

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

AMORY INVESTMENTS LLC,

Plaintiff,

v.

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

Defendants.

Case No.: 21-cv-1907

**JURY TRIAL DEMANDED**

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

**COMPLAINT**

1. Plaintiff Amory Investments LLC (“Amory”) is a Delaware limited liability company which, on or around March 31, 2021, acquired various assets of Maines Paper & Food Service, Inc., and its affiliates (collectively “Maines”), including the claims that are the subject of this action. Maines was a direct purchaser of Broilers from several producer Defendants.

2. Amory 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’ Amended Consolidated Complaint and Demand for Jury Trial, filed in *In re Broiler Antitrust Litigation*, Civil Action No. 1:16-cv-08637 (ECF 4243; ECF 4244).

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

Plaintiff Name	Named Defendants <sup>1</sup>	Named Co-Conspirators	Causes of Action
Amory Investments LLC	Agri Stats; Case; Claxton; Foster Farms; Harrison; House of Raeford; Keystone; Koch; MarJac; Mountaire; O.K. Foods; Perdue; Pilgrim's Pride; Sanderson; Simmons; Tyson; Wayne; Rabobank	Amick; Fieldale; George's; Peco	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.

### **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.

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<sup>1</sup> 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 4243/4244.

Dated: April 9, 2021

BY: Scott E. Gant

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