

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

In re Broiler Chicken Antitrust Litigation,
Case No: 16-cv-08637

TARGET CORPORATION,

Plaintiff,

v.

AGRI STATS, INC., *et al.*,

Defendants.

Case No. 20-cv-07191

Judge Thomas M. Durkin
Magistrate Judge Jeffrey T. Gilbert

JURY TRIAL DEMANDED

AMENDED COMPLAINT

1. Plaintiff Target Corporation (“Target” or “Plaintiff”), is a Minnesota corporation with its principal place of business in Minneapolis, Minnesota. Target operates approximately 1900 retail stores throughout the United States and also engages in internet sales via Target.com. Target, a direct purchaser of Broilers from several producer Defendants, brings this action under the federal antitrust laws against the Defendants identified below.

2. Pursuant to Federal Rule of Civil Procedure 15(a)(1), Plaintiff hereby amends its Complaint (ECF 1) in Case No. 20-cv-07191, to name the following Defendants: Utrecht-America Holdings, Inc. and its subsidiaries, Rabo AgriFinance LLC, Rabobank USA Financial Corporation, and Utrecht-America Finance Co. (collectively “Rabobank”).

3. Plaintiff incorporates by reference the factual allegations and reservations of rights contained in the Direct Action Plaintiffs’ Consolidated Complaint and Demand for Jury Trial, filed in *In re Broiler Antitrust Litigation*, Case No. 1:16-cv-08637 (ECF 3922, 3924) (“DAP

Consolidated Complaint”),¹ and amends its row to be added in Section II’s Chart of Direct-Action Plaintiff Cases as follows:

Plaintiff Name	Named Defendants ²	Named Co-Conspirators	Causes of Action
Target Corporation	Agri Stats; Amick; Case; Claxton; Foster Farms; George’s; Harrison; House of Raeford; Keystone; Koch; MarJac; Mountaire; O.K. Foods; Peco; Perdue; Pilgrim’s Pride; Sanderson; Simmons; Tyson; Wayne; Rabobank	Fieldale	Count I (Sherman Act Claim for all Anticompetitive Conduct); Count II (Sherman Act Claim for Output Restriction); Count III (Sherman Act for GA Dock Manipulation)

4. Plaintiff also incorporates by reference the allegations against Rabobank contained in the Amended Complaints filed by Sysco Corporation (Case No. 1:16-cv-08637; ECF 4151, 4159) and US Foods, Inc. (Case No. 1:16-cv-08637, ECF 4153, 4160).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Enter joint and several judgments against all Defendants in favor of Plaintiff;
- B. Award Plaintiff treble damages, of an amount to be determined at trial, to the maximum extent allowed under the federal antitrust laws;
- C. Award Plaintiff post-judgment interest as provided by law, with such interest to be awarded at the highest legal rate;

¹ The DAP Consolidated Complaint is in the process of being amended to reflect ECF 4139 and the addition of DAPs which have filed complaints since the DAP Consolidated Complaint was filed. When the amended DAP Consolidated Complaint is filed, it will reflect the amendments included herein.

² The Defendants and Co-Conspirators named in this Complaint include the entire family of each Defendant or Co-Conspirators in this table, identified in Section IV of ECF 3922/ECF 3924. With regard to Amick, George’s, and Peco, Plaintiff is asserting non-released claims.

D. Award Plaintiff its attorneys' fees, litigation expenses, and costs, as provided by law;

E. Grant Plaintiff such other and further relief to which Plaintiff is entitled.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff demands a trial by jury on all of its claims and issues so triable.

Dated: January 21, 2021

Respectfully submitted,

/s/ Scott E. Gant

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