

EXHIBIT A

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

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.