settlement is approved, Cargill will pay \$4,000,000 to resolve all Certified Class Members' legal claims against Cargill Foods for the Released Claims (as defined in the Cargill Settlement Agreement). In addition to this monetary benefit, Cargill has agreed to provide specified cooperation in the Commercial and Institutional Indirect Purchaser Plaintiffs' continued prosecution of the lawsuit. The Cargill Settlement Agreement is available at TurkeyCommercialCase.com.

12. What are the Cooper Farms, Farbest Foods, and Cargill settlement benefits being used for?

No money will be distributed to Class Members at this time. Class Counsel will continue to pursue the lawsuit against the non-settling Defendants. The Settlement Funds from the Cooper Farms settlement, Farbest Foods settlement, and Cargill settlement will be used to pay all valid settlement claims submitted by Certified Class members, as well as all settlement notice and administration costs.

You will be notified later, when there is an opportunity to submit a claim form to receive a payment. The Settlement Funds will also be used, if awarded by the Court, to pay attorneys' fees, cost reimbursement, and service awards.

13. What are the Released Claims?

Sections 15 – 17 of the Cooper Farms Settlement Agreement describe the Cooper Farms Released Claims in necessary legal terminology, Sections 15 – 17 of the Farbest Foods Settlement Agreement describe the Farbest Foods Released Claims in necessary legal terminology, and Sections 16-18 of the Cargill Settlement Agreement describe the Cargill Released Claims in necessary legal terminology, so read these sections carefully.

The Cooper Farms, Farbest Foods, and Cargill Settlement Agreements are available at TurkeyCommercialCase.com or in the public Court records on file in this lawsuit. For questions regarding the Releases or what they mean, you can contact one of the lawyers listed below for free, or you can talk to your own lawyers at your own expense.

OBJECTING TO THE SETTLEMENTS

14. How do I tell the Court I do not like the Cooper Farms, Farbest Foods, and/or Cargill Settlements?

Objecting is telling the Court that you do not like something about the settlement. If you are a member of the Certified Class and have not previously excluded yourself from the Certified Class – Damages Class, you can object to the Cooper Farms, Farbest Foods, and/or the Cargill Settlements if you do not like part or all of it.

Questions? Go to www.TurkeyCommercialCase.com or call 1-800-403-3089.

To object, you must send a letter or other written statement saying that you object to the Cooper Farms, Farbest Farms, and/or Cargill Settlements in *In re Turkey Antitrust Litigation (Commercial and Institutional Indirect Purchaser Actions)* and the reasons why you object. Be sure to include your full name, current mailing address, and email address. Your objection must be signed. You may include or attach any documents that you would like the Court to consider. Do not send your written objection to the Court or the judge. Instead, mail the objection to the Settlement Administrator, Class Counsel, and counsel for Cooper Farms, Farbest Foods and/or Cargill at the addresses listed below. Your objection must be **postmarked by November 6, 2025**.

<p><u>Settlement Administrator:</u> <i>Turkey Commercial and Institutional Indirect Purchaser Litigation</i> Settlement Administrator P.O. Box 5560 Portland, OR 97228-5560</p>	<p><u>Class Counsel:</u> Sterling Aldridge Barrett Law Group, P.A. 404 Court Square P.O. Box 927 Lexington, MS 39095</p> <p><u>Class Counsel:</u> Michael J. Flannery Cuneo Gilbert & LaDuca, LLP 2445 M Street, NW Suite 740 Washington, DC 20037</p>	<p><u>Counsel for Farbest Foods:</u> Gaspare J. Bono Leslie A. Barry Dentons US LLP 1900 K Street NW Washington, DC 20006</p> <p><u>Counsel For Cooper Farms:</u> Jennifer A.L. Battle Carpenter Lipps LLP 280 North High Street, Suite 1300 Columbus, OH 43215</p> <p><u>Counsel For Cargill:</u> Britt M. Miller Matthew D. Provance Mayer Brown LLP 71 South Wacker Drive Chicago, IL 60606</p>
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15. What happens if I do nothing at all?

You do not need to take any action at this time if you are a member of the Certified Class for the Cooper Farms, Farbest Foods, and Cargill. You will have the opportunity to participate in the Settlements if you submit a valid claim form, if required, when that option is available at a later date. You will also have the opportunity to participate in any future settlements or judgments obtained by Commercial and Institutional Indirect Purchaser Plaintiffs against other Defendants in this case.

THE LAWYERS REPRESENTING YOU

16. Do I have a lawyer in this lawsuit?

Yes, the Court has appointed Michael J. Flannery from Cuneo Gilbert & LaDuca, LLP, and Sterling Aldridge from Barrett Law Group, P.A. as Class Counsel for the Certified Class. You do not need to hire your own lawyer because Class Counsel is working on your behalf. You may hire your own lawyer at your own cost if you want someone other than Class Counsel to represent you in this lawsuit.

17. How will Class Counsel be paid?

Class Counsel will ask the Court for attorneys' fees not to exceed one-third of the Settlement Funds inclusive of the Tyson settlement, plus past and current expenses and costs incurred not to exceed \$1.5 million, and class representative service awards not to exceed \$6,000.00 per class representative from the Settlement Funds. Any payment to the attorneys or class representatives will be subject to Court approval, and the Court may award less than the requested amount. The costs, expenses, and service awards that the Court orders, plus the costs to administer the Settlements, will come out of the Cooper Farms, Farbest Foods, and Cargill Settlement Funds. Attorneys' fees will come out of the Cooper Farms, Farbest Foods, Cargill, and Tyson Settlement Funds.

Class Counsel may seek additional attorneys' fees, costs, expenses, and service awards from any other settlements or recoveries obtained in the future.

When Class Counsel's motions for attorneys' fees, costs, expenses, and service awards are filed in the Cooper Farms, Farbest Foods, and Cargill Settlements, they will be available at TurkeyCommercialCase.com. The motions will be posted on the case website before the deadline for objecting to each settlement.

THE COURT'S FAIRNESS HEARING

18. When and where will the Court decide whether to approve the Cooper Farms, Farbest Foods, and Cargill Settlements?

The Court will hold a hearing to decide whether to approve the Cooper Farms, Farbest Foods, and Cargill Settlements (the "Fairness Hearing"). You may attend and you may ask to speak, but you do not have to. The Court will hold a Fairness Hearing on December 16, 2025, at 10:00 a.m. before the Honorable Sunil R. Harjani at the Everett McKinley Dirksen U.S. Courthouse, 219 South Dearborn Street, Chicago, IL 60604, or via telephone or video conference. At this hearing, the Court will consider whether the Settlements are fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to Class Members 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 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 case website TurkeyCommercialCase.com regarding any changes to the hearing date.

Note: The date, time, and/or location (in person or via telephone or video) of the Fairness Hearing are subject to change without further notice. You should check the website TurkeyCommercialCase.com to confirm the date, time and location (in person or via telephone or video) of the Fairness Hearing have not changed.

19. Do I have to attend the Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend. If you submit an objection, you do not have to attend the hearing 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 is not necessary.

20. May I speak at the Fairness Hearing?

Yes. You may ask to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intention to Appear in *In re Turkey Antitrust Litigation (Commercial and Institutional Indirect Purchaser Actions)*." Be sure to include your name, current mailing address, telephone number, and signature. Your "Notice of Intention to Appear" must be postmarked by **November 6, 2025**, and it must be sent to the Clerk of the Court, Class Counsel, and counsel for Cooper Farms, Farbest Foods, and/or Cargill. The address for the Clerk of the Court is: United States District Court for the Northern District of Illinois, Eastern Division, Everett McKinley Dirksen U.S. Courthouse, 219 South Dearborn Street, Chicago, IL 60604. The addresses for Class Counsel and counsel for the Settling Defendants are provided above.

GETTING MORE INFORMATION

21. How do I get more information about the lawsuit?

This notice summarizes the lawsuit, Cooper Farms, Farbest Foods, Cargill Settlements, and your legal rights. More details are in the Class Certification Order and the Settling Defendants' Settlement Agreements. You can find a copy of the Class Certification Order, Settlement Agreements, other important documents, and information about the current status of the lawsuit by visiting TurkeyCommercialCase.com. You may contact the Settlement Administrator at info@TurkeyCommercialCase.com or toll-free at 1-800-403-3089.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE.

Questions? Go to www.TurkeyCommercialCase.com or call 1-800-403-3089.