

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

IN RE TURKEY ANTITRUST LITIGATION

No. 1:19-cv-08318

This Document Relates To:

Hon. Sunil Harjani

COMMERCIAL AND INSTITUTIONAL
INDIRECT PURCHASER PLAINTIFF
ACTION

Hon. Keri L. Holleb Hotaling

**DECLARATION OF MICHAEL J. FLANNERY IN SUPPORT OF COMMERCIAL AND
INSTITUTIONAL INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS
REPRESENTATIVE SERVICE AWARDS**

I, Michael J. Flannery, declare as follows:

1. I am an attorney admitted to practice in the Northern District of Illinois, Eastern Division in the above-captioned lawsuit. I have practiced law since 1991 and am a partner with the firm of Cuneo Gilbert & LaDuca, LLP in St. Louis, Missouri. I have litigated class actions and other complex matters most of my career. This declaration is submitted in support of Commercial and Institutional Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

2. I, alongside Sarah Sterling Aldridge of the Barrett Law Group, P.A., was appointed by the Court as Co-Lead Class Counsel for the Commercial and Institutional Indirect Purchaser Plaintiffs on January 22, 2025. ECF No. 1107 at 71. Work assignments in this case have been made by Co-Lead Class Counsel to avoid duplicative effort, and my firm has worked efficiently on behalf of the certified CIIPPs class.

3. The law firms representing the CIIPPs have worked on this litigation on a contingent basis since 2019. My law firm, and the law firms representing the CIIPPs under the direction of Co-Lead Counsel for the CIIPPs, have done so without any guarantee of being paid for their time or being reimbursed for the considerable expenses they devoted to pursuing this case and the settlements currently before the Court.

4. Antitrust class actions are challenging, and this is a decidedly complex litigation. There are seven class representatives of the CIIPP certified classes who are pursuing money damage claims in 28 states and the District of Columbia. The CIIPP Certified Class Representative Plaintiffs are: Sandee's Bakery d/b/a Sandee's Catering Bakery & Deli; Gnemi, LLC d/b/a Logan Farms; Maquoketa Care Center; Bernie's LLC; Liberty Holding Company d/b/a Liberty Tap Room and Grill; Martin's BBQ LLC; and Social Kitchen. Additionally, two entities served as interim class representative prior to class certification, but were not included in CIIPPs' Motion for Class Certification and the Court's grant of that Motion.

Those entities are: Thyme Café & Market; and Music Matters, LCC d/b/a Stickyz Rock ‘N’ Roll. *See* ECF No. 666 at ¶¶ 38-46.

5. The Defendants, including settling Defendants Tyson Foods, Inc., Tyson Fresh Meats, Inc., Tyson Prepared Foods, Inc., and Hillshire Brands Co. (collectively “Tyson”); Farbest Foods, Inc. (“Farbest Foods”); Cooper Farms, Inc. (“Cooper Farms”); and Cargill, Inc., and Cargill Meat Solutions Corporation (collectively “Cargill”), are large national and international companies with the resources to hire some of the best defense lawyers in the country. The alleged conspiratorial conduct spans the better part of a decade and involves many companies and witnesses.

6. Since 2019, some of the CIPPs’ attorneys have spent much of their professional time on this litigation. It has been and will continue to be a substantial undertaking. To date, our activities have included:

- Research and investigation of the turkey industry and the sale of turkey products through commercial and foodservice distribution channels;
- Collecting information from a variety of sources, including industry sources and evidence produced by Defendants and third parties;
- Extensive research on the various aspects of the antitrust and other laws of dozens of states and the District of Columbia, and drafting and editing the initial and amended complaints;
- Analyzing and preparing liability and damages claims against all Defendants;
- Collecting and analyzing information and discovery including voluminous discovery produced by the Defendants and third parties, such as food service distributors;
- Consultation with economic and other liability and damages experts;
- Drafting and negotiating key case-management documents, protocols, and stipulations;
- Review, in conjunction with the other plaintiff group, hundreds of thousands of pages of documents produced by the Defendants and third parties;
- Drafting, preparing for, and arguing oppositions to motions to dismiss;
- Responding to discovery and other information sought by the Defendants from the CIPPs;

- Negotiating discovery issues with defense counsel including numerous meet-and-confer sessions, each of which required substantial preparation;
- Preparing correspondence with respect to timing, stipulations, and case planning issues;
- Corresponding and attending calls with CIIPP co-counsel regarding client discovery and trial preparation issues;
- Obtaining and analyzing documents and data from class representatives;
- Locating, review, redaction, and production of documents from class representatives;
- Exchanging information and coordinating with direct purchaser and individual action counsel regarding various issues;
- Attending calls and meetings to help formulate subpoenas and discovery from third parties;
- Attending status conferences with the Court;
- Performing all the tasks necessary to reach and effectuate prior settlements, including formulating demands, negotiating, mediation, in-person meetings, exchange of drafts, preparing escrow agreements, drafting the settlement agreement, drafting preliminary and final approval motions, and drafting class notices, claim forms, and other settlement-related documents and coordinating with the claims administrator;
- Coordinating with and reviewing the work product produced by retained experts in connection with the class certification motion;
- Preparing for and taking and defending depositions;
- Drafting the class certification motion for CIIPPs;
- Preparing for and briefing *Daubert* motions;
- Preparing for and conducting a full expert evidentiary hearing at the class certification stage, including two full days of testimony from all parties' experts, as well as a subsequent hearing to allow the parties to argue their positions on class certification and *Daubert*;
- Preparing for summary judgment and trial;
- Performing all the tasks necessary to reach the settlements with Cargill, Cooper Farms and Farbest Foods, including formulating demands, negotiating, mediation, in-person meetings, exchange of drafts, preparing escrow agreements;
- Drafting settlement agreements, preliminary approval motions, and class notices; and

- Drafting notices, claim forms, and other settlement-related documents and consulting with the claims administrator.

7. Defendants have asked the class representative CIIPPs to produce documents and electronic data relating to numerous aspects of their businesses. They have asked for purchase and transactional data, emails, organizational information, and numerous other topics. Defendants have sought documents and data located on computers, databases, and other storage devices. Counsel for the CIIPPs have had to negotiate these demands with Defendants. Summary judgment and trial preparation continues in this case for claims against the non-settling Defendants.

8. The Class Representatives have devoted time and attention to this litigation and have repeatedly conferred with counsel for the CIIPPs, assisted counsel in numerous ways, and opened their business operations and records up for review and scrutiny by Defendants. Representative Plaintiffs have been deposed. The Representative Plaintiffs understand that they may need to provide trial testimony and are committed to representing both their own interests and the interests of similarly situated businesses and individuals.

9. The settlements with Farbest Foods, Cooper Farms, and Cargill provide a combined total of \$5,124,000 in monetary relief (and material cooperation) for the benefit of eligible CIIPPs. These are all-cash settlements with no reversion to Farbest Foods, Cooper Farms or Cargill or any third parties. These settlements, along with the settlement with the Tyson Defendants, bring the total of all settlements to \$6,875,000. The settlements include terms requiring these settling Defendants to provide certain assistance to the CIIPPs, which counsel for the CIIPPs believe will provide valuable aid in their prosecution of claims against the non-settling Defendants.

10. The Settlements were reached after years of litigation and were reached through adversarial, arms-length negotiations by experienced counsel. Counsel for the CIIPPs had transactional data, documents produced in discovery, deposition testimony, assistance from experts, and a strong

understanding of the strengths and weaknesses of the claims and defenses. CIIPPs and the settling Defendants exchanged information and negotiated to reach the settlements.

11. The parties, after multiple rounds of negotiation, reached agreements on the core terms of the Settlements but then continued to negotiate other components. They exchanged proposals and drafts of the settlement agreements before they reached agreement on all terms.

12. The class notices published for these Settlements advised class members that counsel would seek: (a) up to one-third of the combined settlements, including the earlier Tyson settlement, as attorneys' fees, (b) reimbursement for past expenses, and (c) class representative service awards for the Class Representatives. *See* Long Form Notice, ECF No. 1380-1 at 113.

13. As of the date of this declaration, no class member has objected to the Settlements.

14. The Court is familiar with the complexity of this litigation and of antitrust litigation in general. Counsel for the CIIPPs have dedicated thousands of attorney and paralegal hours to this case. Co-Lead Counsel for the CIIPPs have coordinated the efforts of counsel representing the CIIPPs to maximize efficiency, minimize duplication of effort, and minimize unnecessary or duplicative billing. Co-Lead Counsel for the CIIPPs also monitored the work to avoid unauthorized or unnecessary work.

15. Co-Lead Counsel for the CIIPPs directed the firms who would perform common benefit work for the CIIPPs to keep detailed time and expense records and provided counsel with instructions about what time would be considered for reimbursement and how time and expense requests must be recorded. Co-Lead Counsel for the CIIPPs monitored firms working for the CIIPPs to ensure efficiency and to avoid unauthorized and unnecessary work.

16. Co-Lead Counsel for the CIIPPs and the firms working under their direction have devoted substantial time on this litigation, which they could have spent working on other matters. They have invested this time for six years and have or will be paid for their work only if they reach settlements or achieve judgments.

17. Counsel for the CIIPPs have also invested their own money to pay for unreimbursed litigation expenses to achieve the Settlement before the Court. These expenses included court fees, service of process fees, expert fees, costs of gathering and producing documents and data, maintaining a database for the documents produced in discovery, computerized legal and factual research, mediation costs, travel expenses, photocopying, long distance telephone and facsimile charges, postage and delivery expenses, and filing fees. These costs included the fees charged by experts for data gathering and production, economic analysis, production of expert reports, and the cost of document review and hosting for the ever-increasing volume of documents and data produced in the litigation. These expenses were paid by CIIPPs' counsel, with no guarantee they would ultimately be recovered.

18. Co-Lead Counsel for the CIIPPs has issued assessments to the firms working for the CIIPPs to establish a fund that is used to pay certain large expenses. My Co-Lead Counsel, Ms. Aldrige at the Barrett Law Group, P.A., maintained that litigation fund and has recorded and documented the litigation expenses paid out of that fund. In relation to the prior settlement with Tyson, the Court awarded reimbursement of past litigation expenses and allowed money to be set aside for future litigation expenses. The future litigation funds have been used to pay various litigation expenses, of which expert fees and data gathering, preparation, production, and hosting made up the majority.

19. Since the time of the award in early 2022, the money that the Court awarded from the Tyson settlement has been exhausted. Counsel for the CIIPPs have incurred significant expert and other expenses as they prepare for summary judgment and the eventual trial of the case against the non-Settling Defendants. Counsel for the CIIPPs have collectively advanced and paid \$4,078,362.99 for other unreimbursed litigation costs, as reflected in the declarations filed concurrently with this motion. These are reasonable litigation costs that were incurred in this case for the benefit of the settlement class members.

20. Current invoices from the notice and claim administrator for the development,

implementation, and delivery of the notice plan for the Settlement, which the Settling Defendants have agreed could be paid from the settlement funds and for which the Court approved reimbursement from the settlement funds, are not included in the above totals. *See* Cooper Farms/Farbest Foods Preliminary Approval Order ECF No. 1276; Cargill Preliminary Approval Order ECF No. 1371.

21. The size and complexity of this litigation requires the expenditure of significant expenses for scanning and preparation of documents for database entry, document review and database hosting of those documents, and extensive economic expert analysis and report preparation. As the case progressed to class certification, *Daubert* motions, and now toward summary judgment and trial, the expert and other associated expenses have increased dramatically. Experts in antitrust cases typically create economic and damage models that describe the mechanisms and impact of the anti-competitive behavior at issue. In this litigation, counsel for the CIIPPs have incurred several million dollars of expert costs in relation to data analysis and modeling used for CIIPPs' motion for class certification and *Daubert* responses, as well as merits issues for the anticipated summary judgment motions and eventual trial.

22. In addition, ongoing expenses related to the Plaintiffs' processing and hosting of hundreds of thousands of pages of documents are a significant expense, for which the CIIPPs' share alone has been substantial. CIIPPs' counsel also maintain their own database of documents gathered and produced in the case. And, if the Settlement is granted final approval, the cost to administer claims from class members is expected to total hundreds of thousands of dollars.

23. Co-Lead Counsel for the CIIPPs therefore request an award of \$1,500,000.00 for past, unreimbursed expenses.

24. The schedule attached to this declaration as Exhibit A, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through September 30, 2025. The lodestar calculation is based on my firm's current billing rates for antitrust class action litigation. Exhibit A was prepared from contemporaneous

time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

25. The total number of hours reasonably expended on this litigation by my firm from inception through September 30, 2025 is 7,874.40. The total lodestar for my firm at current rates is \$5,479,751.25. Expense items are billed separately and are not duplicated in my firm's lodestar.

26. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred.

27. My firm has incurred and paid \$268,534.57 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses by category is attached as Exhibit B.

28. In addition to the out-of-pocket expenses described above, participating CIIPP firms made periodic assessments to a litigation expense fund established and maintained by Barrett Law Group, P.A., for the common benefit of the CIIPPs. These assessments were collected to fund case-wide expenses necessary to prosecute the litigation efficiently, including expert and consultant fees, deposition and transcript costs, document-management and data-hosting charges, discovery-related expenses, and other shared costs incurred for the benefit of the CIIPPs class as a whole. All firms contributing to the litigation fund did so in proportion to their work and role in the case. None of these amounts are included in Exhibit B to prevent any duplication of expenses.

29. Expenses for the common benefit of the CIIPPs were paid from the litigation expense fund maintained by Barrett Law Group, P.A. Disbursements from that fund covered shared costs

necessary to advance the litigation, including expert and consultant fees, data management and analysis, deposition and transcript costs, filing and service fees, and other expenses incurred for the common benefit of the CIIPP class. In accordance with the Court's February 24, 2022 Order (ECF No. 448), which approved \$700,000 "for litigation costs already paid, ongoing litigation expenses, and class representative service awards" in connection with the Tyson settlement, those funds were used to pay common-benefit expenses for verified expenses approved by Co-Lead Class Counsel and consistent with the Court's order.

30. The time records submitted to CIIPPs' Co-Lead Counsel by the firms working on behalf of the certified CIIPP classes demonstrate that counsel for the CIIPPs have worked for six years and devoted over 24,000 attorney hours and over 4,800 hours for legal assistants and law clerks to this litigation. Applying the rates customarily charged by those attorneys and legal professionals to the hours expended yields a lodestar of \$18,638,834.25 (from inception through September 30, 2025). Other attorneys and firms provided common benefit work to help advance the CIIPPs claims in this litigation.

31. Co-Lead Counsel for the CIIPPs respectfully request a fee award equal to approximately one-third of the Settlement, after deducting the past expenses and the cost of class service awards. That calculation is: \$6,875,000 - \$700,000 (previously granted reimbursement of expenses) - \$1,500,000 (current request for reimbursement for expenses) - \$10,000 (previously granted service awards) - \$44,000 (current request for service awards) = \$4,621,000 / 3 = \$1,540,333.

32. Counsel for the CIIPPs request a fee award totaling \$1,540,333. They have not previously sought a fee award in this six-year-old litigation. The fee award respectfully sought in this motion represents only a small percentage of CIIPP Counsel's current lodestar (\$18,398,834.25), using counsels' current customary rates. Co-Lead Counsel's good-faith allocation of any fee award will reflect each individual Class Counsel's contribution to the litigation.

33. Co-Lead Counsel for the CIIPPs believe a total award of \$6,000.00 from the Settlements to each of the nine named class representatives is warranted for their willingness to serve as class representatives and to compensate them for their service in this case, without which these Settlements would not have been possible. This includes two class representatives who served as representatives in advance of class certification but were not named as representatives of the certified classes. While they are not representatives of the certified Classes, prior to certification they fully participated in this litigation, sitting for depositions, providing substantial discovery materials, and contributing their time and expertise to the prosecution of this matter.

34. On February 24, 2022, following CIIPPs' settlement with the Tyson Defendants, this Court granted CIIPPs' request for \$5,000 service awards for Sandee's Bakery and Gnemi, LLC. For those two class representatives that received an award at the time of the Tyson settlement, their award from the Farbest Foods/Cooper Farms/Cargill settlements will be \$1,000. bringing the total of their service awards to \$6,000.00; the seven other class representatives, who were not in the case at the time of the Tyson settlement, will receive the full \$6,000.00 service award.

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

Executed this the 23rd day of October 2025, in St. Louis, Missouri.

/s/ Michael J. Flannery
Michael J. Flannery

Exhibit A

LODESTAR SUMMARYFirm: **Cuneo Gilbert & LaDuca, LLP**Reporting Period: **Inception – September 30, 2025**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan Cuneo	P	\$1,430	315.50	\$451,165.00
Pamela Gilbert	P	\$800	1.00	\$800.00
Joel Davidow	P	\$1,230	2.00	\$2,460.00
Mike Smith	P	\$1,400	2.50	\$3,500.00
Michael Flannery	P	\$1,175	798.40	\$998,000.00
Monica Miller	P	\$1,250	6.00	\$7,500.00
Daniel Cohen	P	\$980	916.40	\$1,145,500.00
Jennifer Kelly	P	\$850	82.00	\$86,100.00
Amanda Lewis	P	\$850	39.40	\$33,490.00
Lissa Morgans	P	\$800	79.40	\$63,520.00
Evelyn Riley	P	\$800	453.30	\$475,965.00
Blaine Finley	P	\$800	1,054.65	\$843,720.00
Peter Gil-Montllor	A	\$800	7.00	\$5,600.00
John Kakinuki	OC	\$800	300.00	\$240,000.00
Cody McCracken	A	\$475	997.50	\$473,812.50
Aaron Zoellick	LC	\$325	41.70	\$13,552.50
Kaylah Alexander	LC	\$275	74.00	\$20,350.00
Douglas Graebner	LC	\$275	262.25	\$72,118.75
Barbara Yuill	LC	\$275	25.25	\$6,943.75
John Yuill	LC	\$275	201.60	\$55,440.00
Sydney Albert	PL	\$225	124.00	\$34,100.00
Benjamin Apelbaum	PL	\$225	85.50	\$19,237.50
Ally Bachart	PL	\$225	64.40	\$14,490.00
Noah Bray	PL	\$225	333.75	\$75,093.75
Vienna Chan	PL	\$225	8.30	\$1,867.50
Delany Denton	PL	\$225	1.00	\$225.00
Momena Haider	PL	\$225	11.00	\$2,475.00
Olivia Harwood	PL	\$225	584.10	\$131,422.50
Nicholas Hassett	PL	\$225	76.85	\$17,291.25
Terra Johns	PL	\$225	6.20	\$1,395.00
Mina Lili Kassim	PL	\$225	8.00	\$1,800.00
Leena Khan	PL	\$225	99.00	\$22,275.00
Adele Krabak	PL	\$225	5.50	\$1,237.50
Jacob Levine	PL	\$225	45.25	\$10,181.25
Jacob Miller	PL	\$225	8.20	\$1,845.00
Whitney Powers	PL	\$225	45.55	\$10,248.75
Dajonna Richardson	PL	\$225	46.40	\$10,440.00
Valeria Rivera	PL	\$225	1.30	\$292.50
Darren Villalobos	PL	\$225	476.75	\$107,268.75
Roy Tiefer	PL	\$95	174.50	\$16,577.50
Billy Czerwinski	PL	\$50	9.00	\$450.00
TOTAL			7,874.40	\$5,479,751.25

Status:

Partner (P)

Associate (A)

Paralegal (PL)

Of Counsel (OC)

Law Clerk (LC)

Legal Assistant (LA)

Exhibit B

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Cuneo Gilbert & LaDuca, LLP**
Reporting Period: **Inception-September 30, 2025**

EXPENSE	AMOUNT
Assessments	\$0.00
Court Reporters/Videos/Transcripts/Publications	\$1,302.61
Copying	\$4,283.82
Meals, Hotels and Transportation	\$54,210.87
Messenger, Express Mail, Postage	\$2,043.83
Service	\$250.00
Telephone, Facsimile	\$546.82
Westlaw/Lexis-Nexis/PACER research	\$1,046.03
Consulting	\$184,706.25
Filing Fees	\$654.61
Database, Supplies	\$19,489.73
Total	\$268,534.57

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

IN RE TURKEY ANTITRUST LITIGATION

No. 1:19-cv-08318

This Document Relates To:

Hon. Sunil Harjani

COMMERCIAL AND INSTITUTIONAL
INDIRECT PURCHASER PLAINTIFF
ACTION

Hon. Keri L. Holleb Hotaling

**DECLARATION OF SARAH STERLING ALDRIDGE IN SUPPORT OF COMMERCIAL AND
INSTITUTIONAL INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS
REPRESENTATIVE SERVICE AWARDS**

I, Sarah Sterling Aldridge, declare as follows:

1. I am an attorney admitted to practice *pro hac vice* in the Northern District of Illinois, Eastern Division in the above-captioned lawsuit. I have practiced law since 2012 and am a partner with the firm of Barrett Law Group in Lexington, Mississippi. I have litigated class actions and other complex matters most of my career. This declaration is submitted in support of Commercial and Institutional Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

2. I, alongside Michael J. Flannery with Cuneo, Gilbert and LaDuca, LLP, was appointed by the Court as Co-Lead Class Counsel for the Commercial and Institutional Indirect Purchaser Plaintiffs on January 22, 2025. Dkt. No. 1107 at 71. Work assignments in this case have been made by Co-Lead Class Counsel to avoid duplicative effort, and my firm has worked efficiently on behalf of the certified CIIPPs class.

3. The schedule attached to this declaration as Exhibit A, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through September 30, 2025. The lodestar calculation is based on my firm's current billing rates for antitrust class action litigation. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

4. The total number of hours reasonably expended on this litigation by my firm from inception through September 30, 2025 is 4,263.70. The total lodestar for my firm at current rates is \$3,037,392.50. Expense items are billed separately and are not duplicated in my firm's lodestar.

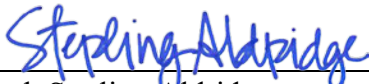
5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred.

6. My firm has incurred and paid \$40,860.70 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses by category is attached as Exhibit B.

7. Expenses for the common benefit of the CIIPPs were paid from the litigation expense fund maintained by my firm. Disbursements from that fund covered shared costs necessary to advance the litigation, including transactional data acquisition and analysis, expert witness expenses, costs of gathering and producing documents and electronic data, maintaining database for the documents produced in discovery, legal and factual research technology, filing fees, and other expenses incurred for the common benefit of the CIIPP class. In accordance with the Court's February 24, 2022 Order (Dkt. No. 448), which approved \$700,000 "for litigation costs already paid, ongoing litigation expenses, and class representative service awards" in connection with the Tyson settlement, a portion of that award was used to reimburse costs for previously-incurred common-benefit expenses paid into or on behalf of the litigation fund as well as then-ongoing expenses. Since applying the \$700,000.00, Co-Lead Class Counsel has incurred additional out of pocket expenses totaling \$4,078,362.99. All reimbursements were made proportionally and only for verified expenses approved by Co-Lead Class Counsel and consistent with the Court's order. The litigation fund continues to be used to pay necessary, reasonable, and properly documented expenses for the ongoing prosecution of this action.

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

Dated: October 23, 2025



Sarah Sterling Aldridge

Exhibit A

LODESTAR SUMMARY

Firm: **Barrett Law Group, P.A.**
 Reporting Period: **Inception – September 30, 2025**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Ben Hudson	A	\$675.00	58.1	\$39,217.50
Ben Whie	P	\$800.00	410.9	\$328,720.00
Don Barrett	P	\$1,450.00	73	\$105,850.00
Katherine Riley	P	\$950.00	95.9	\$91,105.00
Sterling Aldridge	P	\$950.00	1176.3	\$1,117,485.00
Lisa Barrett	P	\$950.00	722.9	\$686,755.00
Chris Hammett	LA	\$250.00	23	\$5,750.00
Connor Douglas	LC	\$400.00	6	\$2,400.00
Ellen Robb	SCA	\$400.00	43.8	\$17,520.00
Nanci-Taylor Maddux	PL	\$400.00	159.8	\$63,920.00
Nicki Boland	SCA	\$400.00	718.5	\$287,400.00
Patricia Herlihy	SCA	\$400.00	618.4	\$247,360.00
Patricia Peterson Smith	SCA	\$400.00	30.9	\$12,360.00
Michael Herrington	SCA	\$250.00	126.2	\$31,550.00
TOTALS			4,263.7	\$3,037,392.50

Status:

Partner (P)

Associate (A)

Paralegal (PL)

Law Clerk (LC)

Legal Assistant (LA)

Staff/Contract Attorney (SCA)

Exhibit B

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Barrett Law Group, P.A.**
Reporting Period: **Inception-September 30, 2025**

EXPENSES	AMOUNT
Federal Express, Local Courier, etc.	\$908.70
Postage Charges	\$3.19
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	\$13,766.29
Court fees (filing, etc.)	\$1,266.3
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	\$55.00
Computer Research	\$4,861.09
Document Review	\$20,000.00
TOTAL	\$40,860.70

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

IN RE TURKEY ANTITRUST LITIGATION

No. 1:19-cv-08318

This Document Relates To:

Hon. Sunil Harjani

COMMERCIAL AND INSTITUTIONAL
INDIRECT PURCHASER PLAINTIFF
ACTION

Hon. Keri L. Holleb Hotaling

**DECLARATION OF SHAWN M. RAITER IN SUPPORT OF
COMMERCIAL AND INSTITUTIONAL INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS
REPRESENTATIVE SERVICE AWARDS**

I, Shawn M. Raiter, declare as follows:

1. I am an attorney admitted to practice [*pro hac vice*] in the Northern District of Illinois, Eastern Division in the above-captioned lawsuit. I have practiced law since 1993 and am a partner with the firm of Larson · King, LLP in Saint Paul, Minnesota. I have litigated class actions and other complex matters most of my career. This declaration is submitted in support of Commercial and Institutional Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

2. My law firm is one of the firms working on behalf of the Commercial and Institutional Indirect Purchaser Plaintiffs. We have worked in coordination with Co-Lead Class Counsel Barrett Law Group, P.A. and Cuneo Gilbert & LaDuca, LLP since the beginning of this litigation. Work assignments in this case have been made by Co-Lead Class Counsel to avoid duplicative effort and my firm has worked efficiently on behalf of the certified CIIPPs class.

3. The schedule attached to this declaration as Exhibit A, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through September 30, 2025. The lodestar calculation is based on my firm's current billing rates for antitrust class action litigation. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

4. The total number of hours reasonably expended on this litigation by my firm from inception through September 30, 2025 is 1,114.50. The total lodestar for my firm at current rates is \$686,670.50. Expense items are billed separately and are not duplicated in my firm's lodestar.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred.

6. My firm has incurred and paid \$4,908.83 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses by category is attached as Exhibit B. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B but are included in the

separate Declaration of Co-Lead Class Counsel Sterling Aldridge of the Barrett Law Group, P.A.

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

Dated: October 21, 2025

s/Shawn M. Raiter
Shawn M. Raiter
Partner, Larson King, LLP

Exhibit A

LODESTAR SUMMARY

Firm: **Larson · King, LLP**
 Reporting Period: **Inception – September 30, 2025**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shawn M. Raiter	P	\$1,050.00	282.10	\$296,205.00
Kelly A. Lelo	P	\$750.00	88.20	\$66,150.00
Matthew B. Bolt	A	\$475.00	76.10	\$36,147.00
Alex P. Kroeger	A	\$475.00	96.50	\$45,837.50
Ryan T. Deschene	A	\$475.00	96.20	\$45,695.00
Jason T. Johnson	A	\$475.00	252.80	\$120,080.00
Monica R. Detert	A	\$475.00	1.40	\$665.00
Madeline E. Davis	A	\$475.00	55.50	\$26,362.50
Iosif V. Sorokin	A	\$475.00	37.80	\$17,955.00
Gretchen A. Touchette	PL	\$215.00	116.40	\$29,100.00
Courtney Burks	PL	\$215.00	11.50	\$2,472.50
TOTALS			1,114.50	\$686,670.50

Status:

Partner (P)

Associate (A)

Paralegal (PL)

Of Counsel (OC)

Law Clerk (LC)

Legal Assistant (LA)

Exhibit B

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Larson · King, LLP**
Reporting Period: **Inception-September 30, 2025**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$162.11
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research (PACER, Westlaw, etc.)	\$431.72
Miscellaneous (Document and data processing and hosting)	\$4,315.00
TOTAL	\$4,908.83

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

IN RE TURKEY ANTITRUST LITIGATION

No. 1:19-CV-08318

This Document Relates To:

Hon. Sunil Harjani

COMMERCIAL AND INSTITUTIONAL
INDIRECT PURCHASER PLAINTIFF
ACTION

Hon. Keri L. Holleb Hotaling

**DECLARATION OF DAVID M. CIALKOWSKI IN SUPPORT OF COMMERCIAL AND
INSTITUTIONAL INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND
CLASS REPRESENTATIVE SERVICE AWARDS**

I, David M. Cialkowski, declare as follows:

1. I am an attorney admitted to practice in the Northern District of Illinois, Eastern Division in the above-captioned lawsuit. I have practiced law since 1998 and am a partner with the firm of Zimmerman Reed LLP in Minneapolis, Minnesota. I have litigated class actions and other complex matters most of my career. This declaration is submitted in support of Commercial and Institutional Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

2. My firm is one of the firms working on this matter on behalf of the certified CIIPPs Class. We have worked in coordination with Co-Lead Class Counsel Barrett Law Group, P.A. and Cuneo Gilbert & LaDuca, LLP for the certified CIIPPs class. Work assignments in this case have been made by Co-Lead Class Counsel to avoid duplicative effort and my firm has worked efficiently on behalf of the certified CIIPPs class.

3. The schedule attached to this declaration as Exhibit A, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through September 30, 2025. The lodestar calculation is based on my firm's current billing rates for antitrust class action litigation. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

4. The total number of hours reasonably expended on this litigation by my firm from inception through September 30, 2025, is 9,919.6. The total lodestar for my firm at current rates is \$5,026,417.00. Expense items are billed separately and are not duplicated in my firm's lodestar.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred.

6. My firm has incurred and paid \$10,678.16 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses by category is attached as Exhibit B. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B but are included in the separate Declaration of Co-Lead Class Counsel Sterling Aldridge of the Barrett Law Group, P.A.

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

Dated: October 23, 2025

/s/ David M. Cialkowski
David M. Cialkowski

Exhibit A

LODESTAR SUMMARY

Firm: **ZIMMERMAN REED LLP**
 Reporting Period: **Inception – September 30, 2025**

Professional	Status	Hourly Rate	Total Hours to Date	Total Lodestar to Date
David M. Cialkowski	P	\$1,100	467.0	\$513,700.00
J. Gordon Rudd, Jr.	P	\$1,100	7.6	\$8,360.00
Carolyn G. Anderson	P	\$1,025	.3	\$307.50
June P. Hoidal	P	\$1,050	.6	\$630.00
Caleb Marker	P	\$1,000	3.0	\$3,000.00
Charles R. Toomajian	P	\$750	2.5	\$1,875.00
Anna E. Jenks	OC	\$775	154.5	\$119,737.50
Ian F. McFarland	A	\$745	682.6	\$508,537.00
Zachary J. Freese	A	\$615	54.0	\$33,210.00
Giselle M. Webber	A	\$590	28.6	\$16,874.00
Lisa Hayes	ATTY	\$450	2,065.0	\$929,250.00
Joseph Price	ATTY	\$450	4,401.5	\$1,980,675.00
Stephanie Long	ATTY	\$450	1,888.5	\$849,825.00
Julianne Van Norman	PL	\$375	147.1	\$55,162.50
Josephine Lu	PL	\$375	.2	\$75.00
Amanda Klinger	LA	\$325	3.5	\$1,137.5
Derek Dixon	MKTG	\$310	13.1	\$4,061.00
TOTALS			9,919.6	\$5,026,417.00

Status:

Partner (P)

Associate (A)

Of Counsel (OC)

Attorney (ATTY)

Law Clerk (LC)

Paralegal (PL)

Legal Assistant (LA)

Marketing (MKTG)

Exhibit B

EXPENSE/DISBURSEMENT SUMMARY

Firm: **ZIMMERMAN REED LLP**
Reporting Period: **Inception – September 30, 2025**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$1,976.12
Postage Charges	0
Facsimile Charges	0
Long Distance	0
In-House Photocopying	\$214.10
Outside Photocopying	0
Travel (Transportation, lodging, meals, etc.)	\$2,872.75
Court fees (filing, etc.)	0
Professional Fees (expert/investigators, etc.)	0
Witness/Service Fees	0
Court Reporter/Transcripts	0
Computer Research	\$5,521.46
Miscellaneous (Supplies for off-site document review)	\$93.73
TOTAL	\$10,678.16

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

*IN RE TURKEY ANTITRUST
LITIGATION*

No. 1:19-cv-08318

This Document Relates To:

Hon. Sunil Harjani

COMMERCIAL AND
INSTITUTIONAL INDIRECT
PURCHASER PLAINTIFF ACTION

Hon. Keri L. Holleb Hotaling

DECLARATION OF JON A. TOSTRUD IN SUPPORT OF COMMERCIAL AND
INSTITUTIONAL INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION
EXPENSES, AND CLASS REPRESENTATIVE SERVICE AWARDS

I, Jon A. Tostrud, declare as follows:

1. I am an attorney admitted to practice *pro hac vice* in the Northern District of Illinois, Eastern Division in the above-captioned lawsuit. I have practiced law since 1994 and am the founder of the law firm Tostrud Law Group, P.C. in Los Angeles, California. I have litigated class actions and other complex matters most of my career. This declaration is submitted in support of Commercial and Institutional Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

2. My firm is one of the firms working on this matter on behalf of the certified CIIPPs Class. We have worked in coordination with Co-Lead Class Counsel Barrett Law Group, P.A. and Cuneo Gilbert & LaDuca, LLP for the certified CIIPPs class. Work assignments in this case have been made by Co-Lead Class Counsel to avoid duplicative effort and my firm has worked efficiently on behalf of the certified CIIPPs class.

3. The schedule attached to this declaration as Exhibit A, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through September 30, 2025. The lodestar calculation is based on my firm's current billing rates for antitrust class action litigation. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

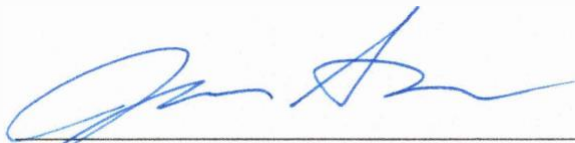
4. The total number of hours reasonably expended on this litigation by my firm from inception through September 30, 2025 is 4,973.60. The total lodestar for my firm at current rates is \$3,672,922.50. Expense items are billed separately and are not duplicated in my firm's lodestar.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred.

6. My firm has incurred and paid \$17,029.84 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses by category is attached as Exhibit B. The total amount of assessments my firm paid to a litigation expense fund for this case is \$267,587.93, and is not included in Exhibit B, but is included in the separate Declaration of Co-Lead Class Counsel Sterling Aldridge of the Barrett Law Group, P.A.

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

Dated: October 21, 2025



Jon A. Tostrud

Exhibit A

LODESTAR SUMMARYFirm: **TOSTRUD LAW GROUP, P.C.**Reporting Period: **Inception – September 30, 2025**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jon A. Tostrud	P	\$1050	1317.50	\$1,383,365.00
Anthony M. Carter	P	\$950	1117.60	\$1,061,720.00
Scott Lundering	OC	\$475	971.50	\$461,462.50
Peter Rabinov	OC	\$475	1493.50	\$709,412.50
Brent Walton	OC	\$475	73.50	\$56,962.50
TOTALS				\$3,672,922.50

Status: Partner (P)

Associate (A)

Paralegal (PL)

Of Counsel (OC)

Law Clerk (LC)

Legal Assistant (LA)

Exhibit B

EXPENSE / DISBURSEMENT SUMMARY

Firm: **TOSTRUD LAW GROUP, P.C.**
Reporting Period: **Inception-September 30, 2025**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	\$166.63
Telephone/Facsimile Charges	\$575.00
Long Distance	
In-House Photocopying	\$1,175.00
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	\$10,733.21
Court fees (filing, etc.)	\$100.00
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	\$4,280.00
Miscellaneous (Describe)	
TOTAL	\$17,029.84

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

IN RE TURKEY ANTITRUST LITIGATION

No. 1:19-cv-08318

This Document Relates To:

Hon. Sunil Harjani

COMMERCIAL AND INSTITUTIONAL
INDIRECT PURCHASER PLAINTIFF
ACTION

Hon. Keri L. Holleb Hotaling

**DECLARATION OF MARCUS BOZEMAN IN SUPPORT OF COMMERCIAL AND
INSTITUTIONAL INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES,
AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Marcus Neil Bozeman, declare as follows:

1. I am an attorney admitted to practice *pro hac vice* in the Northern District of Illinois, Eastern Division in the above-captioned lawsuit. I have practiced law since 1995 and am a partner with the firm of Bozeman Law Firm, P.A. in Little Rock Arkansas. I have litigated class actions and other complex matters most of my career. This declaration is submitted in support of Commercial and Institutional Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

2. My firm is one of the firms working on this matter on behalf of the certified CIIPPs Class. We have worked in coordination with Co-Lead Class Counsel Barrett Law Group, P.A. and Cuneo Gilbert & LaDuca, LLP for the certified CIIPPs class. Work assignments in this case have been made by Co-Lead Class Counsel to avoid duplicative effort and my firm has worked efficiently on behalf of the certified CIIPPs class.

3. The schedule attached to this declaration as Exhibit A, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through September 30, 2025. The lodestar calculation is based on my firm's current billing rates for antitrust class action litigation. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

4. The total number of hours reasonably expended on this litigation by my firm from inception through September 30, 2025 is 717.5. The total lodestar for my firm at current rates is \$538,125.00. Expense items are billed separately and are not duplicated in my firm's lodestar.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred.

6. My firm has incurred and paid \$1,148.79 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses by category is attached as Exhibit B. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B but are included in the separate Declaration of Co-Lead Class Counsel Sterling Aldridge of the Barrett Law Group, P.A.

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

Dated: October 21, 2025

Marcus Neil Bozeman
Marcus Neil Bozeman

Exhibit A

LODESTAR SUMMARY

Firm: **Bozeman Law Firm, P.A.**
 Reporting Period: **Inception – September 30, 2025**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Marcus Bozeman	P	\$750	717.5	\$538,125.00
TOTALS			717.5	\$538,125.00

Status:
 Partner (P)
 Associate (A)
 Paralegal (PL)
 Of Counsel (OC)
 Law Clerk (LC)
 Legal Assistant (LA)

Exhibit B

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Bozeman Law Firm, P.A.**
Reporting Period: **Inception-September 30, 2025**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	\$997.00
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	\$92.29
Travel (Transportation, lodging, meals, etc.)	
Court fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	\$13.50
Miscellaneous (meal with client during depo. prep.)	\$46.00
TOTAL	\$1,148.79

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

IN RE TURKEY ANTITRUST LITIGATION

No. 1:19-cv-08318

This Document Relates To:

Hon. Sunil Harjani

COMMERCIAL AND INSTITUTIONAL
INDIRECT PURCHASER PLAINTIFF
ACTION

Hon. Keri L. Holleb Hotaling

**DECLARATION OF MARCO CERONE IN SUPPORT OF COMMERCIAL AND
INSTITUTIONAL INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES,
AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Marco Cercone, declare as follows:

1. I am an attorney admitted to practice *pro hac vice* in the Northern District of Illinois, Eastern Division in the above-captioned lawsuit. I have practiced law since 2003 and am a partner with the firm of Rupp Pfalzgraf, LLC in Buffalo, New York. I have litigated class actions and other complex matters most of my career. This declaration is submitted in support of Commercial and Institutional Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

2. My firm is one of the firms working on this matter on behalf of the certified CIIPPs Class. We have worked in coordination with Co-Lead Class Counsel Barrett Law Group, P.A. and Cuneo Gilbert & LaDuca, LLP for the certified CIIPPs class. Work assignments in this case have been made by Co-Lead Class Counsel to avoid duplicative effort and my firm has worked efficiently on behalf of the certified CIIPPs class.

3. The schedule attached to this declaration as Exhibit A, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through September 30, 2025. The lodestar calculation is based on my firm's current billing rates for antitrust class action litigation. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

4. The total number of hours reasonably expended on this litigation by my firm from inception through September 30, 2025 is 18.30. The total lodestar for my firm at current rates is \$8,980.50. Expense items are billed separately and are not duplicated in my firm's lodestar.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred.

6. My firm has incurred and paid \$0.14 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses by category is attached as Exhibit B. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B but are included in the separate Declaration of Co-Lead Class Counsel Sterling Aldridge of the Barrett Law Group, P.A.

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

Dated: October 20, 2025

s/ Marco Cercone
Marco Cercone, Esq.
Rupp Pfalzgraf, LLC
1600 Liberty Street
424 Main Street
Buffalo, New York 14202
Telephone: (716) 854-3400

Exhibit A

LODESTAR SUMMARY

Firm: **RUPP PFALZGRAF, LLC**
Reporting Period: **Inception – September 30, 2025**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Arthur N. Bailey	P	\$495.00	14.4	\$6,480.00
Marco Cercone	P	\$475.00	3.9	\$1,852.50
TOTALS			18.30	\$8,980.50

Status:

Partner (P)

Associate (A)

Paralegal (PL)

Of Counsel (OC)

Law Clerk (LC)

Legal Assistant (LA)

Exhibit B

EXPENSE / DISBURSEMENT SUMMARY

Firm: **RUPP PFALZGRAF, LLC**
Reporting Period: **Inception-September 30, 2025**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	.14
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	\$0.14

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

IN RE TURKEY ANTITRUST LITIGATION

No. 1:19-cv-08318

This Document Relates To:

Hon. Sunil Harjani

COMMERCIAL AND INSTITUTIONAL
INDIRECT PURCHASER PLAINTIFF
ACTION

Hon. Keri L. Holleb Hotaling

**DECLARATION OF JONATHAN S. ALTMAN IN SUPPORT OF COMMERCIAL
AND INSTITUTIONAL INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES,
AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Jonathan S. Altman, declare as follows:

1. I am an attorney admitted to practice [*pro hac vice*] in the Northern District of Illinois, Eastern Division in the above-captioned lawsuit. I have practiced law since 1992 and am a partner with the firm of Derfner & Altman, LLC in Charleston, South Carolina. I have litigated class actions and other complex matters most of my career. This declaration is submitted in support of Commercial and Institutional Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

2. My firm is one of the firms working on this matter on behalf of the certified CIIPPs Class. We have worked in coordination with Co-Lead Class Counsel Barrett Law Group, P.A. and Cuneo Gilbert & LaDuca, LLP for the certified CIIPPs class. Work assignments in this case have been made by Co-Lead Class Counsel to avoid duplicative effort and my firm has worked efficiently on behalf of the certified CIIPPs class.

3. The schedule attached to this declaration as Exhibit A, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through September 30, 2025. The lodestar calculation is based on my firm's current billing rates for antitrust class action litigation. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

4. The total number of hours reasonably expended on this litigation by my firm from inception through September 30, 2025 is 128.80. The total lodestar for my firm at current rates is \$93,120.00. Expense items are billed separately and are not duplicated in my firm's lodestar.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred.

6. My firm has incurred and paid \$0.00 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses by category is attached as Exhibit B. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B but are included in the separate Declaration of Co-Lead Class Counsel Sterling Aldridge of the Barrett Law Group, P.A.

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

Dated: October 23, 2025



Jonathan S. Altman

Exhibit A

LODESTAR SUMMARY

Firm: **Derfner & Altman, LLC**
Reporting Period: **Inception – September 30, 2025**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Jonathan S. Altman	P	\$600.00	49.60	\$29,760.00
Armand Derfner	P	\$800.00	79.20	\$63,360.00
TOTALS			128.80	\$93,120.00

Status:

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)

Exhibit B

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Derfner & Altman, LLC**
Reporting Period: **Inception-September 30, 2025**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	\$0.00

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

IN RE TURKEY ANTITRUST LITIGATION

No. 1:19-cv-08318

This Document Relates To:

Hon. Sunil Harjani

COMMERCIAL AND INSTITUTIONAL
INDIRECT PURCHASER PLAINTIFF
ACTION

Hon. Keri L. Holleb Hotaling

**DECLARATION OF ARMAND DERFNER IN SUPPORT OF COMMERCIAL AND
INSTITUTIONAL INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES,
AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Armand Derfner, declare as follows:

1. I am an attorney admitted to practice [*pro hac vice*] in the Northern District of Illinois, Eastern Division in the above-captioned lawsuit. I have practiced law since 1965 and am a partner with the firm of Derfner & Altman, LLC in Charleston, South Carolina. I have litigated class actions and other complex matters most of my career. This declaration is submitted in support of Commercial and Institutional Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

2. My firm is one of the firms working on this matter on behalf of the certified CIIPPs Class. We have worked in coordination with Co-Lead Class Counsel Barrett Law Group, P.A. and Cuneo Gilbert & LaDuca, LLP for the certified CIIPPs class. Work assignments in this case have been made by Co-Lead Class Counsel to avoid duplicative effort and my firm has worked efficiently on behalf of the certified CIIPPs class.

3. The schedule attached to this declaration as Exhibit A, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through September 30, 2025. The lodestar calculation is based on my firm's current billing rates for antitrust class action litigation. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

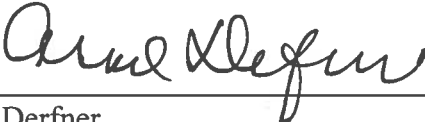
4. The total number of hours reasonably expended on this litigation by my firm from inception through September 30, 2025 is 128.80. The total lodestar for my firm at current rates is \$93,120.00. Expense items are billed separately and are not duplicated in my firm's lodestar.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred.

6. My firm has incurred and paid \$0.00 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses by category is attached as Exhibit B. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B but are included in the separate Declaration of Co-Lead Class Counsel Sterling Aldridge of the Barrett Law Group, P.A.

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

Dated: October 23, 2025



Armand Derfner

Exhibit A

LODESTAR SUMMARY

Firm: **Derfner & Altman, LLC**
Reporting Period: **Inception – September 30, 2025**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Armand Derfner	P	\$800.00	79.20	\$63,360.00
Jonathan S. Altman	P	\$600.00	49.60	\$29,760.00
TOTALS			128.80	\$93,120.00

Status:

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)

Exhibit B

EXPENSE / DISBURSEMENT SUMMARY

Firm: **Derfner & Altman, LLC**
Reporting Period: **Inception-September 30, 2025**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	\$0.00

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

IN RE TURKEY ANTITRUST LITIGATION

No. 1:19-cv-08318

This Document Relates To:

Hon. Sunil Harjani

COMMERCIAL AND INSTITUTIONAL
INDIRECT PURCHASER PLAINTIFF
ACTION

Hon. Keri L. Holleb Hotaling

**DECLARATION OF SHANNON M. MCNULTY IN SUPPORT OF COMMERCIAL
AND INSTITUTIONAL INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES,
AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Shannon M. McNulty, declare as follows:

1. I am an attorney admitted to practice in the Northern District of Illinois, Eastern Division, including in the above-captioned lawsuit. I have practiced law since 2004 and am a partner with the firm of CLIFFORD LAW OFFICES, P.C. in Chicago, Illinois. I have litigated class actions and other complex matters for approximately 15 years, including in this District. This declaration is submitted in support of Commercial and Institutional Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

2. Clifford Law Offices is one of the firms working on this matter on behalf of the certified CIIPPs Class. We have worked in coordination with Co-Lead Class Counsel Barrett Law Group, P.A. and Cuneo Gilbert & LaDuca, LLP for the certified CIIPPs class. Work assignments in this case have been made by Co-Lead Class Counsel to avoid duplicative effort and my firm has worked efficiently on behalf of the certified CIIPPs class.

3. The schedule attached to this declaration as Exhibit A, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through September 30, 2025. The lodestar calculation is based on my firm's current billing rates for antitrust class action litigation. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

4. The total number of hours reasonably expended on this litigation by my firm from inception through September 30, 2025 is 112.3. The total lodestar for my firm at current rates is \$95,455.00. Expense items are billed separately and are not duplicated in my firm's lodestar.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred.

6. My firm has incurred and paid \$44,939.50 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses by category is attached as Exhibit B. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B but are included in the separate Declaration of Co-Lead Class Counsel Sterling Aldridge of the Barrett Law Group, P.A.

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

Dated: October 23, 2025

/s/ Shannon M. McNulty
Shannon M. McNulty

Exhibit A

LODESTAR SUMMARY

Firm: CLIFFORD LAW OFFICES, P.C.
 Reporting Period: **Inception – September 30, 2025**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Shannon M. McNulty	P	\$850.00	112.3	\$95,455.00
TOTALS				\$95,455.00

Status:
 Partner (P)
 Associate (A)
 Paralegal (PL)
 Of Counsel (OC)
 Law Clerk (LC)
 Legal Assistant (LA)

Exhibit B

EXPENSE / DISBURSEMENT SUMMARY

Firm: CLIFFORD LAW OFFICES, P.C.
 Reporting Period: **Inception-September 30, 2025**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	(GNEMI) \$299.88 (SANDEE'S) \$639.62
Postage Charges	
Facsimile Charges	
Long Distance	
In-House Photocopying	
Outside Photocopying	
Travel (Transportation, lodging, meals, etc.)	
Court fees (filing, etc.)	
Professional Fees (expert/investigators, etc.)	(SANDEE'S) \$44,000.00
Witness/Service Fees	
Court Reporter/Transcripts	
Computer Research	
Miscellaneous (Describe)	
TOTAL	\$44,939.50