

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE BROILER CHICKEN ANTITRUST  
LITIGATION

Case No. 1:16-cv-08637

This Document Relates To:

The Honorable Thomas M. Durkin  
The Honorable Jeffrey T. Gilbert

*Sysco Corp. v. Tyson Foods, Inc. et al.*, No.  
1:18-cv-00700

*US Foods, Inc. v. Tyson Foods, Inc. et al.*, No.  
1:18-cv-00702

**DEFENDANTS' MOTION TO COMPEL SYSCO AND US FOODS  
TO PROVIDE WITNESSES ON CERTAIN RULE 30(b)(6) TOPICS**

Pursuant to Federal Rules of Civil Procedure 30 and 37, the undersigned Defendants hereby move for an order compelling Plaintiffs Sysco Corporation and US Foods, Inc. to produce a Rule 30(b)(6) witness to testify concerning Topics 8, 9, 13, 15, 18-20, 23, and 26. The motion is based on the concurrently filed Memorandum in Support of Defendants' Motion to Compel Sysco and US Foods to Provide Witnesses on Certain Rule 30(b)(6) Topics, the supporting declarations and exhibits, and all other evidence and arguments presented in the briefings and at the hearing on this motion.

Pursuant to N.D. Ill. Local Rule 37.2, Defendants certify that the parties have engaged in several meet and confers, including at least five telephone conferences between counsel for Defendants and Plaintiffs' counsel. The last telephonic meet and confer regarding the Topics subject to this motion occurred on September 21, 2020. *See* Ex. H to the Memorandum in Support. Defendants provided a follow up e-mail on September 22 and received a response from Plaintiffs on October 13.

Dated: October 16, 2020

Respectfully submitted,

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