

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

McDONALD'S CORPORATION,

Plaintiff,

vs.

PILGRIM'S PRIDE CORPORATION; KOCH FOODS, INC.; JCG FOODS OF ALABAMA, LLC; JCG FOODS OF GEORGIA, LLC; KOCH MEAT CO., INC.; SANDERSON FARMS, INC.; SANDERSON FARMS, INC. (FOOD DIVISION); SANDERSON FARMS, INC. (PRODUCTION DIVISION); SANDERSON FARMS, INC. (PROCESSING DIVISION); HOUSE OF RAEFORD FARMS, INC.; MAR-JAC POULTRY, INC.; PERDUE FARMS, INC.; PERDUE FOODS, LLC; WAYNE FARMS, LLC; SIMMONS FOODS, INC.; SIMMONS PREPARED FOODS, INC.; O.K. FOODS, INC.; O.K. FARMS, INC.; O.K. INDUSTRIES, INC.; HARRISON POULTRY, INC.; FOSTER FARMS, LLC; FOSTER POULTRY FARMS; NORMAN W. FRIES, INC. d/b/a CLAXTON POULTRY FARMS, INC.; MOUNTAIRE FARMS, INC.; MOUNTAIRE FARMS, LLC; MOUNTAIRE FARMS OF DELAWARE, INC.; CASE FOODS, INC.; CASE FARMS, LLC; CASE FARMS PROCESSING, INC.; and AGRI STATS, INC.,

Defendants.

Case No.: 21-cv-4354

**COMPLAINT**

**Jury Trial Demanded**

## COMPLAINT

1. Plaintiff McDonald's Corporation ("McDonald's" or "Plaintiff") is a Delaware corporation with its principal place of business in Chicago, Illinois. McDonald's Corporation has established a global quick-service restaurant business operating under the McDonald's brand with over 39,000 restaurants in over 100 countries, including over 13,000 restaurants in the United States.

2. McDonald's brings this action pursuant to assignments with The HAVI Group LP, HAVI Global Solutions LLC, Lopez Foods, Inc., Dorada Poultry LLC, DeOro Foods LLC, Armada Supply Chain Solutions, LLC, ATEC Systems, Ltd., and their affiliates and predecessors with respect to direct purchases made in the United States for McDonald's company-owned, franchised and developmental licensee locations in the United States, U.S. territories, and Latin America. The HAVI Group LP, HAVI Global Solutions LLC, Lopez Foods, Inc., Dorada Poultry LLC, DeOro Foods LLC, Armada Supply Chain Solutions, LLC and ATEC Systems, Ltd. on behalf of themselves and their affiliates and predecessors have assigned federal antitrust claims based on those direct purchases to McDonald's.

3. McDonald's 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 4244).

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

<b>Plaintiff Name</b>	<b>Named Defendants<sup>1</sup></b>	<b>Named Co-Conspirators</b>	<b>Causes of Action</b>
McDonald's Corporation	Agri Stats; Claxton; Foster Farms; Harrison; House of Raeford; Koch; Mar-Jac; Mountaire; O.K. Foods; Perdue; Pilgrim's Pride; Sanderson; Simmons; Wayne; Case	Fieldale; Amick; George's; Peco; Tyson; Keystone; Allen Harim	Count I (Sherman Act Claim for all Anticompetitive Conduct); Count II (Sherman Act Claim for Output Restriction, Pled in the Alternative to Count I); Count III (Sherman Act Claim for GA Dock Manipulation, Pled in the Alternative to Count I)

### **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 named in this Complaint include the entire Defendant family of each Defendant in this table, identified in Section IV.B of ECF 4244.

Respectfully submitted,

Dated: August 16, 2021

/s/ Terence H. Campbell

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