

UNITED STATES DISTRICT COURT
THE DISTRICT OF MARYLAND

JUDY JIEN, *et al.*,

Plaintiffs,

v.

PERDUE FARMS, INC., *et al.*,

Defendants.

C.A. No. 1:19-CV-2521-SAG

PLAINTIFFS' RENEWED MOTION TO DIRECT NOTICE

Plaintiffs Judy Jien, Kieo Jibidi, Elaisa Clement, Glenda Robinson, Emily Earnest, and Kevin West hereby move this Court for an order directing notice to class members in accordance with Federal Rule of Civil Procedure 23(c)(2)(B). Plaintiffs' proposed notice and allocation plans are described in the concurrently filed memorandum and supporting declaration and exhibits, which include the email and postcard notices. Both use plain language to inform potential class members of their rights and options at this stage of the litigation, and the essential features of the case are available for class members' review on an easy-to-read, translatable website at www.PoultryWages.com. An experienced Class Notice Administrator, A.B. Data, Ltd., supports the proposed notice plan.¹

Counsel for Plaintiffs provided counsel for Settling Defendants with copies of the proposed notices on December 19, 2024. Defendants have no objections to the notices.

¹ See Decl. of Justin Parks, filed concurrently herewith (Parks Decl.).

Dated: December 24, 2024

HAGENS BERMAN SOBOL SHAPIRO LLP

/s/ Shana E. Scarlett

Shana E. Scarlett (admitted *pro hac vice*)

Rio S. Pierce (admitted *pro hac vice*)

715 Hearst Avenue, Suite 300

Berkeley, CA 94710

Telephone: (510) 725-3000

shanas@hbsslaw.com

riop@hbsslaw.com

Steven W. Berman (admitted *pro hac vice*)

Breanna Van Engelen (admitted *pro hac vice*)

HAGENS BERMAN SOBOL SHAPIRO LLP

1301 Second Avenue, Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292

steve@hbsslaw.com

breannav@hbsslaw.com

Elaine T. Byszewski (admitted *pro hac vice*)

Abigail D. Pershing (admitted *pro hac vice*)

HAGENS BERMAN SOBOL SHAPIRO LLP

301 North Lake Avenue, Suite 920

Pasadena, CA 91101

Telephone: (213) 330-7150

elaine@hbsslaw.com

abigailp@hbsslaw.com

Dated: December 24, 2024

COHEN MILSTEIN SELLERS & TOLL PLLC

/s/ Brent W. Johnson

Brent W. Johnson (admitted *pro hac vice*)

Benjamin D. Brown (admitted *pro hac vice*)

Daniel H. Silverman (admitted *pro hac vice*)

Alison S. Deich (admitted *pro hac vice*)

Zachary Glubiak (D. Md. Bar # 20962)

Zachary Krowitz (D. Md. Bar # 22370)

1100 New York Avenue NW, 5th Floor

Washington, DC 20005

Telephone: (202) 408-4600

Facsimile: (202) 408-4699

bjohnson@cohenmilstein.com

bbrown@cohenmilstein.com

dsilverman@cohenmilstein.com

adeich@cohenmilstein.com

zglubiak@cohenmilstein.com
zkowitz@cohenmilstein.com

Dated: December 24, 2024

HANDLEY FARAH & ANDERSON PLLC

/s/ George F. Farah

George F. Farah (admitted *pro hac vice*)
Rebecca P. Chang (admitted *pro hac vice*)
Nicholas J. Jackson (admitted *pro hac vice*)
33 Irving Place
New York, NY 10003
Telephone: (212) 477-8090
gfarah@hfajustice.com
rchang@hfajustice.com
njackson@hfajustice.com

Matthew K. Handley (D. Md. Bar # 18636)
Rachel E. Nadas (admitted *pro hac vice*)
HANDLEY FARAH & ANDERSON PLLC
1201 Connecticut Avenue, NW, Suite 200K
Washington, DC 20036
Telephone: (202) 559-2433
mhandley@hfajustice.com
rnadas@hfajustice.com

William H. Anderson (admitted *pro hac vice*)
HANDLEY FARAH & ANDERSON PLLC
5353 Manhattan Circle, Suite 204
Boulder, CO 80303
Telephone: (202) 559-2433
wanderson@hfajustice.com

Simon Wiener (admitted *pro hac vice*)
HANDLEY FARAH & ANDERSON PLLC
68 Harrison Avenue, Suite 604
Boston, MA 02111
Telephone: (202) 921-4567
swiener@hfajustice.com

Co-Lead Counsel for Plaintiffs and the Proposed Class

Brian D. Clark (admitted *pro hac vice*)
Stephen J. Teti (admitted *pro hac vice*)
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
bdclark@locklaw.com
steti@locklaw.com

Candice J. Enders (admitted *pro hac vice*)
Julia R. McGrath (admitted *pro hac vice*)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 875-3000
Facsimile: (215) 875-4604
cenders@bm.net
jmcgrath@bm.net

*Additional Counsel for Plaintiffs and
the Proposed Class*

CERTIFICATE OF SERVICE

The undersigned attorney of record hereby certifies that on December 24, 2024, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system which will cause notice and a copy of this filing will be served upon all counsel of record.

Dated: December 24, 2024

/s/ Shana E. Scarlett
SHANA E. SCARLETT

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I. INTRODUCTION

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs Judy Jien, Kieo Jibidi, Elaisa Clement, Glenda Robinson, Emily Earnest, and Kevin West (collectively “Plaintiffs”) respectfully move to disseminate notice to settlement classes covered by settlements with the 23 Defendant Processors and one consulting firm, Webber, Meng, Sahl & Co., Inc. (“WMS”).

The settlement classes have not yet received notice of any settlements. On April 4, 2024, Plaintiffs moved to direct notice to settlement classes covered by the 11, then-executed settlements with Defendants (“Prior Settling Defendants”).¹ ECF No. 905. This Court granted the motion. ECF No. 914 (the “Notice Plan”). Shortly after, and before any notices were issued to class members, Plaintiffs entered settlement agreements with additional Defendants that substantially expanded the total settlement fund. *See* ECF No. 932 at 1. To save the costs of duplicative notice and to prevent inaccurate notices from being distributed to settlement classes, Plaintiffs requested, and this Court granted, a brief extension of time to negotiate with the remaining Defendants and to propose amended notices. Plaintiffs have now settled with all the Defendants *except* Agri Stats, Inc. (“Agri Stats”), an information-sharing service.² Concurrently

¹ The first set of settling defendants were: Pilgrim’s Pride Corporation (Pilgrim’s); George’s, Inc. and George’s Foods, LLC (collectively “George’s”); WMS; Peco Foods, Inc. (“Peco”); Simmons Foods, Inc. and Simmons Prepared Foods, Inc. (collectively “Simmons”); Cargill Meat Solutions Corporation (“Cargill”); Sanderson Farms, Inc. (“Sanderson”); Wayne Farms LLC (“Wayne”); Perdue Farms, Inc. and Perdue Foods, LLC (collectively “Perdue”); Case Foods, Inc. and Case Farms, LLC (collectively “Case Foods”); and Mountaire Farms Inc. (“Mountaire Farms”).

² The second set of settling defendants are: Allen Harim Foods, LLC (“Allen Harim”), Amick Farms, LLC (“Amick”), Butterball, LLC (“Butterball”), Fieldale Farms Corp. (“Fieldale”), Foster Poultry Farms (“Foster Farms”), Jennie-O Turkey Store, Inc. (“Jennie-O”), Koch Foods, Inc. (“Koch”), O.K. Foods, Inc. (“O.K. Foods”), Tyson Foods, Inc. and Keystone Foods, LLC (collectively “Tyson”).

with the filing of this motion, Plaintiffs are moving for preliminary approval of nine additional settlements.

Plaintiffs now move to direct notice to settlement classes for the over \$398 million in settlements reached in this case. Class Counsel have retained an experienced notice and claims administrator, A.B. Data, Ltd. (“A.B. Data”); the claims administrator has the expertise to oversee notice and distribution to this nationwide class of underpaid workers. Declaration of Justin Parks (“Parks Decl.”), ¶¶ 3–4. This Court previously appointed A.B. Data to serve as the notice and claims administrator for the settlements with the Prior Settling Defendants. *See* ECF No. 853 (appointing A.B. Data to serve as the notice and claims administrator for the settlements with Pilgrim’s, George’s, Peco, WMS, Simmons, Cargill, Sanderson, Wayne, Perdue); ECF No. 911 (same appointment for the Case and Mountaire settlements).

Working together, A.B. Data and Class Counsel have put together a notice plan and robust set of notices that satisfy both the requirements of Rule 23 and constitutional due process. The notice plan includes both a direct and indirect notice component, as well as a comprehensive settlement website available to answer class members’ questions.

Direct notice: A.B. Data has identified 1.4 million unique mailing addresses and over 110,000 email address contained in the data provided by the Defendants. Plaintiffs will distribute emails to those for whom email addresses are available, using best practices to reduce SPAM or junk filters. Plaintiffs will disseminate postcard notice for class members for whom physical addresses are available. Mailing addresses will be updated through the U.S. Postal Services (“USPS”) national change of address database. And where forwarding addresses are provided, undeliverable postcards will be remailed. In response to the direct notice, class members for whom all relevant information is known (*i.e.*, compensation information, contact information,

and a verified Taxpayer Identification Number (“TIN”)) will not need to do anything and will automatically receive a check in the distribution phase of the case, unless they elect to exclude themselves from the settlements. Parks Decl., ¶¶ 7–16.

Indirect notice: Additionally, Class Counsel proposes a robust campaign of indirect notice, consisting of supplemental paid media, earned media, union outreach, a website, and a toll-free telephone number. Class members who are not contained in the data produced by Settling Defendants and are reached via indirect notice will be directed to the settlement website, where information will be requested from them. An example of the proposed participation form that will assist such class members to submit their claims accompanies this motion. *See* Parks Decl., Ex. F.

Settlement website: Class Counsel have already purchased and built out a settlement website, www.PoultryWages.com, which allows former or current poultry workers to determine whether they might be a member of a settlement class, check and update their compensation and contact information, and review important documents in the case. Class Counsel and A.B. Data have drafted a detailed set of “frequently asked questions” to assist class members in understanding their claims and the distribution process. Using an online translating tool, the website will be easily translated into more than 130 languages for the class members’ ease. The participation form will also be available on the website and can be translated using the same online translating tool, for easy participation by class members. *Id.* ¶¶ 25–26.

Both the direct and indirect forms of notice inform class members of their rights and options in response to the settlements. *See* Parks Decl., Exs. B and C. The notices (or the websites to which they link) inform class members that they may elect to remain in settlement classes by doing nothing, remain in the settlement classes and object to one or more settlements,

or exclude themselves from settlements. *Id.* In sum, Plaintiffs' proposed plan of notice satisfies the Rule 23 requirements and is constitutional.

In addition, Plaintiffs request approval of a *pro rata* plan of allocation. Plaintiffs propose that class members will be entitled to recover a proportionate amount of these settlements based on the amount of compensation earned by each class member during the relevant class periods. Plaintiffs propose that class members can receive their funds through either physical checks or digital payments.

II. ARGUMENT

A. Plaintiffs request that this Court direct notice to the settlement classes.

The notice plan this Motion describes is nearly identical to one the Court previously approved. *See* ECF No. 914. The most significant change is that the updated notice and website materials now include the most recent wave of nine settlements and include the additional settlement funds available. But the proposed notice methods and back-end verification processes are the same and still satisfy all legal requirements, as discussed below.

1. The proposed manner of notice dissemination is reasonable and represents the best notice practicable under the circumstances.

Class actions certified under Rule 23(b)(3) require “the best notice practicable under the circumstances,” including “individual notice to all members who can be identified through reasonable effort.”³ Notice that is mailed to each member of a settlement class “who can be identified through reasonable effort” constitutes the best notice practicable.⁴ But notice may also be by electronic means. Fed. R. Civ. P. 23(c)(2)(B). And when class members cannot be

³ *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156, 173 (1974).

⁴ *Id.* at 176.

individually identified, notice by publication “constitutes a reasonable effort to provide notice to class members.”⁵

Plaintiffs propose a state-of-the-art notice program designed by an experienced notice and claims administrator, A.B. Data. The notice program includes: (1) direct notice, (2) supplemental paid media, (3) earned media, (4) union outreach, and (5) website notice.

Direct Notice. Plaintiffs propose two forms of notice: postcard notice and e-mail notice. Parks Decl., Exs. B and C. A.B. Data has identified 1.4 million unique mailing addresses and over 110,000 email address contained in the data provided by the Defendants. For those class members with email addresses, the claims administrator will send the proposed email notice. A.B. Data will perform several tasks to maximize email deliverability and avoid SPAM or junk filters. These tasks include: (1) running the list of recipient email addresses through a deliverability analysis to ensure the email addresses are valid, and (2) working with email service providers to develop sending strategies that achieve optimal deliverability. A.B. Data will also incorporate certain best practices to maximize deliverability, such as ensuring exclusion of words or phrases known to trigger SPAM or junk filters, not including attachments to the email, and sending the emails in tranches. Parks Decl., ¶¶ 10–12.

For those class members for whom no email address is available or the email notice is returned as undeliverable, A.B. Data will send postcard notice. Because the postcard notice will inform class members of the aggregate amount of their compensation information (so they are aware whether the information is complete or not), the postcard notice will be formatted as a sealed double postcard to facilitate privacy of class member information. All mailing addresses

⁵ See, e.g., *In re Titanium Dioxide Antitrust Litig.*, No. RDB-10-0318, 2013 WL 5182093, at *5 (D. Md. Sept. 12, 2013).

will be standardized and updated through the USPS's national change of address database. A.B. Data may also use available demographic information and known standard tools to locate class members' contact information, if necessary. The postcard notice will be sent to updated mailing addresses. Should the postcard notice be returned as undeliverable with a forwarding address provided, A.B. Data will promptly remail the postcard notice to the forwarding address. If the postcard notice is returned as undeliverable with no forwarding address provided, A.B. Data will search for an updated address using an information provider to which it subscribes and promptly remail the postcard notice to any such available address. Parks Decl., ¶¶ 13–15.

Supplemental Paid Media. Plaintiffs also propose a paid media campaign on both digital and social media to reach class members who did not receive the email notice or the postcard notice. The ads—which will appear on desktops, tablets, and mobile devices for 30 days on Google Display Network, YouTube, Facebook, Instagram, and other platforms—are estimated to achieve approximately 30 million gross impressions. The ads will appear nationally and also be geotargeted within states with the highest concentration of poultry workers, including Alabama, Arkansas, California, Georgia, Mississippi, New York, and Virginia. *Id.* ¶ 17.

The entire media campaign and settlement website will use a standard logo that will help class members identify the correct official settlement website. Each piece of the campaign—the simple text, standard logo, and eye-catching colors on the online banner ads and social media newsfeed ads—is designed to alert class members about the case. The ads will include links to the case-specific website so that class members may easily find answers to frequently asked questions, download case information, update their information, and/or complete the participation form. Sample banner and social media ads accompany this motion. *Id.* ¶ 18; Ex. D.

Sponsored search listings will also appear on Google—the most-visited search engine—and other search partners. A person will be able to use specific target phrases or keywords to search for information, and the link to the case-specific website may appear on the search result pages. This supplemental paid media is flexible and will be adjusted as necessary to provide sufficient notice coverage. *Id.* ¶ 20.

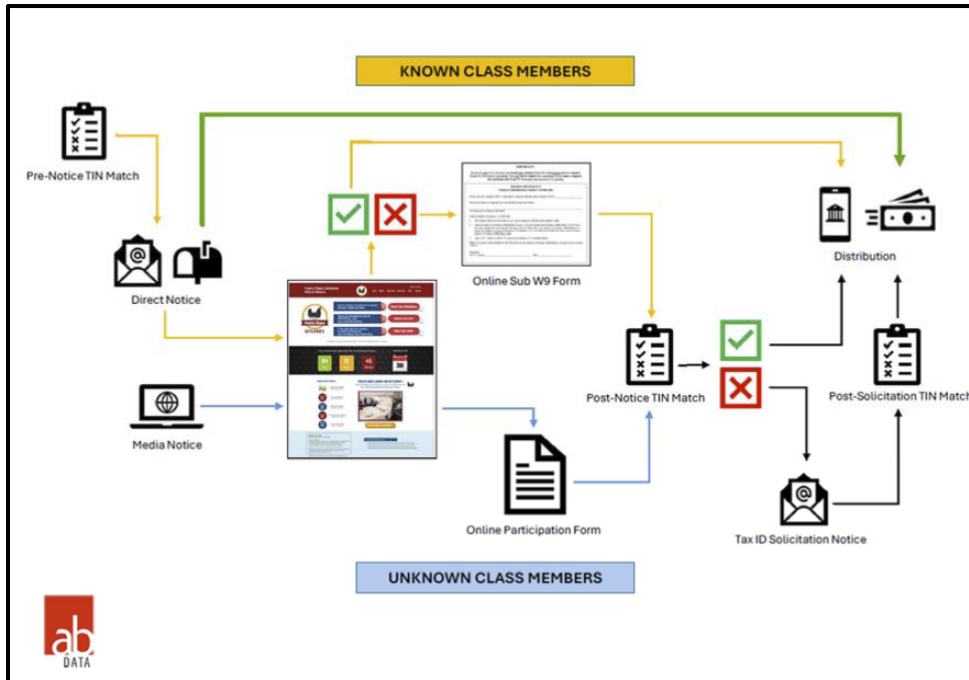
Earned Media. The proposed notice plan also includes a press release calculated to reach traditional media outlets (television, radio, newspapers, magazines), news websites, and journalists nationwide. The news release will be distributed via PR Newswire’s US1 and Hispanic National Newslines to help the case gain class members’ attention. News about the settlements will also be distributed via X (formerly known as Twitter) to thousands of media outlets, journalists, and other followers. *Id.* ¶¶ 21–22.

Union Outreach. Plaintiffs intend to create flyers with QR codes directing class members to the settlement website and to ask the United Food and Commercial Workers International Union to assist in disseminating news about the settlement funds to reach additional class members. *Id.* ¶ 23.

Settlement Website. Plaintiffs have already obtained a case-specific website for this matter: www.PoultryWages.com. Working with the claims administrator, Plaintiffs have developed a very specific logo to be placed at the top of the page, to help ensure continuity between the various notices and the official, court-sponsored website (versus the websites of claims aggregators). The website will be continually updated by Class Counsel regarding timelines in the case, countdowns to submit claims, important documents and decisions in the case, and answers to frequently asked questions. The frequently asked questions will be translated to English, Spanish, and Marshallese (the language of several named plaintiffs and a

large number of affected workers in this case). The website's content will be developed in HTML so that it can be translated into over *130 languages*, including Spanish, French/Haitian (Creole), and Vietnamese. The website's content will thus be available in each of the top five languages spoken by poultry-processing workers. *Id.* ¶¶ 25–28.

Because this case involves the return of wages, Class Counsel have sought the advice of an accounting firm regarding the necessity of W-9s or TINs from class members. Following that advice, the website will include multiple precautions. First, prior to sending notice, the claims administrator will perform a TIN match. For those with matches, direct notice will be sent, and distribution will be automatic. For a second group, TIN verification will be needed, and class members will be directed to the website where a W-9 or substitute W-9 will be solicited. If a TIN match thereafter results, then the class member will be moved automatically to the distribution phase. For those without TIN matches, one more attempt will be made to solicit a TIN, and then a distribution will be made. To avoid penalties to the settlement funds due to a lack of TIN-verification, the following process will be followed, but under all pathways, class members will ultimately receive distribution (that is, funds will not be denied because of a lack of TIN matching):



Toll-Free Telephone Number. A.B. Data will also implement and maintain a toll-free telephone number with an automated interactive voice response system. The automated interactive voice system will present callers with a series of choices to hear prerecorded information concerning the settlements in both English and Spanish. Callers will also have the option to speak with a live operator during business hours or, during nonbusiness hours, leave a message that will be returned. *Id.* ¶ 24.

In short, the proposed notice plan satisfies the requirements of Rule 23 and due process, will provide ample notice to potential settlement class members, and is the best notice practicable under the circumstances. Plaintiffs respectfully request that this Court approve the proposed notice plan.

2. The proposed form of class notice clearly and fairly apprises class members of the nature of this action and the scope of their rights.

In any Rule 23(b)(3) class action, the Court must direct notice of class certification to class members using the “best notice that is practicable under the circumstances, including

individual notice to all members who can be identified through reasonable effort.” Fed. R. Civ. P. 23(c)(2)(B). The class notice must “clearly and concisely state in plain, easily understood language”: (i) the nature of the action; (ii) the definition of the class certified; (iii) the class claims, issues, or defenses; (iv) that a class member may enter an appearance through an attorney; (v) that the court will exclude from the class any member who requests exclusion; (vi) the time and manner for requesting exclusion; and (viii) the binding effect of a class judgment on class members. *Id.*

Because the results of a certified Rule 23(b)(3) class action bind class members unless they affirmatively opt out, this notice protects the constitutional due process rights of absent class members.⁶ To satisfy Rule 23 and due process, the class notice should be “reasonably calculated, under all the circumstances, to apprise [absent class members] of the pendency of the action and afford them an opportunity to present their objections.”⁷

The notice must “fairly apprise” prospective class members of both the settlement terms and their options.⁸ In particular, the notice must describe the settlement terms “in sufficient detail to alert those with adverse viewpoints to investigate and to come forward and be heard.”⁹ Notices generally need not estimate the amount class members’ recovery as it is “difficult, if not impossible, for parties to reliably predict the number of valid claims when drafting notices.”¹⁰

⁶ *Phillips Petroleum Co. v. Shutts*, 472 U.S. 797, 812 (1985); *Eisen*, 417 U.S. at 173–74.

⁷ *McAdams v. Robinson*, 26 F.4th 149, 157 (4th Cir. 2022) (quoting *Mullane v. Cent. Hanover Bank & Tr. Co.*, 339 U.S. 306, 314 (1950)).

⁸ *Id.* (quoting *Wal-Mart Stores, Inc. v. Visa U.S.A., Inc.*, 396 F.3d 96, 114 (2d Cir. 2005)).

⁹ *Id.* (quoting *In re Online DVD-Rental Antitrust Litig.*, 779 F.3d 934, 946 (9th Cir. 2015)).

¹⁰ *Id.* at 158.

Plaintiffs and the claims administrator worked to propose forms of notice that are highly informative and readily accessible. In clear, simple language, the proposed notices describe the settlement classes' definitions, the allegations and claims, the objection and opt-out procedures, and the right of any class member who does not opt out to appear at the fairness hearing. If class members require additional information, the proposed website notice provides the claims administrator's and Class Counsel's contact information. Parks Decl., ¶ 18.

The notices maximize accessibility while preserving privacy. The email notice will be readable on mobile devices and link to a secure website where class members can access further information or correct their contact information. The postcard notice will be folded over to protect the personal information of class members and will also contain the website link.

Both sets of notice will include (to the extent possible) the total wages each class member is known to have earned while working for the Defendants during the class periods. Thus, class members will know the basis of their *pro rata* recovery and can confirm that the information informing their award is correct.¹¹ If a class member believes that information is incorrect, they can provide additional compensation information on the settlement website. *Id.* ¶ 18.

Because most poultry processing workers speak English as a second language or have a high school diploma, its equivalent, or less, the proposed notices were carefully drafted in accessible language. The email and postcard notice are drafted with language at a seventh grade reading level. The "frequently asked questions" are drafted at a sixth grade reading level and will be translated on the website to English, Marshallese, and Spanish—three of the primary

¹¹ Actual payments to class members are determined in part by the number of class members submitting claims, and it is unknown at this time how many class members will submit claims and receive distributions. Accordingly, the notices make clear that the actual amount of money each claimant will receive will be determined at a later date. *See* Parks Decl., Exs. B & C.

languages spoken by poultry-processing workers. The content of the website will be available in HTML and translatable to more than 130 languages, including Spanish, French/Haitian (Creole), and Vietnamese. *Id.* ¶ 26.

Since the Court’s first preliminary approval of the Pilgrim’s settlement, Class Counsel and A.B. Data have evaluated class members’ demographics and have endeavored to provide the clearest notice practicable. So, the proposed notices plainly satisfy the requirements of due process and the specific requirements of Rule 23(c)(2)(B).¹² Plaintiffs respectfully request that the Court approve the contents of the proposed notices.

B. The proposed plan of allocation is fair and reasonable.

Allocation plans must pass muster under Federal Rule of Civil Procedure 23. Courts evaluate the fairness, reasonableness, and adequacy of proposed allocation plans to determine whether class members are treated “equitably relative to each other.”¹³ *Pro rata* allocation plans are routinely approved by courts as fair, adequate, and reasonable.¹⁴

Plaintiffs propose that the plan of allocation will be a *pro rata* share of compensation earned by each settlement class member during the relevant class periods. Plaintiffs propose that

¹² *See, e.g., Boger v. Citrix Sys., Inc.*, No. LKG-19-1234, 2023 WL 3763974, at *12 (D. Md. June 1, 2023) (finding a notice that contained, among other things, details regarding the nature of the lawsuit, the settlement agreement’s terms, the release of claims, information regarding objections, and details about the fairness hearing was sufficient for Rule 23); Order Preliminarily Approving Settlement Proposal, Conditionally Certifying the Settlement Class, Conditionally Appointing Settlement Class Counsel and Settlement Class Representative, and Providing for Notice at 3, 5, *Yost v. Elon Prop. Mgmt., LLC*, No. CCB-21-1520 (D. Md. July 11, 2022), ECF No. 36 (approving notice that reasonably informed class members of the “essential features” of the case, the settlement agreements, class certification, and their rights).

¹³ *Feinberg v. T. Rowe Price Grp., Inc.*, 610 F. Supp. 3d 758, 769 (D. Md. 2022) (citing Fed. R. Civ. P. 23(e)(2)(D)); *see also In re Zetia (Ezetimibe) Antitrust Litig.*, 699 F. Supp. 3d 448, 460 (E.D. Va. 2023).

¹⁴ *See, e.g., In re Zetia (Ezetimibe) Antitrust Litig.*, 699 F. Supp. 3d at 460; *Feinberg*, 610 F. Supp. 3d at 770; *Boyd v. Coventry Health Care Inc.*, 299 F.R.D. 451, 461 (D. Md. 2014).

class members will have multiple methods of payment available. For class members with valid email addresses, they have the option of either receiving a physical check or electronically receiving digital payments through Mastercard or various brands such as Amazon, Wal-Mart, or grocery stores—places where class members will be able to use their returned wages. Class members without valid email addresses will be mailed a check. Parks Decl., ¶ 34.

After an initial distribution has taken place, it is very likely that additional settlement funds will remain in the escrow accounts. Plaintiffs propose that either the funds remaining from the first-round distribution will be joined with any subsequent settlements for the class, or that a second round of distribution will take place limited to only those class members who cashed their checks or claimed their digital funds in the first round.¹⁵ Plaintiffs also propose that any second-round distribution remove *de minimus* payments where the costs of administration would outweigh the benefit to that class member. To this end, Plaintiffs propose that there would be a floor of \$5 per class member in the second round of distribution, and any amounts of awards less than \$5 would be forfeited and returned to the settlement funds. Finally, if money remains after this second round of distribution and it is no longer cost effective to continue with a third round of distribution, and no additional settlements are reached with which the first-round funds may be joined, Plaintiffs propose that the money would be sent to the State Attorney General of Maryland for use in prosecuting antitrust actions.

III. PROPOSED SCHEDULE FOR FINAL APPROVAL

Plaintiffs propose the following schedule for the dissemination of notice, period for objections, and motion for final approval:

¹⁵ Limiting this second round of distribution to only class members who have already demonstrated that they are sufficiently engaged to collect their funds and that their contact information is correct will help to reduce administrative costs.

Task	Proposed Deadline
Publication notice plan, postcard and email notice to commence.	45 days from the date of the Order on this motion.
Initial Notice Complete (email and postcard).	75 days from the date of the Order on this motion.
Class Counsel to file motion for award of attorneys' fees, costs, and service awards.	105 days from the date of the Order on this motion.
Deadline for class members to request exclusion or object to settlements.	119 days from the date of the Order on this motion.
Class Counsel to file motion for final approval, a declaration regarding the completion of notice, and a list of timely excluded class members.	140 days from the date of the Order on this motion.
Final approval hearing.	As convenient to the Court.
Deadline for submission of claims/update of tax or TIN information to be provided by class members.	280 days from the date of the Order on this motion.

IV. CONCLUSION

Defendants have paid nearly \$400 million into a settlement fund benefitting settlement classes. Thus, Plaintiffs respectfully request this Court approve the proposed form of notice, the proposed manner of dissemination to settlement classes members, and approve the plan of allocation.

Dated: December 24, 2024

HAGENS BERMAN SOBOL SHAPIRO LLP

/s/ Shana E. Scarlett

Shana E. Scarlett (admitted *pro hac vice*)

Rio S. Pierce (admitted *pro hac vice*)

715 Hearst Avenue, Suite 300

Berkeley, CA 94710

Telephone: (510) 725-3000

shanas@hbsslaw.com

riop@hbsslaw.com

Steven W. Berman (admitted *pro hac vice*)

Breanna Van Engelen (admitted *pro hac vice*)

HAGENS BERMAN SOBOL SHAPIRO LLP

1301 Second Avenue, Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292
steve@hbsslaw.com
breannav@hbsslaw.com

Elaine T. Byszewski (admitted *pro hac vice*)
Abigail D. Pershing (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
301 North Lake Avenue, Suite 920
Pasadena, CA 91101
Telephone: (213) 330-7150
elaine@hbsslaw.com
abigailp@hbsslaw.com

Dated: December 24, 2024

COHEN MILSTEIN SELLERS & TOLL PLLC

/s/ Brent W. Johnson

Brent W. Johnson (admitted *pro hac vice*)
Benjamin D. Brown (admitted *pro hac vice*)
Daniel H. Silverman (admitted *pro hac vice*)
Alison S. Deich (admitted *pro hac vice*)
Zachary Glubiak (D. Md. Bar # 20962)
Zachary Krowitz (D. Md. Bar # 22370)
1100 New York Avenue NW, 5th Floor
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
bjohnson@cohenmilstein.com
bbrown@cohenmilstein.com
dsilverman@cohenmilstein.com
adeich@cohenmilstein.com
zglubiak@cohenmilstein.com
zkrowitz@cohenmilstein.com

Dated: December 24, 2024

HANDLEY FARAH & ANDERSON PLLC

/s/ George F. Farah

George F. Farah (admitted *pro hac vice*)
Rebecca P. Chang (admitted *pro hac vice*)
Nicholas J. Jackson (admitted *pro hac vice*)
33 Irving Place
New York, NY 10003
Telephone: (212) 477-8090
gfarah@hfajustice.com
rchang@hfajustice.com
njackson@hfajustice.com

Matthew K. Handley (D. Md. Bar # 18636)
Rachel E. Nadas (admitted *pro hac vice*)
HANDLEY FARAH & ANDERSON PLLC
1201 Connecticut Avenue, NW, Suite 200K
Washington, DC 20036
Telephone: (202) 559-2433
mhandley@hfajustice.com
rnadas@hfajustice.com

William H. Anderson (admitted *pro hac vice*)
HANDLEY FARAH & ANDERSON PLLC
5353 Manhattan Circle, Suite 204
Boulder, CO 80303
Telephone: (202) 559-2433
wanderson@hfajustice.com

Simon Wiener (admitted *pro hac vice*)
HANDLEY FARAH & ANDERSON PLLC
68 Harrison Avenue, Suite 604
Boston, MA 02111
Telephone: (202) 921-4567
swiener@hfajustice.com

Co-Lead Counsel for Plaintiffs and the Proposed Class

Brian D. Clark (admitted *pro hac vice*)
Stephen J. Teti (admitted *pro hac vice*)
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
bdclark@locklaw.com
steti@locklaw.com

Candice J. Enders (admitted *pro hac vice*)
Julia R. McGrath (admitted *pro hac vice*)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 875-3000
Facsimile: (215) 875-4604
cenders@bm.net
jmcgrath@bm.net

*Additional Counsel for Plaintiffs and
the Proposed Class*

CERTIFICATE OF SERVICE

The undersigned attorney of record hereby certifies that on December 24, 2024, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system which will cause notice and a copy of this filing will be served upon all counsel of record.

Dated: December 24, 2024

/s/ Shana E. Scarlett
SHANA E. SCARLETT

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JUDY JIEN, *et al.*,

Plaintiffs,

v.

PERDUE FARMS, INC., *et al.*,

Defendants.

CIVIL ACTION NO. 1:19-CV-2521

**DECLARATION OF JUSTIN PARKS OF A.B. DATA IN SUPPORT OF
MOTION FOR APPROVAL OF NOTICE PLAN**

I, Justin Parks, declare and state as follows:

1. I am Vice President of A.B. Data, Ltd.’s Class Action Administration Division (“A.B. Data”), whose Corporate Office is located in Milwaukee, Wisconsin. Class Counsel has retained A.B. Data to act as Settlement Administrator in this case after a competitive bidding process.

2. At the request of Class Counsel, I prepared a proposed notice administration plan (“Notice Plan”) for this litigation. This declaration will describe the proposed Notice Plan and how it will meet Rule 23 of the Federal Rules of Civil Procedure’s requirements and provide due process to class members. This declaration is based upon my personal knowledge and upon information provided to me by Class Counsel, my associates, and A.B. Data staff members.

3. A.B. Data has implemented and coordinated some of the largest and most complex notice and administration plans in the country. The scope of our work includes notification, claims processing, and distribution plans in all types of class actions. In addition, our team has administered many protein antitrust cases in recent years, including: *In re Broiler*

Chicken Antitrust Litigation, No. 16-cv-08637 (N.D. Ill.) (Direct Purchasers); *In re Broiler Chicken Antitrust Litigation*, No. 16-cv-08637 (N.D. Ill.) (Indirect Purchasers); *In re Broiler Chicken Antitrust Litigation*, No. 16-cv-08637 (N.D. Ill.) (Commercial and Institutional Purchasers); *In re Pork Antitrust Litigation*, No. 18-cv-1776 (D. Minn.) (Direct Purchasers); *In re Pork Antitrust Litigation*, No. 18-cv-1776 (D. Minn.) (Indirect Purchasers); *Olean Wholesale Grocery Cooperative v. Agri Stats*, No. 1:19-cv-08318 (N.D. Ill.) (Turkey – Direct Purchasers); and *In re Cattle and Beef Antitrust Litigation* (In re DPP Beef Litigation), No. 20-cv-01319 (D. Minn.).

4. A.B. Data has been appointed as notice, claims, and/or settlement administrator in hundreds of large consumer, antitrust, securities, ERISA, insurance, and government agency matters. A profile of A.B. Data’s background and capabilities, including representative case and client lists, is included as **Exhibit A**.

NOTICE PLAN OVERVIEW

5. The objective of the Notice Plan is to provide notice of the settlements to class members. The class is generally defined as:

All persons employed by Defendants, their subsidiaries, and related entities at poultry processing complexes, plants, hatcheries, and feed mills in the continental United States from January 1, 2000 until July 20, 2021.

The subclass is generally defined as:

All persons employed by Defendants, their subsidiaries, and/or related entities at poultry processing plants in the continental United States from January 1, 2009 until July 20, 2021

6. The proposed Notice Plan uses customary procedures that have been widely adopted in class actions with a comprehensive list of class member data. The Notice Plan includes direct notice via email and First-Class Mail and supplemental paid and earned media. A dedicated case-specific website and toll-free telephone number will serve as additional resources for class members.

DIRECT NOTICE

7. The proposed Notice Plan includes direct notice by email and First-Class U.S. mail, using the structured data produced by each settling defendant.

8. Pursuant to the Protective Order issued on September 5, 2023, the Court appointed A.B. Data as the Notice and Claims Administrator and instructed Defendants, defined therein, to produce structured data consisting of names and contact information for class members and data related to class members' wages and compensation (in accordance with the Preliminary Approval Order applicable to each settling Defendant) to A.B. Data. Given the existence of personally identifiable information (PII) in the structured data, A.B. Data has taken the applicable security measures, as defined within the Protective Order, with respect to structured data that Defendants produced.

9. As of the date of this declaration, A.B. Data has received and begun processing approximately one (1) billion rows of data received from Defendants as referenced above. The structured data produced by each Defendant was received in varying file formats, thus requiring substantial data mapping and collation efforts. To date, A.B. Data estimates that it has already spent approximately 200 hours processing the data.

10. As of the date of this declaration, and based on the data received and processed to date, there are approximately 1.4 million unique mailing addresses and over 110,000 email address contained in the data provided by the Defendants.¹ Due to the voluminous nature of the data received, as well as the ongoing review and consolidation efforts, the final counts of class members designated to receive Notice via email or mail may change. Based on A.B. Data's experience, it is estimated that there will be sufficient data to effectuate the robust Direct Notice Plan as described herein.

¹ These numbers are estimated, as data is still being processed and cleaned. Tasks in progress include integrating the data, verifying mail and email addresses, matching contacts, appending missing information, and removing duplicates and invalid contacts, among other measures. A.B. Data is currently employing an additional level of review, utilizing AI and other programmatic means to further consolidate the data across all Defendants.

11. A.B Data will send the Notice, in the form of an email (“Email Notice”), to class members for whom a valid email address is available.

12. Prior to emailing, A.B. Data will perform several tasks to maximize deliverability. These tasks include running the list of recipient email addresses through a deliverability analysis to ensure the email addresses are valid and working with our email service providers to develop sending strategies to achieve optimal deliverability. A.B. Data will also incorporate best practices, such as excluding words or phrases known to trigger SPAM or junk filters, not including email attachments, and sending the emails in tranches over a period of time.

13. A.B. Data will send the Notice, formatted as a double postcard (“Postcard Notice”), by First-Class Mail to class members with only a known mailing address and those whose email addresses were not provided or are determined to be invalid. Because this Notice will inform class members of the aggregate amount of their compensation information (so they are aware whether the information is complete or not), the Postcard Notice will be formatted as a sealed double postcard to facilitate privacy of class member information.

14. Prior to mailing, A.B. Data will standardize and update all mailing addresses through the United States Postal Service’s (“USPS”) national change of address database. For class members with a registered change of address, A.B. Data will mail a Postcard Notice to the updated mailing address provided by the USPS. Also, A.B. Data may utilize available demographic information and known standard tools to locate contact information for class members if necessary.

15. For any Postcard Notice returned to A.B. Data by the USPS as undeliverable as addressed (“UAA”) with a forwarding address provided, A.B. Data will promptly remail the Postcard Notice to the forwarding address. For any UAA Postcard Notice returned with no forwarding address provided, A.B. Data will search for an updated address using an information provider to which we subscribe. If an updated address is available, A.B. Data will promptly remail the Postcard Notice to the updated address.

16. The Postcard and Email Notices are attached as **Exhibits B and C**.

SUPPLEMENTAL PAID MEDIA

17. To supplement the comprehensive direct notice, A.B. Data designed a paid media plan (including digital and social media) to reach potential class members who do not receive a Notice via email or mail. Ads will appear across desktop, tablet, and mobile devices for 30 days on Google Display Network, YouTube, Facebook, Instagram, and other platforms. Approximately 30 million gross impressions will be delivered nationally and geotargeted within states with higher concentrations of poultry workers (Alabama, Georgia, Virginia, Mississippi, Arkansas, New York, and California).²

18. The online banner and social media newsfeed ads are designed with simple text, a standard logo, and eye-catching colors to alert potential class members about the case. Each ad will include a link to the case-specific website, www.PoultryWages.com, so when potential class members click on it, they will go directly to the case-specific website where they can find answers to commonly asked questions, download case information, update their information, or fill out a Participation Form. Sample banner and social media ads are attached as **Exhibit D**.

19. Sponsored search listings will be purchased to appear on Google, the most highly visited search engine, and/or other search partners. When a person uses a specific target phrase and/or keyword in a search engine to search for information, the link to the case-specific website may appear on the search result pages.

20. The supplemental paid media plan is flexible and can be adjusted as necessary to provide sufficient notice coverage. For example, the number of impressions ultimately served will depend on how many class members are successfully sent direct notice and will be adjusted accordingly to provide sufficient reach.

² U.S. Bureau of Labor Statistics, *Counties with highest concentrations of jobs in poultry and animal slaughtering, June 2020*, <https://www.bls.gov/opub/ted/2021/counties-with-highest-concentrations-of-jobs-in-poultry-and-animal-slaughtering-june-2020.htm> (last visited April 1, 2024).

EARNED MEDIA & OUTREACH

21. A.B. Data will distribute a news release via PR Newswire's US1 and Hispanic National newlines to help the case gain more attention from the media and potential class members. The press release will reach traditional media outlets (television, radio, newspapers, magazines), news websites, and journalists nationwide.

22. News about the settlements will also be broadcast to the news media via X (formerly known as Twitter). It will be tweeted from PR Newswire's and A.B. Data's X accounts to thousands of media outlets, journalists, and other followers.

23. A.B. Data will help create flyers with QR codes directing class members to the case-specific website (as needed) to assist the unions in their efforts to communicate information about the settlements to class members.

TOLL-FREE TELEPHONE NUMBER

24. To assist class members in understanding the terms of the settlements and their rights, A.B. Data will establish a case-specific toll-free telephone number. The toll-free telephone number will appear in all forms of notice, including on the case-specific website. The toll-free telephone number will be equipped with an automated interactive voice response ("IVR") system. The automated IVR system will present callers with a series of choices to hear prerecorded information (in English and Spanish) about the case. If callers need further help, they will have an option to speak with a live operator during business hours and leave a message during non-business hours which will be returned.

WEBSITE

25. A.B. Data will also implement and maintain a case-specific website for this matter. The website address, www.PoultryWages.com, will appear on all forms of notice. The custom website will be simple to navigate and provide, among other things, a summary and background about the case, information about class member rights and options, important dates, any pertinent updates, and other relevant information. An image of the website homepage is

attached as **Exhibit E**. Class members will be able to access detailed Frequently Asked Questions and download copies of key documents, such as the Notice, Participation Form, important court documents, and the Settlement Agreements. The case-specific website will feature a tool for class members to confirm and update their contact information and a look-up tool for them to check that their employer(s) and/or workplace(s) are included. A participation portal on the case-specific website will also allow class members who did not receive a Notice to download or electronically submit their Participation Form online. The Participation Form is attached as **Exhibit F**. The website also provides contact information for A.B. Data and Class Counsel in case class members need additional information. This website will be secure, with an “https” designation.

26. The top five languages spoken by poultry workers include Spanish, English, Marshallese (Ebon), French/Haitian Creole, and Vietnamese.³ The case-specific website will contain Frequently Asked Questions available to download in English, Marshallese, and Spanish. A copy of the Frequently Asked Questions is attached as **Exhibit G**. Additionally, the website content will be developed in HTML, so it can be translated and available in over 130 languages, including Spanish, French/Haitian (Creole), and Vietnamese.⁴ The combination of the downloadable Frequently Asked Questions and the languages available for translation will provide notice information to class members in their native tongue, including in the top five languages spoken by poultry workers.

27. The Email Notice, Postcard Notice, and case-specific website’s look-up tool each indicate the total wages each class member is known to have earned while working for Defendants during the class periods. Thus, class members will be informed of the basis of their pro rata share of recovery and can, if necessary, use the website’s look-up tool to verify the same or additional employment information. Total payments are determined by the number of class

³ Economic Policy Institute, *Who are America’s meat and poultry workers?*, <https://www.epi.org/blog/meat-and-poultry-worker-demographics/> (last visited April 1, 2024).

⁴ Google, *Cloud Translation, Language Support, Neural Machine Translation model*, <https://cloud.google.com/translate/docs/languages> (last visited April 1, 2024).

members, how long they worked for the Defendants, how much money they made, and any amount the court approves for attorney costs, fees, and class representative service awards (if any), so individual distribution amounts cannot be calculated at this time. The Notices state that the total amount of money each claimant will get will be determined at a later date.

NOTICE FORM, CONTENT, AND DESIGN

28. To foster consistency and help class members easily identify that they are getting trusted information associated with these settlements across channels, the notice materials and banner and social media ads feature a standard chicken logo and consistent graphic theme.

29. The Notice and detailed Frequently Asked Questions will be available on the case-specific website. The Notice and Frequently Asked Questions include all required information about class members' rights and options and meet the notice requirements in the Federal Rules of Civil Procedure Rule 23. They are designed to encourage readership and understanding in a well-organized and reader-friendly format and are written using plain and engaging language.

30. A Notice in the form of a postcard and email will be used to provide notice of the proposed settlements. The Notice provides a clear, plain language summary about the litigation, proposed settlements, and class members' rights and options. It has a large, bold headline so individuals who see the Notice can easily determine if they are included. This Notice includes the website address and toll-free telephone number so class members can obtain additional details about the case and background information.

31. Detailed Frequently Asked Questions will be available on the case-specific website and include more substantial information on how class members can act on their rights and options. The Frequently Asked Questions are written in plain language, contain all necessary information, and use a question-and-answer format to make it easier for potential class members to find and understand the relevant information.

32. In terms of education, most poultry processing workers have equivalent or equal to a high school diploma or less.⁵ Also, a significant portion (28.1%) of these workers are foreign-born, and English is not their first language.⁶ Therefore, it is critical that the content of the Notice and Frequently Asked Questions is easy for class members to comprehend. The Notice has an average Flesch-Kincaid⁷ grade level of 7th grade, and the Frequently Asked Questions are at an average 4th grade level. In comparison, the model FJC notices⁸ have an average reading level between 10–12th grades for the shorter form notices and 8–9th grades for the long form (Frequently Asked Questions) notice.

33. As noted above, the Frequently Asked Questions will all be available in class members' top languages.

PLAN OF ALLOCATION

34. A.B. Data will process each claim in accordance with the court-approved Plan of Allocation and/or relevant court orders. Class members with valid email addresses will be provided an opportunity to request their payment by digital payment through pre-paid cards from popular retailers such as Target, Walmart, Starbucks, Amazon, etc., or by check. Class members that do not have a valid email address will be mailed a check. Distributions from the net settlement proceeds will be sent to class members with a specified period for each claimant to redeem their payment (typically 90 or 120 days). A.B. Data will conduct an outreach campaign via email to encourage class members to redeem their payments and will provide reissued checks where applicable. Reissued checks will be valid until the initial void date or for 30 days whichever is longer.

⁵ Bureau of Labor Statistics, *Educational attainment for workers 25 years and older by detailed occupation*, <https://www.bls.gov/emp/tables/educational-attainment.htm> (last visited April 1, 2024).

⁶ Economic Policy Institute, *Who are America's meat and poultry workers?*, <https://www.epi.org/blog/meat-and-poultry-worker-demographics/> (last visited March 22, 2024).

⁷ The Flesch Kincaid Grade Level is a standard readability metric used to measure the ease with which a reader can understand and comprehend content. The higher the readability, the more likely the content is accessible to a broader audience.

⁸ Federal Judicial Center, *Illustrative Forms of Class Action Notices: Products Liability Notices*, <https://www.fjc.gov/content/products-liability-notices> (last visited March 22, 2024).

CONCLUSION

35. It is my opinion, based on my individual expertise and experience, and that of my A.B. Data colleagues, that the proposed Notice Plan described herein is designed to effectively reach class members and will deliver plain language notices that will capture class members' attention and provide them with the necessary information to effectively understand their rights and options in an informative and easy to understand manner. This proposed Notice Plan conforms to the standards employed by A.B. Data in similar notification plans. For all these reasons, in my opinion, the proposed Notice Plan is the best practicable under the circumstances and satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure and due process.

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

Executed this 24th day of December 2024 in Minneapolis, Minnesota.

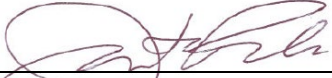

Justin Parks
Vice President
A.B. Data, Ltd.
Class Action Administration Division

EXHIBIT A

**Class
Action
Administration**



Headquarters

600 A.B. Data Drive
Milwaukee, WI 53217
P: 866-217-4470
F: 414-961-3099

New York

One Battery Park Plaza
32nd Floor
New York, NY 10004
P: 646-290-9137

Washington DC

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

Florida

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


Israel

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




CAPABILITIES

About A.B. Data


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

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

Location, Ownership Structure

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

Services

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

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

Services

All Digital — From Notice to Distribution

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

Pre-Settlement Consultation

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

Media Services

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

Notice Administration

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

Claims Processing

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

Contact Center

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

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

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

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

Case Websites

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

Settlement Fund Distribution

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

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

A.B. Data's Leadership



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Secure Environment



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

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

Data Security



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

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

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

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

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

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

Fraud Prevention and Detection



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

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

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

Representative Class Action Engagements



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

Consumer & Antitrust Cases

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

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

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

Securities Cases

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

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

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

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

Labor & Employment Cases

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

- *Simon v. R.W. Express LLC, d/b/a Go Airlink NYC*
- *Perez v. Mexican Hospitality Operator LLC, d/b/a Cosme*
- *Shanahan v. KeyBank, N.A.*
- *Loftin v. SunTrust Bank*
- *Alvarez v. GEO Secure Services, LLC*
- *Weisgarber v. North American Dental Group, LLC*
- *Talisa Borders, et al. v. Wal-mart Stores, Inc.*
- *Reale v. McClain Sonics Inc., et al.*
- *Larita Finisterre and Songhai Woodard, et al. v. Global Contact Services, LLC*
- *Adebisi Bello v. The Parc at Joliet*
- *Garcia, et al. v. Vertical Screen, Inc.*
- *Brook Lemma and Matthieu Hubert, et al. v. 103W77 Partners LLC, et al. ("Dovetail Settlement")*
- *American Federation of Government Employees, Local 1145 v. Federal Bureau of Prisons, U.S. Penitentiary, Atlanta, Georgia*
- *Lisa Ferguson, Octavia Brown, et al. v. Matthew G. Whitaker, Acting AG, DOJ Bureau of Prisons ("USP Victorville")*
- *American Federation of Government Employees, Local 2001 v. Federal Bureau of Prisons, Federal Correctional Institution, Fort Dix, New Jersey*
- *American Federation of Government Employees, Local 506 v. U.S. Department of Justice, Federal Bureau of Prisons, U.S. Penitentiary Coleman II, Coleman, Florida*
- *Vargas v. Sterling Engineering*
- *Rosenbohm v. Verizon*
- *Alex Morgan, et al. v. United States Soccer Federation, Inc.*
- *Iskander Rasulev v. Good Care Agency, Inc.*
- *Kyndl Buzas, et al., v. Phillips 66 Company and DOES 1 through 10*
- *American Federation of Government Employees, Local 408 v. U.S. Dept. of Justice, Federal Bureau of Prisons, Federal Correctional Complex, Butner, NC*
- *In re 2014 Avon Products, Inc. ERISA Litigation*
- *In re Eastman Kodak ERISA Litigation*
- *Taronica White, et al. v. Attorney General Loretta Lynch, Department of Justice*
- *Lisa Ferguson, et al. v. Acting Attorney General Matthew Whitaker, Department of Justice*
- *Melissa Compere v. Nusret Miami, LLC, et al.*
- *Abelar v. American Residential Services, L.L.C., Central District of California*
- *Flores, et al. v. Eagle Diner Corp., et al., Eastern District of Pennsylvania*
- *Michael Furman v. Godiva Chocolatier, Inc., 15th Judicial Circuit, Palm Beach County, Florida*
- *Finisterre et. al v. Global Contact Services, LLC, New York State Supreme Court, Kings County*
- *McGuire v. Intelident Solutions, LLC, et al., Middle District of Florida, Tampa Division*
- *Duran De Rodriguez, et al. v. Five Star Home Health Care Agency, Inc. et al., Eastern District of New York*

Data Breach/BIPA Cases

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

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

Telephone Consumer Protection Act (TCPA) Cases

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

For More Information

For more detailed information regarding A.B. Data's experience, services, or personnel, please see our website at www.abdataclassaction.com.

EXHIBIT B

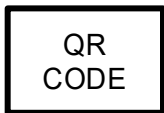
Jien v. Perdue Farms, No. 1:19-cv-002521 (D. Md.)

If You Worked in Poultry Processing between 2000 and 2021, You Could Get Money from Settlements.

This notice is about a lawsuit, and you may be part of the group of people affected, called a “Class.”

Poultry workers sued their employers (called the “Defendants”). This lawsuit says that some poultry companies talked to each other about how much to pay their workers in a way that is against the law and allowed them to pay workers less money than they should have. Defendants deny these claims. Some Defendants have agreed to settlements to stop the lawsuit against them to avoid further costs and risks.

Scan the QR Code to visit the website to learn more or update or add contact, payment, or earnings info:



Who are the Defendants? The poultry companies being sued are: Tyson Foods; Keystone Foods; Pilgrim's Pride; Perdue Farms; Perdue Foods; Sanderson Farms; Koch Foods; Wayne Farms; Cargill Meat Solutions; Mountaire Farms; Simmons Foods; Fieldale Farms; George's; George's Foods; Peco Foods; Foster Farms; Case Foods; Case Farms; O.K. Foods; Allen Harim; Amick Farms; Butterball; Jennie-O Turkey Store; Agri Stats; and Webber, Meng, Sahl and Company.

Who is a part of the lawsuit? You are part of the main Class if you worked at any Defendant's poultry processing complexes, plants, hatcheries, or feed mills in the United States at any time from January 1, 2000, until July 20, 2021. If you are part of this main Class, you are eligible for payment from settlements totaling \$363.25 million. You also may be part of an additional smaller "Subclass" if you worked in any Defendant's poultry plants in the U.S. at any time from January 1, 2009, until July 20, 2021. If you are also part of this Subclass, you are eligible for an additional payment from settlements totaling \$34.8 million.

What do I get? Some poultry companies agreed to cooperate and pay a total of \$398.05 million in settlements to stop this lawsuit. You may be able to get some of this money. Money will be paid proportionally (or *pro rata*). The amount of money you get will depend on how many people are in the classes, how long you worked for any of the Defendants, how much money you earned, and how much money the Court approves for lawsuit costs, attorneys' fees, and Class Representative awards. This money may be subject to tax withholding.

What are my earnings? Defendants' records show you earned about \$_____ in a job covered by the Class.

How do I get money? If you got this notice, you do not need to do anything to get money, but you should update and add your contact, employment, and earnings information [here](#) by [Month 00, 2025] to make sure all of your money gets to you.

Learn More:

1-877-311-3745

www.PoultryWages.com

What are my rights? If you do nothing, you will be bound by the Court's decisions. If you want to keep your right to sue the Defendants at your own cost instead of getting some of the settlement money, you must opt out by [Month 00, 2025]. If you stay in the settlements but do not agree with any part of them, you may object to them by [Month 00, 2025]. The Court will hold a hearing on [Month 00, 2025], to consider if it will approve the settlements and a request for attorneys' fees up to 33.33% of the settlements (\$132,670,065) plus interest earned on that amount, costs up to \$8 million, and up to a \$30,000 award for each of the Class Representatives. You or your own lawyer may appear and speak at the hearing at your own expense.

If you have additional or updated contact information, please complete and return the below:

Name

Address

City

State

Zip Code

Email Address

Phone Number

**POULTRY WAGES SETTLEMENT
C/O A.B. DATA, LTD.
P.O. BOX 173016
MILWAUKEE, WI 53217**

EXHIBIT C

Legal Notice

Jien v. Perdue Farms, No. 1:19-cv-002521 (D. Md.)

**If You Worked in Poultry Processing between 2000 and 2021,
You Could Get Money from Settlements.**

This notice is about a lawsuit, and you may be part of the group of people affected, called a “Class.” Learn more: Visit www.PoultryWages.com, email info@PoultryWages.com, or call 1-877-311-3745 (toll-free).

Defendants’ records show you earned about \$ _____ in a job covered by the Class.

If these numbers are inaccurate, you may update or add information on your earnings by visiting the website www.PoultryWages.com or clicking [here](#).

What is this lawsuit about?

Poultry workers sued their employers (called the “Defendants”). This lawsuit says that some poultry companies talked to each other about how much to pay their workers in a way that is against the law and allowed them to pay workers less money than they should have. Defendants deny these claims. Some Defendants have agreed to settlements to stop the lawsuit against them to avoid further costs and risks.

Who are the Defendants?

The poultry companies being sued in this lawsuit are: Tyson Foods; Keystone Foods; Pilgrim’s Pride; Perdue Farms; Perdue Foods; Sanderson Farms; Koch Foods; Wayne Farms; Cargill Meat Solutions; Mountaire Farms; Simmons Foods; Fieldale Farms; George’s; George’s Foods; Peco Foods; Foster Farms; Case Foods; Case Farms; O.K. Foods; Allen Harim; Amick Farms; Butterball; Jennie-O Turkey Store; Agri Stats; and Webber, Meng, Sahl and Company. For more information, please visit www.PoultryWages.com.

Who is a part of the lawsuit?

In a class action lawsuit, one or more people sue on behalf of a larger group. The people who represent the group are called “Class Representatives.” The whole group of people is called a “Class.”

You are part of the main Class in this lawsuit if you worked at any Defendant’s poultry processing complexes, plants, hatcheries, or feed mills in the United States at any point from January 1, 2000, until July 20, 2021. If you are part of the main Class, you are eligible for payment from settlements with 20 Defendants that total \$363.25 million.

You also may be part of an additional smaller “Subclass” if you worked in any Defendant’s poultry plants in the United States at any point from January 1, 2009, until July 20, 2021. If you are also part of this Subclass, you are eligible for an additional payment from settlements with three additional Defendants totaling \$34.8 million.

What do I get?

Some poultry companies agreed to cooperate and pay a total of \$398.05 million in settlements to stop this lawsuit. You may be able to get some of this money. Money will be paid proportionally (or *pro rata*). The amount of money you get will depend on how many people are in the Classes, how long you worked for any of the Defendants, how much money you earned, and how much money the Court approves for the

lawsuit costs, attorneys' fees, and Class Representative awards. This money may be subject to tax withholding.

How do I get money?

If you got this notice, you do not need to do anything to get money, but you should update and add your contact, employment, and earnings information [here](#) by [Month 00, 2025] to make sure all of your money gets to you.

What are my rights?

Even if you do nothing, you will be bound by the Court's decisions. If you want to keep your right to sue the Defendants at your own cost instead of getting some of the settlement money, you must opt out by [Month 00, 2025]. If you want to stay in the settlements but do not agree with any part of them, you may object to them by [Month 00, 2025]. More information about these options is available in the Notice on the website www.PoultryWages.com or by clicking [here](#).

The Court will hold a hearing on [Month 00, 2025], to consider if it will approve the settlements and a request for attorneys' fees up to one third of the settlements (\$132,670,065) plus interest earned on that amount, costs up to \$8 million, and up to a \$30,000 award for each of the Class Representatives. If you have concerns about the settlements, you or your own lawyer may appear and speak at the hearing at your own expense.

Learn More: 1-877-311-3745 info@PoultryWages.com
www.PoultryWages.com

EXHIBIT D



Did You Work in POULTRY PROCESSING between 2000 and 2021?

Poultry Wages

There are Settlements in a
Lawsuit Worth \$398.05 Million
AND YOU COULD GET MONEY

LEARN MORE HERE >

OFFICIAL WEBSITE: PoultryWages.com

Poultry Wages Settlements

Sponsored

You Could Get Money from \$398.05 Million in Settlements

If You Worked at any of the Defendants' Poultry Complexes, Plants, Hatcheries, and Feed Mills from January 1, 2000 to July 20, 2021.



Did You Work in POULTRY PROCESSING between 2000 and 2021?

Poultry Wages

There are Settlements in a
Lawsuit Worth \$398.05 Million
AND YOU COULD GET MONEY

LEARN MORE HERE >

OFFICIAL WEBSITE: PoultryWages.com

www.PoultryWages.com

Update Your Information Today!

Learn More



Comments

Shares

Like

Comment

Share



EXHIBIT E



Home Notice Participation Form Court Documents Contact

A federal court has authorized this. It is not a solicitation from a lawyer.
Did you work in Poultry Processing between 2000 and 2021?
 You Could Get Money from Settlements



- If You Received a Notice You Can Update Your Information and Update Your Earnings.** >>>
- If You Did Not Get a Notice by Email or Postcard You Can Participate Now.** >>>
- Check to See If You Worked in a Covered Poultry Processing Place Between 2000 and 2021.** >>>

- Update Your Information**
- Participate**
- Check Your Workspace**

Time Left to Get Your Money and Tell Your Friends and Family

00

Days

00

Hours

00

Minutes

00

Seconds

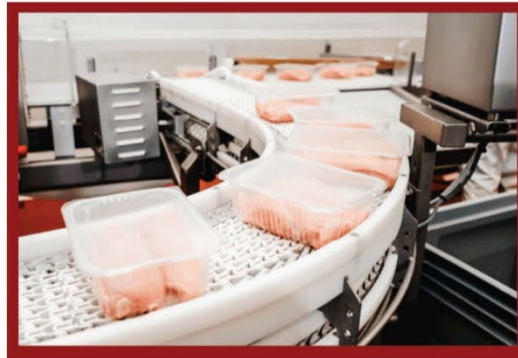
Deadline to File

Important Dates

- Participation Period Starts
Month Day 2025
- Opt Out Deadline
Month Day 2025
- Objection Deadline
Month Day 2025
- Final Approval Hearing
Month Day 2025
- Participation Period Ends
Month Day 2025

POULTRY WAGES LAWSUIT AND SETTLEMENTS

Read the Notice to see if you are a part of the lawsuit and learn about the Settlements and your choices.



PARTICIPATE HERE

About the Case:

Jen v. Perdue Farms, No. 1:10-cv-00252

LEGAL NOTICE

This lawsuit says that some poultry companies talked to each other about how much to pay their workers, in a way that was against the law and allowed them to pay workers less money than they should have.

Several workers sued those poultry companies.

The people who sued are called the "Plaintiffs." The poultry companies they sued are called the "Defendants." The Defendants say they did nothing wrong.

The Court has not decided who is right. Instead, both sides agreed to settle.

Important Things to Know

If you do nothing and you get a notice in the mail or by email, you will get money. But to make sure you get your money, update and add your contact information, and earnings information here to make sure all of your money gets to you. If you did not get a notice, you will need to fill out a Participation Form here to ask for money. Unless you opt out, you will stay a part of this lawsuit, and your rights will be affected.

Deciding What To Do

	Do Nothing	Ask to Participate	Exclude Yourself	Object
Can I get money if I ...	NO	YES	YES	NO
Will the Court's decision in this lawsuit affect me if I ...	YES	YES	NO	YES
Can I sue the Defendants myself for these claims if I ...	NO	NO	YES	NO

- Basic Information
- The Settlements
- How to Participate
- Remaining in the Lawsuit
- The Lawyers Representing You
- Objecting to the Settlement
- The Final Fairness Hearing

You Could Get Money from \$398,050,000 in Settlements
If You Worked at a Poultry Processing Complex, Plant, Hatchery, or Feed Mill
from January 1, 2000 to July 21, 2021.

What Do I Do Next

- GET A PAYMENT:** If you did not get a Notice by email or postcard, or are not sure, ask to Participate today.
- DO NOTHING:** Automatically be a part of the lawsuit.
- OPT OUT:** Get no money from the Settlements. But you can sue the Defendants on your own about the claims in this lawsuit.
- OBJECT:** Tell the Court why you don't like the Settlements.

By providing your information, either on paper, electronically or through a website, you consent to us storing and using your information for case administration purposes only. Our site uses tracking technologies to tailor your experience and understand how you and other visitors use our site. By continuing to navigate this site you consent to use of these tracking technologies. For more information on how we use your personal data, please read our Privacy Policy.



EXHIBIT F

POULTRY WAGES SETTLEMENT PARTICIPATION FORM

Jien v. Perdue Farms, No. 1:19-cv-002521 (D. Md.)

If you did not get a postcard or email notice, you must fill out and submit a participation form online or postmarked **on or before MONTH DAY YEAR.**

Fill out and submit your completed participation form:

Online at www.PoultryWages.com

OR

By **Mail** to the following address:

**Poultry Wages Settlement
c/o A.B. Data, Ltd.
P.O. Box 173016
Milwaukee, WI 53217**

You must complete all the sections on this form and sign it to be able to get money from these Settlements.

If you submit a participation form, you are swearing that you worked at one or more of the Defendants' poultry processing complexes plants, hatcheries, and feed mills in the United States at some point between January 1, 2000, and July 20, 2021.

YOUR NAME* (FIRST LAST)

UNIQUE ID FROM EMAIL OR POSTCARD NOTICE (IF YOU DID NOT GET A NOTICE, LEAVE THIS BLANK)

STREET ADDRESS*

CITY*

STATE*

ZIP*

<input type="text"/>	<input type="text"/>	<input type="text"/>
----------------------	----------------------	----------------------

MOBILE NUMBER*

EMAIL*

* Required if you have one.

Instructions:

- 1.** Please provide a copy of an official photo identification (like a driver's license or an employee ID from one of the poultry companies involved in this litigation) **OR** a copy of your pay history from the payroll service provider (see www.PoultryWages.com on how to obtain one) **OR** a copy of at least one paycheck/paystub from your time working at one of the companies.

AND:

- 2.** Please complete the chart on the following page, including the poultry company(ies) you worked for, your workplace(s), the dates you worked, how much you were paid per hour (or per year, if you received an annual salary), your average weekly hours, and your job title(s). Please type or write as neatly as possible.

We will first use this information to try to match your information with the data we were provided. If we cannot, we may conduct an independent audit of it. We may contact you by email, letter, or phone to ask for more information. Please keep your contact information up to date.

Over →

Employer	State	Facility	Start Date	End Date	Pay Rate	Average Hours/Week	Position
<i>Tyson</i>	<i>Arkansas</i>	<i>Hope</i>	<i>1/1/2002</i>	<i>9/15/2008</i>	<i>\$10.35</i>	<i>40</i>	<i>Live Hanger</i>
<i>Perdue</i>	<i>Delaware</i>	<i>Georgetown</i>	<i>5/1/2010</i>	<i>8/31/2011</i>	<i>\$12.50</i>	<i>30</i>	<i>Deboner</i>
<i>Pilgrims</i>	<i>Virginia</i>	<i>Harrisonburg</i>	<i>8/1/2015</i>	<i>9/15/2019</i>	<i>\$16.00</i>	<i>45</i>	<i>Cutter</i>

If you are a “U.S. person,” complete the Substitute IRS Form W-9 below. You are a U.S. person if you are a U.S. citizen or a U.S. resident alien. A U.S. “resident alien” is an individual who meets either the “Green Card Test” or the “Substantial Presence Test.” An undocumented individual is treated as a U.S. person for tax purposes if the Substantial Presence Test is met.

The Substantial Presence Test is met if you are physically present in the U.S. on at least:

- 31 days during 202X, and
- 183 days counting:
 - All the days you were present in 2024, and
 - 1/3 of the days you were present in 2023, and
 - 1/6 of the days you were present in 2022.

IMPORTANT:

If you are **not** a U.S. person, you should **not** complete Form W-9 and **do not** need to complete Form W-9 to get a payment. You **will** still be eligible for a payment if you cannot complete the Substitute IRS Form W-9 because you are not a U.S. person.

Substitute IRS Form W-9

Taxpayer Identification Number Certification

Social Security Number (SSN)/Individual Taxpayer Identification Number (ITIN):

_____ --- _____ --- _____

Print your name as it appears on your federal income tax return (First Name and Last Name for Individuals):

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct Social Security Number or Taxpayer Identification Number; and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
3. I am a U.S. citizen or other U.S. person (including a U.S. resident alien).

Note: If you have been notified by the IRS that you are subject to backup withholding, you must cross out item 2 above.

By signing this participation form, I state that the information in this form is accurate and complete to the best of my knowledge. I agree and consent that the Settlement Administrator and Class Counsel may contact me electronically via email, phone, and/or mobile phone. **I agree to give more information about my participation if the Settlement Administrator asks me to do so. If I do not provide adequate documentation when asked (or requested), I understand my participation in these Settlements may be denied.**

Signature of U.S. Person:

Signature: _____

Date: _____

EXHIBIT G

Did you work in Poultry Processing between 2000 and 2021? You Could Get Money from Settlements.

Poultry workers sued their employers because they believe they were not paid enough. This is called a lawsuit. The poultry companies say they did nothing wrong. But some poultry companies agreed to pay these employees \$398.05 million to stop the lawsuit. This is called a settlement. If you worked for one of these companies at any time between 2000 and 2021, you may be able to get some of this money.

If you were a poultry employee, you have three options:

1. **Do nothing.** If you do nothing, you will continue to be part of this lawsuit. Your rights will be affected. You may get money. **You may still need to fill out a form to get your money.** If you need to fill out a form, you must do it by **Month 00, 2025**. You may have some questions about the form. *See* Questions 16-21.
2. **Object to the settlements.** You can tell the judge in this case that you do not like the settlements. This is called “objecting.” You have until **Month 00, 2025** to object to the settlements. You may have some questions about how to object. *See* Questions 25-28.
3. **Opt out of the lawsuit.** You can choose to no longer be part of this lawsuit. This is called “opting out.” If you opt out, this lawsuit will not affect your rights. You will not get any money from this lawsuit. You have until **Month 00, 2025** to opt out. You may have some questions about how to opt out. *See* Questions 22-24.

If you have questions or need help, please go to www.PoultryWages.com or call 1-877-311-3745.

This Notice

1. Why did I get a notice?

You got a notice because records show you work or used to work for a poultry company that was sued in this lawsuit. Some poultry companies agreed to pay a total of \$398.05 million in settlements to stop this lawsuit.

You may be part of the group of people affected, called the “Class.” The Court will hold a hearing on **[Month 00, 2025]** to decide if it will approve the settlements. Your rights may be affected.

2. What do I do next?

Read this information to see if you are part of the lawsuit and learn more about the settlements and your choices. Then, decide if you need to take any action.

3. What is this lawsuit about?

This lawsuit says that some poultry companies talked to each other about how much to pay their workers in a way that was against the law and allowed them to pay workers less money than they should have.

Several workers sued those poultry companies. The people who sued are called the “Plaintiffs.”

The poultry companies they sued are called the “Defendants.” The Defendants say they did nothing wrong.

4. What can I do?

You need to decide if you want to:

Option	Summary	Important Date	Go to Questions:
GET MONEY	<p>If you got a notice in the mail or by email, you do not need to do anything to get money, but you should still update and add your contact, employment, and earnings information here to make sure all of your money from the settlements gets to you.</p> <p>If you did not get a notice, you need to fill out a participation form to get money.</p> <p>You can’t sue the Defendants on your own about the claims in this lawsuit.</p>	Month 00, 2025	14-20
OPT OUT	Get no money from the settlements. But you can sue the Defendants on your own about the claims in this lawsuit.	Month 00, 2025	22-24
OBJECT	Tell the Court why you don’t like the settlements. You can do this in writing without needing to go to Court. You will still be part of the Class, and you will still get money.	Month 00, 2025	25-28
DO NOTHING	If you got a notice in the mail or by email, you will get money. You can’t sue the Defendants on your own about the claims in this lawsuit.		36
GO TO A HEARING	Go to the hearing. Ask the Court if you can speak about the fairness of the settlements.	Month 00, 2025	31-35

5. What is this lawsuit called?

This lawsuit is called *Jien v. Perdue Farms*, No. 1:19-cv002521.

6. What Court is this lawsuit in?

This lawsuit is in the United States District Court for the District of Maryland.

7. Who is the judge?

The judge in this lawsuit is Judge Stephanie A. Gallagher.

8. What is a class action lawsuit?

In a class action lawsuit, one or more people sue on behalf of a larger group. The people who represent the group are called “class representatives.” The whole group of people is called a “class.” Individual people in the class are called “class members.”

9. Who represents this Class?

The people who represent this Class are Judy Jien, Kieo Jibidi, Elaisa Clement, Glenda Robinson, Emily Earnest, and Kevin West.

10. Who are the Defendants in this lawsuit and which ones have settled?

The Defendants in this lawsuit are:

- Agri Stats, Inc.
- Allen Harim Foods, LLC
- Amick Farms, LLC
- Butterball, LLC
- Cargill Meat Solutions Corporation
- Case Farms, LLC
- Case Foods, Inc.
- Fieldale Farms Corporation
- Foster Poultry Farms
- George’s Foods, LLC
- George’s, Inc.
- Jennie-O Turkey Store, Inc.
- Keystone Foods, LLC
- Koch Foods, Inc.
- Mountaire Farms, Inc.
- O.K. Foods, Inc.
- Peco Foods, Inc.
- Perdue Farms, Inc.
- Perdue Foods LLC
- Pilgrim’s Pride Corporation
- Sanderson Farms, Inc.
- Simmons Foods, Inc.
- Tyson Foods, Inc.
- Wayne Farms, LLC
- Webber, Meng, Sahl and Company, Inc. (“WMS”)

All the Defendants except Agri Stats, Inc. have settled in this case. These settlements are reflected in documents called “Settlement Agreements.” Each of the Settlement Agreements in this case are available [here](#).

The Settlements

11. What do the settlements in this case provide?

All but one Defendants who settled are making payments to Class Members to settle this case. This is a list of the amounts those Defendants are paying:

- Allen Harim Foods, LLC: \$5,000,000.00
- Amick Farms, LLC: \$6,250,000.00
- Butterball, LLC: \$8,500,000.00

- Cargill Meat Solutions Corporation: \$15,000,000.00
- Case Farms, LLC and Case Foods, Inc.: \$8,500,000.00
- Fieldale Farms Corporation: \$5,500,000.00
- Foster Poultry Farms: \$13,300,000.00
- George's Foods, LLC and George's, Inc.: \$5,800,000.00
- Jennie-O Turkey Store, Inc.: \$3,500,000.00
- Koch Foods, Inc.: \$18,500,000.00
- Mountaire Farms, Inc.: \$13,500,000.00
- O.K. Foods, Inc.: \$4,750,000.00
- Peco Foods, Inc.: \$3,000,000.00
- Perdue Farms, Inc. and Perdue Foods LLC: \$60,650,000.00
- Pilgrim's Pride Corporation: \$29,000,000.00
- Sanderson Farms, Inc.: \$38,300,000.00
- Simmons Foods, Inc.: \$12,000,000.00
- Tysons Foods, Inc. and Keystone Foods, LLC: \$115,500,000.00
- Wayne Farms, LLC: \$31,500,000.00

Each of these Defendants has also agreed to provide cooperation to the benefit of the Class as part of their settlements.

One Defendant, WMS, settled without payment. As part of that settlement, WMS provided important cooperation to the benefit of the Class.

The lawsuit continues against Defendant Agri Stats. Plaintiffs want Agri Stats to make changes to the way it does business to benefit poultry workers.

12. Why are there settlements in this lawsuit?

The Court has not decided who is right. Instead, the Plaintiffs and Defendants have agreed to settle. A settlement is an agreement to stop the lawsuit. That way, it avoids the cost of a trial, and the people in the Class will get money. The Class Representatives and the attorneys think the settlements are best for the Class.

13. How do I know if I am in the Class?

You are in the Class if you:

- Worked at any of the Defendants' poultry processing complexes, plants, hatcheries, and feed mills,
- In the United States,
- At some point between January 1, 2000, and July 20, 2021.

You can be part of the Class even if you did not work for a Defendant for the entire time period.

If you got a postcard or email notice, records show you are in the Class.

If you did not get postcard or email notice, you may still be in the Class:

- Click [here](#) to see if the records show you are a Class Member.
- If your name is not in the records, click [here](#) to see if your employer or the place you worked at is on the list.

The Settlement Administrator reserves the right to ask Class Members and anyone who seeks to participate in the Class to provide additional documentation. You understand participation in these settlements may be denied if you are unable to provide adequate documentation if asked to do so.

Still not sure? Get free help:

- Call 1-877-311-3745
- Email info@poultrywages.com
- Write to: Poultry Wages Settlement, c/o A.B. Data, Ltd., P.O. Box 173016, Milwaukee, WI 53217.

Getting Money

14. Will I get money from the settlements?

If the Court approves the settlements and you are a Class Member who has not opted out, you will get money from the settlements. Defendants will pay \$398,050,000 total. That money will be distributed to Class Members, after payments have been made for:

- Attorneys' fees up to 33.33% of the settlements (\$132,670,065) plus interest earned on that amount;
- Lawsuit costs up to \$8 million;
- Notice and administration costs up to []; and
- Up to a \$30,000 award to each Class Representative.

15. How much money will I get?

At this time, it is not known how much money you will get.

If you worked at any Defendant's poultry processing complexes, plants, hatcheries, or feed mills in the United States at any point from January 1, 2000, until July 20, 2021, you are part of the Class. Members of the Class are eligible for payments from settlements with 20 Defendants totaling \$363.25 million.

You are also part of an additional class (called the "Subclass") if you worked in any Defendant's poultry plants in the United States at any point from January 1, 2009, until July 20, 2021. If you are also part of this Subclass, you are eligible for an additional payment from settlements with three additional Defendants totaling \$34.8 million.

Money will be paid proportionally (or *pro rata*) to members of the Class and Subclass. The amount of money you get will depend on:

- How many people are in the Class and Subclass,
- How long you worked for any of the Defendant(s),
- How much money you made, and
- How much money the Court approves for lawsuit costs, attorneys' fees, and Class Representative awards.

This is why it is important that you make sure the information we have for you is correct.

16. How can I get money?

If you:	To Get Money
Got a postcard or email notice	You will get money, but you should still update and add your contact, employment, and earnings information here to make sure all of your money gets to you.
Did not get a postcard or email notice	<p>You need to fill out and send in a participation form:</p> <ul style="list-style-type: none"> • Online: Click here to fill out and submit the participation form. <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Mail: Print the participation form here or call 1-877-311-3745 to ask for one. Fill out the participation form and mail it to: <p style="text-align: center;">Poultry Wages Settlement c/o A.B. Data, Ltd. P.O. Box 173016 Milwaukee, WI 53217</p> <p>Your participation form must be submitted online or postmarked by [MONTH 00, 2025].</p> <p>If your participation form is approved, you will get money.</p>

17. Is this money taxable and who pays the taxes?

Any money you received will be treated as wages, subject to applicable tax withholding, and may be reported to the taxing authorities and the Settlement Class Member on an IRS Form W-2. Any required payroll taxes will be withheld from your payment and paid by the Settlement Administrator. Check with your tax professional if you have any questions.

18. How do I update my contact, employment, and earnings information?

To update or change your contact, employment, and earnings information, you can:

- Click [here](#) to search for your information in the records. When your information appears, you can update or change your contact, employment, and/or earnings information.
- Call 1-877-311-3745.
- Email info@poultrywages.com.

19. How will my information be used?

If you give personal information to make sure you get the correct payment, your information will be treated as confidential. The Court decided that any information you give in this case will only be used by the Settlement Administrator and cannot be given to anyone else without a Court order.

20. When will I get paid?

You will get paid after the settlements are approved and any appeals end. This process can take time. Please check this website for updates.

21. What happens if I stay in the Class?

If you stay in the Class (and if you do nothing), you may get money. But you will also “release” all the claims made or that could be made in this lawsuit. That means that if you stay in the Class, you cannot sue the Defendants on your own for these same claims. The same is true for the Subclass.

These claims you are releasing if you stay in the Class or Subclass are described in the Settlement Agreements available [here](#).

Opting Out

22. What does it mean to “opt out?”

Opting out means to leave a settlement class. If you opt out from a settlement class, you will not get money from that settlement, and you will not be able to object to that settlement. If you want to sue the Defendant in a settlement on your own (or with your own lawyer) about the claims in this lawsuit, you must opt out of that settlement class.

23. How do I opt out?

To opt out, you must mail a letter to the Settlement Administrator by [**Month 00, 2025**].

You may opt out of one, more than one, or all the settlements. To opt out of particular settlements, your letter should indicate which settlements you would like to opt out of.

Your letter must include:

- Your name,
- Your address,
- Your notice ID number (if you have one),
- If you want to opt out of all settlements, a sentence saying, “I want to opt out from all of the settlements in *Jien v. Perdue Farms*.” Or, if you only want to opt out of some settlements, a sentence identifying those settlements by writing the name(s) of the Defendant(s), and
- Your signature (you must sign the letter).

You must mail your opt-out request postmarked no later than [**Month 00, 2025**], to:

Poultry Wages Settlement
Opt Out
c/o A.B. Data, Ltd.
P.O. Box 173016
Milwaukee, WI 53217

24. If I opt out from a settlement, can I still get money from that settlement?

No. If you opt out from a settlement, you will not get money from that settlement. And if you opt out from all of the settlements, you will not get money from any of the settlements in this case.

Objecting

25. What does it mean to “object”?

Objecting is when you tell the Court that you don’t like something about a settlement. You must give reasons why you think the Court should not approve it. The Court will consider your views. You can hire your own lawyer to help you, but you don’t have to.

26. How do I object?

To object, you must mail a letter to the Court. Your letter must include:

- Your name,
- Your address,
- Your telephone number,
- Your notice ID number (if you have one),
- The reason(s) you object to one, several, or all of the settlements,
- Your lawyer’s name (if you have one),
- A statement saying that you object to *Jien v. Perdue Farms*,
- A statement saying if you (or your lawyer) want to speak at the hearing, and
- Your signature (you must sign the letter).

You must mail your objection postmarked no later than [Month 00, 2025], to these two addresses:

Court	Settlement Administrator
Clerk United States District Court District of Maryland 101 West Lombard Street Chambers 7C Baltimore, MD 21201	Poultry Wages Settlement Objections c/o A.B. Data, Ltd. P.O. Box 173016 Milwaukee, WI 53217

27. If I object, will the judge change the settlements?

No. The judge cannot change the settlement terms. She can only approve or not approve the settlements as they are. If the judge agrees with your objection, she may not approve the settlements.

28. Can I object to a settlement if I opt out of it?

No. You cannot object to a settlement if you opt out of it.

Lawyers for the Class

29. Do I have a lawyer in this lawsuit?

Yes. The judge assigned lawyers from three law firms to represent you and the other Class Members in this lawsuit. The law firms are Hagens Berman Sobol Shapiro LLP; Handley Farah & Anderson PLLC; and Cohen Milstein Sellers & Toll PLLC. These lawyers are called “Class Counsel.”

You will not be charged for these lawyers, and you can contact them for free. If you want to be represented by your own lawyer, you can hire one, but you may have to pay them.

30. Do I have to pay the lawyers in this lawsuit?

No. Class Counsel will ask the judge for attorneys' fees up to 33.33% of the settlements (\$132,670,065) plus interest earned on that amount and lawsuit costs up to \$8 million. They have not been paid yet for their work on this lawsuit.

Class Counsel will also ask the judge for a \$30,000 award for each of the Class Representatives. Awards are given to the Class Representatives for their help.

If the judge approves any requests for attorneys' fees, lawsuit costs, or Class Representative awards, the payments will be made from the settlements.

Court Hearing

31. What happens next in this lawsuit?

The judge will hold a hearing to decide if she will approve these settlements. The judge's decision after the hearing will affect the rights of all Class Members. The settlements will only go into effect if the judge approves them and appeals are resolved. If you wish, you may attend the hearing.

The hearing is scheduled for [Month 00, 2025], at X:00 x.m., at:

United States District Court, District of Maryland
101 West Lombard Street, Chambers 7C
Baltimore, MD 21201

The judge may decide to move the hearing to a different date or time. Check www.PoultryWages.com for updates.

32. What happens at the hearing?

At the hearing, the Court will consider if it will approve the settlements. The Court may consider any objections at that time. The judge will listen to people who have asked to speak at the hearing. The Court may also decide how much it wants to pay Class Counsel and the Class Representatives.

33. What happens after the hearing?

After the hearing, the Court will decide whether to approve the settlements. We do not know how long this decision will take.

34. Do I have to come to the hearing?

No. You do not have to come to the hearing, but you are welcome to come at your own cost.

If you mail a written objection to the Court on time, the judge will consider it. This is true even if you do not come to Court to talk about it.

You may also pay your own lawyer to attend, but you do not have to.

35. Can I ask to speak at the hearing?

Yes. You may ask for permission to speak at the hearing. To ask to speak, you must mail a letter to the Court by [Month 00, 2025].

Your letter must include:

- Your name,
- Your address,
- Your telephone number,
- A statement saying that you (or your lawyer) want to speak in *Jien v. Perdue Farms*, and
- Your signature (you must sign the letter).

You must mail your letter postmarked no later than [Month 00, 2025], to these two addresses:

Court	Settlement Administrator
Clerk United States District Court District of Maryland 101 West Lombard Street Chambers 7C Baltimore, MD 21201	Poultry Wages Settlement Objections c/o A.B. Data, Ltd. P.O. Box 173016 Milwaukee, WI 53217

Deciding What You Want to Do

36. How do I decide what to do?

Your choices are to:

- Stay in the Class and get money.
 - If you got a notice in the mail or by email: You will get money, but you should update and add your contact, employment, and earnings information [here](#) to make sure all of your money gets to you.
 - If you did not get a notice by mail or email: Fill out the participation form [here](#) to ask for money. You will get money if it is approved.
- Stay in the Class and object to the settlements and/or ask to speak at the hearing.
- Opt out of all of the settlements or particular settlements.

This chart shows the effects of each choice:

	<i>Stay in Class</i>	<i>Object</i>	<i>Opt Out of Settlement(s)</i>
Can I get money if I . . .	YES	YES	NO
Will the Court’s decisions in this lawsuit affect me if I . . .	YES	YES	NO
Can I sue the Defendants myself for these claims if I . . .	NO	NO	YES

Key Resources

37. How do I get more information?

This notice is a summary. More details and documents about the settlements can be found [here](#).

You can also get court documents online on the [Court Electronic Records \(PACER\) system](#) or by visiting the Clerk’s office of the Court (address below).

If you have more questions:

- Call: 1-877-311-3745
- Email: info@poultrywages.com
- Write to: Poultry Wages Settlement, c/o A.B. Data, Ltd., P.O. Box 173016, Milwaukee, WI 53217

What else can I find on this website?

- A [tool](#) to check if you are in the Class.
- A [tool](#) to see if the place you worked at is on the list to be a member of the Class.
- A [tool](#) to check and update your contact, earnings, and employment information.
- A [participation form](#) (if you aren’t sure if you need one, click [here](#) for more information).
- Important [case documents](#).
- [Contact information](#).

Resources List

Case website	www.PoultryWages.com		
Settlement Administrator	Poultry Wages Settlement c/o A.B. Data, Ltd. P.O. Box 173016 Milwaukee, WI 53217 Phone: 1-877-311-3745 Email: info@poultrywages.com		
Class Counsel (Contact For Free)	Shana E. Scarlett Hagens Berman Sobol Shapiro LLP 715 Hearst Avenue Suite 300 Berkeley, CA 94710	George F. Farah Handley Farah & Anderson PLLC 1201 Connecticut Avenue, NW Suite 200K Washington, DC 20036	Brent W. Johnson Cohen Milstein Sellers & Toll PLLC 1100 New York Avenue NW Washington, DC 20005
Court	United States District Court District of Maryland 101 West Lombard Street		

**(DO NOT
CONTACT
WITH
QUESTIONS
ABOUT THIS
CASE)**

Chambers 7C
Baltimore, MD 21201

UNITED STATES DISTRICT COURT
THE DISTRICT OF MARYLAND

JUDY JIEN, *et al.*,

Plaintiffs,

v.

PERDUE FARMS, INC., *et al.*,

Defendants.

C.A. No. 1:19-CV-2521-SAG

**[PROPOSED] ORDER GRANTING PLAINTIFFS' RENEWED MOTION TO DIRECT
NOTICE**

This matter came before the Court on Plaintiffs' Renewed Motion to Direct Notice to Settlement Classes with Allen Harim,¹ Amick,² Butterball,³ Fieldale Farms,⁴ Foster Farms,⁵ Jennie-O,⁶ Koch,⁷ O.K. Foods,⁸ and Tyson Foods⁹ Settlements, as well as all previously approved settlements approved by this Court in this case. The Court has considered Plaintiffs' arguments and submissions and hereby ORDERS:

1. The proposed plan set forth in the memorandum in support of the corrected motion complies with Federal Rule of Civil Procedure 23(c)(2)(B) and due process, as it constitutes the best notice that is practicable under the circumstances, including individual notice via email and postcard mail to all Class Members who can be

¹ Allen Harim Foods, LLC.

² Amick Farms, LLC.

³ Butterball, LLC.

⁴ Fieldale Farms Corporation.

⁵ Foster Poultry Farms.

⁶ Jennie-O Turkey Store, Inc.

⁷ Koch Foods, Inc.

⁸ O.K. Foods, Inc.

⁹ Tyson Foods, Inc. and Keystone Foods, LLC (together, "Tyson").

- identified through reasonable effort. The direct email and mail notice will be supported by reasonable publication notice to reach potential members of the settlement classes who could not be individually identified;
2. The notice documents attached to the Declaration of Justin Parks comply with Rule 23(c)(2)(B) and satisfy due process and all applicable laws because they reasonably inform Class Members of the essential features of the claims, settlements, class certifications, and their rights with respect thereto. Specifically, the notices are reasonably calculated to fairly apprise Class Members of (i) the nature of the action; (ii) the definition of the class certified; (iii) the class claims, issues, or defenses; (iv) that a Class Member may enter an appearance through an attorney if the member so desires; (v) that the Court will exclude from the settlement classes any member who requests exclusion; (vi) the time and manner for requesting exclusion; and (vii) the binding effect of a class judgment on member of the class under Rule 23(c)(3). Non-substantive changes, such as typographical errors, can be made to the notice documents by agreement of the parties without leave of the Court;
 3. After notice has been disseminated, the Court shall hold a hearing on the proposed settlements to determine whether they are fair, reasonable, and adequate, and whether they should be finally approved by the Court (the Final Approval Hearing). The Court schedules a final approval hearing for _____;
 4. After notice has been disseminated, Class members who wish to exclude themselves from the proposed settlements will be required to submit an appropriate and timely request for exclusion, and Class Members who wish to object to the proposed settlements must submit an appropriate and timely written statement of the grounds for objection. Class Members who wish to appear in person to object to any of these agreements may do so at the Final Approval Hearing pursuant to directions by the Court;

5. The Court finds the proposed plan of allocation to be fair, reasonable, adequate, and treats Class Members equitably relative to each other. Plaintiffs propose that the initial distribution will be a pro rata share of compensation earned by each Class Member during the relevant class periods. After an initial distribution has taken place, it is very likely that additional funds will remain in the escrow accounts. Plaintiffs propose that either the funds remaining from the first-round distribution will be joined with any subsequent settlements for the class, or that a second round of distribution will take place limited to only those Class Members who cashed their checks or claimed their digital funds in the first round. Plaintiffs also propose that any second-round distribution remove *de minimus* payments where the costs of administration would outweigh the benefit to that Class Member. To this end, Plaintiffs propose that there would be a floor of \$5 per class member. This Court finds that the proposed plan of allocation fairly compensates Class Members based on their relative earnings and the total value of the settlements. The plan of allocation further is designed to reduce administrative costs and, when combined with the multiple phases of TIN solicitations to reduce penalties, fairly, reasonably, and adequately maximizes the funds available to Class Members.
6. Because the proposed plan of allocation involves personally identifiable information, any information provided by Class Members to the notice and claims administrator will be subject to the protective order in this action and will not be produced to anyone other than class counsel without a further Court order;
7. All payments for Class Members from the settlement fund will be sent directly to Class Members;
8. The administrator of the Qualified Settlement Fund shall solicit or cause to be solicited a TIN from each claimant on an IRS Form W-9 or a conforming substitute W-9. Such solicitation shall include the following notice, which shall appear prominently in bolded text: “**IMPORTANT: If you are not a U.S. person, you**

should not complete Form W-9 and do not need to complete Form W-9 to receive a payment. You will still be eligible for payment if you cannot complete the Substitute IRS Form W-9 because you are not a U.S. person.”;

9. The following deadlines govern the notice plan:

Task	Proposed Deadline
Publication notice plan, postcard and email notice to commence.	45 days from the date of this Order
Initial Notice Complete (Email and Postcard)	75 days from the date of this Order
Class counsel to file motion for award of attorneys’ fees, costs, and service awards.	105 days from the date of this Order
Deadline for class members to request exclusion or object to settlements.	119 days from the date of this Order
Class counsel to file motion for final approval, a declaration regarding the completion of notice, and a list of timely excluded class members.	140 days from the date of this Order
Final approval hearing (as convenient to the Court).	As convenient to the Court
Deadline for submission of claims/update of tax or TIN information to be provided by class members.	280 days from the date of the Order on this motion.

10. Plaintiffs’ Motion to Direct Notice is GRANTED.

IT IS SO ORDERED.

DATED: _____

HON. STEPHANIE A. GALLAGHER
UNITED STATES DISTRICT JUDGE