

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

CAMPBELL SOUP COMPANY, CAMPBELL
SOUP SUPPLY COMPANY L.L.C., AND
PACIFIC FOODS OF OREGON, LLC,

Plaintiffs,

v.

AGRI STATS, INC., ET AL.,

Defendants.

Case No.:

Jury Trial Demanded

(Related to *In re Broiler Chicken Antitrust
Litigation* – Case No.: 1:16-cv-08637)

COMPLAINT

1. Plaintiff Campbell Soup Company, is a New Jersey corporation with its principal place of business in Camden, New Jersey; Plaintiff Campbell Soup Supply Company L.L.C., is a Delaware corporation with its principal place of business in Camden, New Jersey; Plaintiff Pacific Foods of Oregon, LLC, is an Oregon corporation with its principal place of business in Tualatin, Oregon (collectively “Campbell” or “Plaintiffs”). Campbell is a manufacturer and marketer of high-quality, branded food and beverage products.

2. Campbell, a direct purchaser of Broilers from several producer Defendants, brings this action under the federal antitrust laws against the Defendants identified below and 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*, Civil Action No. 1:16-cv-08637 (ECF 3924; ECF 3922).

3. Campbell's joins Section II of the Direct Action Plaintiffs' Consolidated Complaint and Demand for Jury Trial, adding the following to specify Campbell's causes of action and the Defendants in Campbell's action:

Plaintiff Name	Named Defendants ¹	Causes of Action
Campbell Soup Company; Campbell Soup Supply Company, L.L.C.; Pacific Foods of Oregon, LLC	Agri Stats; Case; Claxton; Fieldale; Foster Farms; George's; Harrison; House of Raeford; Keystone; Koch; Mar- Jac; Mountaire; O.K. Foods; Peco; Perdue; Pilgrim's Pride; Sanderson; Simmons; Tyson; Wayne	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)

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;
- 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.

¹ The Defendants named in this Complaint include the entire Defendant family of each Defendant in this table, identified in Section IV.B. of ECF 3922/ECF 3924.

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.

October 30, 2020

BY: /s/Kevin G. Owens, IL ARDC #6185926
One of Plaintiffs' attorneys

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