

EXHIBIT A

STATE OF SOUTH CAROLINA)	IN THE CIRCUIT COURT FOR THE
)	
COUNTY OF CALHOUN)	FIRST JUDICIAL CIRCUIT
)	
FORREST E. CRIDER,)	<u>2020-CP-__-__</u>
)	
)	
Plaintiff,)	
)	SUMMONS
vs.)	(JURY TRIAL REQUESTED)
)	
PILGRIM'S PRIDE CORPORATION, HOG)	
SLAT INCORPORATED, AGFIRST FARM)	
CREDIT BANK, and AGSOUTH FARM)	
CREDIT ACA,)	
)	
Defendants)	

TO THE DEFENDANTS ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and are required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer upon the subscribers at 720 South Shelmore Boulevard, Suite 100, Mount Pleasant, South Carolina, 29464 within thirty (30) days after the service thereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

SEGUI LAW FIRM, PC

s/Abigail Y. Bechtol
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Mount Pleasant, South Carolina
 May 13, 2020

STATE OF SOUTH CAROLINA)	IN THE CIRCUIT COURT FOR THE
)	
COUNTY OF CALHOUN)	FIRST JUDICIAL CIRCUIT
)	
FORREST E. CRIDER,)	<u>2020-CP-__-__</u>
)	
)	
Plaintiff,)	
)	COMPLAINT
vs.)	(JURY TRIAL REQUESTED)
)	
PILGRIM'S PRIDE CORPORATION, HOG)	
SLAT INCORPORATED, AGFIRST FARM)	
CREDIT BANK, and AGSOUTH FARM)	
CREDIT ACA,)	
)	
Defendants)	

NOW COMES the Plaintiff above-named, complaining of the Defendants above-named, who alleges and shows unto this Honorable Court as follows:

PARTIES

1. The Plaintiff, Forrest E. Crider, is an individual residing in Calhoun County, State of South Carolina, and previously owned and operated the poultry farm located at 181 Center Hill Road, Saint Matthews, South Carolina until approximately June 2019.

2. Upon information and belief, Defendant Pilgrim's Pride Corporation (hereinafter "Pilgrim's Pride") is a corporation organized and existing under the laws of the State of Delaware conducting business in Calhoun County, State of South Carolina, and at all times relevant herein was engaged in the production of poultry for mass consumption.

3. Upon information and belief, Defendant Hog Slat Incorporated (hereinafter "Hog Slat") is a corporation organized and existing under the laws of the State of North Carolina conducting business in Calhoun County, State of South Carolina, and at all times relevant herein provided and installed materials and equipment to Plaintiff in the operation of Plaintiff's poultry

farm.

4. Upon information and belief, Defendant AgFirst Farm Credit Bank (hereinafter “AgFirst”) is headquartered and domiciled in the State of South Carolina conducting business in Calhoun County, State of South Carolina, and at all times relevant herein was engaged in the lending of money to Plaintiff for operation of his poultry farm.

5. Upon information and belief, Defendant AgSouth Farm Credit ACA (hereinafter “AgSouth”) is headquartered and domiciled in the State of Georgia conducting business in Calhoun County, State of South Carolina, and at all times relevant herein was engaged in the lending of money to Plaintiff for operation of his poultry farm.

JURISDICTION AND VENUE

6. This Court has jurisdiction over the parties and subject matter hereto and that the allegations out of which this action arises all involve the operations of Plaintiff’s poultry farm located in Calhoun County, State of South Carolina.

7. Venue is proper because one or more Defendants maintain business facilities, have agents, transact business, and otherwise operate within Calhoun County. Further, the unlawful acts alleged herein were performed and had effects within Calhoun County.

FACTUAL BACKGROUND

8. “Broilers” (young chickens bred for meat) account for nearly all domestic chicken consumption. Their production is concentrated into networks of production, dominated by vertically-integrated poultry companies known as “Integrators.” Defendant Pilgrim’s Pride is one such Integrator.

9. Integrators such as Defendant Pilgrim’s Pride control every aspect of broiler

production except the care and raising of the birds themselves. For the care of the birds from hatching until the broilers reach slaughtering age, Integrators contract with individual poultry farmers known as “Growers” via agreements known as “poultry growing agreements” or “broiler production agreements.” Integrators require exclusivity, and Growers are not permitted to provide services to other Integrators for any reason.

10. While the Integrators provide to their Growers the birds themselves, feed, veterinary services, and supervision, the Growers are responsible for labor, utilities, maintenance, and the up-front costs required to construct the large houses (“grow-out facilities”) in which the broilers grow until they reach appropriate age. Because of the substantial start-up costs (usually in the form of vast debts) required for a Grower to enter the poultry growing business, Growers are effectively beholden to the wishes of their Integrators.

11. Integrators have the most power over Growers laden with debt from building or upgrading their houses. Thus, Integrators are keenly aware of Growers’ debt burdens, and require them to undertake unnecessary and expensive upgrades to their facilities to prevent financial independence.

12. Plaintiff owned and operated a poultry farm containing four (4) poultry houses located at 181 Center Hill Road, Saint Matthews, South Carolina on his family’s land beginning in approximately 2007.

13. Defendants AgFirst and AgSouth lent Plaintiff approximately one million, two hundred thousand dollars (\$1,200,000.00) to construct said poultry houses on Plaintiff’s land in approximately 2007.

14. Plaintiff entered into a contract with Defendant Pilgrim’s Pride via letter of intent

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