IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE BROILER CHICKEN ANTITRUST LITIGATION,

Case No.: 1:16-cv-08637

The Honorable Thomas M. Durkin

This Document Relates To:

THE DIRECT PURCHASER PLAINTIFF ACTION

DIRECT PURCHASER PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF THE SETTLEMENTS WITH DEFENDANTS PILGRIM'S PRIDE CORP., TYSON FOODS, INC., TYSON CHICKEN, INC., TYSON BREEDERS, INC., AND TYSON POULTRY, INC.

Please take notice that the Direct Purchaser Plaintiffs hereby move the Court for an Order granting their Motion for Final Approval of the Settlements with Defendants Pilgrim's Pride Corp., and Tyson Foods, Inc., Tyson Chicken, Inc., Tyson Breeders, Inc., and Tyson Poultry, Inc. This motion is based on this notice of motion and motion, Federal Rule of Civil Procedure 23, the concurrently filed Memorandum and supporting declarations, and all other evidence and arguments presented in the briefings and at the hearing on this motion.¹

Pursuant to the United States District Court for the Northern District of Illinois' Tenth General Order 20-0012 (Feb. 12, 2021), the undersigned counsel will not request an in-person presentment of this Motion, and instead will present this motion by telephone on June 29, 2021 at 9:00 a.m. CDT as directed by the Court (ECF No. 4339). Should the Court determine that an in-person hearing is necessary, the undersigned counsel is available at the Court's earliest availability.

¹ DPPs will file a [Proposed] Order granting this Motion no later than June 25, 2021.



Date: June 15, 2021

/s/ Bobby Pouya

Clifford H. Pearson (*Pro Hac Vice*)
Daniel L. Warshaw (*Pro Hac Vice*)
Thomas J. Nolan (*Pro Hac Vice*)
Bobby Pouya (*Pro Hac Vice*)
Michael H. Pearson (*Pro Hac Vice*)
PEARSON SIMON & WARSHAW, LLP
15165 Ventura Boulevard, Suite 400
Sherman Oaks, CA 92403
Telephone: (818) 788-8300
Facsimile: (818) 788-8104
cpearson@pswlaw.com
dwarshaw@pswlaw.com
tnolan@pswlaw.com
bpouya@pswlaw.com
mpearson@pswlaw.com

W. Joseph Bruckner (*Pro Hac Vice*)
Brian D. Clark (*Pro Hac Vice*)
Simeon A. Morbey (*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
wjbruckner@locklaw.com
bdclark@locklaw.com

samorbey@locklaw.com

Bruce L. Simon (*Pro Hac Vice*)
PEARSON SIMON & WARSHAW, LLP
350 Sansome Street, Suite 680
San Francisco, CA 94104
Telephone: (415) 433-9000
Facsimile: (415) 433-9008
bsimon@pswlaw.com

Direct Purchaser Plaintiffs Interim Co-Lead Class Counsel

Steven A. Hart (#6211008)
Brian Eldridge (#6281336)
Kyle Pozan (#6306761)
HART MCLAUGHLIN & ELDRIDGE, LLC
121 West Wacker Drive, Suite 1050
Chicago, IL 60601
Telephone: (312) 955-0545
Facsimile: (312) 971-9243
shart@hmelegal.com
beldridge@hmelegal.com
kpozan@hmelegal.com

Direct Purchaser Plaintiffs Liaison Counsel

