

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

IN RE BROILER CHICKEN ANTITRUST
LITIGATION,

This Document Relates To:

THE DIRECT PURCHASER PLAINTIFF
ACTION

Case No.: 1:16-cv-08637

The Honorable Thomas M. Durkin

Magistrate Judge Jeffrey T. Gilbert

**DECLARATION OF W. JOSEPH BRUCKNER IN SUPPORT OF
DIRECT PURCHASER PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS'
FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS
REPRESENTATIVE SERVICE AWARDS**

I, W. Joseph Bruckner, declare and state:

1. I am a partner with the law firm Lockridge Grindal Nauen P.L.L.P. (“LGN”). I submit this Declaration in support of Direct Purchaser Plaintiffs’ (“DPPs”) Motion for Payment of Attorneys’ Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

2. The Court appointed LGN and Pearson Warshaw, LLP (“PW”) as Interim Co-Lead Counsel at the outset of the litigation (ECF No. 144, Oct. 14, 2016 Order), and as Co-Lead Class Counsel when it granted DPPs’ motion for class certification (ECF No. 5644 at 6). Co-Lead Class Counsel, with the assistance of 20 other firms (collectively, “Class Counsel”), have vigorously and efficiently prosecuted this complex antitrust case. At all times, the work of Class Counsel was directed by Co-Lead Class Counsel.

3. In this Declaration, I describe four aspects of this litigation:

- I. All Class Counsel’s efforts in advancing this litigation and the settlements achieved as a result;
- II. All Class Counsel’s time and expense reporting, total time and expenses incurred, and our maintenance of a common cost litigation fund;
- III. Class Representatives’ contribution to the prosecution of this case; and
- IV. The time and expenses LGN has incurred in this case.

I. CLASS COUNSEL’S EFFORTS IN PROSECUTING THIS LITIGATION

4. Throughout the lengthy duration of this case Class Counsel faced a significant risk of nonpayment. DPPs alleged a price-fixing conspiracy by the United States’ leading Broiler chicken producers and claimed that they and the Class paid significant overcharges as a result. Class Counsel conceived and brought this case without the benefit of any related government investigation or enforcement action. Indeed, only after DPPs had prosecuted this case for two-and-a-half years did the DOJ convene grand jury proceedings. And then, the first step the DOJ took

was to subpoena DPP Co-Lead Counsel for the extensive discovery record Class Counsel had amassed from Defendants and third parties, after which the DOJ moved to intervene in this case. (ECF No. 2302.) Class Counsel believed in DPPs' case, invested extensive amounts of their time, effort, and money, and prosecuted it vigorously. Class Counsel did so at the risk of no recovery and declined other opportunities because of the complexity, time, and expense this case demanded.

5. Once the Court denied each of Defendants' motions to dismiss (*see* ECF Nos. 343-345; 440; 541), DPPs turned to litigating the case against 20 Defendants. Discovery involved more than 200 document custodians, more than 8 million documents and communications, millions of telephone calls and messages, many third parties, and the depositions of hundreds of fact witnesses. Class Counsel took the lead in coordinating this discovery with Defendants, two other classes, and nearly 100 Direct Action Plaintiffs. Plaintiffs and Class Counsel also fulfilled their own discovery obligations, in response to fulsome discovery by Defendants.

6. Class Counsel developed numerous case management plans and coordinated with indirect purchaser class counsel, direct action plaintiffs, the DOJ, and Defendants to implement those plans.

7. Class Counsel consulted with experts during their pre-suit investigation, and during the discovery and merits phases of this case. This includes their agricultural economist Dr. Colin Carter, who prepared reports in support of class certification and the merits.

8. DPPs then began preparing and briefing their motion for class certification. This process involved numerous attorneys and staff to craft the factual and legal bases for the motion. Once DPPs filed their motion in Fall 2020, Defendants marshalled the full force of their top-tier law firms in opposition. Like their motions to dismiss, Defendants challenged each and every aspect of DPPs' case factually, procedurally, and legally. Defendants presented their own experts

to bolster their arguments and discredit DPPs'. After extensive briefing (which exceeded 2,000 pages), including many expert opinion reports, evidence relating to class certification issues, and a two-day hearing, the Court certified the DPP Class. (ECF No. 5644.) The Court of Appeals denied Defendants' Rule 23(f) petition for an interlocutory appeal of the decision. *Sanderson Farms Inc. v. Amory Investments LLC*, No. 22-8007 (7th Cir. Jul. 18, 2022).

9. Even after class certification, the DPP Class continued to face significant risks, including at summary judgment. After voluminous briefing and two full days of hearings, the Court denied summary judgment for several Defendants, but granted summary judgment for Defendants Agri Stats, Case, Fieldale, Foster Farms, Claxton, Perdue, and Wayne Farms, as well as all Plaintiffs' claims regarding the manipulation of the Georgia Dock. (ECF No. 6641.) Defendants' concurrent *Daubert* challenges to DPPs' trial expert were hotly contested and ultimately denied. (*Id.*)

10. The DPP Class eventually proceeded to trial against Sanderson Farms, the only Defendant who did not settle or obtain summary judgment. DPPs assembled a trial team of skilled attorneys and support staff. In the weeks and months leading up to the September 2023 trial, Class Counsel worked tirelessly to prepare, including mock trials, legal research to support trial strategies, negotiating the jury instructions and verdict form, appearing at each hearing, and meeting and conferring with counsel for Sanderson Farms regarding trial exhibits. Once preparation was complete, the trial team worked to present DPPs' case to the jury in the most efficient and effective way possible. After a 6-week trial, the jury returned a defense verdict for Sanderson Farms. (ECF No. 7015.)

11. In the face of these risks, Class Counsel have achieved significant recoveries on behalf of the DPP Class. Class Counsel engaged in extensive adversarial negotiations and mediations and ultimately negotiated settlements with all Defendants.

12. DPPs reached monetary settlements with 13 Defendant families: Fieldale, Peco, George's, Amick, Pilgrim's Pride, Tyson, Mar Jac, Harrison Poultry, Simmons, Mountaire, O.K. Foods, House of Raeford, and Koch. These settlements total \$284,651,750 as follows:

Defendant Family	Settlement Amount	Status
Fieldale	\$2,250,000	Finally Approved (ECF No. 1414), Distributed to Qualified Claimants.
Peco	\$4,964,600	Finally Approved (ECF No. 3944), Distributed to Qualified Claimants.
George's	\$4,097,000	Finally Approved (ECF No. 3944), Distributed to Qualified Claimants.
Amick	\$3,950,000	Finally Approved (ECF No. 3945), Distributed to Qualified Claimants.
Pilgrim's	\$75,000,000	Finally Approved (ECF No. 4789), Distributed to Qualified Claimants.
Tyson	\$79,340,000	Finally Approved (ECF No. 4789), Distributed to Qualified Claimants.
Mar Jac	\$7,975,000	Finally Approved (ECF No. 5397), Pending Distribution.
Harrison Poultry	\$3,300,000	Finally Approved (ECF No. 5397), Pending Distribution.
Simmons	\$8,018,991	Finally Approved (ECF No. 7085), Pending Distribution.
Mountaire	\$15,899,826	Finally Approved (ECF No. 7087), Pending Distribution.
O.K. Foods	\$4,856,333	Finally Approved (ECF No. 7088), Pending Distribution.
House of Raeford	\$27,500,000	Preliminarily Approved (ECF No. 7070). ¹
Koch	\$47,500,000	Preliminarily Approved (ECF No. 7070). ¹
Total	\$284,651,750	

¹ The settlements with HRF and Koch have been preliminarily approved by the Court and the notice plan for these settlements is in progress. Co-Lead Class Counsel will report to the Court regarding any objections prior to the hearing on this motion, which is set to be held concurrently with the final approval hearing for those settlements, as well as the cost waiver settlements.

13. Upon payment of any settlement proceeds by a settling Defendant, the money was held in an interest-bearing escrow account. To date the Mar Jac, Harrison Poultry, Simmons, Mountaire, O.K. Foods, House of Raeford, and Koch settlements have earned \$2,975,355.20 in interest. (*See* Exhibit 1.) In April 2022, this Court awarded the Commercial and Institutional Indirect Purchaser Plaintiffs class a 33 1/3% fee including interest earned on the settlement amounts. (*See* ECF No. 5543 at 3.) DPPs propose the same methodology be used here, and that the balance of the interest earned be distributed to the DPP Class *pro rata* along with the net principal amounts of the settlements.

14. In addition to the monetary component, each of these settlements contained cooperation provisions that assisted the DPPs throughout the litigation of the case and at trial.

15. As the Court is aware, the Court's final approval of the Simmons settlement has been appealed by Certain Restaurant DAPs, who have indicated that they also intend to object to final approval of the Koch and Raeford settlements. (*See* ECF No. 7040 at 1.) While Class Counsel have included these three settlements – Simmons, Koch, and Raeford – in their calculation of the funds upon which attorneys' fees and litigation expenses would be awarded, Class Counsel will not take any fees or expenses until they are finally approved and any appeals are resolved in favor of the DPP Class.² Class Counsel will vigorously litigate the pending appeal of final approval of the Simmons settlement and any objections or appeals of other settlements. DPPs will present the Court with an updated accounting regarding the attorneys' fees (because interest continues to accrue) for the Court's approval shortly after any and all appeals are resolved.

² The Court's Order granting DPPs' second interim request for reimbursement of litigation expenses set forth the *pro rata* amount of litigation expenses applicable to each of the settlements. (*See* ECF No. 7086.) Because the Simmons settlement is subject to the Certain Restaurant DAPs' appeal, the litigation expenses attributable to the Simmons settlement (\$894,869.32) have not been paid, but are being held in an interest-bearing escrow account pending resolution of the appeal.

16. Apart from the 13 settlements itemized in paragraph 12 above, seven Defendants remained in the DPP case. In June 2023 the Court entered summary judgment in favor of six of them (ECF No. 6641), and the DPP Class's trial against the remaining Defendant, Sanderson Farms, resulted in a jury verdict in October 2023 in Sanderson Farms' favor (ECF No. 7015). As prevailing parties those seven Defendants could seek to tax certain litigation costs against the DPP Class if summary judgment or the jury verdict (as the case may be) was upheld in post-trial proceedings or on appeal. To eliminate this risk and to facilitate the prompt distribution of the net settlement funds to qualified DPP Class members, the DPP Class entered into settlements with those seven Defendants: Foster Farms, Perdue, Case, Claxton, Wayne Farms, Agri Stats, and Sanderson Farms. Under the settlements, DPPs and each settling Defendant mutually agreed to waive all rights to appeal or otherwise further adjudicate their claims against the other, and in exchange each party agreed not to seek or assert any claim for costs, fees, attorney's fees or any other form of recovery against the other. As such, none of the attorneys' fees, litigation expenses, or Class Representative service awards being sought in this motion are being funded from these seven settlements.

17. Co-Lead Class Counsel have prepared and executed the Court-approved class notice and settlement claims administration programs.

18. The retainer agreements between Class Counsel and the named Plaintiffs do not specify the amount of attorneys' fees, but simply say that counsel would receive as fees a percentage of any recovery as awarded by the Court. (*See* ECF No. 5229 at 4.) As the fee request here is consistent with the actual agreement with the named Plaintiffs and no DPP objected to the previous fee request, Class Counsel submit that the present request is appropriate.

II. CLASS COUNSEL'S TIME AND EXPENSE REPORTING TO CO-LEAD CLASS COUNSEL

19. Among the Co-Lead Counsel firms, LGN is responsible for collecting all Class Counsel's contemporaneously prepared attorney and paralegal time and expense reports.

20. Shortly after being appointed Interim Co-Lead Counsel, we proposed and the Court approved a Time and Expense Protocol. (*See* ECF No. 172 at 7, ¶ 11(g); Exhibit 2, Oct. 21, 2016 Hr'g Tr. at 56:3–63:11; Exhibit 3, Dec. 9, 2016 Hr'g Tr. at 9:19–13:6.) We subsequently sent that time and expense protocol to all Class Counsel in November 2016, and thereafter as appropriate, and instructed them to abide by it. (ECF No. 455-2 at 38-40.) We also provided each Class Counsel templates of the required Microsoft Excel reporting form.

21. The Time and Expense Protocol requires each firm to contemporaneously record and transmit to us each month, via email, a detailed, task-based spreadsheet with their time entries. The reports contain a chronological listing of time reported for work performed by attorneys and paralegals in specified activity categories, a complete and accurate categorization of work performed, the name and title of the person who performed the work, the hourly rate associated with each attorney and paralegal at the time the work was performed (i.e., the professional's "historical" rate), and the firm's resulting lodestar reported for that month.

22. To control Class Counsel's lodestar, the Time and Expense Protocol instructed Class Counsel not to submit time for work not requested by Co-Lead Class Counsel, or for duplicative work related to any client not retained. Additionally, the Time and Expense Protocol required that each firm submit via email all litigation-related expenses incurred by the firm for the month. Finally, time included in this fee petition that was spent on first-tier document review was capped at \$350.00 per hour.

23. To ensure that time and expense entries submitted by each firm are reported in a uniform matter, the Time and Expense Protocol requires that all reports be submitted to Co-Lead Counsel in a Microsoft Excel format, by the 20th day of each month for time and expenses incurred in the preceding month. This uniform, electronic monthly reporting facilitated our review of each firm's reports.

24. Each month, upon receipt, Co-Lead Class Counsel reviewed the monthly time and expense reports from Class Counsel, and requested adjustments and revisions as appropriate, to ensure compliance with the Time and Expense Protocol.

25. As the Court directed at the outset of this case, we have submitted Class Counsel's time, lodestar, and expenses to the Court *in camera* on a quarterly basis.

26. All monthly attorney and paralegal time and expense reports submitted to my firm by Class Counsel are retained and preserved on a computer server and on back-up media at my office.

A. CLASS COUNSEL'S TOTAL RECORDED LODESTAR

27. In preparing this petition, we asked all Class Counsel to review their monthly reported hours and expenses, and to submit a declaration attesting to the total of their allowed time and expenses incurred through January 31, 2024 (Co-Lead Class Counsel through March 31, 2024). In addition, once again we reviewed their monthly reported hours and expenses in preparing this submission in support of this petition.

28. Attached as Exhibits 2-18, as well as Exhibit 19 for LGN's time, are those declarations from Class Counsel attesting that the time and expenses they reported to Co-Lead Class Counsel and which Co-Lead Counsel allowed are true, accurate, and comply with the Time

and Expense Protocol.³ Each declarant also identifies the attorneys and paralegals from the firm that have worked on the case and submitted time in the monthly reports, and the historic hourly rates for each professional that has submitted time.

29. Co-Lead Class Counsel have worked diligently to ensure that throughout the case, Class Counsel's efforts have been coordinated, detailed, vigorous, and efficient. Since January 1, 2021, Class Counsel have invested 53,880.80 hours of attorney and other legal professional time through January 31, 2024 (Co-Lead Class Counsel through March 31, 2024). In total, from case inception through January 31, 2024 (Co-Lead Class Counsel through March 31, 2024), Class Counsel have invested 154,507.66 hours of attorney and other legal professional time. Class Counsel's base lodestar using historical rates is \$41,480,268.50 for January 1, 2021 through January 31, 2024 (Co-Lead Class Counsel through March 31, 2024), and \$92,393,630.25 since case inception. The average hourly rate by Class Counsel and their associated professional staff is approximately \$598 (with a cap of \$350.00 per hour on document review), a rate comparable to those charged by other law firms with similar experience, expertise, and reputation, for similar services in the nation's leading legal markets. All Class Counsel performed this work on an entirely contingent basis.

30. Attached as Exhibit 20 to this declaration is a summary chart with lodestar figures for attorney and paralegal time reported by each firm for their efforts on behalf of the Class from January 1, 2021 through January 31, 2024 (Co-Lead Class Counsel's time is through March 31, 2024). The total lodestar figure for each firm is reflected in the right-hand column of the chart, and at the end of that column is the combined lodestar for all firms. Based on the data available to me and my firm, I hereby attest that the lodestar amounts reported in Exhibit 20 accurately reflect the

³ Only the firms that worked on the case since January 1, 2021 have submitted declarations.

data reported to us by Class Counsel and allowed by Co-Lead Counsel. The underlying data is available for the Court's *in camera* review, if requested.

B. EXPENSES INCURRED ON BEHALF OF THE CLASS

31. In total, Class Counsel have incurred over \$10 million in expenses throughout this litigation. This Court has previously approved reimbursement of expenses totaling \$8,969,346.65. (ECF Nos. 5229 (\$4,500,000.00 reimbursement for litigation fund and individual firm expenses), 7086 (\$4,469,346.65 (reimbursement for litigation fund expenses from the Mar Jac, Harrison, Simmons, Mountaire, and O.K. Foods settlements).)

32. In notifying DPP Class members of the HRF, Koch, and cost waiver settlements, Class Counsel informed DPP Class members that they would seek repayment of litigation expenses in an amount not to exceed \$4 million.

33. As described below, Class Counsel's unreimbursed litigation expenses total \$1,029,448.72, and consist of the following five categories of expenses: (1) Class Counsel reported expenses, which are expenses incurred individually by Class Counsel firms since January 1, 2021 through March 31, 2024, (2) common cost litigation fund expenses, which are expenses incurred since October 1, 2024 through April 30, 2024, and (3) administration expenses (authorized in each of the monetary settlements and paid directly from the respective settlement fund to the Court-approved administrator); (4) escrow fees; and (5) taxes. The chart below summarizes the amount sought in this petition for the first two categories.

Expense Category	Amount
Individual Class Counsel Expenses	\$527,880.28
Litigation Fund Expenses	\$501,568.44
Total	\$1,029,448.72

1. CLASS COUNSEL’S INDIVIDUAL FIRM EXPENSES

34. Class Counsel have incurred \$527,880.28 in recorded expenses in this litigation on behalf of the DPP Class for which they now seek reimbursement. This total is based on monthly expense reports submitted to Co-Lead Class Counsel for the period from January 1, 2021 through March 31, 2024. The total expenses described in this Declaration, overall and by category, include expenses incurred separately by all Class Counsel. The allowed expense categories were contained in the Time and Expense Protocol sent to all Class Counsel by Co-Lead Class Counsel in November 2016, shortly after this litigation was commenced. Each Class Counsel has submitted a declaration confirming they abided by the Time and Expense Protocol, and that their time and expense submission complies with the Protocol.

35. Exhibit 21, attached hereto, summarizes the expenses reported as having been incurred by all Class Counsel and paid by those firms; these do not include those expenses paid out of the Litigation Fund (*see* Section II(B)(2) below). These expenses include categories such as online legal research, travel, shipping and mailing, and document imaging and copying. Outside of the expenses incurred by Co-Lead Class Counsel, the primary expenses incurred by Class Counsel relate to preparing for and attending depositions and hearings (e.g., travel, exhibit copy, and exhibit shipping expenses) and legal research (e.g., Westlaw charges). Class Counsel have itemized their costs separately in their requests for reimbursement accompanying this motion (*see* Exhibits 2-18, and Exhibit 22 for LGN’s expenses) and have thereby attested to the reasonableness and accuracy thereof.

2. CLASS COUNSEL’S COMMON COST LITIGATION FUND

36. On behalf of all Class Counsel, my firm established, monitored, and administered a common cost litigation fund (“Litigation Fund”) from which to pay litigation costs incurred for

the case overall in its prosecution. The Litigation Fund is used to pay ongoing litigation expenses on behalf of the DPP Class in this matter. The Litigation Fund initially was funded and is replenished as required by assessment payments from Class Counsel. The expenditures of the Litigation Fund are in addition to expenses incurred individually by each Class Counsel, described in Section B.1 above.⁴

37. All expenses paid from the Litigation Fund were reasonably incurred and necessary to the prosecution of this case. The recorded costs and expenses incurred by Class Counsel since October 1, 2023 and paid by the Litigation Fund total \$501,568.44.

38. Costs paid by the Litigation Fund fall into seven categories: (1) Experts, (2) Document Database Vendor, (3) Mediators, (4) Deposition Costs, (5) Court Transcripts, (6) Trial Costs, and (7) Appellate Costs. Each of these categories is described in further detail below.⁵

38.1 **Experts:** Co-Lead Class Counsel engaged the services of a testifying expert economist (Dr. Colin Carter) as well as Dr. Carter's team, and a prominent economic analyst firm (OSKR) to assist him and his team in standardizing and processing substantial amounts of data. Since October 1, 2023, Co-Lead Counsel paid \$282,871.86 for Dr. Carter and OSKR's reasonable and necessary expense.⁶

⁴ To avoid any double counting, individual firms' request for reimbursement of their recorded expenses do not include their assessment payments to the Litigation Fund. Instead, those assessment payments are accounted for in Class Counsel's request for reimbursement of expenses incurred by the Litigation Fund.

⁵ Upon request by the Court, Co-Lead Class Counsel will provide the Court further detail and documentation concerning any category, but requests that such information be submitted *in camera*.

⁶ Pursuant to the Court's Order (*see* ECF No. 6872), the Certain Restaurant DAPs paid \$24,375.00 to the DPP Class Litigation Fund. As these funds were contested by the Certain Restaurant DAPs and may be impacted by the outcome of the appeal, DPPs have not credited the paid amount against the expert cost category. DPPs will include the outcome of this point in a report to the Court regarding the future expense fund once resolved.

38.2 **Document Database Vendor:** In connection with discovery in this case, Co-Lead Class Counsel retained a vendor with expertise in designing and maintaining electronic databases (“Document Database Vendor”). DPPs’ Document Database Vendor provided a database that enabled Class Counsel to search, review, analyze, and code a database with more than 8 million documents and other records produced by Defendants and various third parties. The review, analysis, and coding of documents has been integral to Co-Lead Class Counsel’s efforts relating to fact and expert discovery. The Document Database Vendor’s product also included a technology-assisted review (“TAR”) tool that increased the accuracy of the review and decreased the percent of the overall documents it was necessary to have manually reviewed by attorneys. Since October 1, 2023, Co-Lead Class Counsel paid Document Database Vendor costs totaling \$22,558.17.

38.3 **Mediators:** In connection with the settlements, on several occasions Co-Lead Class Counsel engaged the services of prominent mediators. Co-Lead Class Counsel split the cost of such mediators with other parties, but since October 1, 2023, Co-Lead Class Counsel spent \$3,096.00 for mediators.

38.4 **Deposition Costs:** Another critical element of fact and expert discovery has been the Rule 30(b)(1), 30(b)(6), and expert depositions taken by all parties. Co-Lead Class Counsel and Defendants retained separate vendors with expertise in providing deposition transcription services in complex antitrust litigation (“Deposition Vendors”). The services provided by the Deposition Vendors have been critical to Co-Lead Class Counsel’s efforts to prosecute DPPs’ claims. Since October 1, 2023, for deposition-related costs Co-Lead Class Counsel have paid a total of \$24,775.69.

38.5 **Court Transcripts:** Co-Lead Class Counsel have incurred significant costs obtaining hearing transcripts in this matter. These costs were necessary to litigate this case. However, some of these costs were shared with other plaintiffs. Following the previous motion for reimbursement of litigation fund expenses, since October 1, 2023, DPPs received reimbursement for \$23,792.92 in costs for court transcripts, including for the Track 1 trial. As such, the Litigation Fund was credited \$23,792.92.

38.6 **Trial Costs:** Trial in this matter commenced on September 12, 2023, but preparation began long before the first day in Court. The significant costs incurred for this category were reasonable and necessary to prepare for and put on the highly complex antitrust trial. The Litigation Fund paid costs of \$132,520.04 for trial-related matters.

38.7 **Appellate Costs:** As the Court is aware, the Court's final approval of the Simmons settlement currently is on appeal by Certain Restaurant DAPs. Class Counsel has incurred costs directly related to this appeal, including copying and the retention of an appellate legal consultant. In total, Co-Lead Counsel have paid \$59,539.60 in appellate costs since October 1, 2023.

* * *

39. In addition to the litigation expenses paid by Class Counsel set forth above, \$407,720.15 has been paid to administrators, \$29,000.00 has been paid in escrow fees, and \$75,434.68 has been paid in taxes directly from the settlements at issue. (*See* Exhibit 1.)

40. As such, the expenses to be deducted from the settlement recoveries at issue in calculating the net attorneys' fee award equals \$6,010,950.20, which includes the \$4,469,346.65 from the second expense reimbursement (*see* ECF No. 7086), outstanding individual firm expenses

of \$527,880.28, outstanding litigation fund expenses of \$501,568.44, administrator costs of \$407,720.15, escrow fees of \$29,000.00, and taxes of \$75,434.68.

41. Additionally, Class Counsel requests that the Court approve payment of \$100,000.00 for the payment of ongoing and future litigation expenses to be paid *pro rata* from the HRF and Koch settlement proceeds. DPP Class members were provided notice of this request. (See ECF No. 7174-2, Court-approved long form notice.) Many of the costs described above and in the accompanying attorney declarations are not one-time expenses; they are ongoing and will continue until the case is complete. Co-Lead Class Counsel will, of course, endeavor to keep costs to a minimum. Allowing a portion of class settlement funds to be used for future expenses is a well-accepted practice. See, e.g., *In re Pork Antitrust Litig.*, No. 0:18-cv-01776-JRT (ECF No. 1424) (D. Minn. July 22, 2022) (Attached hereto as Exhibit 23) (awarding attorneys' fees at 33 1/3 percent and approving incurred and future litigation expenses totaling \$5 million).

III. CLASS REPRESENTATIVES' CONTRIBUTION TO THE PROSECUTION OF THIS CASE

42. The five Class Representatives in this case are Maplevale Farms, Inc.; John Gross and Company, Inc.; Ferraro Foods, Inc. and Ferraro Foods of North Carolina, LLC; Joe Christiana Food Distributors, Inc.; and Cedar Farms Co., Inc. Their help was instrumental in this outstanding result and deserving of an additional service award.

43. Each of the Class Representatives has provided a declaration, which are attached hereto as Exhibits 24-28, setting forth the contributions they have made to this litigation over the past 7 years, including estimates of time since 2021.

44. The Class Representatives each received a \$15,000.00 interim service award in December 2021 for their hard work and dedication to this matter. (See ECF No. 5229.) Co-Lead

Class Counsel submit that a further award is warranted here as the Class Representatives continued supporting this litigation through trial.

45. Throughout this lengthy litigation, the Class Representatives advised Class Counsel, reviewed and responded to written discovery, searched for, gathered, preserved, and produced documents, prepared for and sat for depositions, kept up to date on the progress of the case, and performed other similar activities. (*See* ECF Nos. 3962-39 to 3962-43 (declarations from each class representative in support of DPPs' motion for class certification).) They were never promised that they would receive any additional compensation for leading the case. (*Id.* ¶ 38.) Rather, they devoted their time and efforts solely to recovery some portion of their own overcharges and to enable other DPP Class members to recover theirs. (*Id.*) Their help has been instrumental to the success of this litigation.

IV. LGN'S TIME AND EXPENSES

46. Since the inception of this case, my firm, Lockridge Grindal Nauen P.L.L.P., also has directly represented Maplevale Farms, Inc. and John Gross & Company, Inc. Moreover, since the Court appointed our firm as Co-Lead Class Counsel, we have led the prosecution of this matter in all regards, including at trial.

47. The schedule attached hereto as Exhibit 19 is a detailed summary of the time spent by the partners, attorneys and other professional support staff of my firm who were involved in this litigation, and the lodestar calculation based on my firm's historic billing rates from January 1, 2021 through March 31, 2024. The schedule was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm.

48. The hourly rates for the partners, attorneys and professional support staff in my firm included in Exhibit 19 are our usual hourly rates customarily charged and routinely awarded in litigation of this nature.

49. As detailed in Exhibit 19, the total number of hours my firm expended on this litigation from January 1, 2021 through March 31, 2024 is 22,346.65 hours. The total lodestar for my firm is \$16,934,853.50. My firm's lodestar figures are based on the firm's historic billing rates.

50. As detailed in Exhibit 22, my firm has incurred a total of \$279,340.41 in unreimbursed expenses during the period from January 1, 2021 through March 31, 2024 in connection with the prosecution of this litigation.

51. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 1st day of May 2024 at Minneapolis, Minnesota.

/s/ W. Joseph Bruckner
W. Joseph Bruckner

Exhibit 1

Breakdown of Settlement Funds at Issue as of 4/30/2024, Subject to Further Update									
Defendant Family	Settlement Amount	Interest Earned (through 3/31/24)	Taxes Paid	Administrator Expenses	Escrow Fees	Second Cost Motion Pro Rata	Current Motion Attorneys' Fees (incl. Interest) Pro Rata	Current Motion Expenses (Outstanding and Future) Pro Rata	Current Motion Service Award Pro Rata
Mar Jac	\$ 7,975,000.00	\$ 526,472.65	\$ 20,184.36	\$ 198,873.53	\$ 7,000.00	\$ 889,960.20	\$ 2,685,297.88	\$ -	\$ 5,198.82
Harrison Poultry	\$ 3,300,000.00	\$ 228,875.45	\$ 11,242.06	\$ 82,292.49	\$ 7,000.00	\$ 368,259.39	\$ 1,114,640.04	\$ -	\$ 2,151.24
Simmons	\$ 8,018,991.00	\$ 290,402.82	\$ 15,030.39	\$ 32,537.27	\$ 3,000.00	\$ 894,869.32	\$ 2,624,627.35	\$ -	\$ 5,227.50
Mountaire	\$ 15,899,826.00	\$ 390,193.29	\$ 9,108.60	\$ 64,513.97	\$ 3,000.00	\$ 1,774,321.30	\$ 5,145,409.05	\$ -	\$ 10,364.93
O.K. Foods	\$ 4,856,333.00	\$ 131,298.51	\$ 3,791.35	\$ 19,704.70	\$ 3,000.00	\$ 541,936.44	\$ 1,575,406.63	\$ -	\$ 3,165.79
Koch	\$ 47,500,000.00	\$ 925,654.83	\$ 13,476.46	\$ 6,205.52	\$ 3,000.00	\$ -	\$ 15,295,856.82	\$ 715,317.52	\$ 30,964.76
HRF	\$ 27,500,000.00	\$ 482,457.65	\$ 2,601.46	\$ 3,592.67	\$ 3,000.00	\$ -	\$ 8,838,613.90	\$ 414,131.20	\$ 17,926.96
Total	\$ 115,050,150.00	\$ 2,975,355.20	\$ 75,434.68	\$ 407,720.15	\$ 29,000.00	\$ 4,469,346.65	\$ 37,279,851.67	\$ 1,129,448.72	\$ 75,000.00

Exhibit 2

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

IN RE BROILER CHICKEN ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER PLAINTIFF
ACTION

Case No. 1:16-cv-08637

The Honorable Thomas M. Durkin

Magistrate Judge Jeffrey T. Gilbert

**DECLARATION OF DIRECT PURCHASER PLAINTIFF CO-LEAD CLASS COUNSEL
MICHAEL H. PEARSON IN SUPPORT OF DIRECT PURCHASER PLAINTIFFS'
MOTION FOR PAYMENT OF ATTORNEYS' FEES, REIMBURSEMENT OF
LITIGATION EXPENSES, AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Michael H. Pearson, declare and state as follows:

1. I am a partner of the law firm of Pearson Warshaw, LLP (“PW”). I submit this Declaration in support of Direct Purchaser Plaintiffs’ (“DPPs”) Motion for Payment of Attorneys’ Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

2. The Court appointed PW and Lockridge Grindal Nauen P.L.L.P. as Interim Co-Lead Counsel at the outset of the litigation (ECF No. 144, Oct. 14, 2016 Order), and as Co-Lead Class Counsel when it granted DPPs’ motion for class certification (ECF No. 5644 at 6). Co-Lead Class Counsel, with the assistance of 20 other firms (collectively, “Class Counsel”), have vigorously and efficiently prosecuted this complex antitrust case. At all times, the work of Class Counsel was directed by Co-Lead Class Counsel.

3. The work performed, fees incurred, and costs paid from the litigation fund by Co-Lead Class Counsel, as well as other DPP class counsel, are generally set forth in the Motion and the concurrently filed Declaration of W. Joseph Bruckner. To avoid duplication, this declaration primarily focuses on PW’s time and expenses throughout this litigation.

4. In this role as Co-Lead Class Counsel, PW has been directly involved in the management of the entire case and participated in all facets of the litigation from inception through the present. PW has performed a considerable amount of work and incurred substantial expenses over the course of almost eight years without any compensation. These efforts have resulted in the recovery of over \$284 million for the DPP Class. PW will continue to fulfill its duties as Co-Lead Class Counsel through the completion of this litigation.

5. Throughout the course of this litigation, PW has maintained contemporaneous billing records, which have been summarized and submitted to the Court on a quarterly basis in

the DPP time and expense reports. In preparing this declaration PW conducted a further review of its billing records to ensure accuracy.

6. The summary attached hereto as Exhibit 1 is a detailed report indicating the amount of time spent and the respective lodestar of the partners, attorneys and other professional support staff of PW for the work performed in this case. The lodestar calculation is based on PW's historic hourly billing rates, except for work done on first tier document review which is capped at \$350 per hour, from January 1, 2021 through March 31, 2024.

7. The total number of hours expended on this litigation by PW from January 1, 2021 through March 31, 2024, is 15,797.50 hours. The total lodestar for PW is \$12,964,333.00. The hourly rates for the partners, attorneys and professional support staff are the same as the usual and customary hourly rates charged for their services in contingent billable matters. The hourly rates for PW have been approved by courts in multiple other class action lawsuits across the country and in this District. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by PW.

8. The expenses incurred in this action are reflected on the books and records of PW. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred. Prior to submitting this declaration my firm conducted a further review of our expense records, to ensure accuracy.

9. As detailed in Exhibit 2, my firm has incurred a total of \$157,749.17 in unreimbursed litigation expenses during the period from January 1, 2021 through March 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel, which are reflected in the concurrently filed declaration of W. Joseph Bruckner.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 1st day of May, 2024 at Sherman Oaks, California.

/s/ Michael H. Pearson
Michael H. Pearson

EXHIBIT 1

IN RE BROILER CHICKEN ANTITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: Pearson Warsaw, LLP Reporting Period: 01/01/2021 - 03/31/2024

- | | | | |
|--|---|---|--|
| <p>Categories:</p> <ul style="list-style-type: none"> 1) Legal Research 2) Investigation / Factual Research 3) Discovery (Written / Deposition Taking & Defending / Meet & Confer / etc.) 4) Document Review (Including for depo prep, class cert, experts, liability issues, jurisdictional, and meetings re doc review) | <ul style="list-style-type: none"> 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing) 6) Class Certification 7) Summary Judgment 8) Appeals 9) Court Appearance and Prep 10) Experts | <ul style="list-style-type: none"> 11) Settlements & Mediation 12) Case Management 13) Class Notice 14) Trial Prep (Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.) 15) Trial | <p>TITLE:</p> <ul style="list-style-type: none"> (P) Partner (A) Associate (L.C) Law Clerk (SPL) Senior Paralegal (PL) Paralegal |
|--|---|---|--|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Clifford Pearson (P)																0.00	0.00	0.00	\$985.00	\$0.00	\$0.00	\$0.00
Clifford Pearson (P)																0.00	0.00	0.00	\$1,035.00	\$0.00	\$0.00	\$0.00
Clifford Pearson (P)																0.00	0.00	0.00	\$1,050.00	\$0.00	\$0.00	\$0.00
Clifford Pearson (P)																0.00	0.00	0.00	\$1,150.00	\$0.00	\$0.00	\$0.00
Clifford Pearson (P)	2.80		31.90		63.10	40.80			36.80	85.70	187.00	360.60	0.40	4.10		0.00	813.20	813.20	\$1,190.00	\$0.00	\$967,708.00	\$967,708.00
Clifford Pearson (P)			12.00		11.90	1.00	6.00	16.00	27.90	18.20	179.70	341.70		206.10	107.00	0.00	927.50	927.50	\$1,250.00	\$0.00	\$1,159,375.00	\$1,159,375.00
Daniel Warsaw (P)																0.00	0.00	0.00	\$870.00	\$0.00	\$0.00	\$0.00
Daniel Warsaw (P)																0.00	0.00	0.00	\$985.00	\$0.00	\$0.00	\$0.00
Daniel Warsaw (P)																0.00	0.00	0.00	\$1,050.00	\$0.00	\$0.00	\$0.00
Daniel Warsaw (P)																0.00	0.00	0.00	\$1,150.00	\$0.00	\$0.00	\$0.00
Daniel Warsaw (P)	3.40		3.60		42.00	1.20		8.40	13.90	10.50	13.10	76.90				0.00	173.00	173.00	\$1,190.00	\$0.00	\$205,870.00	\$205,870.00
Daniel Warsaw (P)	2.60		1.50		63.50	2.20	12.00	41.80	30.70	14.30	6.80	38.80	1.90	63.10	40.80	0.00	320.00	320.00	\$1,250.00	\$0.00	\$400,000.00	\$400,000.00
Bruce Simon (P)																0.00	0.00	0.00	\$985.00	\$0.00	\$0.00	\$0.00
Bruce Simon (P)																0.00	0.00	0.00	\$1,035.00	\$0.00	\$0.00	\$0.00
Bruce Simon (P)																0.00	0.00	0.00	\$1,050.00	\$0.00	\$0.00	\$0.00
Bruce Simon (P)																0.00	0.00	0.00	\$1,150.00	\$0.00	\$0.00	\$0.00
Bruce Simon (P)			9.90		10.50	11.00				22.60	4.90	1.30				0.00	61.50	61.50	\$1,190.00	\$0.00	\$73,185.00	\$73,185.00
Aaron Sheamin (A)																0.00	0.00	0.00	\$825.00	\$0.00	\$0.00	\$0.00
Aaron Sheamin (A)																0.00	0.00	0.00	\$900.00	\$0.00	\$0.00	\$0.00
Michael Pearson (A)																0.00	0.00	0.00	\$475.00	\$0.00	\$0.00	\$0.00
Michael Pearson (A)																0.00	0.00	0.00	\$500.00	\$0.00	\$0.00	\$0.00
Michael Pearson (A)																0.00	0.00	0.00	\$600.00	\$0.00	\$0.00	\$0.00
Michael Pearson (A)																0.00	0.00	0.00	\$625.00	\$0.00	\$0.00	\$0.00
Michael Pearson (P)		37.90	250.90		947.80	33.50	1.40	107.00	142.50	149.90	181.70	75.30	36.70	131.10	6.40	0.00	2,102.10	2,102.10	\$800.00	\$0.00	\$1,681,680.00	\$1,681,680.00
Benjamin Shifan (A)																0.00	0.00	0.00	\$495.00	\$0.00	\$0.00	\$0.00
Benjamin Shifan (A)																0.00	0.00	0.00	\$520.00	\$0.00	\$0.00	\$0.00
Benjamin Shifan (A)																0.00	0.00	0.00	\$650.00	\$0.00	\$0.00	\$0.00
Benjamin Shifan (A)																0.00	0.00	0.00	\$900.00	\$0.00	\$0.00	\$0.00
Benjamin Shifan (P)		0.10	0.30							0.20		0.20				0.00	0.80	0.80	\$940.00	\$0.00	\$752.00	\$752.00
Alexander Simon (A)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Alexander Simon (A)																0.00	0.00	0.00	\$400.00	\$0.00	\$0.00	\$0.00
Bobby Pouya (A)																0.00	0.00	0.00	\$670.00	\$0.00	\$0.00	\$0.00
Bobby Pouya (A)																0.00	0.00	0.00	\$800.00	\$0.00	\$0.00	\$0.00
Bobby Pouya (P)	5.80	29.00	306.70		522.10	26.20			86.00	111.30	55.30	95.70		1.70		0.00	1,239.80	1,239.80	\$950.00	\$0.00	\$1,177,810.00	\$1,177,810.00
Bobby Pouya (P)	10.90		188.20		633.80	3.80	164.40	88.50	179.60	92.80	102.50	55.90		760.10	268.40	0.00	2,548.90	2,548.90	\$990.00	\$0.00	\$2,523,411.00	\$2,523,411.00
Neil Swartzberg (A)																0.00	0.00	0.00	\$900.00	\$0.00	\$0.00	\$0.00
Neil Swartzberg (A)																0.00	0.00	0.00	\$920.00	\$0.00	\$0.00	\$0.00
Neil Swartzberg (A)	8.40		164.60		9.00	11.00	21.60			39.90		19.90		35.40	1.80	0.00	311.60	311.60	\$940.00	\$0.00	\$292,904.00	\$292,904.00
Meredith Doyle (A)																0.00	0.00	0.00	\$370.00	\$0.00	\$0.00	\$0.00
Meredith Doyle (A)																0.00	0.00	0.00	\$400.00	\$0.00	\$0.00	\$0.00
Matthew Pearson (A)																0.00	0.00	0.00	\$400.00	\$0.00	\$0.00	\$0.00
Matthew Pearson (A)																0.00	0.00	0.00	\$450.00	\$0.00	\$0.00	\$0.00
Matthew Pearson (A)																0.00	0.00	0.00	\$480.00	\$0.00	\$0.00	\$0.00
Matthew Pearson (A)												0.30				0.00	0.30	0.30	\$560.00	\$0.00	\$168.00	\$168.00
Matthew Pearson (P)					0.70		2.10									0.00	2.80	2.80	\$800.00	\$0.00	\$2,240.00	\$2,240.00

Alan Cyrin (A)																	0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Eric Mont (A)			61.20	0.60	2.80		182.10		24.00		22.70	43.30		879.80			0.00	1,216.50	1,216.50	\$350.00	\$0.00	\$425,775.00	\$425,775.00
Eric Mont (A)	8.80		0.40		27.70			1.00			0.50			77.40	345.60		0.00	461.40	461.40	\$500.00	\$0.00	\$230,700.00	\$230,700.00
Gianna Liddy (A)																	0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Naveed Abaie (A)				38.00													0.00	38.00	38.00	\$350.00	\$0.00	\$13,300.00	\$13,300.00
Naveed Abaie (A)																	0.00	0.00	0.00	\$400.00	\$0.00	\$0.00	\$0.00
Naveed Abaie (A)	26.90	11.20	102.30		1.00	10.30				0.50	16.10	73.20		13.60			0.00	255.10	255.10	\$450.00	\$0.00	\$114,795.00	\$114,795.00
Naveed Abaie (A)	8.50	12.00	37.30		122.90	5.80	141.40	16.20	21.90	20.10		39.60	7.00	804.60	166.00		0.00	1,402.40	1,402.40	\$500.00	\$0.00	\$701,200.00	\$701,200.00
Christina Oh (A)																	0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Jessop Stroman (A)																	0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Thomas Nolan (OC)			35.40		125.00	2.10			0.80	16.70	5.00	135.00					0.00	320.00	320.00	\$1,190.00	\$0.00	\$380,800.00	\$380,800.00
Thomas Nolan (OC)																	0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Jill Manning (P)			50.00		24.90	49.90	314.90		34.10	155.40	0.80	2.70		1,254.80	188.50		0.00	2,112.00	2,112.00	\$1,000.00	\$0.00	\$2,112,000.00	\$2,112,000.00
Alex Winding (A)	3.70	69.20		29.20						7.10		0.50					0.00	109.70	109.70	\$350.00	\$0.00	\$38,395.00	\$38,395.00
Adrian Buonomano (A)	50.50	0.20	5.80	26.40	16.90		46.20				0.40	17.50		4.20			0.00	168.10	168.10	\$350.00	\$0.00	\$58,835.00	\$58,835.00
Adrian Buonomano (A)	2.60				9.80			2.70				1.20					0.00	16.30	16.30	\$500.00	\$0.00	\$8,150.00	\$8,150.00
Kyle Costello (A)							143.40				14.20				8.00		0.00	165.60	165.60	\$350.00	\$0.00	\$57,960.00	\$57,960.00
Brian Pafundi (A)	3.80		3.20	3.20	26.90		36.10							707.40	\$7.50		0.00	838.10	838.10	\$350.00	\$0.00	\$293,335.00	\$293,335.00
Veronica Glaze (A)																	0.00	0.00	0.00	\$520.00	\$0.00	\$0.00	\$0.00
Veronica Glaze (A)																	0.00	0.00	0.00	\$495.00	\$0.00	\$0.00	\$0.00
																	0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																	0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	138.70	159.60	1,264.90	97.70	2,662.30	198.80	1,071.60	281.60	598.20	759.40	776.50	1,379.60	46.00	4,951.40	1,182.00	0.00	15,602.10	15,602.10			\$0.00	\$12,920,368.00	\$12,920,368.00
NON-ATTORNEYS (I.C., S.P., P.L.)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR	
Ellowene Grant (PL)		0.60	27.90		8.90	1.60	103.60	17.70	5.00		1.80	6.10	0.20	22.20		0.00	195.40	195.40	\$225.00	\$0.00	\$43,965.00	\$43,965.00	
Brad Kopp (PL)																0.00	0.00	0.00	\$225.00	\$0.00	\$0.00	\$0.00	
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00	
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00	
SUB-TOTAL	0.00	0.60	27.90	0.00	8.90	1.60	103.60	17.70	5.00	0.00	1.80	6.10	0.20	22.20	0.00	593.60	195.40	195.40		\$0.00	\$43,965.00	\$43,965.00	
GRAND TOTAL:	138.70	160.20	1292.80	97.70	2671.20	200.40	1175.20	299.30	603.20	759.40	778.30	1385.70	46.20	4973.60	1182.00	593.60	15,797.50	15,797.50			\$0.00	\$12,964,333.00	\$12,964,333.00

EXHIBIT 2

IN RE BROILER CHICKEN ANTITRUST LITIGATION

EXPENSE REPORT - (To be submitted on the 20th of each month)

FIRM NAME: Pearson Warshaw, LLP

REPORTING PERIOD: 01/01/2021 - 03/31/2024

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees			\$823.00	\$823.00
Experts/consultants				\$0.00
Federal Express / UPS /Ontrac			\$3,557.29	\$3,557.29
Postage / U.S. Mail			\$10.00	\$10.00
Service of Process				\$0.00
Messenger/delivery				\$0.00
Hearing Transcripts			\$12.00	\$12.00
Investigation				\$0.00
Computer Research: Lexis/westlaw/Pacer			\$27,548.77	\$27,548.77
Photocopies - in House			\$171.00	\$171.00
Photocopies - Outside			\$1.60	\$1.60
Telephone/telecopier			\$346.09	\$346.09
Travel - Transportation			\$34,498.15	\$34,498.15
Travel - Meals, Etc.			\$17,556.53	\$17,556.53
Travel - Hotels			\$73,224.74	\$73,224.74
Miscellaneous				\$0.00
TOTAL EXPENSES		\$0.00	\$157,749.17	\$157,749.17
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$157,749.17	\$157,749.17

Exhibit 3

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF STEVEN A. HART IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF
HART MCLAUGHLIN & ELDRIDGE, LLC**

I, Steven A. Hart, declare and state as follows:

1. I am a partner of the law firm of Hart McLaughlin & Eldridge, LLC. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly

billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 2,652.10 hours. The total lodestar for my firm for that same time period is \$2,055,985.00. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$9,363.58 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/30/2024 at One south dearborn st, chicago, IL.

DocuSigned by:
Steven Hart
FD14C63B785941A...
Steven A. Hart

EXHIBIT 1

IN RE BROILER CHICKEN ANITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: Hart McLaughlin & Eldridge, LLC Reporting Period: 01/01/2021 - 01/31/2024

- | | | | |
|---|---|--|---|
| <p>Categories:</p> <ul style="list-style-type: none"> 1) Legal Research 2) Investigation / Factual Research 3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.) 4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | <ul style="list-style-type: none"> 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing) 6) Class Certification 7) Summary Judgment 8) Appeals 9) Court Appearance and Prep 10) Experts | <ul style="list-style-type: none"> 11) Settlements & Mediation 12) Case Management 13) Class Notice 14) Trial Prep
(Exhibit & Witness List/Jury Instruction/Vior Dire/Opening Statements/Closing Arguments/Demonstratives/etc.) 15) Trial | <p>TITLE:</p> <ul style="list-style-type: none"> (P) Partner (A) Associate (LC) Law Clerk (SPL) Senior Paralegal (PL) Paralegal |
|---|---|--|---|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Steven Hart(P)			191.10	425.90	75.50		45.70		126.00	13.10				125.40	420.80	0.00	1,423.50	1,423.50	\$850.00	\$0.00	\$1,209,975.00	\$1,209,975.00
Brian Eldridge(P)																0.00	0.00	0.00	\$850.00	\$0.00	\$0.00	\$0.00
Kyle Pozan(P)		0.40	268.10	18.60	116.20				4.60	6.50	17.40	0.30	69.80			0.00	501.90	501.90	\$850.00	\$0.00	\$426,615.00	\$426,615.00
Benjamin Shrader(A)																0.00	0.00	0.00	\$550.00	\$0.00	\$0.00	\$0.00
Christina Flores (A)																0.00	0.00	0.00	\$550.00	\$0.00	\$0.00	\$0.00
Jack Prior(A)																0.00	0.00	0.00	\$550.00	\$0.00	\$0.00	\$0.00
John Marrese (A)			53.20	7.80	7.70				1.80	28.80						0.00	99.30	99.30	\$850.00	\$0.00	\$84,405.00	\$84,405.00
Blake Stubbs (A)			60.10	126.70												0.00	186.80	186.80	\$350.00	\$0.00	\$65,380.00	\$65,380.00
Marie Johnson (A)					12.00											0.00	12.00	12.00	\$550.00	\$0.00	\$6,600.00	\$6,600.00
Timothy Keiser (A)				7.80												0.00	7.80	7.80	\$550.00	\$0.00	\$4,290.00	\$4,290.00
Grant Papastefan (A)					28.90		29.10		0.90					10.10		0.00	69.00	69.00	\$550.00	\$0.00	\$37,950.00	\$37,950.00
Stewart Weltman (P)			10.00		98.50		116.50							15.00		0.00	240.00	240.00	\$850.00	\$0.00	\$204,000.00	\$204,000.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	0.00	0.40	582.50	586.80	338.80	0.00	191.30	0.00	133.30	48.40	17.40	0.30	69.80	150.50	420.80	0.00	2,540.30	2,540.30		\$0.00	\$2,039,215.00	\$2,039,215.00
NON-ATTORNEYS (LC, SPL, PL)																						
Amanda Hayes(LC)																0.00	0.00	0.00	\$150.00	\$0.00	\$0.00	\$0.00
John Emmanuel (LC)																0.00	0.00	0.00	\$150.00	\$0.00	\$0.00	\$0.00
Elliot Kim (LC)																0.00	0.00	0.00	\$150.00	\$0.00	\$0.00	\$0.00
Grant Papastefan (LC)				23.50												0.00	23.50	23.50	\$150.00	\$0.00	\$3,525.00	\$3,525.00
Liam Tripp(LC)		3.50	1.90		4.50											0.00	9.90	9.90	\$150.00	\$0.00	\$1,485.00	\$1,485.00
Bradley Kupiec(LC)															19.50	0.00	19.50	19.50	\$150.00	\$0.00	\$2,925.00	\$2,925.00
Daniel Abraham (PL)															2.00	0.00	2.00	2.00	\$150.00	\$0.00	\$300.00	\$300.00
Kiana Bernard (PL)				0.50												0.00	0.50	0.50	\$150.00	\$0.00	\$75.00	\$75.00
Maximilian Bungert	2.20			3.20												0.00	5.40	5.40	\$150.00	\$0.00	\$810.00	\$810.00
Morgan Forbes			8.40	8.50			0.90		26.70	0.30		2.80				0.00	47.60	47.60	\$150.00	\$0.00	\$7,140.00	\$7,140.00
Madeline Paoli (PL)					0.90							2.50				0.00	3.40	3.40	\$150.00	\$0.00	\$510.00	\$510.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	2.20	3.50	10.30	35.70	5.40	0.00	0.90	0.00	26.70	0.30	0.00	5.30	0.00	0.00	21.50	0.00	111.80	111.80		\$0.00	\$16,770.00	\$16,770.00
GRAND TOTAL:	2.20	3.90	592.80	622.50	344.20	0.00	192.20	0.00	160.00	48.70	17.40	5.60	69.80	150.50	442.30	0.00	2,652.10	2,652.10		\$0.00	\$2,055,985.00	\$2,055,985.00

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: Hart McLaughlin & Eldridge, LLC****REPORTING PERIOD: 01/01/2021 - 01/30/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants				\$0.00
Federal Express / UPS /Ontrac		\$0.00	\$171.03	\$171.03
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery				\$0.00
Hearing Transcripts		\$0.00	\$4,271.35	\$4,271.35
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00	\$74.72	\$74.72
Photocopies - in House		\$0.00	\$414.70	\$414.70
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier				\$0.00
Travel - Transportation		\$0.00	\$749.70	\$749.70
Travel - Meals, Etc.		\$0.00	\$2,655.05	\$2,655.05
Travel - Hotels		\$0.00	\$429.87	\$429.87
Miscellaneous		\$0.00	\$597.16	\$597.16
		\$0.00		
TOTAL EXPENSES		\$0.00	\$9,363.58	\$9,363.58
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$9,363.58	\$9,363.58

Exhibit 4

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF NOAH AXLER IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF AXLER GOLDICH LLC**

I, Noah Axler, declare and state as follows:

1. I am a partner with the law firm of Axler Goldich LLC. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 10.50 hours. The total lodestar for my firm for that same time period is \$7,875.00. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$0.00 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/24/2024 at New York, New York.

DocuSigned by:



088c6858cc94d6...
Noah Axler

EXHIBIT 1

IN RE BROILER CHICKEN ANTITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: AXLER GOLDICH LLC Reporting Period: 01/01/2021 - 01/31/2024

- | | | | |
|--|---|--|---|
| Categories:

1) Legal Research

2) Investigation / Factual Research

3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.)

4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing)

6) Class Certification

7) Summary Judgment

8) Appeals

9) Court Appearance and Prep

10) Experts | 11) Settlements & Mediation

12) Case Management

13) Class Notice

14) Trial Prep
(Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.)

15) Trial | TITLE:

(P) Partner

(A) Associate

(LC) Law Clerk

(SPL) Senior Paralegal

(PL) Paralegal |
|--|---|--|---|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Noah Axler (P)											2.70	0.20		8.30		0.00	10.50	10.50	\$750.00	\$0.00	\$7,875.00	\$7,875.00
Marc Goldich (P)																0.00	0.00	0.00	\$550.00	\$0.00	\$0.00	\$0.00
Matt Strout (A)																0.00	0.00	0.00	\$300.00	\$0.00	\$0.00	\$0.00
Name (A)																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
Name (A)																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
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																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00		

																	0.00	0.00	0.00		\$0.00	\$0.00	\$0.00	
																		0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																		0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																		0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																		0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																		0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																		0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																		0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																		0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00		\$0.00	\$0.00	\$0.00																		
GRAND TOTAL:	0.00	2.70	0.20	0.00	8.30	0.00	0.00	0.00	10.50	10.50		\$0.00	\$7,875.00	\$7,875.00										

EXHIBIT 2

IN RE BROILER CHICKEN ANTITRUST LITIGATION**EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: AXLER GOLDICH LLC****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00		\$0.00
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00		\$0.00
Photocopies - in House		\$0.00		\$0.00
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$0.00		\$0.00
Travel - Transportation		\$0.00		\$0.00
Travel - Meals, Etc.		\$0.00		\$0.00
Travel - Hotels		\$0.00		\$0.00
Miscellaneous		\$0.00		\$0.00
		\$0.00		
TOTAL EXPENSES		\$0.00	\$0.00	\$0.00
TOTAL LODESTAR		\$0.00	\$7,875.00	\$7,875.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$7,875.00	\$7,875.00

Exhibit 5

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF JEFFREY BLOCK IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF BLOCK & LEVITON LLP**

I, Jeffrey Block, declare and state as follows:

1. I am managing partner at the law firm of Block & Leviton LLP. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 230.40 hours. The total lodestar for my firm for that same time period is \$190,432.50. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$604.84 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/24/2024 at Delray, Florida.

DocuSigned by:

Jeffrey Block

22E6FB5C88044F4...

Jeffrey Block

EXHIBIT 1

IN RE BROILER CHICKEN ANTITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: Block & Leviton LLP Reporting Period: 01/01/2021 - 01/31/2024

- | | | | |
|--|---|--|---|
| Categories:

1) Legal Research

2) Investigation / Factual Research

3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.)

4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing)

6) Class Certification

7) Summary Judgment

8) Appeals

9) Court Appearance and Prep

10) Experts | 11) Settlements & Mediation

12) Case Management

13) Class Notice

14) Trial Prep
(Exhibit & Witness List/Jury Instruction/ Vior Dire/Opening Statements/Closing Arguments/Demonstratives/etc.)

15) Trial | TITLE:

(P) Partner

(A) Associate

(LC) Law Clerk

(SPL) Senior Paralegal

(PL) Paralegal |
|--|---|--|---|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Whitney Street (P)			116.50								15.50			19.50		0.00	151.50	151.50	\$900.00	\$0.00	\$136,350.00	\$136,350.00
Erica Langsen (A)																0.00	0.00	0.00	\$525.00	\$0.00	\$0.00	\$0.00
Matthew Smith (A)																0.00	0.00	0.00	\$550.00	\$0.00	\$0.00	\$0.00
Stephen Teti (A)			76.20													0.00	76.20	76.20	\$700.00	\$0.00	\$53,340.00	\$53,340.00
Stephen Teti (A)																6.40	0.00	6.40	\$350.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	0.00	0.00	192.70	0.00	15.50	0.00	0.00	19.50	0.00	6.40	227.70	234.10		\$0.00	\$189,690.00	\$189,690.00						
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Brooke Jordy (PL)																0.00	0.00	0.00	\$235.00	\$0.00	\$0.00	\$0.00
Elizabeth Davey (PL)																0.00	0.00	0.00	\$250.00	\$0.00	\$0.00	\$0.00
Rachel Murphy (PL)			2.70													0.00	2.70	2.70	\$275.00	\$0.00	\$742.50	\$742.50
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	2.70	0.00	0.00	0.00	0.00	0.00	0.00	2.70	2.70		\$0.00	\$742.50	\$742.50							
GRAND TOTAL:	0.00	0.00	195.40	0.00	15.50	0.00	0.00	19.50	0.00	6.40	230.40	236.80		\$0.00	\$190,432.50	\$190,432.50						

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: Block & Leviton LLP****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00	\$304.84	\$304.84
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00		\$0.00
Photocopies - in House		\$0.00	\$300.00	\$300.00
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$0.00		\$0.00
Travel - Transportation		\$0.00		\$0.00
Travel - Meals, Etc.		\$0.00		\$0.00
Travel - Hotels		\$0.00		\$0.00
Miscellaneous		\$0.00		\$0.00
		\$0.00		
TOTAL EXPENSES		\$0.00	\$604.84	\$604.84
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$604.84	\$604.84

Exhibit 6

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF ROBERTA LIEBENBERG IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF FINE KAPLAN AND BLACK**

I, Roberta Liebenberg, declare and state as follows:

1. I am a partner with the law firm of Fine Kaplan and Black. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 136.50 hours. The total lodestar for my firm for that same time period is \$84,920.00. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$2,605.29 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/23/2024 at Location.

DocuSigned by:

Roberta Liebenberg

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Roberta Liebenberg

EXHIBIT 1

IN RE BROILER CHICKEN ANTITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: FINE, KAPLAN AND BLACK, RPC Reporting Period: 01/01/2021 - 01/31/2024

- | | | | |
|---|---|--|---|
| <p>Categories:</p> <ul style="list-style-type: none"> 1) Legal Research 2) Investigation / Factual Research 3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.) 4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | <ul style="list-style-type: none"> 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing) 6) Class Certification 7) Summary Judgment 8) Appeals 9) Court Appearance and Prep 10) Experts | <ul style="list-style-type: none"> 11) Settlements & Mediation 12) Case Management 13) Class Notice 14) Trial Prep
(Exhibit & Witness List/Jury Instruction/Vior Dire/Opening Statements/Closing Arguments/Demonstratives/etc.) 15) Trial | <p>TITLE:</p> <ul style="list-style-type: none"> (P) Partner (A) Associate (LC) Law Clerk (SPL) Senior Paralegal (PL) Paralegal |
|---|---|--|---|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Donald L. Perelman (P)																0.00	0.00	0.00	\$795.00	\$0.00	\$0.00	\$0.00
Roberta Liebenberg (P)																0.00	0.00	0.00	\$795.00	\$0.00	\$0.00	\$0.00
Jeffrey S. Istvan (P)																0.00	0.00	0.00	\$695.00	\$0.00	\$0.00	\$0.00
Gerard A. Dever (P)																0.00	0.00	0.00	\$650.00	\$0.00	\$0.00	\$0.00
Paul Costa (P)																0.00	0.00	0.00	\$600.00	\$0.00	\$0.00	\$0.00
Matthew H. Duncan (P)																0.00	0.00	0.00	\$600.00	\$0.00	\$0.00	\$0.00
Adam J. Pessin (P)																0.00	0.00	0.00	\$600.00	\$0.00	\$0.00	\$0.00
Mary L. Russell (A)																0.00	0.00	0.00	\$500.00	\$0.00	\$0.00	\$0.00
Ria C. Momblanco (A)																0.00	0.00	0.00	\$500.00	\$0.00	\$0.00	\$0.00
Joseph J. Borgia (A)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Donald L. Perelman (P)																0.00	0.00	0.00	\$850.00	\$0.00	\$0.00	\$0.00
Roberta Liebenberg (P)																0.00	0.00	0.00	\$850.00	\$0.00	\$0.00	\$0.00
Jeffrey S. Istvan (P)																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Gerard A. Dever (P)																0.00	0.00	0.00	\$700.00	\$0.00	\$0.00	\$0.00
Paul Costa (P)																0.00	0.00	0.00	\$650.00	\$0.00	\$0.00	\$0.00
Matthew H. Duncan (P)																0.00	0.00	0.00	\$650.00	\$0.00	\$0.00	\$0.00
Adam J. Pessin (P)																0.00	0.00	0.00	\$650.00	\$0.00	\$0.00	\$0.00
Mary L. Russell (A)																0.00	0.00	0.00	\$550.00	\$0.00	\$0.00	\$0.00
Ria C. Momblanco (A)																0.00	0.00	0.00	\$550.00	\$0.00	\$0.00	\$0.00
Jessica D. Khan (A)																0.00	0.00	0.00	\$475.00	\$0.00	\$0.00	\$0.00
Joseph J. Borgia (A)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Robert A. Larsen (A)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Roberta Liebenberg (P)		0.50														0.00	0.50	0.50	\$950.00	\$0.00	\$475.00	\$475.00
Jeffrey S. Istvan (P)																0.00	0.00	0.00	\$825.00	\$0.00	\$0.00	\$0.00
Gerard A. Dever (P)																0.00	0.00	0.00	\$775.00	\$0.00	\$0.00	\$0.00
Paul Costa (P)																0.00	0.00	0.00	\$725.00	\$0.00	\$0.00	\$0.00
Adam J. Pessin (P)																0.00	0.00	0.00	\$725.00	\$0.00	\$0.00	\$0.00
Mary L. Russell (A)																0.00	0.00	0.00	\$625.00	\$0.00	\$0.00	\$0.00
Ria C. Momblanco (A)																0.00	0.00	0.00	\$625.00	\$0.00	\$0.00	\$0.00
Jessica D. Khan (A)																0.00	0.00	0.00	\$550.00	\$0.00	\$0.00	\$0.00
Joseph J. Borgia (A)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Robert A. Larsen (A)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Roberta Liebenberg (P)																0.00	0.00	0.00	\$975.00	\$0.00	\$0.00	\$0.00
Jeffrey S. Istvan (P)																0.00	0.00	0.00	\$850.00	\$0.00	\$0.00	\$0.00
Gerard A. Dever (P)		14.60						5.80								0.00	20.40	20.40	\$800.00	\$0.00	\$16,320.00	\$16,320.00
Paul Costa (P)																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Adam J. Pessin (P)																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Mary L. Russell (A)																0.00	0.00	0.00	\$650.00	\$0.00	\$0.00	\$0.00
Ria C. Momblanco (A)																0.00	0.00	0.00	\$700.00	\$0.00	\$0.00	\$0.00
Jessica D. Khan (A)		41.30						63.00								0.00	104.30	104.30	\$600.00	\$0.00	\$62,580.00	\$62,580.00
Joseph J. Borgia (A)		8.20						2.40								0.00	10.60	10.60	\$500.00	\$0.00	\$5,300.00	\$5,300.00
Robert A. Larsen (A)																0.00	0.00	0.00	\$575.00	\$0.00	\$0.00	\$0.00

																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	64.10	0.50	0.00	0.00	0.00	0.00	0.00	0.00	71.20	0.00	135.80	135.80		\$0.00	\$84,675.00	\$84,675.00						
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Nancy M. Blakeslee (PL)																0.00	0.00	0.00	\$275.00	\$0.00	\$0.00	\$0.00
Allyson L. Katzman (PL)																0.00	0.00	0.00	\$275.00	\$0.00	\$0.00	\$0.00
Susan J. Hufnagel (PL)																0.00	0.00	0.00	\$300.00	\$0.00	\$0.00	\$0.00
Nancy M. Blakeslee (PL)																0.00	0.00	0.00	\$300.00	\$0.00	\$0.00	\$0.00
Allyson L. Katzman (PL)																0.00	0.00	0.00	\$300.00	\$0.00	\$0.00	\$0.00
Susan J. Hufnagel (PL)																0.00	0.00	0.00	\$330.00	\$0.00	\$0.00	\$0.00
Nancy M. Blakeslee (PL)																0.00	0.00	0.00	\$330.00	\$0.00	\$0.00	\$0.00
Allyson L. Katzman (PL)																0.00	0.00	0.00	\$330.00	\$0.00	\$0.00	\$0.00
Susan J. Hufnagel (PL)																0.00	0.00	0.00	\$300.00	\$0.00	\$0.00	\$0.00
Nancy M. Blakeslee (PL)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Allyson L. Katzman (PL)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Susan J. Hufnagel (PL)											0.70					0.00	0.70	0.70	\$350.00	\$0.00	\$245.00	\$245.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.70	0.00	0.00	0.00	0.00	0.00	0.00	0.70	0.70		\$0.00	\$245.00	\$245.00
GRAND TOTAL:	64.10	0.50	0.00	0.00	0.00	0.00	0.00	71.20	0.00	0.70	0.00	0.00	0.00	0.00	0.00	0.00	136.50	136.50		\$0.00	\$84,920.00	\$84,920.00

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: FINE, KAPLAN AND BLACK, RPC****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00		\$0.00
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00	\$2,583.99	\$2,583.99
Photocopies - in House		\$0.00		\$0.00
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$0.00		\$0.00
Travel - Transportation		\$0.00		\$0.00
Travel - Meals, Etc.		\$0.00		\$0.00
Travel - Hotels		\$0.00		\$0.00
Miscellaneous: PACER Computer Research		\$0.00	\$21.30	\$21.30
		\$0.00		
TOTAL EXPENSES		\$0.00	\$2,605.29	\$2,605.29
TOTAL LODESTAR				
TOTAL EXPENSES & LODESTAR		\$0.00	\$2,605.29	\$2,605.29

Exhibit 7

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF ROBERT J. WOZNAK IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF
FREED KANNER LONDON & MILLEN LLC**

I, Robert J. Wozniak, declare and state as follows:

1. I am a partner with the law firm of Freed Kanner London & Millen LLC. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly

billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 2049.80. The total lodestar for my firm for that same time period is \$1,740,369.00. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$4,674.27 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/24/2024 at Oak Park, Illinois.

DocuSigned by:

Robert J. Wozniak

4DCB01A034224FA...
Robert J. Wozniak

EXHIBIT 1

IN RE BROILER CHICKEN ANITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: Freed Kanner London & Millen LLC Reporting Period: 01/01/2021 -01/31/2024

Categories: 1) Legal Research 2) Investigation / Factual Research 3) Discovery (Written / Deposition Taking & Defending / Meet & Confer / etc.) 4) Document Review (Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review)	5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing) 6) Class Certification 7) Summary Judgment 8) Appeals 9) Court Appearance and Prep 10) Experts	11) Settlements & Mediation 12) Case Management 13) Class Notice 14) Trial Prep (Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.) 15) Trial	TITLE: (P) Partner (A) Associate (LC) Law Clerk (SPL) Senior Paralegal (PL) Paralegal
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ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Michael J. Freed (P)																0.00	0.00	0.00	\$855.00	\$0.00	\$0.00	\$0.00
Michael J. Freed (P)																0.00	0.00	0.00	\$895.00	\$0.00	\$0.00	\$0.00
Michael J. Freed (P)																0.00	0.00	0.00	\$910.00	\$0.00	\$0.00	\$0.00
Michael J. Freed (P) 2022						4.80										0.00	4.80	4.80	\$1,125.00	\$0.00	\$5,400.00	\$5,400.00
Steven A. Kanner (P)																0.00	0.00	0.00	\$810.00	\$0.00	\$0.00	\$0.00
Michael J. Freed (P)																0.00	0.00	0.00	\$880.00	\$0.00	\$0.00	\$0.00
William H. London (P)																0.00	0.00	0.00	\$790.00	\$0.00	\$0.00	\$0.00
William H. London (P)																0.00	0.00	0.00	\$760.00	\$0.00	\$0.00	\$0.00
Douglas A. Millen (P)																0.00	0.00	0.00	\$805.00	\$0.00	\$0.00	\$0.00
Douglas A. Millen (P)																0.00	0.00	0.00	\$785.00	\$0.00	\$0.00	\$0.00
Douglas A. Millen (P)																0.00	0.00	0.00	\$770.00	\$0.00	\$0.00	\$0.00
Douglas A. Millen (P)																0.00	0.00	0.00	\$755.00	\$0.00	\$0.00	\$0.00
Douglas A. Millen (P)																0.00	0.00	0.00	\$700.00	\$0.00	\$0.00	\$0.00
Douglas A. Millen (P)																0.00	0.00	0.00	\$740.00	\$0.00	\$0.00	\$0.00
Douglas A. Millen (P) 2022											1.90	1.60				0.00	3.50	3.50	\$925.00	\$0.00	\$3,237.50	\$3,237.50
Douglas A. Millen (P) 2023													1.60	0.60		0.00	2.20	2.20	\$990.00	\$0.00	\$2,178.00	\$2,178.00
Michael E. Moskovitz (P)																0.00	0.00	0.00	\$825.00	\$0.00	\$0.00	\$0.00
Michael E. Moskovitz (P)																0.00	0.00	0.00	\$770.00	\$0.00	\$0.00	\$0.00
Michael E. Moskovitz (P)																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Michael E. Moskovitz (P)																0.00	0.00	0.00	\$735.00	\$0.00	\$0.00	\$0.00
Michael E. Moskovitz (P)																0.00	0.00	0.00	\$720.00	\$0.00	\$0.00	\$0.00
Michael E. Moskovitz (P)																0.00	0.00	0.00	\$705.00	\$0.00	\$0.00	\$0.00
Robert J. Wozniak (P)																0.00	0.00	0.00	\$640.00	\$0.00	\$0.00	\$0.00
Brian M. Hogan (P)																0.00	0.00	0.00	\$600.00	\$0.00	\$0.00	\$0.00
Brian M. Hogan (P)																0.00	0.00	0.00	\$560.00	\$0.00	\$0.00	\$0.00
Brian M. Hogan (P)																0.00	0.00	0.00	\$545.00	\$0.00	\$0.00	\$0.00
Brian M. Hogan (P)																0.00	0.00	0.00	\$530.00	\$0.00	\$0.00	\$0.00
Brian M. Hogan (P)																0.00	0.00	0.00	\$490.00	\$0.00	\$0.00	\$0.00
Steve Serdikoff (OC)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Jonathan M. Jagher (P) 2021			441.10		2.20						0.30					0.00	443.60	443.60	\$775.00	\$0.00	\$343,790.00	\$343,790.00
Jonathan M. Jagher (P)																0.00	0.00	0.00	\$700.00	\$0.00	\$0.00	\$0.00
Jonathan M. Jagher (P)																0.00	0.00	0.00	\$640.00	\$0.00	\$0.00	\$0.00
Jonathan M. Jagher (P) 2022			0.40		2.70											0.00	3.10	3.10	\$825.00	\$0.00	\$2,557.50	\$2,557.50
Jonathan M. Jagher (P) 2023			11.50		1.10										15.90	0.00	28.50	28.50	\$900.00	\$0.00	\$25,650.00	\$25,650.00
Kimberly A. Justice (P)																0.00	0.00	0.00	\$820.00	\$0.00	\$0.00	\$0.00
Robert J. Wozniak (P) 2023					114.20				6.00					586.90	325.20	0.00	1,032.30	1,032.30	\$925.00	\$0.00	\$954,877.50	\$954,877.50
Robert J. Wozniak (P) 2022					147.20							0.50				0.00	147.70	147.70	\$850.00	\$0.00	\$125,545.00	\$125,545.00
Robert J. Wozniak (P) 2021			15.00	253.10	5.50							8.50				0.00	282.10	282.10	\$800.00	\$0.00	\$225,680.00	\$225,680.00
Robert J. Wozniak (P)																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Robert J. Wozniak (P)																0.00	0.00	0.00	\$720.00	\$0.00	\$0.00	\$0.00
Robert J. Wozniak (P)																0.00	0.00	0.00	\$705.00	\$0.00	\$0.00	\$0.00
Robert J. Wozniak (P)																0.00	0.00	0.00	\$690.00	\$0.00	\$0.00	\$0.00
Robert J. Wozniak (P)																0.00	0.00	0.00	\$675.00	\$0.00	\$0.00	\$0.00

Robert J. Wozniak (P)																0.00	0.00	0.00	\$660.00	\$0.00	\$0.00	\$0.00
Michael J. Freed (P) 2021		0.70			0.60								0.40			0.00	1.70	1.70	\$1,050.00	\$0.00	\$1,785.00	\$1,785.00
Steven A. Kanner (P) 2021													2.70			0.00	2.70	2.70	\$975.00	\$0.00	\$2,632.50	\$2,632.50
Douglas A. Millen (P) 2021					0.50							0.40	4.40			0.00	5.30	5.30	\$875.00	\$0.00	\$4,637.50	\$4,637.50
Kimberly A. Justice (P) 2021			6.20													0.00	6.20	6.20	\$875.00	\$0.00	\$5,425.00	\$5,425.00
William H. London (P)												0.50				0.00	0.50	0.50	\$885.00	\$0.00	\$442.50	\$442.50
Matthew W. Ruan (P) 2022					4.90											0.00	4.90	4.90	\$800.00	\$0.00	\$3,920.00	\$3,920.00
Matthew W. Ruan (P) 2023					10.40											0.00	10.40	10.40	\$875.00	\$0.00	\$9,100.00	\$9,100.00
Nia-Imara Binns (A) 2022	17.40															0.00	17.40	17.40	\$375.00	\$0.00	\$6,525.00	\$6,525.00
Nia-Imara Binns (A) 2023												4.40		23.30		0.00	27.70	27.70	\$425.00	\$0.00	\$11,772.50	\$11,772.50
ATTY SUB-TOTAL	17.40	15.70	712.30	0.00	289.30	4.80	0.00	0.00	6.00	0.00	7.50	18.10	0.00	611.80	341.70	0.00	2,024.60	2,024.60		\$0.00	\$1,734,978.00	\$1,734,978.00
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Marlene S. Khamoo (PL)																0.00	0.00	0.00	\$195.00	\$0.00	\$0.00	\$0.00
Marlene S. Khamoo (PL)																0.00	0.00	0.00	\$205.00	\$0.00	\$0.00	\$0.00
Natalie Lazaritt (PL)			6.00		11.20											0.00	17.20	17.20	\$205.00	\$0.00	\$3,526.00	\$3,526.00
Danielle Millikan (PL)					4.50							2.20				0.00	6.70	6.70	\$225.00	\$0.00	\$1,507.50	\$1,507.50
Danielle Millikan (PL)					0.60									0.70		0.00	1.30	1.30	\$275.00	\$0.00	\$357.50	\$357.50
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	6.00	0.00	16.30	0.00	0.00	0.00	0.00	0.00	0.00	2.20	0.00	0.70	0.00	0.00	25.20	25.20		\$0.00	\$5,391.00	\$5,391.00
GRAND TOTAL:	17.40	15.70	718.30	0.00	305.60	4.80	0.00	0.00	6.00	0.00	7.50	20.30	0.00	612.50	341.70	0.00	2,049.80	2,049.80		\$0.00	\$1,740,369.00	\$1,740,369.00

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: Freed Kanner London & Millen LLC****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00	\$191.65	\$191.65
Postage / U.S. Mail		\$0.00	\$74.54	\$74.54
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00	\$3.00	\$3.00
Computer Research: Lexis/westlaw/Pacer		\$0.00	\$3,230.23	\$3,230.23
Photocopies - in House		\$0.00	\$752.60	\$752.60
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$0.00	\$65.25	\$65.25
Travel - Transportation		\$0.00	\$90.00	\$90.00
Travel - Meals, Etc.		\$0.00	\$138.08	\$138.08
Travel - Hotels		\$0.00		\$0.00
Miscellaneous		\$0.00	\$128.92	\$128.92
		\$0.00		
TOTAL EXPENSES		\$0.00	\$4,674.27	\$4,674.27
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$4,674.27	\$4,674.27

Exhibit 8

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF ROBERT EISLER IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF GRANT & EISENHOFER P.A.**

I, Robert Eisler, declare and state as follows:

1. I am a Director of the law firm of Grant & Eisenhofer P.A.. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 53.60 hours. The total lodestar for my firm for that same time period is \$54,360.00. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$286.13 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/23/2024 at Wilmington, Delaware.

DocuSigned by:



Robert Eisler

EXHIBIT 1

IN RE BROILER CHICKEN ANITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: Grant & Eisenhofer, PA Reporting Period: 01/01/2021 - 01/31/2024

- | | | | |
|---|---|--|--|
| Categories:
1) Legal Research
2) Investigation / Factual Research
3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.)
4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing)
6) Class Certification
7) Summary Judgment
8) Appeals
9) Court Appearance and Prep
10) Experts | 11) Settlements & Mediation
12) Case Management
13) Class Notice
14) Trial Prep
(Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.)
15) Trial | TITLE:
(P) Partner
(A) Associate
(LC) Law Clerk
(SPL) Senior Paralegal
(PL) Paralegal |
|---|---|--|--|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
											6.00	6.60		1.00		0.00	13.60	13.60	\$1,100.00	\$0.00	\$14,960.00	\$14,960.00
Robert Eisler (P)									2.80		11.80	25.40				0.00	40.00	40.00	\$985.00	\$0.00	\$39,400.00	\$39,400.00
Adam J. Levitt (P)																0.00	0.00	0.00	\$925.00	\$0.00	\$0.00	\$0.00
Deborah Elman (A)																0.00	0.00	0.00	\$800.00	\$0.00	\$0.00	\$0.00
Allison J. McCowen (A)																0.00	0.00	0.00	\$475.00	\$0.00	\$0.00	\$0.00
James Welch (A)																0.00	0.00	0.00	\$475.00	\$0.00	\$0.00	\$0.00
Ray Schuenemann (A)																0.00	0.00	0.00	\$30.00	\$0.00	\$0.00	\$0.00
Morris Ingemanson (A)																0.00	0.00	0.00	\$395.00	\$0.00	\$0.00	\$0.00
Joseph Nearey (A)																0.00	0.00	0.00	\$360.00	\$0.00	\$0.00	\$0.00
Sarah Hickey (A)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	0.00	2.80	0.00	11.80	25.40	0.00	0.00	0.00	53.60	53.60		\$0.00	\$54,360.00	\$54,360.00								
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00		\$0.00	\$0.00	\$0.00											
GRAND TOTAL:	0.00	2.80	0.00	11.80	25.40	0.00	0.00	0.00	53.60	53.60		\$0.00	\$54,360.00	\$54,360.00								

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: Grant & Eisenhofer, PA****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00		\$0.00
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00	\$244.13	\$244.13
Photocopies - in House		\$0.00		\$0.00
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$0.00		\$0.00
Travel - Transportation		\$0.00		\$0.00
Travel - Meals, Etc.		\$0.00	\$42.00	\$42.00
Travel - Hotels		\$0.00		\$0.00
Miscellaneous		\$0.00		\$0.00
		\$0.00		
TOTAL EXPENSES		\$3,368.44	\$286.13	\$286.13
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$3,368.44	\$286.13	\$286.13

Exhibit 9

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF JOSEPH SAVERI IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF JOSEPH SAVERI LAW FIRM**

I, Joseph Saveri, declare and state as follows:

1. I am a partner with the law firm of Joseph Saveri Law Firm. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 915.80 hours. The total lodestar for my firm for that same time period is \$728,134.25. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$6,303.36 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/26/2024 at San Francisco, California.

DocuSigned by:

Joseph Saveri

7A999A815307414...
Joseph Saveri

EXHIBIT 1

IN RE BROILER CHICKEN ANTITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: Joseph Saveri Law Firm Reporting Period: 01/01/2021 - 01/31/2024

- | | | | |
|---|---|--|--|
| Categories:
1) Legal Research
2) Investigation / Factual Research
3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.)
4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing)
6) Class Certification
7) Summary Judgment
8) Appeals
9) Court Appearance and Prep
10) Experts | 11) Settlements & Mediation
12) Case Management
13) Class Notice
14) Trial Prep
(Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.)
15) Trial | TITLE:
(P) Partner
(A) Associate
(LC) Law Clerk
(SPL) Senior Paralegal
(PL) Paralegal |
|---|---|--|--|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Cadio Zirpoli (P)		0.50	224.60	83.30	23.00											0.00	331.95	331.95	\$945.00	\$0.00	\$316,480.50	\$316,480.50
Cadio Zirpoli (P)					4.75											0.00	4.75	4.75	\$995.00	\$0.00	\$4,726.25	\$4,726.25
Travis Manfredi (A)			412.40	4.60	13.70									72.80		0.00	500.50	500.50	\$750.00	\$0.00	\$375,375.00	\$375,375.00
Name (A)																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
Name (A)																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
Name (A)																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	0.00	0.50	637.00	87.90	41.45	0.00	72.80	0.00	0.00	837.20	837.20		\$0.00	\$696,581.75	\$696,581.75							
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Sean Robertson (PL)			62.70		6.80											0.00	69.50	69.50	\$400.00	\$0.00	\$27,800.00	\$27,800.00
Aaron Cera (LC)			0.50													0.00	0.50	0.50	\$350.00	\$0.00	\$175.00	\$175.00
Yasmin Jayasuriya (PL)			5.00	0.50												0.00	5.50	5.50	\$425.00	\$0.00	\$2,337.50	\$2,337.50
Ameta Ortiz			2.30													0.00	3.10	3.10	\$400.00	\$0.00	\$1,240.00	\$1,240.00
Name (SPL)																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
Name (SPL)																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
Name (PL)																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
Name (PL)																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
Name (PL)																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	70.50	0.50	6.80	0.00	0.00	0.00	0.00	0.00	0.00	0.80	0.00	0.00	0.00	0.00	78.60	78.60		\$0.00	\$31,552.50	\$31,552.50
GRAND TOTAL:	0.00	0.50	707.50	88.40	48.25	0.00	0.00	0.00	0.00	0.00	0.00	0.80	0.00	72.80	0.00	0.00	915.80	915.80		\$0.00	\$728,134.25	\$728,134.25

EXHIBIT 2

IN RE BROILER CHICKEN ANTITRUST LITIGATION

EXPENSE REPORT - (To be submitted on the 20th of each month)

FIRM NAME: Joseph Saveri Law Firm

REPORTING PERIOD: 01/01/2021 - 01/31/2024

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00	\$150.00	\$150.00
Experts/consultants		\$0.00	\$0.00	\$0.00
Federal Express / UPS /Ontrac		\$0.00	\$93.36	\$93.36
Postage / U.S. Mail		\$0.00	\$0.00	\$0.00
Service of Process		\$0.00	\$0.00	\$0.00
Messenger/delivery		\$0.00	\$0.00	\$0.00
Hearing Transcripts		\$0.00	\$0.00	\$0.00
Investigation		\$0.00	\$0.00	\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00	\$1,821.80	\$1,821.80
Photocopies - in House		\$0.00	\$4,123.75	\$4,123.75
Photocopies - Outside		\$0.00	\$0.00	\$0.00
Telephone/telecopier		\$0.00	\$0.00	\$0.00
Travel - Transportation		\$0.00	\$0.00	\$0.00
Travel - Meals, Etc.		\$0.00	\$0.00	\$0.00
Travel - Hotels		\$0.00	\$69.00	\$69.00
Miscellaneous		\$0.00	\$45.45	\$45.45
		\$0.00		
TOTAL EXPENSES		\$0.00	\$6,303.36	\$6,303.36
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$6,303.36	\$6,303.36

Exhibit 10

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF JOSEPH KOHN IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF KOHN, SWIFT & GRAF, P.C.**

I, Joseph Kohn, declare and state as follows:

1. I am a shareholder with the law firm of Kohn, Swift & Graf, P.C.. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 5.30 hours. The total lodestar for my firm for that same time period is \$3,842.50. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$0.00 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

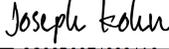
6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/24/2024 at Philadelphia, Pa.

DocuSigned by:



ZC06B06E13384A6...
Joseph Kohn

EXHIBIT 1

IN RE BROILER CHICKEN ANTITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: Kohn, Swift & Graf, P.C. Reporting Period: 01/01/2021 - 01/31/2024

- | | | | |
|---|---|--|--|
| Categories:

1) Legal Research

2) Investigation / Factual Research

3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.)

4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing)

6) Class Certification

7) Summary Judgment

8) Appeals

9) Court Appearance and Prep

10) Experts | 11) Settlements & Mediation

12) Case Management

13) Class Notice

14) Trial Prep
(Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.)

15) Trial | TITLE:

(P) Partner

(A) Associate

(LC) Law Clerk

(SPL) Senior Paralegal

(PL) Paralegal |
|---|---|--|--|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Joseph C. Kohn (P) (2017)																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Douglas A. Abrahams (P) (2017)																0.00	0.00	0.00	\$700.00	\$0.00	\$0.00	\$0.00
Douglas a A. Abrahams (P) (2019)																0.00	0.00	0.00	\$725.00	\$0.00	\$0.00	\$0.00
Douglas A. Abrahams (P) (2021)								5.20								0.00	5.20	5.20	\$725.00	\$0.00	\$3,770.00	\$3,770.00
William E. Hoese (P) (2016)																0.00	0.00	0.00	\$675.00	\$0.00	\$0.00	\$0.00
William E. Hoese (P) (2017)																0.00	0.00	0.00	\$700.00	\$0.00	\$0.00	\$0.00
William E. Hoese (P) (2021)								0.10								0.00	0.10	0.10	\$725.00	\$0.00	\$72.50	\$72.50
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	0.00	5.30	0.00	5.30	5.30		\$0.00	\$3,842.50	\$3,842.50													
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Yohannes T. Ejigu (2016)																0.00	0.00	0.00	\$175.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	0.00		\$0.00	\$0.00	\$0.00															
GRAND TOTAL:	0.00	5.30	0.00	5.30	5.30		\$0.00	\$3,842.50	\$3,842.50													

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: Kohn, Swift & Graf, P.C.****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$100.00		\$100.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00		\$0.00
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$3.10		\$3.10
Photocopies - in House		\$22.50		\$22.50
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$1.30		\$1.30
Travel - Transportation		\$0.00		\$0.00
Travel - Meals, Etc.		\$0.00		\$0.00
Travel - Hotels		\$0.00		\$0.00
Miscellaneous		\$0.00		\$0.00
		\$0.00		
TOTAL EXPENSES		\$126.90	\$0.00	\$126.90
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$126.90	\$0.00	\$126.90

Exhibit 11

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF MINDEE J. RUEBEN IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF LITE DEPALMA GREENBERG &
AFANADOR, LLC**

I, Mindee J. Rueben, declare and state as follows:

1. I am a member with the law firm of Lite DePalma Greenberg & Afanador, LLC. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly

billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 4,097.20 hours. The total lodestar for my firm for that same time period is \$2,580,727.50. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$12,006.99 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/24/2024 at Wynnewood, PA.

DocuSigned by:

Mindee Rueben

AS051938EE3040C...
Mindee J. Rueben

EXHIBIT 1

IN RE BROILER CHICKEN ANITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: Lite Depalma Greenberg & Afanador, LLC Reporting Period: 01/01/2021 - 01/31/2024

- | | | | |
|--|---|--|---|
| Categories:
1) Legal Research
2) Investigation / Factual Research
3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.)
4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing)
6) Class Certification
7) Summary Judgment
8) Appeals
9) Court Appearance and Prep
10) Experts | 11) Settlements & Mediation
12) Case Management
13) Class Notice
14) Trial Prep
(Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.)
15) Trial | TITLE:
(P) Partner
(A) Associate
(LC) Law Clerk
(SPL) Senior Paralegal
(PL) Paralegal |
|--|---|--|---|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Joseph J. DePalma (P) [2017+ rate]			0.30			0.50					1.10	0.40				0.00	2.30	2.30	\$800.00	\$0.00	\$1,840.00	\$1,840.00
Joseph J. DePalma (P)																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Steven J. Greenfogel (C) [2018+ rate]		0.70									1.40			0.20	0.70	0.00	3.00	3.00	\$850.00	\$0.00	\$2,550.00	\$2,550.00
Steven J. Greenfogel (C) [2017+ rate]																0.00	0.00	0.00	\$825.00	\$0.00	\$0.00	\$0.00
Steven J. Greenfogel (C)			0.20													0.00	0.20	0.20	\$800.00	\$0.00	\$160.00	\$160.00
Katrina Carroll (P)																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Mindee J. Rueben (P) [2021+ rate]	30.60	0.60	1,461.70		2.90		1.80		20.40	3.10	4.80	8.00		547.90	381.50	0.00	2,463.30	2,463.30	\$800.00	\$0.00	\$1,970,640.00	\$1,970,640.00
Mindee J. Rueben (C) [2018+ rate]																0.00	0.00	0.00	\$700.00	\$0.00	\$0.00	\$0.00
Mindee J. Rueben (C)																0.00	0.00	0.00	\$675.00	\$0.00	\$0.00	\$0.00
Mindee J. Rueben (C) (doc rev rate)			1.40	0.60												0.00	2.00	2.00	\$350.00	\$0.00	\$700.00	\$700.00
Michael R. Darbee (A)																0.00	0.00	0.00	\$525.00	\$0.00	\$0.00	\$0.00
Michael R. Darbee (A) (doc rev rate)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Nicholas R. Lange (A)																0.00	0.00	0.00	\$525.00	\$0.00	\$0.00	\$0.00
Catherine B. Derenze (A) [2022+ rate]			4.40													0.00	4.40	4.40	\$500.00	\$0.00	\$2,200.00	\$2,200.00
Catherine B. Derenze (A)	12.60		5.10													0.00	17.70	17.70	\$375.00	\$0.00	\$6,637.50	\$6,637.50
Michael J. Scales (A)																0.00	0.00	0.00	\$375.00	\$0.00	\$0.00	\$0.00
Bruce D. Greenberg (P)																0.00	0.00	0.00	\$800.00	\$0.00	\$0.00	\$0.00
Sarah Diyanidh (A)	17.10															0.00	17.10	17.10	\$375.00	\$0.00	\$6,412.50	\$6,412.50
Dana S. Smith (C)	88.60		293.50											54.00		0.00	436.10	436.10	\$675.00	\$0.00	\$294,367.50	\$294,367.50
Anthony Zatkos (A)	27.20															0.00	27.20	27.20	\$350.00	\$0.00	\$9,520.00	\$9,520.00
Comor Wright (A)	17.30															0.00	17.30	17.30	\$375.00	\$0.00	\$6,487.50	\$6,487.50
Nicholas McClelland (A)	20.80															0.00	20.80	20.80	\$375.00	\$0.00	\$7,800.00	\$7,800.00
Emily Fea (A)	5.70															0.00	5.70	5.70	\$375.00	\$0.00	\$2,137.50	\$2,137.50
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	219.90	1.30	1,766.60	0.60	2.90	0.50	1.80	0.00	20.40	3.10	7.30	8.40	0.00	602.10	382.20	0.00	3,017.10	3,017.10		\$0.00	\$2,311,452.50	\$2,311,452.50
NON-ATTORNEYS (LC, SPL, PL)																						
Eric Henley (SPL)			722.40	46.70										256.50	46.80	0.00	1,072.40	1,072.40	\$250.00	\$0.00	\$268,100.00	\$268,100.00
Amanda Cunha (LC)																0.00	0.00	0.00	\$225.00	\$0.00	\$0.00	\$0.00
Elvira Palomino (SPL)			1.70													0.00	1.70	1.70	\$250.00	\$0.00	\$425.00	\$425.00
Nicole Flynn (LC)	1.70	0.20			4.10											0.00	6.00	6.00	\$125.00	\$0.00	\$750.00	\$750.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	1.70	0.20	724.10	46.70	4.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	256.50	46.80	0.00	1,080.10	1,080.10		\$0.00	\$269,275.00	\$269,275.00
GRAND TOTAL:	221.60	1.50	2,490.70	47.30	7.00	0.50	1.80	0.00	20.40	3.10	7.30	8.40	0.00	858.60	429.00	0.00	4,097.20	4,097.20		\$0.00	\$2,580,727.50	\$2,580,727.50

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: Lite Depalma Greenberg & Afanador, LLC****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00	\$566.39	\$566.39
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00		\$0.00
Photocopies - in House		\$0.00		\$0.00
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$0.00		\$0.00
Travel - Transportation		\$0.00	\$1,018.91	\$1,018.91
Travel - Meals, Etc.		\$0.00	\$1,705.74	\$1,705.74
Travel - Hotels		\$0.00	\$8,695.95	\$8,695.95
Miscellaneous		\$0.00	\$20.00	\$20.00
		\$0.00		
TOTAL EXPENSES		\$0.00	\$12,006.99	\$12,006.99
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$12,006.99	\$12,006.99

Exhibit 12

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF SHARON S. ALMONRODE IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF THE MILLER LAW FIRM, P.C.**

I, Sharon S. Almonrode, declare and state as follows:

1. I am a partner with the law firm of The Miller Law Firm, P.C.. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 298.20 hours. The total lodestar for my firm for that same time period is \$207,341.50. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$346.25 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/25/2024 at Rochester, Michigan.

DocuSigned by:

Sharon Almonrode

22EC238826FB440...
Sharon S. Almonrode

EXHIBIT 1

IN RE BROILER CHICKEN ANITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: The Miller Law Firm Reporting Period: 01/01/2021 - 01/31/2024

- | | | | | | |
|--------------------|--|---|--|---------------|--|
| Categories: | 1) Legal Research
2) Investigation / Factual Research
3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.)
4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing)
6) Class Certification
7) Summary Judgment
8) Appeals
9) Court Appearance and Prep
10) Experts | 11) Settlements & Mediation
12) Case Management
13) Class Notice
14) Trial Prep
(Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.)
15) Trial | TITLE: | (P) Partner
(A) Associate
(LC) Law Clerk
(SPL) Senior Paralegal
(PL) Paralegal |
|--------------------|--|---|--|---------------|--|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
E. Powell Miller (P)			4.10								0.70	0.40				0.00	5.20	5.20	\$890.00	\$0.00	\$4,628.00	\$4,628.00
Sharon S. Almonrode (P)			1.70		0.10						0.50	0.30				0.00	2.60	2.60	\$795.00	\$0.00	\$2,067.00	\$2,067.00
Marc L. Newman (P)			0.50													0.00	0.50	0.50	\$750.00	\$0.00	\$375.00	\$375.00
Ann L. Miller (P)																0.00	0.00	0.00	\$690.00	\$0.00	\$0.00	\$0.00
Christopher D. Kaye (P)																0.00	0.00	0.00	\$625.00	\$0.00	\$0.00	\$0.00
Devon P. Allard (P)			284.70									0.80				0.00	285.50	285.50	\$695.00	\$0.00	\$198,422.50	\$198,422.50
Emily Hughes (P)			0.10													0.00	0.10	0.10	\$695.00	\$0.00	\$69.50	\$69.50
Dennis A. Lienhardt (A)			0.20									0.20				0.00	0.40	0.40	\$425.00	\$0.00	\$170.00	\$170.00
Rick A. Decker (A)			0.70													0.00	0.70	0.70	\$465.00	\$0.00	\$325.50	\$325.50
Steven M. Zehnder (A)																0.00	0.00	0.00	\$465.00	\$0.00	\$0.00	\$0.00
Nancy Decker (A)																0.00	0.00	0.00	\$445.00	\$0.00	\$0.00	\$0.00
Deniro D. Lazar (A)																0.00	0.00	0.00	\$295.00	\$0.00	\$0.00	\$0.00
Mariell Lehmann (A)																0.00	0.00	0.00	\$475.00	\$0.00	\$0.00	\$0.00
Kurt Parker (A)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Sydenee M. Rogers (A)																0.00	0.00	0.00	\$285.00	\$0.00	\$0.00	\$0.00
Lowell Johnson (A)																0.00	0.00	0.00	\$495.00	\$0.00	\$0.00	\$0.00
William Kalas (A)			0.30													0.00	0.30	0.30	\$405.00	\$0.00	\$121.50	\$121.50
Daniel Ravitz (A)			2.30									0.20				0.00	2.50	2.50	\$425.00	\$0.00	\$1,062.50	\$1,062.50
Guralczyk, Kristen (A)												0.20				0.00	0.20	0.20	\$325.00	\$0.00	\$65.00	\$65.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	0.00	0.00	294.60	0.00	0.10	0.00	0.00	0.00	0.00	0.00	1.20	2.10	0.00	0.00	0.00	0.00	298.00	298.00		\$0.00	\$207,306.50	\$207,306.50
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Arturo Alfaro (LC)																0.00	0.00	0.00	\$225.00	\$0.00	\$0.00	\$0.00
Danelle Vanderbeke (PL)																0.00	0.00	0.00	\$175.00	\$0.00	\$0.00	\$0.00
Sarah Dablin (PL)																0.00	0.00	0.00	\$175.00	\$0.00	\$0.00	\$0.00
Amy Davis (PL)																0.00	0.00	0.00	\$175.00	\$0.00	\$0.00	\$0.00
Abby Trautmann (PL)												0.20				0.00	0.20	0.20	\$175.00	\$0.00	\$35.00	\$35.00
Licia Bates (PL)																0.00	0.00	0.00	\$175.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.20	0.00	0.00	0.00	0.00	0.20	0.20		\$0.00	\$35.00	\$35.00
GRAND TOTAL:	0.00	0.00	294.60	0.00	0.10	0.00	0.00	0.00	0.00	0.00	1.20	2.30	0.00	0.00	0.00	0.00	298.20	298.20		\$0.00	\$207,341.50	\$207,341.50

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: The Miller Law Firm****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00		\$0.00
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00		\$0.00
Photocopies - in House		\$0.00	\$346.25	\$346.25
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$0.00		\$0.00
Travel - Transportation		\$0.00		\$0.00
Travel - Meals, Etc.		\$0.00		\$0.00
Travel - Hotels		\$0.00		\$0.00
Miscellaneous		\$0.00		\$0.00
		\$0.00		
TOTAL EXPENSES		\$0.00	\$346.25	\$346.25
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$346.25	\$346.25

Exhibit 13

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF LINDA P. NUSSBAUM IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF NUSSBAUM LAW GROUP, P.C.**

I, Linda P. Nussbaum, declare and state as follows:

1. I am managing partner at the law firm of Nussbaum Law Group, P.C.. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 110.60 hours. The total lodestar for my firm for that same time period is \$70,113.00. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$32.25 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/24/2024 at New York, NY.

DocuSigned by:

Linda Nussbaum

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Linda P. Nussbaum

EXHIBIT 1

IN RE BROILER CHICKEN ANITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: NUSSBAUM LAW GROUP, P.C. Reporting Period: 01/01/2021 - 01/31/2024

- | | | | |
|--|---|---|---|
| <p>Categories:</p> <ul style="list-style-type: none"> 1) Legal Research 2) Investigation / Factual Research 3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.) 4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | <ul style="list-style-type: none"> 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing) 6) Class Certification 7) Summary Judgment 8) Appeals 9) Court Appearance and Prep 10) Experts | <ul style="list-style-type: none"> 11) Settlements & Mediation 12) Case Management 13) Class Notice 14) Trial Prep
(Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.) 15) Trial | <p>TITLE:</p> <ul style="list-style-type: none"> (P) Partner (A) Associate (LC) Law Clerk (SPL) Senior Paralegal (PL) Paralegal |
|--|---|---|---|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Linda P. Nussbaum (P)			0.30								1.10					0.00	1.40	1.40	\$995.00	\$0.00	\$1,393.00	\$1,393.00
Linda P. Nussbaum (P)																0.00	0.00	0.00	\$950.00	\$0.00	\$0.00	\$0.00
Linda P. Nussbaum (P)																0.00	0.00	0.00	\$925.00	\$0.00	\$0.00	\$0.00
Susan R. Schwaiger (OC)			0.30													0.00	0.30	0.30	\$750.00	\$0.00	\$225.00	\$225.00
Susan R. Schwaiger (OC) (Doc Review)			102.10													0.00	102.10	102.10	\$650.00	\$0.00	\$66,365.00	\$66,365.00
Bart D. Cohen (P)												0.40				0.00	0.40	0.40	\$925.00	\$0.00	\$370.00	\$370.00
Bart D. Cohen (P)																0.00	0.00	0.00	\$900.00	\$0.00	\$0.00	\$0.00
Bart D. Cohen (P)																0.00	0.00	0.00	\$875.00	\$0.00	\$0.00	\$0.00
Bart D. Cohen (P)																0.00	0.00	0.00	\$850.00	\$0.00	\$0.00	\$0.00
Bradley J. Demuth (P)																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Peter Moran (A)																0.00	0.00	0.00	\$675.00	\$0.00	\$0.00	\$0.00
Hugh D. Sandler (A)																0.00	0.00	0.00	\$650.00	\$0.00	\$0.00	\$0.00
Hugh D. Sandler (A)																0.00	0.00	0.00	\$625.00	\$0.00	\$0.00	\$0.00
Hoyoung Yang (A)																0.00	0.00	0.00	\$425.00	\$0.00	\$0.00	\$0.00
Daniel M. Trieff (A)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Jason Young (CL)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Abraham Schmilowitz (CL)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	0.00	0.00	102.70	0.00	1.10	0.40	0.00	0.00	0.00	0.00	104.20	104.20		\$0.00	\$68,353.00	\$68,353.00						
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Benjamin M. Alpert (PL)																0.00	0.00	0.00	\$225.00	\$0.00	\$0.00	\$0.00
Zachary Shutran (PL)																0.00	0.00	0.00	\$325.00	\$0.00	\$0.00	\$0.00
Zachary Shutran (PL)																0.00	0.00	0.00	\$200.00	\$0.00	\$0.00	\$0.00
Lauren Kostman (PL)																0.00	0.00	0.00	\$150.00	\$0.00	\$0.00	\$0.00
Omri Gildor (PL)																0.00	0.00	0.00	\$150.00	\$0.00	\$0.00	\$0.00
Donald Roper (PL)																0.00	0.00	0.00	\$325.00	\$0.00	\$0.00	\$0.00
Donald Roper (PL)																0.00	0.00	0.00	\$200.00	\$0.00	\$0.00	\$0.00
Matthew Kamnier (PL)																0.00	0.00	0.00	\$175.00	\$0.00	\$0.00	\$0.00
Vivian Lee (PL)												6.40				0.00	6.40	6.40	\$275.00	\$0.00	\$1,760.00	\$1,760.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6.40	0.00	0.00	0.00	0.00	6.40	6.40		\$0.00	\$1,760.00	\$1,760.00
GRAND TOTAL:	0.00	0.00	102.70	0.00	1.10	6.80	0.00	0.00	0.00	0.00	110.60	110.60		\$0.00	\$70,113.00	\$70,113.00						

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: NUSSBAUM LAW GROUP, P.C.****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00		\$0.00
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00	\$9.65	\$9.65
Photocopies - in House		\$0.00	\$22.60	\$22.60
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$0.00		\$0.00
Travel - Transportation		\$0.00		\$0.00
Travel - Meals, Etc.		\$0.00		\$0.00
Travel - Hotels		\$0.00		\$0.00
Miscellaneous		\$0.00		\$0.00
		\$0.00		
TOTAL EXPENSES		\$0.00	\$32.25	\$32.25
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$32.25	\$32.25

Exhibit 14

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF GARRETT D. BLANCHFIELD IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF REINHARDT WENDORF &
BLANCHFIELD**

I, Garrett D. Blanchfield, declare and state as follows:

1. I am a partner with the law firm of Reinhardt Wendorf & Blanchfield. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly

billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 0.80 hours. The total lodestar for my firm for that same time period is \$604.00. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$16.80 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/24/2024 at St. Paul, Minnesota.

DocuSigned by:

Garrett Blanchfield

FD98BF47E8184A3...
Garrett D. Blanchfield

EXHIBIT 1

IN RE BROILER CHICKEN ANTITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: REINHARDT WENDORF & BLANCHFIELD Reporting Period: 01/01/2021 - 01/31/2024

- | | | | |
|---|---|--|---|
| Categories:

1) Legal Research

2) Investigation / Factual Research

3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.)

4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing)

6) Class Certification

7) Summary Judgment

8) Appeals

9) Court Appearance and Prep

10) Experts | 11) Settlements & Mediation

12) Case Management

13) Class Notice

14) Trial Prep
(Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.)

15) Trial | <u>TITLE:</u>

(P) Partner

(A) Associate

(LC) Law Clerk

(SPL) Senior Paralegal

(PL) Paralegal |
|---|---|--|---|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Blanchfield, Garrett (P)					0.80											0.00	0.80	0.80	\$755.00	\$0.00	\$604.00	\$604.00
Reinhardt, Mark (P)																0.00	0.00	0.00	\$910.00	\$0.00	\$0.00	\$0.00
Wendorf, Mark (P)																0.00	0.00	0.00	\$860.00	\$0.00	\$0.00	\$0.00
Penney, Brant (P)																0.00	0.00	0.00	\$495.00	\$0.00	\$0.00	\$0.00
Yard, Roberta (P)																0.00	0.00	0.00	\$495.00	\$0.00	\$0.00	\$0.00
Hayes, Lisa (A)																0.00	0.00	0.00	\$440.00	\$0.00	\$0.00	\$0.00
Shannon, Gerard (A)																0.00	0.00	0.00	\$420.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	0.00	0.00	0.00	0.00	0.80	0.00	0.80	0.80		\$0.00	\$604.00	\$604.00										
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Kosek, Shirley (PL)																0.00	0.00	0.00	\$250.00	\$0.00	\$0.00	\$0.00
Schulte, Kathy (PL)																0.00	0.00	0.00	\$50.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	0.00		\$0.00	\$0.00	\$0.00															
GRAND TOTAL:	0.00	0.00	0.00	0.00	0.80	0.00	0.80	0.80		\$0.00	\$604.00	\$604.00										

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: REINHARDT WENDORF & BLANCHFIELD****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00		\$0.00
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00	\$16.80	\$16.80
Photocopies - in House		\$0.00		\$0.00
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$0.00		\$0.00
Travel - Transportation		\$0.00		\$0.00
Travel - Meals, Etc.		\$0.00		\$0.00
Travel - Hotels		\$0.00		\$0.00
Miscellaneous		\$0.00		\$0.00
		\$0.00		
TOTAL EXPENSES		\$0.00	\$16.80	\$16.80
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$16.80	\$16.80

Exhibit 15

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF ARTHUR N. BAILEY IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF RUPP PFALZGRAF, LLC**

I, Arthur N. Bailey, declare and state as follows:

1. I am a partner with the law firm of Rupp Pfalzgraf, LLC. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 57.90 hours. The total lodestar for my firm for that same time period is \$25,200.50. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$0.49 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/25/2024 at Jamestown, NY.

DocuSigned by:

Arthur Bailey

3D9254DF22504C9
Arthur N. Bailey

EXHIBIT 1

IN RE BROILER CHICKEN ANTITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: RUPP PFALZGRAF, LLC Reporting Period: 01/01/2021 - 01/31/2024

- | | | | |
|---|---|--|--|
| Categories:
1) Legal Research
2) Investigation / Factual Research
3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.)
4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing)
6) Class Certification
7) Summary Judgment
8) Appeals
9) Court Appearance and Prep
10) Experts | 11) Settlements & Mediation
12) Case Management
13) Class Notice
14) Trial Prep
(Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.)
15) Trial | TITLE:
(P) Partner
(A) Associate
(LC) Law Clerk
(SPL) Senior Paralegal
(PL) Paralegal |
|---|---|--|--|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Arthur N. Bailey (P)*			1.40								3.70	38.10		1.00		0.00	44.20	44.20	\$450.00	\$0.00	\$20,088.00	\$20,088.00
Marco Cercone (P)*		0.20										12.40				0.00	12.60	12.60	\$425, \$450, \$475	\$0.00	\$4,837.50	\$4,837.50
David R. Pfalzgraf (P)																0.00	0.00	0.00	\$395.00	\$0.00	\$0.00	\$0.00
Anthony G. Marecki (P)																0.00	0.00	0.00	\$250.00	\$0.00	\$0.00	\$0.00
Name (A)																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	0.00	0.20	1.40	0.00	3.70	50.50	0.00	1.00	0.00	0.00	56.80	56.80		\$0.00	\$24,925.50	\$24,925.50						
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Theresa Hobbs (PL)												1.10				0.00	1.10	1.10	\$250.00	\$0.00	\$275.00	\$275.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	1.10	0.00	0.00	0.00	0.00	1.10	1.10		\$0.00	\$275.00	\$275.00										
GRAND TOTAL:	0.00	0.20	1.40	0.00	3.70	51.60	0.00	1.00	0.00	0.00	57.90	57.90		\$0.00	\$25,200.50	\$25,200.50						

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: RUPP BAASE PFALZGRAF CUNNINGHAM****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00		\$0.00
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00		\$0.00
Photocopies - in House		\$0.00	\$0.49	\$0.49
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$0.00		\$0.00
Travel - Transportation		\$0.00		\$0.00
Travel - Meals, Etc.		\$0.00		\$0.00
Travel - Hotels		\$0.00		\$0.00
Miscellaneous		\$0.00		\$0.00
		\$0.00		
TOTAL EXPENSES		\$0.00	\$0.49	\$0.49
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$0.49	\$0.49

Exhibit 16

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF R. ALEXANDER SAVERI IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF SAVERI & SAVERI, INC.**

I, R. Alexander Saveri, declare and state as follows:

1. I am the managing partner at the law firm of Saveri & Saveri, Inc.. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 1,132.05 hours. The total lodestar for my firm for that same time period is \$732,993.75. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$574.72 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/24/2024 at San Francisco, California.

DocuSigned by:

R. Alexander Saveri

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R. Alexander Saveri

EXHIBIT 1

IN RE BROILER CHICKEN ANITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: SAVERI & SAVERI, INC. Reporting Period: 01/01/2021 - 01/31/2024

- | | | | |
|--|---|---|---|
| <p>Categories:</p> <ul style="list-style-type: none"> 1) Legal Research 2) Investigation / Factual Research 3) Discovery
(Written / Deposition Taking & Defending / Meet & Confer / etc.) 4) Document Review
(Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review) | <ul style="list-style-type: none"> 5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing) 6) Class Certification 7) Summary Judgment 8) Appeals 9) Court Appearance and Prep 10) Experts | <ul style="list-style-type: none"> 11) Settlements & Mediation 12) Case Management 13) Class Notice 14) Trial Prep
(Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.) 15) Trial | <p>TITLE:</p> <ul style="list-style-type: none"> (P) Partner (A) Associate (LC) Law Clerk (SPL) Senior Paralegal (PL) Paralegal |
|--|---|---|---|

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Guido Saveri (P)																0.00	0.00	0.00	\$950.00	\$0.00	\$0.00	\$0.00
R. Alexander Saveri (P)																0.00	0.00	0.00	\$700.00	\$0.00	\$0.00	\$0.00
Cadio Zarpoli (P)			662.35													0.00	662.35	662.35	\$775.00	\$0.00	\$513,321.25	\$513,321.25
Cadio Zarpoli (P)																0.00	0.00	0.00	\$650.00	\$0.00	\$0.00	\$0.00
Carl Hammarskjold (A)																0.00	0.00	0.00	\$400.00	\$0.00	\$0.00	\$0.00
Lisa Saveri (P)																0.00	0.00	0.00	\$775.00	\$0.00	\$0.00	\$0.00
Lisa Saveri (P)																0.00	0.00	0.00	\$675.00	\$0.00	\$0.00	\$0.00
Matthew Heaphy (A)																0.00	0.00	0.00	\$600.00	\$0.00	\$0.00	\$0.00
Matthew Heaphy (A)																0.00	0.00	0.00	\$475.00	\$0.00	\$0.00	\$0.00
Sarah Van Culin (A)			420.50		1.40				2.00							0.00	423.90	423.90	\$475.00	\$0.00	\$201,352.50	\$201,352.50
Sarah Van Culin (A)																0.00	0.00	0.00	\$400.00	\$0.00	\$0.00	\$0.00
Travis Manfredi (A)			45.80													0.00	45.80	45.80	\$400.00	\$0.00	\$18,320.00	\$18,320.00
Anjalee Behni (A)																0.00	0.00	0.00	\$400.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	0.00	0.00	1,128.65	0.00	1.40	0.00	0.00	0.00	2.00	0.00	1,132.05	1,132.05		\$0.00	\$732,993.75	\$732,993.75						
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Mary Basile (LC)																0.00	0.00	0.00	\$225.00	\$0.00	\$0.00	\$0.00
Anjalee Behni (LC)																0.00	0.00	0.00	\$250.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
GRAND TOTAL:	0.00	0.00	1,128.65	0.00	1.40	0.00	0.00	0.00	2.00	0.00	1,132.05	1,132.05		\$0.00	\$732,993.75	\$732,993.75						

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: SAVERI & SAVERI, INC.****REPORTING PERIOD:** 01/01/2021 - 01/31/2024

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00	\$574.72	\$574.72
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00		\$0.00
Photocopies - in House		\$0.00		\$0.00
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$0.00		\$0.00
Travel - Transportation		\$0.00		\$0.00
Travel - Meals, Etc.		\$0.00		\$0.00
Travel - Hotels		\$0.00		\$0.00
Miscellaneous		\$0.00		\$0.00
		\$0.00		
TOTAL EXPENSES		\$0.00	\$574.72	\$574.72
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$574.72	\$574.72

Exhibit 17

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF WILLIAM G. CALDES IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF
SPECTOR ROSEMAN & KODROFF, P.C.**

I, William G. Caldes, declare and state as follows:

1. I am a partner with the law firm of Spector Roseman & Kodroff, P.C. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly

billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 3,843.70 hours. The total lodestar for my firm for that same time period is \$2,947,942.50. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$52,470.91 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/24/2024 at Philadelphia, Pa.

DocuSigned by:

William Caldes

A82EBF16B8A146A...
William G. Caldes

EXHIBIT 1

IN RE BROILER CHICKEN ANTITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: **SPECTOR ROSEMAN & KODROFF, PC** Reporting Period: **01/01/2021 - 01/31/2024**

Categories: 1) Legal Research 2) Investigation / Factual Research 3) Discovery (Written / Deposition Taking & Defending / Meet & Confer / etc.) 4) Document Review (Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review)	5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing) 6) Class Certification 7) Summary Judgment 8) Appeals 9) Court Appearance and Prep 10) Experts	11) Settlements & Mediation 12) Case Management 13) Class Notice 14) Trial Prep (Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.) 15) Trial	TITLE: (P) Partner (A) Associate (LC) Law Clerk (SPL) Senior Paralegal (PL) Paralegal
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ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
EUGENE SPECTOR (P)										0.20						0.00	0.20	0.20	\$985.00	\$0.00	\$197.00	\$197.00
EUGENE SPECTOR (P) 2022			5.00							5.50		0.20				0.00	10.70	10.70	\$1,015.00	\$0.00	\$10,860.50	\$10,860.50
JON JAGHER (P)																0.00	0.00	0.00	\$585.00	\$0.00	\$0.00	\$0.00
JEFFREY SPECTOR (P)			6.30	5.10	20.10					163.30	0.40	1.90				0.00	197.10	196.60	\$590.00	\$0.00	\$116,289.00	\$116,289.00
JEFFREY SPECTOR (P) 2022			0.20	2.00	40.10					225.50			43.10			0.00	310.90	310.90	\$725.00	\$0.00	\$225,402.50	\$225,402.50
JEFFREY SPECTOR (P) 2022			2.40	49.60					1.10	368.30	0.60	5.60	0.20			0.00	427.80	427.80	\$825.00	\$0.00	\$352,935.00	\$352,935.00
JEFFREY SPECTOR (P) 2023								0.50								0.00	0.50	0.50	\$850.00	\$0.00	\$425.00	\$425.00
WILLIAM CALDES (P)													0.30			0.00	0.30	0.30	\$775.00	\$0.00	\$232.50	\$232.50
WILLIAM CALDES (P) 2022					1.20			0.10						0.10		0.00	1.40	1.40	\$900.00	\$0.00	\$1,260.00	\$1,260.00
WILLIAM CALDES (P) 2023			0.50	0.60					0.10	1.20	0.10	1.40				0.00	4.50	4.50	\$975.00	\$0.00	\$4,387.50	\$4,387.50
JEFFREY CORRIGAN (P)			12.00			27.00			2.80	214.00						0.00	255.80	256.00	\$895.00	\$0.00	\$228,941.00	\$228,941.00
JEFFREY CORRIGAN (P) 2022				2.40	3.20				35.00	616.50						0.00	657.10	657.10	\$935.00	\$0.00	\$614,388.50	\$614,388.50
JEFFREY CORRIGAN (P) 2022/2023				78.80				4.10	603.70	109.00	0.50	0.60		207.90		0.00	1,004.60	1,004.60	\$975.00	\$0.00	\$979,485.00	\$979,485.00
RACHEL KOPP (A)																0.00	0.00	0.00	\$500.00	\$0.00	\$0.00	\$0.00
RACHEL KOPP (A) 2023												0.10				0.00	0.10	0.10	\$650.00	\$0.00	\$65.00	\$65.00
DONALD SAWYER (OC)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
KEVIN MANYIN (OC)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
ICEE ETHRIDGE (A)			46.50							70.50						0.00	117.00	117.00	\$480.00	\$0.00	\$56,160.00	\$56,160.00
ICEE ETHRIDGE (A) 2023			0.10									1.50				0.00	1.60	1.60	\$575.00	\$0.00	\$920.00	\$920.00
JOHN MACORETTA (P)												2.00				0.00	2.00	2.00	\$825.00	\$0.00	\$1,650.00	\$1,650.00
CARY ZHANG (A)		7.50	5.20		208.00					432.60		42.40				0.00	695.70	695.70	\$450.00	\$0.00	\$313,065.00	\$313,065.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	0.00	7.50	78.20	0.00	347.70	90.40	0.00	4.70	642.70	2,206.60	1.60	56.00	43.40	207.90	0.00	0.00	3,687.30	3,687.00		\$0.00	\$2,906,663.50	\$2,906,663.50
NON-ATTORNEYS (LC, SPL, PL)																PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Chales Briglia (PL)																0.00	0.00	0.00	\$240.00	\$0.00	\$0.00	\$0.00
Gerri De Marshall (PL)			7.50													0.00	7.50	7.50	\$280.00	\$0.00	\$2,100.00	\$2,100.00
Gerri De Marshall (PL) 2022			79.10													0.00	79.10	79.10	\$310.00	\$0.00	\$24,521.00	\$24,521.00
Mary Casper (LC)			3.00	18.30												0.00	21.30	21.30	\$210.00	\$0.00	\$4,473.00	\$4,473.00
Alex Iozzo (PL)			34.50							12.50						0.00	47.00	47.00	\$210.00	\$0.00	\$9,870.00	\$9,870.00
BRISTOW, FLORENCE (PL)												1.50				0.00	1.50	1.50	\$210.00	\$0.00	\$315.00	\$315.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	124.10	0.00	18.30	0.00	0.00	0.00	0.00	12.50	0.00	1.50	0.00	0.00	0.00	0.00	156.40	156.40		\$0.00	\$41,279.00	\$41,279.00
GRAND TOTAL:	0.00	7.50	202.30	0.00	366.00	90.40	0.00	4.70	642.70	2219.10	1.60	57.50	43.40	207.90	0.00	0.00	3,843.70	3,843.40		\$0.00	\$2,947,942.50	\$2,947,942.50

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: SPECTOR ROSEMAN & KODROFF, PC****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00	\$150.00	\$150.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00	\$728.17	\$728.17
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00	\$20,275.72	\$20,275.72
Photocopies - in House		\$0.00	\$4,802.75	\$4,802.75
Photocopies - Outside		\$0.00	\$908.08	\$908.08
Telephone/telecopier		\$0.00		\$0.00
Travel - Transportation		\$0.00	\$9,795.19	\$9,795.19
Travel - Meals, Etc.		\$0.00	\$1,045.82	\$1,045.82
Travel - Hotels		\$0.00	\$14,008.88	\$14,008.88
Miscellaneous		\$0.00	\$756.30	\$756.30
		\$0.00		
TOTAL EXPENSES		\$0.00	\$52,470.91	\$52,470.91
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$52,470.91	\$52,470.91

Exhibit 18

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

<p>IN RE BROILER CHICKEN ANTITRUST LITIGATION</p> <p>This Document Relates To: Direct Purchaser Actions</p>	<p>Case No. 1:16-cv-08637</p> <p>The Honorable Thomas M. Durkin</p> <p>Magistrate Judge Jeffrey T. Gilbert</p>
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**DECLARATION OF ALLAN STEYER IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND CLASS REPRESENTATIVE
SERVICE AWARDS FILED ON BEHALF OF
STEYER LOWENTHAL BOODROOKAS ALVAREZ & SMITH LLP**

I, Allan Steyer, declare and state as follows:

1. I am a partner with the law firm of Steyer Lowenthal Boodrookas Alvarez & Smith LLP. I submit this Declaration in support of Direct Purchaser Plaintiffs' ("DPPs") Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards in connection with services rendered and expenses incurred by my firm in this litigation.

2. My firm has acted as counsel to DPPs and the Direct Purchaser Plaintiff Class. During the period from case inception through January 31, 2024, my firm worked on assignments that it was specifically directed to perform by Court-appointed Co-Lead Class Counsel.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the lawyers and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation based on my firm's historic hourly

billing rates (except for work done on document review which is capped at \$350 per hour) from January 1, 2021, through January 31, 2024.

4. As detailed in Exhibit 1, the total number of hours expended on this litigation by my firm from January 1, 2021, through January 31, 2024, is 142.20 hours. The total lodestar for my firm for that same time period is \$150,241.00. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. I determined my firm's total hours and lodestar by examining contemporaneous, daily time records regularly prepared and maintained by my firm.

5. As detailed in Exhibit 2, my firm has incurred a total of \$1,504.82 in unreimbursed reasonable and necessary litigation expenses during the period from January 1, 2021, through January 31, 2024. These expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Co-Lead Class Counsel.

6. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent an accurate recordation of the expenses incurred.

7. In November 2016, shortly after this litigation was commenced, Co-Lead Class Counsel sent us the Court's approved time and expense reporting protocols. In the course of this litigation, my firm has abided by these protocols as we have performed work and incurred expenses in the case. During this litigation my firm regularly reported our time, lodestar, and expenses to Co-Lead Class Counsel. My firm's submission of its compensable time and reimbursable expenses in this declaration and its exhibits comport with these Court-approved time and expense reporting protocols.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 4/23/2024 at San Francisco, California.

DocuSigned by:



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Allan Steyer

EXHIBIT 1

IN RE BROILER CHICKEN ANITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

Firm Name: Steyer Lowenthal et al. Reporting Period: 01/01/2021 - 01/31/2024

Categories: 1) Legal Research 2) Investigation / Factual Research 3) Discovery (Written / Deposition Taking & Defending / Meet & Confer / etc.) 4) Document Review (Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review)	5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing) 6) Class Certification 7) Summary Judgment 8) Appeals 9) Court Appearance and Prep 10) Experts	11) Settlements & Mediation 12) Case Management 13) Class Notice 14) Trial Prep (Exhibit & Witness List/Jury Instruction/ Voir Dire/Opening Statements/Closing Arguments/Demonstratives/etc.) 15) Trial	TITLE: (P) Partner (A) Associate (LC) Law Clerk (SPL) Senior Paralegal (PL) Paralegal
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ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Allan Steyer (P) 2015																0.00	0.00	0.00	\$880.00	\$0.00	\$0.00	\$0.00
Allan Steyer (P) 2016																0.00	0.00	0.00	\$895.00	\$0.00	\$0.00	\$0.00
Allan Steyer (P) 2017																0.00	0.00	0.00	\$980.00	\$0.00	\$0.00	\$0.00
Allan Steyer (P) 2018																0.00	0.00	0.00	\$980.00	\$0.00	\$0.00	\$0.00
Allan Steyer (P) 2019																0.00	0.00	0.00	\$995.00	\$0.00	\$0.00	\$0.00
Allan Steyer (P) 2020																0.00	0.00	0.00	\$1,060.00	\$0.00	\$0.00	\$0.00
Allan Steyer (P) 2021						38.90					2.10	0.70				0.00	41.70	41.70	\$1,100.00	\$0.00	\$45,870.00	\$45,870.00
Allan Steyer (P) 2022												0.10				0.00	0.10	0.10	\$1,180.00	\$0.00	\$118.00	\$118.00
Allan Steyer (P) 2023								1.80			2.20	3.60			2.30	0.00	10.50	10.50	\$1,350.00	\$0.00	\$14,175.00	\$14,175.00
Jill M. Manning (P) 2015																0.00	0.00	0.00	\$720.00	\$0.00	\$0.00	\$0.00
Jill M. Manning (P) 2016																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Jill M. Manning (P) 2017																0.00	0.00	0.00	\$800.00	\$0.00	\$0.00	\$0.00
Jill M. Manning (P) 2018																0.00	0.00	0.00	\$820.00	\$0.00	\$0.00	\$0.00
Jill M. Manning (P) 2019																0.00	0.00	0.00	\$880.00	\$0.00	\$0.00	\$0.00
Jill M. Manning (P) 2020																0.00	0.00	0.00	\$910.00	\$0.00	\$0.00	\$0.00
Jill M. Manning (P) 2021						12.00										0.00	12.00	12.00	\$960.00	\$0.00	\$11,520.00	\$11,520.00
D. Scott Macrae (P) 2015																0.00	0.00	0.00	\$810.00	\$0.00	\$0.00	\$0.00
D. Scott Macrae (P) 2016																0.00	0.00	0.00	\$850.00	\$0.00	\$0.00	\$0.00
D. Scott Macrae (P) 2017																0.00	0.00	0.00	\$895.00	\$0.00	\$0.00	\$0.00
D. Scott Macrae (P) 2018																0.00	0.00	0.00	\$920.00	\$0.00	\$0.00	\$0.00
D. Scott Macrae (P) 2019																0.00	0.00	0.00	\$960.00	\$0.00	\$0.00	\$0.00
D. Scott Macrae (P) 2020																0.00	0.00	0.00	\$990.00	\$0.00	\$0.00	\$0.00
D. Scott Macrae (P) 2021						72.20										0.00	72.20	72.20	\$1,040.00	\$0.00	\$75,088.00	\$75,088.00
D. Scott Macrae (P) 2022												0.70				0.00	0.70	0.70	\$1,100.00	\$0.00	\$770.00	\$770.00
Alexander D. Kullar (A) 2018																0.00	0.00	0.00	\$610.00	\$0.00	\$0.00	\$0.00
Jill K. Cohoe											5.00					0.00	5.00	5.00	\$540.00	\$0.00	\$2,700.00	\$2,700.00
Kristopher M. DiGiovanni (A)																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Suneel Jain (A) Dec 2016																0.00	0.00	0.00	\$240.00	\$0.00	\$0.00	\$0.00
Suneel Jain (A) 2017																0.00	0.00	0.00	\$340.00	\$0.00	\$0.00	\$0.00
Suneel Jain (A) 2019																0.00	0.00	0.00	\$390.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	123.10	0.00	0.00	1.80	0.00	9.30	5.10	0.00	0.00	2.30	0.00	142.20	142.20		\$0.00	\$150,241.00	\$150,241.00
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Suneel Jain (SPL)																0.00	0.00	0.00	\$240.00	\$0.00	\$0.00	\$0.00
Adison Marshall (PL) 2016																0.00	0.00	0.00	\$195.00	\$0.00	\$0.00	\$0.00
Adison Marshall (PL) 2017																0.00	0.00	0.00	\$240.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
GRAND TOTAL:	0.00	0.00	0.00	0.00	0.00	123.10	0.00	0.00	1.80	0.00	9.30	5.10	0.00	0.00	2.30	0.00	142.20	142.20		\$0.00	\$150,241.00	\$150,241.00

EXHIBIT 2

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: Steyer Lowenthal et al.****REPORTING PERIOD: 01/01/2021 - 01/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00		\$0.00
Postage / U.S. Mail		\$0.00		\$0.00
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00		\$0.00
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00	\$1,504.82	\$1,504.82
Photocopies - in House		\$0.00		\$0.00
Photocopies - Outside		\$0.00		\$0.00
Telephone/telecopier		\$0.00		\$0.00
Travel - Transportation		\$0.00		\$0.00
Travel - Meals, Etc.		\$0.00		\$0.00
Travel - Hotels		\$0.00		\$0.00
Miscellaneous		\$0.00		\$0.00
		\$0.00		
TOTAL EXPENSES		\$0.00	\$1,504.82	\$1,504.82
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$1,504.82	\$1,504.82

Exhibit 19

IN RE BROILER CHICKEN ANTITRUST LITIGATION
TIME REPORT - (To be submitted on the 20th of every month)

Firm Name:	<u>Lockridge Grindal Nauen PLLP</u>	Reporting Period:	<u>1/1/2021 - 03/31/2024</u>
Categories:	1) Legal Research 2) Investigation / Factual Research 3) Discovery (Written / Deposition Taking & Defending / Meet & Confer / etc.) 4) Document Review (Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review)	5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing) 6) Class Certification 7) Summary Judgment 8) Appeals 9) Court Appearance and Prep 10) Experts	11) Settlements & Mediation 12) Case Management 13) Class Notice 14) Trial Prep (Exhibit & Witness List/Jury Instruction/Vior Dire/Opening Statements/Closing Arguments/Demonstratives/etc.) 15) Trial
			TITLE:
			(P) Partner (A) Associate (LC) Law Clerk (SPL) Senior Paralegal (PL) Paralegal

ATTORNEYS (P, A)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR
Richard A. Lockridge (P)																0.00	0.00	0.00	\$900.00	\$0.00	\$0.00	\$0.00
W. Joseph Bruckner (P) 2024					15.00			9.00	2.50		39.70	1.50			5.80	0.00	73.50	73.50	\$1,225.00	\$0.00	\$90,037.50	\$90,037.50
W. Joseph Bruckner (P) 2023			1.50	2.50	2.00	0.50	78.30		1.50	24.00	144.40	26.50	7.90	529.80	516.00	0.00	1,334.90	1,334.90	\$1,175.00	\$0.00	\$1,568,507.50	\$1,568,507.50
W. Joseph Bruckner (P) 2022			36.00		25.50	238.00	11.50	0.50	56.50	365.45	23.80	18.50	2.30	74.30		0.00	852.35	852.35	\$1,150.00	\$0.00	\$980,202.50	\$980,202.50
W. Joseph Bruckner (P) 2021	0.50		47.00		130.00	370.00			90.50	69.50	168.60	56.50	5.00	96.50		0.00	1,034.10	1,034.10	\$1,050.00	\$0.00	\$1,085,805.00	\$1,085,805.00
W. Joseph Bruckner (P)																0.00	0.00	0.00	\$950.00	\$0.00	\$0.00	\$0.00
W. Joseph Bruckner (P)																0.00	0.00	0.00	\$925.00	\$0.00	\$0.00	\$0.00
W. Joseph Bruckner (P)																0.00	0.00	0.00	\$875.00	\$0.00	\$0.00	\$0.00
W. Joseph Bruckner (P)																0.00	0.00	0.00	\$850.00	\$0.00	\$0.00	\$0.00
Charles N. Nauen (P) 2023														10.80	0.70	0.00	11.50	11.50	\$1,175.00	\$0.00	\$13,512.50	\$13,512.50
Charles N. Nauen (P)																0.00	0.00	0.00	\$875.00	\$0.00	\$0.00	\$0.00
Charles N. Nauen (P)																0.00	0.00	0.00	\$850.00	\$0.00	\$0.00	\$0.00
Heidi M. Sifton (P)																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Elizabeth R. Odette (P)																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Elizabeth R. Odette (P)																0.00	0.00	0.00	\$650.00	\$0.00	\$0.00	\$0.00
Elizabeth R. Odette (P)																0.00	0.00	0.00	\$600.00	\$0.00	\$0.00	\$0.00
Elizabeth R. Odette (P)																0.00	0.00	0.00	\$575.00	\$0.00	\$0.00	\$0.00
Elizabeth R. Odette (P)																0.00	0.00	0.00	\$550.00	\$0.00	\$0.00	\$0.00
H. Theodore Grindal (P)																0.00	0.00	0.00	\$810.00	\$0.00	\$0.00	\$0.00
Gregory J. Myers (P)																0.00	0.00	0.00	\$625.00	\$0.00	\$0.00	\$0.00
David J. Zoll (P) 2023														2.80	2.30	0.00	5.10	5.10	\$975.00	\$0.00	\$4,972.50	\$4,972.50
David J. Zoll (P)																0.00	0.00	0.00	\$625.00	\$0.00	\$0.00	\$0.00
Robert J. Schmit (P)																0.00	0.00	0.00	\$725.00	\$0.00	\$0.00	\$0.00
Robert J. Schmit (P) at doc review rate cap																0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00
Karen H. Riebel (P)													0.80			0.00	0.80	0.80	\$950.00	\$0.00	\$760.00	\$760.00
Karen H. Riebel (P)																0.00	0.00	0.00	\$850.00	\$0.00	\$0.00	\$0.00
Anna M. Horning Nygren (P)																0.00	0.00	0.00	\$600.00	\$0.00	\$0.00	\$0.00
Anna M. Horning Nygren (P)																0.00	0.00	0.00	\$575.00	\$0.00	\$0.00	\$0.00
Brian D. Clark (P) 2024								6.90			20.30	12.80				0.00	40.00	40.00	\$1,100.00	\$0.00	\$44,000.00	\$44,000.00
Brian D. Clark (P) 2023			5.70		2.50	0.40	86.90	2.30	56.10	1.00	131.40	14.90	3.70	1,344.20	324.20	0.00	1,973.30	1,973.30	\$975.00	\$0.00	\$1,923,967.50	\$1,923,967.50
Brian D. Clark (P) 2022			79.80		17.50	13.60	12.30	1.10	49.40	22.00	19.10	25.30	1.60	75.60	0.90	0.00	318.20	318.20	\$925.00	\$0.00	\$294,335.00	\$294,335.00
Brian D. Clark (P) 2021			135.50		51.40	9.20			24.1	28.30	227.30	45.20	16.20	8.40		0.00	545.60	545.60	\$850.00	\$0.00	\$463,760.00	\$463,760.00
Brian D. Clark (P)																0.00	0.00	0.00	\$750.00	\$0.00	\$0.00	\$0.00
Brian D. Clark (P)																0.00	0.00	0.00	\$625.00	\$0.00	\$0.00	\$0.00
Brian D. Clark (P)																0.00	0.00	0.00	\$575.00	\$0.00	\$0.00	\$0.00
Brian D. Clark (A)																0.00	0.00	0.00	\$500.00	\$0.00	\$0.00	\$0.00
Kyle J. Pozan (A) 2024								1.40	0.50			0.10				0.00	2.00	2.00	\$925.00	\$0.00	\$1,850.00	\$1,850.00
Kyle J. Pozan (A) 2023			58.00		16.00	0.40	169.00		100.10	13.20	1.10	8.30		530.80	387.90	0.00	1,284.80	1,284.80	\$850.00	\$0.00	\$1,092,080.00	\$1,092,080.00
Kyle J. Pozan (A) 2022		0.20	633.60	0.30	68.10	101.40	182.30	6.00	36.30	89.20	3.10	24.20		13.30		0.00	1,158.00	1,158.00	\$800.00	\$0.00	\$926,400.00	\$926,400.00
Kyle J. Pozan (A) 2021	5.10	0.20	102.60		121.30	1.20	21.60		7.60	26.90	33.20	29.30	0.90	20.30		0.00	370.20	370.20	\$750.00	\$0.00	\$277,650.00	\$277,650.00
Rick N. Linsk (A)																0.00	0.00	0.00	\$525.00	\$0.00	\$0.00	\$0.00
Rick N. Linsk (A)																0.00	0.00	0.00	\$450.00	\$0.00	\$0.00	\$0.00
Craig S. Davis (A)	10.50															0.00	10.50	10.50	\$725.00	\$0.00	\$7,612.50	\$7,612.50

Craig S., Davis (A)																		0.00	0.00	0.00	\$700.00	\$0.00	\$0.00	\$0.00										
Craig S., Davis (A) 2022																		57.60			\$785.00	\$0.00	\$45,216.00	\$45,216.00										
Devona L. Wells (A)																				0.00	0.00	0.00	\$450.00	\$0.00	\$0.00	\$0.00								
Rachel A. KitzeCollins (A)																				0.00	0.00	0.00	\$475.00	\$0.00	\$0.00	\$0.00								
Rachel A. KitzeCollins (A)																				0.00	0.00	0.00	\$450.00	\$0.00	\$0.00	\$0.00								
Kate M. Baxter-Kauf (P) 2022																				0.40			\$850.00	\$0.00	\$340.00	\$340.00								
Kate M. Baxter-Kauf (P)																				0.40			\$800.00	\$0.00	\$320.00	\$320.00								
Kate M. Baxter-Kauf (A)																				0.00	0.00	0.00	\$475.00	\$0.00	\$0.00	\$0.00								
Kristen G. Martila (A) 2023																				2.00			\$975.00	\$0.00	\$1,950.00	\$1,950.00								
Kristen G. Martila (A)																				0.00	0.00	0.00	\$525.00	\$0.00	\$0.00	\$0.00								
Simeon A. Morbey (A) 2024																							\$925.00	\$0.00	\$6,937.50	\$6,937.50								
Simeon A. Morbey (A) 2023	2.50	19.00	65.50					4.20												0.00			805.60	805.60	\$850.00	\$0.00	\$684,760.00	\$684,760.00						
Simeon A. Morbey (A) 2022			1.30	0.70																			7.10	7.10	\$800.00	\$0.00	\$5,680.00	\$5,680.00						
Simeon A. Morbey (A) 2021	2.20	52.90	38.60																	0.50	18.10	69.20	1.50	2.10		0.00	185.10	185.10	\$675.00	\$0.00	\$124,942.50	\$124,942.50		
Simeon A. Morbey (A)																										0.00	0.00	0.00	\$575.00	\$0.00	\$0.00	\$0.00		
Simeon A. Morbey (A)																										0.00	0.00	0.00	\$500.00	\$0.00	\$0.00	\$0.00		
Simeon A. Morbey (A)																										0.00	0.00	0.00	\$445.00	\$0.00	\$0.00	\$0.00		
Simeon A. Morbey (A)																										0.00	0.00	0.00	\$420.00	\$0.00	\$0.00	\$0.00		
Arielle S. Wagner (A)																										0.00	0.00	0.00	\$500.00	\$0.00	\$0.00	\$0.00		
Arielle S. Wagner (A)																										0.00	0.00	0.00	\$475.00	\$0.00	\$0.00	\$0.00		
Arielle S. Wagner (A)																										0.00	0.00	0.00	\$450.00	\$0.00	\$0.00	\$0.00		
Arielle S. Wagner (A) 2023	4.20	10.10	18.40					1.00	40.10																	0.00			795.80	795.80	\$715.00	\$0.00	\$568,997.00	\$568,997.00
Stephen M. Owen (A) 2024	12.70		38.30					1.50																		0.00			52.50	52.50	\$775.00	\$0.00	\$40,687.50	\$40,687.50
Stephen M. Owen (A) 2023	26.40	1.00	143.90					39.40	1.00	71.80	2.40															0.00			1,595.60	1,595.60	\$700.00	\$0.00	\$1,116,920.00	\$1,116,920.00
Stephen M. Owen (A) 2022	5.70	82.90	66.20					79.80																		0.00			387.50	387.50	\$650.00	\$0.00	\$251,875.00	\$251,875.00
Stephen M. Owen (A) 2021	14.00	238.10																								0.00			288.10	288.10	\$600.00	\$0.00	\$172,860.00	\$172,860.00
Stephen M. Owen (A)																										0.00	0.00	0.00	\$575.00	\$0.00	\$0.00	\$0.00		
Stephen M. Owen (A)																										0.00	0.00	0.00	\$500.00	\$0.00	\$0.00	\$0.00		
Stephen M. Owen (A)																										0.00	0.00	0.00	\$475.00	\$0.00	\$0.00	\$0.00		
Stephanie A. Chen (A)			0.30																							0.00	0.30	0.30	\$600.00	\$0.00	\$180.00	\$180.00		
Stephanie A. Chen (A)																										0.00	0.00	0.00	\$550.00	\$0.00	\$0.00	\$0.00		
Stephanie A. Chen (A)																										0.00	0.00	0.00	\$500.00	\$0.00	\$0.00	\$0.00		
Stephanie A. Chen (A)																										0.00	0.00	0.00	\$475.00	\$0.00	\$0.00	\$0.00		
Steven E. Serdikoff (A) 2023			7.90					47.00																		0.00			1,632.20	1,632.20	\$850.00	\$0.00	\$1,387,370.00	\$1,387,370.00
Steven E. Serdikoff (A) 2022			61.90					143.10																		0.00			241.90	241.90	\$800.00	\$0.00	\$193,520.00	\$193,520.00
Steven E. Serdikoff (A) 2021			595.70	84.70	2.20																					0.00			734.20	734.20	\$750.00	\$0.00	\$550,650.00	\$550,650.00
Steven E. Serdikoff (A)																										0.00	0.00	0.00	\$700.00	\$0.00	\$0.00	\$0.00		
Stephen J. Teti (A) 2023	14.60		0.20																							0.00			17.80	17.80	\$850.00	\$0.00	\$15,130.00	\$15,130.00
Stephen J. Teti (A) 2022			193.40	0.40																						0.00			220.50	220.50	\$800.00	\$0.00	\$176,400.00	\$176,400.00
Stephen J. Teti (A) 2021			7.20																							0.00			9.50	9.50	\$750.00	\$0.00	\$7,125.00	\$7,125.00
Laura M. Matson (A) 2022			0.20	0.40				0.20																		0.00			1.70	1.70	\$650.00	\$0.00	\$1,105.00	\$1,105.00
Laura M. Matson (A)	6.30		52.50					0.40																		0.00			59.20	59.20	\$650.00	\$0.00	\$38,480.00	\$38,480.00
Kailey C. Mrosak (A)																										0.00	0.00	0.00	\$550.00	\$0.00	\$0.00	\$0.00		
Leona B. Ajavon (A) 2022			5.10	1.10																						0.00			6.20	6.20	\$640.00	\$0.00	\$3,968.00	\$3,968.00
Leona B. Ajavon (A) 2021			186.20																							0.00			186.20	186.20	\$600.00	\$0.00	\$111,720.00	\$111,720.00
Kristin N. Condon (A)																										0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00		
Kristin N. Condon (A)																										0.00	0.00	0.00	\$325.00	\$0.00	\$0.00	\$0.00		
Thomas M. Hoffman (A)																										0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00		
Erika D. Overby (A)																										0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00		
Jennifer M. Evans (A)																										0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00		
Daniel R. Josephson (A) non-doc review work 2023																										0.00			614.00	614.00	\$450.00	\$0.00	\$276,300.00	\$276,300.00
Daniel R. Josephson (A) non-doc review work 2022			1.70	4.00																						0.00			6.00	6.00	\$435.00	\$0.00	\$2,610.00	\$2,610.00
Daniel R. Josephson (A) non-doc review work			320.00	192.10																						0.00			730.20	730.20	\$425.00	\$0.00	\$308,820.00	\$308,820.00
Daniel R. Josephson (A) (at rate cap)				13.40																						0.00			13.40	13.40	\$350.00	\$0.00	\$4,690.00	\$4,690.00
Jacob M. Saufley (A)																										0.00	0.00	0.00	\$550.00	\$0.00	\$0.00	\$0.00		
Jacob M. Saufley (A)																										0.00	0.00	0.00	\$500.00	\$0.00	\$0.00	\$0.00		
Jacob M. Saufley (A)																										0.00	0.00	0.00	\$445.00	\$0.00	\$0.00	\$0.00		
Jacob M. Saufley (A)(at rate cap)																										0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00		

Kevin T. Ravenscroft (A)																		0.00	0.00	0.00	\$350.00	\$0.00	\$0.00	\$0.00	
Kailey C. Mrosak (A)																			0.00	0.00	0.00	\$500.00	\$0.00	\$0.00	\$0.00
Mareen K. Berg (A)																			0.00	0.00	0.00	\$625.00	\$0.00	\$0.00	\$0.00
Develyn J. Mistrioti (A) 2023		0.60				10.10	1.30							871.90	431.90			0.00	1,317.20	1,317.20	\$650.00	\$0.00	\$856,180.00	\$856,180.00	
Develyn J. Mistrioti (A)	7.50		27.70			114.10								164.90	45.50			0.00	371.60	371.60	\$600.00	\$0.00	\$222,960.00	\$222,960.00	
																			0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
Cynthia Diekrager (A) 2023		45.50																	0.00	45.50	45.50	\$450.00	\$0.00	\$20,475.00	\$20,475.00
																			0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
																			0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
																			0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
																			0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
																			0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
																			0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
																			0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
																			0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
ATTY SUB-TOTAL	112.20	46.50	2,965.00	298.50	821.30	737.30	996.00	32.00	541.20	691.35	937.70	434.80	108.30	8,181.30	2,504.20			0.00	19,407.65	19,407.65		\$0.00	\$15,974,621.00	\$15,974,621.00	
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR		
Arielle A. Dagen-Sunsdahl (LC)																	0.00	0.00	0.00	\$175.00	\$0.00	\$0.00	\$0.00		
Elizabeth C. Scheible (LC)																	0.00	0.00	0.00	\$175.00	\$0.00	\$0.00	\$0.00		
Stephen M. Owen (LC)																	0.00	0.00	0.00	\$175.00	\$0.00	\$0.00	\$0.00		
Derek C. Waller (LC)																	0.00	0.00	0.00	\$225.00	\$0.00	\$0.00	\$0.00		
Derek C. Waller (LC)																	0.00	0.00	0.00	\$200.00	\$0.00	\$0.00	\$0.00		
Elizabeth M. Sipe (SPL) 2022			5.80	1.50					1.00	13.70	126.70						0.00	148.70	148.70	\$375.00	\$0.00	\$55,762.50	\$55,762.50		
Elizabeth M. Sipe (SPL) 2021	1.00		69.80	52.20	1.50			7.80	1.10	23.50	129.40	2.30	5.20				0.00	293.80	293.80	\$325.00	\$0.00	\$95,485.00	\$95,485.00		
Elizabeth M. Sipe (SPL)																	0.00	0.00	0.00	\$275.00	\$0.00	\$0.00	\$0.00		
Elizabeth M. Sipe (SPL)																	0.00	0.00	0.00	\$200.00	\$0.00	\$0.00	\$0.00		
Greg A. Loeding (IT PL) 2023			0.60														0.00	0.60	0.60	\$285.00	\$0.00	\$171.00	\$171.00		
Greg A. Loeding (IT PL) 2022			71.20	12.20						66.00							0.00	149.40	149.40	\$275.00	\$0.00	\$41,085.00	\$41,085.00		
Greg A. Loeding (IT PL)			8.70	139.90													0.00	148.60	148.60	\$225.00	\$0.00	\$33,435.00	\$33,435.00		
Greg A. Loeding (IT PL)																	0.00	0.00	0.00	\$160.00	\$0.00	\$0.00	\$0.00		
Greg A. Loeding (IT PL)																	0.00	0.00	0.00	\$130.00	\$0.00	\$0.00	\$0.00		
Greg A. Loeding (IT PL)																	0.00	0.00	0.00	\$90.00	\$0.00	\$0.00	\$0.00		
Kathleen J. Kelly (LI PL)																	0.00	0.00	0.00	\$85.00	\$0.00	\$0.00	\$0.00		
Sherri L. Jeull (PL)																	0.00	0.70	0.70	\$325.00	\$0.00	\$227.50	\$227.50		
Sherri L. Jeull (PL)																	0.00	0.00	0.00	\$275.00	\$0.00	\$0.00	\$0.00		
Sherri L. Jeull (PL)																	0.00	0.00	0.00	\$200.00	\$0.00	\$0.00	\$0.00		
Amber M. Raak (PL) 2024				0.60			0.20				4.00						0.00	4.80	4.80	\$430.00	\$0.00	\$2,064.00	\$2,064.00		
Amber M. Raak (PL) 2023			0.20	7.40	88.20		0.20		0.20	91.70	268.40	34.30					0.00	490.60	490.60	\$400.00	\$0.00	\$196,240.00	\$196,240.00		
Amber M. Raak (PL) 2022		0.20	10.60	1.30	1.60		1.00			1.20	76.50	1.40					0.00	93.80	93.80	\$375.00	\$0.00	\$35,175.00	\$35,175.00		
Amber M. Raak (PL)										0.20							0.00	0.20	0.20	\$325.00	\$0.00	\$65.00	\$65.00		
Elizabeth A. Schindler (PL) 2024				0.40			0.80			9.50							0.00	10.70	10.70	\$375.00	\$0.00	\$4,012.50	\$4,012.50		
Elizabeth A. Schindler (PL) 2023			5.50	11.10	1.20	77.30		8.00		2.30	126.60	328.80	368.70				0.00	929.50	929.50	\$345.00	\$0.00	\$320,677.50	\$320,677.50		
Elizabeth A. Schindler (PL) 2022			53.40	3.40			3.50	17.20		66.30	2.80						0.00	146.60	146.60	\$300.00	\$0.00	\$43,980.00	\$43,980.00		
Elizabeth A. Schindler (PL) 2021			2.50	0.80			1.30	0.30	5.80	0.10							0.00	10.80	10.80	\$225.00	\$0.00	\$2,430.00	\$2,430.00		
Eura Chang (LC) 2022	5.50																0.00	5.50	5.50	\$300.00	\$0.00	\$1,650.00	\$1,650.00		
Eura Chang (LC)	3.00																0.00	3.00	3.00	\$250.00	\$0.00	\$750.00	\$750.00		
Erk W. Allerson (LC)																	0.00	0.00	0.00	\$225.00	\$0.00	\$0.00	\$0.00		
Develyn J. Ferguson (LC) 2022	63.70		4.20									0.20		76.60			0.00	144.70	144.70	\$300.00	\$0.00	\$43,410.00	\$43,410.00		
Develyn J. Ferguson (LC) 2021	13.20		1.40											168.70			0.00	183.30	183.30	\$250.00	\$0.00	\$45,825.00	\$45,825.00		
Develyn J. Ferguson (LC)																	0.00	0.00	0.00	\$225.00	\$0.00	\$0.00	\$0.00		
Katarzyna Kokoszka (LC)																	0.00	0.00	0.00	\$200.00	\$0.00	\$0.00	\$0.00		
R. David Hahn (LC)																	0.00	0.00	0.00	\$225.00	\$0.00	\$0.00	\$0.00		
Souvan S. Lee (LC)																	0.00	0.00	0.00	\$225.00	\$0.00	\$0.00	\$0.00		
Han Li (LC)																	0.00	0.00	0.00	\$225.00	\$0.00	\$0.00	\$0.00		
Lexi J. Pitz (LC)																	0.00	0.00	0.00	\$225.00	\$0.00	\$0.00	\$0.00		
Ben Gill (File Clerk)														96.70			0.00	96.70	96.70	\$120.00	\$0.00	\$11,604.00	\$11,604.00		

Madeline Kim (LC)	21.90															0.00	21.90	21.90	\$335.00	\$0.00	\$7,336.50	\$7,336.50
Ryan Chittum		2.90	18.80													0.00	21.70	21.70	\$385.00	\$0.00	\$8,354.50	\$8,354.50
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
Kira Le (LC)	19.90															0.00	19.90	19.90	\$300.00	\$0.00	\$5,970.00	\$5,970.00
Tyler S. Blackmon													13.50			0.00	13.50	13.50	\$335.00	\$0.00	\$4,522.50	\$4,522.50
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
																0.00	0.00	0.00		\$0.00	\$0.00	\$0.00
SUB-TOTAL	128.20	3.10	252.70	152.10	78.70	4.30	165.50	2.00	20.80	85.60	46.90	631.70	2.30	962.10	403.00	0.00	2,939.00	2,939.00		\$0.00	\$960,232.50	\$960,232.50
GRAND TOTAL:	240.40	49.60	3217.70	450.60	900.00	741.60	1161.50	34.00	562.00	776.95	984.60	1066.50	110.60	9143.40	2907.20	0.00	22,346.65	22,346.65		\$0.00	\$16,934,853.50	\$16,934,853.50

Exhibit 20

IN RE BROILER CHICKEN ANTITRUST LITIGATION

TIME REPORT - (To be submitted on the 20th of every month)

<u>All Firm Summary</u>	<u>Reporting Period:</u>	<u>01/01/2021 - 01/31/2024</u>
Categories:		
1) Legal Research	5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing)	11) Settlements & Mediation
2) Investigation / Factual Research	6) Class Certification	12) Case Management
3) Discovery (Written / Deposition Taking & Defending / Meet & Confer / etc.)	7) Summary Judgment	13) Class Notice
4) Document Review (Including for depo prep, class cert, experts, liability issues, jurisdictional issues, and meetings re doc review)	8) Appeals	14) Trial Prep (Exhibit & Witness List/Jury Instruction/Vior Dire/Opening Statements/Closing Arguments/Demonstratives/etc.)
	9) Court Appearance and Prep	15) Trial
	10) Experts	

Firms	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	CURRENT HOURS	CURRENT LODESTAR
Lockridge Grindal Nauen P.L.L.P. (03/31/2024 cut off)	240.40	49.60	3,217.70	450.60	900.00	741.60	1,161.50	34.00	562.00	776.95	984.60	1,066.50	110.60	9,143.40	2,907.20	22,346.65	\$16,934,853.50
Pearson Warshaw LLP (03/31/2024 cut off)	138.70	160.20	1,292.80	97.70	2,671.20	200.40	1,175.20	299.30	603.20	759.40	778.30	1,385.70	46.20	4,973.60	1,182.00	15,797.50	\$12,964,333.00
Hart McLaughlin & Eldridge	2.20	3.90	592.80	622.50	344.20	0.00	192.20	0.00	160.00	48.70	17.40	5.60	69.80	150.50	442.30	2,652.10	\$2,055,985.00
Axler Goldich LLC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.70	0.20	0.00	8.30	0.00	10.50	\$7,875.00
Baron & Budd, P.C.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$0.00
Bernstein Liebhard LLP	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$0.00
Block & Leviton LLP	0.00	0.00	195.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15.50	0.00	0.00	19.50	0.00	230.40	\$190,432.50
Criden & Love, P.A.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$0.00
Fine, Kaplan and Black RPC	64.10	0.50	0.00	0.00	0.00	0.00	0.00	71.20	0.00	0.70	0.00	0.00	0.00	0.00	0.00	136.50	\$84,920.00
Freed Kanner London & Millen LLC	17.40	15.70	718.30	0.00	305.60	4.80	0.00	0.00	6.00	0.00	7.50	20.30	0.00	612.50	341.70	2,049.80	\$1,740,369.00
Grant & Eisenhofer P.A.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.80	0.00	11.80	25.40	0.00	0.00	0.00	53.60	\$54,360.00
Heins Mills & Olson PLC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	\$0.00
Joseph Saveri Law Firm	0.00	0.50	707.50	88.40	48.25	0.00	0.00	0.00	0.00	0.00	0.00	0.80	0.00	72.80	0.00	915.80	\$728,134.25
Kohn Swift & Graf, P.C.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.30	\$3,842.50
Lite DePalma Greenberg, LLC	221.60	1.50	2,490.70	47.30	7.00	0.50	1.80	0.00	20.40	3.10	7.30	8.40	0.00	858.60	429.00	4,097.20	\$2,580,727.50
The Miller Law Firm, P.C.	0.00	0.00	294.60	0.00	0.10	0.00	0.00	0.00	0.00	0.00	1.20	2.30	0.00	0.00	0.00	298.20	\$207,341.50
Nussbaum Law Group, P.C.	0.00	0.00	102.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.10	6.80	0.00	0.00	0.00	110.60	\$70,113.00
Reinhardt Wendorf & Blanchfield	0.00	0.00	0.00	0.00	0.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.80	\$604.00
Rupp Pfalzgrf, LLC	0.00	0.20	1.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.70	51.60	0.00	1.00	0.00	57.90	\$25,200.50
Saveri & Saveri, Inc.	0.00	0.00	1,128.65	0.00	1.40	0.00	0.00	0.00	2.00	0.00	0.00	0.00	0.00	0.00	0.00	1,132.05	\$732,993.75
Spector Roseman Kodroff & Willis PC	0.00	7.50	202.30	0.00	366.00	90.40	0.00	4.70	642.70	2,219.10	1.60	57.50	43.40	207.90	0.00	3,843.70	\$2,947,942.50
Steyer Lowenthal Boodrookas Alvarez & Smith LLP	0.00	0.00	0.00	0.00	0.00	123.10	0.00	0.00	1.80	0.00	9.30	5.10	0.00	0.00	2.30	142.20	\$150,241.00
																0.00	
SUB-TOTAL	684.40	239.60	10,944.85	1,306.50	4,644.55	1,160.80	2,530.70	414.50	2,000.90	3,807.95	1,842.00	2,636.20	270.00	16,048.10	5,304.50	53,880.80	\$41,480,268.50

Exhibit 21

IN RE BROILER CHICKEN ANTITRUST LITIGATION**EXPENSE REPORT - (To be submitted on the 20th of each month)****All Firm Expense Summary****REPORTING PERIOD:** 01/01/2021 - 01/31/2024 (and for Lead Counsel 03/31/2024)

CATEGORY	CURRENT COSTS
Court Costs - Filing Fees	\$1,123.00
Experts/consultants	\$0.00
Federal Express / UPS /Ontrac	\$6,752.53
Postage / U.S. Mail	\$1,856.19
Service of Process	\$0.00
Messenger/delivery	\$0.00
Hearing Transcripts	\$4,914.57
Investigation	\$3.00
Computer Research: Lexis/westlaw/Pacer	\$91,606.24
Photocopies - in House	\$13,133.44
Photocopies - Outside	\$2,036.43
Telephone/telecopier	\$863.10
Travel - Transportation	\$85,549.69
Travel - Meals, Etc.	\$53,760.14
Travel - Hotels	\$254,488.24
Miscellaneous	\$11,793.71
TOTAL EXPENSES	\$527,880.28

Exhibit 22

*IN RE BROILER CHICKEN ANTITRUST LITIGATION***EXPENSE REPORT - (To be submitted on the 20th of each month)****FIRM NAME: Lockridge Grindal Nauen PLLP****REPORTING PERIOD: 01/01/2021 - 03/31/2024**

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs - Filing Fees		\$0.00		\$0.00
Experts/consultants		\$0.00		\$0.00
Federal Express / UPS /Ontrac		\$0.00	\$565.08	\$565.08
Postage / U.S. Mail		\$0.00	\$1,771.65	\$1,771.65
Service of Process		\$0.00		\$0.00
Messenger/delivery		\$0.00	\$631.22	\$631.22
Hearing Transcripts		\$0.00		\$0.00
Investigation		\$0.00		\$0.00
Computer Research: Lexis/westlaw/Pacer		\$0.00	\$34,295.61	\$34,295.61
Photocopies - in House		\$0.00	\$2,199.30	\$2,199.30
Photocopies - Outside		\$0.00	\$1,126.75	\$1,126.75
Telephone/telecopier		\$0.00	\$451.76	\$451.76
Travel - Transportation		\$0.00	\$39,397.74	\$39,397.74
Travel - Meals, Etc.		\$0.00	\$30,616.92	\$30,616.92
Travel - Hotels		\$0.00	\$158,059.80	\$158,059.80
Miscellaneous		\$0.00	\$10,224.58	\$10,224.58
		\$0.00		
TOTAL EXPENSES		\$0.00	\$279,340.41	\$279,340.41
TOTAL LODESTAR		\$0.00	\$0.00	\$0.00
TOTAL EXPENSES & LODESTAR		\$0.00	\$279,340.41	\$279,340.41

*Travel-Hotel and Computer Legal Research categories are higher than those in the "2024-01-31 Final Broiler Chicken Time Lodestar Summary Report with All Firms Reports" submitted by DPP Co-Lead Counsel to the Court in camera on February 1, 2024 due to delays in charges posting to the firm's accounting system

Exhibit 23

UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

Civil No. 18-1776 (JRT/JFD)

This Document Relates To:

THE DIRECT PURCHASER PLAINTIFF
ACTION

**ORDER GRANTING DIRECT
PURCHASER PLAINTIFFS' MOTION
FOR INTERIM PAYMENT OF
ATTORNEYS' FEES, CURRENT AND
ONGOING LITIGATION EXPENSES,
AND SERVICE AWARDS**

This Court, having considered Direct Purchaser Plaintiffs' ("DPPs") Motion for Interim Payment of Attorneys' Fees, Current and Ongoing Litigation Expenses, and Service Awards (the "Motion") and the Memorandum of Law in support thereof (the "Memorandum"), after a duly noticed hearing, hereby finds that interim payments of (i) attorneys' fees, (ii) current and ongoing litigation expenses, and (iii) service awards are appropriate under Federal Rules of Civil Procedure 23(h) and 54(d)(2).

Attorneys' Fees

1. The Motion seeks an interim award of attorneys' fees of \$33,954,766.66, representing 33 1/3% of the \$101,864,300.00 Settlement Fund that comprises the settlement payments paid into escrow by the Settling Defendants.¹ The Court **GRANTS** this request because the amount is fair and reasonable under the percentage-of-the-fund

¹ "Settling Defendants" refers collectively to JBS USA Food Company, JBS USA Food Company Holdings, Swift Pork Company, and Smithfield Foods, Inc.

method, which is confirmed by a lodestar “cross-check,” and well within the range allowed by courts in this District.

2. The Court will award fees to counsel for the DPPs using the percentage-of-the-fund approach. “A routine calculation of fees involves the common-fund doctrine, which is based on a percentage of the common fund recovered.” *In re Xcel Energy, Inc., Sec., Derivative & “ERISA” Litig.*, 364 F. Supp. 2d 980, 991 (D. Minn. 2005) (citing *Blum v. Stenson*, 465 U.S. 886, 900 n.16 (1984)); *see also In re U.S. Bancorp Litig.*, 291 F.3d 1035, 1038 (8th Cir. 2002)); *Boeing Co. v. Van Gemert*, 444 U.S. 472, 478 (1980) (“[A] litigant or a lawyer who recovers a common fund for the benefit of persons other than himself or his client is entitled to a reasonable attorney’s fee from the fund as a whole.”). “In the Eighth Circuit, use of a percentage method of awarding attorney fees in a common-fund case is not only approved, but also ‘well established.’” *In re Xcel*, 364 F. Supp. 2d at 991 (quoting *Petrovic v. Amoco Oil Co.*, 200 F.3d 1140, 1157 (8th Cir. 1999)); *see also Khoday v. Symantec Corp.*, No. 11-180, 2016 WL 1637039, at *8–9 (D. Minn. April 5, 2016).

3. When using the percentage-of-the-fund approach, the Court considers seven factors: “(1) the benefit conferred on the class; (2) the risk to which plaintiffs’ counsel was exposed; (3) the difficulty and novelty of the legal and factual issues of the case; (4) the skill of the lawyers, both plaintiffs’ and defendants’; (5) the time and labor involved; (6) the reaction of the class; and (7) the comparison between the requested attorney fee percentage and percentages awarded in similar cases.” *Khoday*, 2016 WL

1637039, at *9 (quoting *Yarrington v. Solvay Pharms., Inc.*, 697 F. Supp. 2d 1057, 1062 (D. Minn. 2010)); see also *In re Xcel*, 364 F. Supp. 2d at 993. When applied here, these factors indicate that the fee requested is fair.

(a) Counsel Secured Valuable Benefits for DPPs. The cash Settlements, totaling over \$101 million, are coupled with meaningful cooperation that will assist in the prosecution of the claims against the non-settling Defendants. None of the money will revert to the Settling Defendants or to a cy pres designee, and the cooperation terms of the settlements provide significant value to the DPPs. See, e.g., *In re Packaged Ice Antitrust Litig.*, No. 08-1952, 2010 WL 3070161, at *6 (E.D. Mich. Aug. 2, 2010); *In re Pressure Sensitive Labelstock Antitrust Litig.*, 584 F. Supp. 2d 697, 702 (M.D. Pa. 2008). Fee awards in antitrust actions also provide a public benefit. There is a “need in making fee awards to encourage attorneys to bring class actions to vindicate public policy (e.g., the antitrust laws) as well as the specific rights of private individuals.” *In re Folding Carton Antitrust Litig.*, 84 F.R.D. 245, 260 (N.D. Ill. 1979); *In re Cardizem CD Antitrust Litig.*, 218 F.R.D. 508, 534 (E.D. Mich. 2003) (“Society also benefits from the prosecution and settlement of private antitrust litigation.”). Society benefits when those who have violated laws fostering fair competition and honest pricing are required to reimburse affected consumers in civil proceedings. See *Vendo Co. v. Lektro-Vend Corp.*, 433 U.S. 623, 635 (1977); *Wal-Mart Stores, Inc. v. Visa U.S.A., Inc.*, 396 F.3d 96, 122 (2d Cir. 2005) (“[I]t

is especially important to provide appropriate incentives to attorneys pursuing antitrust actions because public policy relies on private sector enforcement of the antitrust laws.”).

(b) Plaintiffs’ Counsel Assumed Considerable Risk. Counsel for the DPPs assumed considerable risk by pursuing this case on a contingent basis, advancing the costs of the litigation, and preparing for trial without a guaranteed recovery. *See Khoday*, 2016 WL 1637039, at *9; *In re Xcel*, 364 F. Supp. 2d at 994–95; *Yarrington*, 697 F. Supp. 2d at 1062–63. The Defendants have vigorously defended the claims, and antitrust litigation is inherently expensive and complex. Counsel for the DPPs risked recovering nothing in this litigation. “[W]ithin the set of colorable legal claims, a higher risk of loss does argue for a higher fee.” *In re Trans Union Corp. Privacy Litig.*, 629 F.3d 741, 746 (7th Cir. 2011). The risk undertaken by counsel for the DPPs supports the requested fee award. *See Khoday*, 2016 WL 1637039, at *9; *In re Xcel*, 364 F. Supp. 2d at 994–95; *Yarrington*, 697 F. Supp. 2d at 1062–63.

(c) The Difficulty and Novelty of the Legal and Factual Issues of the Case. Antitrust class actions are inherently complex. *In re Linerboard Antitrust Litig.*, 292 F. Supp. 2d 631, 639 (E.D. Pa. 2003) (“An antitrust class action is arguably the most complex action to prosecute. The legal and factual issues involved are always numerous and uncertain in outcome.” (citations and internal quotation marks omitted)). This litigation presents challenging legal and factual issues, and this factor also supports the fee requested.

representing 35 1/2 percent of the settlement fund). The Eighth Circuit Court of Appeals and other federal courts have approved awards exceeding one-third of the settlement funds created by counsel representing the settlement class. *See, e.g., In re U.S. Bancorp Litig.*, 291 F.3d 1035, 1038 (8th Cir. 2002) (fee of 36 percent); *In re Combustion, Inc.*, 968 F. Supp. 1116, 1133, 1142 (W.D. La. 1997) (awarding fee of 36 percent and noting that “50 percent of the fund is the upper limit on a reasonable fee award from a common fund”); *Waters v. Intern. Precious Metals Corp.*, 190 F.3d 1291, 1292–94 (11th Cir. 1999); *In re Vitamins Antitrust Litig.*, No. 99-197, 2001 WL 34312839, at *10 (D.D.C. 2001) (awarding one third of \$359 million antitrust recovery, which is “within the fifteen to forty-five percent range established in other cases”); *In re Ampicillin Antitrust Litig.*, 526 F. Supp. 494, 499 (D.D.C. 1981) (awarding fee of 45 percent)

4. Therefore, an interim award of \$33,954,766.66, or 33 1/3% of the Settlement Fund, as attorneys’ fees is reasonable and warranted for the reasons set forth in the DPPs’ supporting Memorandum, including the following: the result obtained for the Class—payment by Settling Defendants of \$101,864,300.00; the quality of work product and quantity of work performed by Class Counsel, including extensive motion practice, substantial discovery efforts, and mediation, all involving complex issues of fact and law that were zealously litigated since 2018; and the risks faced throughout the litigation, which existed from the outset and will continue beyond settlement given that there remain six Defendants.

5. Although not required, courts may apply a lodestar “cross-check” on the reasonableness of the fee calculated as a percentage of the fund. *Keil v. Lopez*, 862 F.3d 685, 701 (8th Cir. 2017). A cross-check of the lodestar incurred by counsel for the DPPs indicates that the fee requested constitutes fair and reasonable compensation for the risks assumed, the work done, and the benefits achieved for the members of the Settlement Class. The Court finds that Class Counsel’s lodestar as of February 28, 2022, based on historical hourly rates, is reasonable. Class Counsel’s requested fee award of \$33,954,766.66 represents a multiplier of 1.48 based on their historical hourly rates through February 28, 2022. This multiplier is especially reasonable considering the complexity of this litigation, the result achieved for the Settlement Class members, the risks assumed by counsel for the DPPs, and the work remaining to be done on the case and for which fees may or may not be available. *See, e.g., Khoday*, 2016 WL 1637039, at *11 (multipliers typically range between two and five); *In re St. Paul Travelers Sec. Litig.*, No. 14-3801, 2006 WL 1116118, at *1 (D. Minn. Apr. 25, 2006) (using a multiplier of 3.9). Class Counsel have also continued to incur attorneys’ fees since February 28, 2022 which are not included in this lodestar calculation.

6. Interim Co-Lead Counsel for the DPPs are authorized to allocate the attorneys’ fees awarded herein among counsel who performed work on behalf of the DPPs in accordance with Interim Co-Lead Counsel’s assessment of each firm’s contribution to the prosecution of this litigation.

Current and Ongoing Litigation Expenses

7. In addition to risking time and effort, Class Counsel advanced substantial costs and expenses in connection with the prosecution of the litigation for the benefit of the Class with no ultimate guarantee of compensation. “It is well established that counsel who create a common fund like the one at issue are entitled to the reimbursement of litigation costs and expenses, which include such things as expert witness costs, mediation costs, computerized research, court reports, travel expenses, and copy, telephone, and facsimile expenses.” *Krueger v. Ameriprise Fin., Inc.*, No. 11-2781, 2015 WL 4246879, at *3 (D. Minn. July 13, 2015).

8. Through April 30, 2022, DPPs have incurred expenses in the total amount of \$2,505,505.75, which the Court has reviewed and now approves as reasonable and necessary and of the type normally awarded in class action litigation. *See, e.g.*, Fed. R. Civ. P. 23(h); *Khoday*, 2016 WL 1637039, at *12 (“Courts generally allow plaintiffs’ counsel in a class action to be reimbursed for costs and expenses out of the settlement fund, so long as those costs and expenses are reasonable and relevant to the litigation.”); *In re Zurn Pex Plumbing Prod. Liab. Litig.*, No. 08-1958, 2013 WL 716460, at *5 (D. Minn. Feb. 27, 2013); *Yarrington*, 697 F. Supp. 2d at 1067. The Court **GRANTS** DPPs’ request for reimbursement of these past litigation expenses.

9. The Court further **GRANTS** the DPPs’ request to establish a fund for future litigation expenses in the amount of \$2,494,494.25. Allowing a portion of class settlement

funds to be used for future expenses is a well-accepted practice. *See, e.g., Newby v. Enron Corp.*, 394 F.3d 296, 302 (5th Cir. 2004) (affirming 37.5 percent set aside for establishment of a \$15 million litigation expense fund from the proceeds of a partial settlement); *In re Auto Parts Antitrust Litig.*, No. 12-2311, 2018 WL 7108072, at *2 (E.D. Mich. Nov. 5, 2018); *In re Auto Parts Antitrust Litig.*, No. 12-2311, 2016 WL 9459355, at *2 (E.D. Mich. Nov. 29, 2016) (approving request to set aside nearly \$10 million for use in future litigation); *In re Auto Parts Antitrust Litig.*, No. 12-2311, 2015 WL 13715591, at *2 (E.D. Mich. Dec. 7, 2015); *In re Transpacific Passenger Air Transp. Antitrust Litig.*, No. 07-5634, 2015 WL 3396829, at *3 (N.D. Cal. May. 26, 2015); *In re Pressure*, 584 F. Supp. 2d at 702; *In re WorldCom, Inc. Sec. Litig.*, No. 02-3288, 2004 WL 2591402, at *22 (S.D.N.Y. Nov. 12, 2004); *In re California Micro Devices Sec. Litig.*, 965 F. Supp. 1327, 1337 (N.D. Cal. 1997); *see also* Manual for Complex Litigation (Fourth) at § 13.21 (“[P]artial settlements may provide funds needed to pursue the litigation . . .”).

10. As indicated in the Memorandum the DPPs submitted, the future litigation expenses will only be used for reasonable expenses incurred in the ongoing litigation against the remaining Defendants. In any future petition for reimbursement of expenses, or at the Court’s request, Interim Co-Lead Counsel will provide an accounting to the Court of their payment of future costs from this award. If the future litigation fund is not fully used, counsel for the DPPs shall first consult with the Court before returning the unused funds for distribution to Settlement Class members who filed valid claims.

11. The past litigation expenses incurred in the prosecution of this case shall be reimbursed from the Settlement Fund. The Court authorizes Interim Co-Lead Counsel to pay the future costs from the future litigation expense set aside fund.

Service Awards

12. The Court also **GRANTS** the requested \$25,000.00 service awards to each of the four named representatives. Courts routinely grant service awards for named plaintiffs. *See, e.g., Yarrington*, 697 F. Supp. 2d at 1068 (upholding service awards and recognizing that “unlike unnamed Class Members who will enjoy the benefits of the Settlement without taking on any significant role, the Named Plaintiffs [make] significant efforts on behalf of the Settlement Class and [participate] actively in the litigation”); *Zilhaver v. UnitedHealth Group, Inc.*, 646 F. Supp. 2d 1075, 1085 (D. Minn. 2009); *see also In re Xcel*, 364 F. Supp. 2d at 1000; *White v. Nat’l Football League*, 822 F. Supp. 1389, 1406 (D. Minn. 1993) (collecting cases).

13. Each of the Class Representatives has remained apprised of the status of the litigation, actively participated in discovery including searching for and producing documents, preparing for depositions, and responding to written discovery, and engaged in other efforts necessary to fulfill their duties as Class Representatives. *See Zilhaver*, 646 F. Supp. 2d at 1085 (quoting *Koenig v. U.S. Bank*, 291 F.3d 1035, 1038 (8th Cir. 2002)); *In re CenturyLink Sales Prac. & Sec. Litig.*, No. 17-2795, 2020 WL 7133805, at *13 (D. Minn. Dec. 4, 2020). The Class Representatives took a risk both financial and otherwise in

representing the Class in this lawsuit. *See Zilhaver*, 646 F. Supp. 2d at 1085. Such awards also compensate representative plaintiffs who “participated and willingly took on the responsibility of prosecuting the case and publicly lending their names to this lawsuit, opening themselves up to scrutiny and attention from both the public and media.” *In re CenturyLink*, 2020 WL 7133805, at *13. The requested \$25,000.00 award is reasonable when compared to awards issued by courts in this District.

14. Interim Co-Lead Counsel for the DPPs are authorized to pay from the Settlement Fund \$25,000.00 to each of these four entities: Maplevale Farms, Inc.; John Gross and Company, Inc.; Ferraro Foods, Inc. and Ferraro Foods of North Carolina, LLC; and Olean Wholesale Grocery Cooperative, Inc.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

Therefore, upon consideration of the Motion and accompanying Memorandum, and based upon all matters of record in this action:

1. Direct Purchaser Plaintiffs’ Motion for Interim Payment of Attorneys’ Fees, Current and Ongoing Litigation Expenses, and Service Awards [Docket No. 1361] is

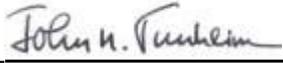
GRANTED.

2. Class Counsel are awarded interim attorneys’ fees in the amount of \$33,954,766.66, representing 33 1/3% of the \$101,864,300.00 Settlement Fund.

3. Class Counsel are awarded \$5,000,000.00 in current and ongoing litigation expenses.

4. The following Class Representatives shall each receive \$25,000.00 as interim service awards: Maplevale Farms, Inc.; John Gross and Company, Inc.; Ferraro Foods, Inc. and Ferraro Foods of North Carolina, LLC; and Olean Wholesale Grocery Cooperative, Inc.

DATED: July 22, 2022
at Minneapolis, Minnesota.



JOHN R. TUNHEIM
United States District Court

Exhibit 28

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

IN RE BROILER CHICKEN ANTITRUST
LITIGATION,

Case No.: 1:16-cv-08637

The Honorable Thomas M. Durkin

This Document Relates To:

Magistrate Judge Jeffrey T. Gilbert

THE DIRECT PURCHASER PLAINTIFF
ACTION

**DECLARATION OF DOUGLAS NECKERS OF MAPLEVALE FARMS, INC. IN
SUPPORT OF DIRECT PURCHASER PLAINTIFFS’ MOTION FOR PAYMENT OF
ATTORNEYS’ FEES, REIMBURSEMENT OF LITIGATION EXPENSES,
AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Douglas Neckers, declare as follows:

1. I am the President and Chief Executive Officer of Maplevale Farms, Inc., a named Plaintiff and Class Representative in this class action. I make this declaration in support of Direct Purchaser Plaintiffs’ Motion for Payment of Attorneys’ Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards. I have personal knowledge of the facts stated in this declaration and, if called as a witness, I could competently testify to them.

2. I live in New York and have worked for Maplevale Farms Inc. for over 30 years.

3. During the Class Period in this case, Maplevale Farms, Inc. purchased Broilers directly from one or more of the Defendants in this lawsuit.

4. On May 27, 2022, the Court granted Direct Purchaser Plaintiffs’ Motion for Class Certification and appointed Maplevale Farms, Inc. as a Class Representative on behalf of

itself and others who purchased Broilers from at least one of the Defendants during the Class Period. (See ECF No. 5644.)

5. Maplevale Farms, Inc. has participated fully in the litigation and acted in the best interests of the entire Class. These activities have included retaining the attorneys appointed as Class Counsel, advising attorneys and approving pleadings, reviewing and responding to written discovery, preparing for and participating in two full day depositions, searching for, collecting, preserving, and producing documents, preparing a declaration in support of Direct Purchaser Plaintiffs’ Motion for Class Certification, performing work in consultation with Class Counsel in preparation for trial, testifying live at trial, and keeping up to date on the progress of the case.

6. The Court previously awarded an interim service award of \$15,000 for Maplevale Farms, Inc.’s service to the Class. (See ECF No. 5229.) Since that time, Maplevale Farms, Inc. has spent 147 hours on this litigation.

7. Maplevale Farms, Inc. respectfully requests that this Court grant Direct Purchaser Plaintiffs’ Motion for Payment of Attorneys’ Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4/26/2024 ___th day of April, in 2024.

DocuSigned by:

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DOUGLAS NECKERS

Exhibit 29

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

IN RE BROILER CHICKEN ANTITRUST
LITIGATION,

Case No.: 1:16-cv-08637

The Honorable Thomas M. Durkin

This Document Relates To:

Magistrate Judge Jeffrey T. Gilbert

THE DIRECT PURCHASER PLAINTIFF
ACTION

**DECLARATION OF SCOTT WAGNER OF JOHN GROSS AND COMPANY, INC. IN
SUPPORT OF DIRECT PURCHASER PLAINTIFFS' MOTION FOR PAYMENT
OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES,
AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Scott Wagner, declare as follows:

1. I am Vice President for John Gross and Company, Inc., a named Plaintiff and Class Representative in this class action. I make this declaration in support of Direct Purchaser Plaintiffs' Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards. I have personal knowledge of the facts stated in this declaration and, if called as a witness, I could competently testify to them.

2. I live in Dillsburg, Pennsylvania, and have worked for John Gross and Company, Inc. for 46 years.

3. During the Class Period in this case, John Gross and Company, Inc. purchased Broilers directly from one or more of the Defendants in this lawsuit.

4. On May 27, 2022, the Court granted Direct Purchaser Plaintiffs' Motion for Class Certification and appointed John Gross and Company, Inc. as a Class Representative on

behalf of itself and others who purchased Broilers from at least one of the Defendants during the Class Period. (See ECF No. 5644.)

5. John Gross and Company, Inc. has participated fully in the litigation and acted in the best interests of the entire Class. These activities have included retaining the attorneys appointed as Class Counsel, advising attorneys and approving pleadings, reviewing and responding to written discovery, preparing for and participating in a full day deposition, searching for, collecting, preserving, and producing documents, preparing a declaration in support of Direct Purchaser Plaintiffs’ Motion for Class Certification, performing work in consultation with Class Counsel in preparation for trial, and keeping up to date on the progress of the case.

6. The Court previously awarded an interim service award of \$15,000 for John Gross and Company, Inc.’s service to the Class. (See ECF No. 5229.) Since that time, John Gross and Company, Inc. has spent 9 hours on this litigation.

7. John Gross and Company, Inc. respectfully requests that this Court grant Direct Purchaser Plaintiffs’ Motion for Payment of Attorneys’ Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4/26/2024 ___th day of April, in 2024.

DocuSigned by:
Scott Wagner
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SCOTT WAGNER

Exhibit 30

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

IN RE BROILER CHICKEN ANTITRUST
LITIGATION,

Case No.: 1:16-cv-08637

The Honorable Thomas M. Durkin

This Document Relates To:

Magistrate Judge Jeffrey T. Gilbert

THE DIRECT PURCHASER PLAINTIFF
ACTION

**DECLARATION OF DEAN BARCELONA OF FERRARO FOODS, INC. AND
FERRARO FOODS OF NORTH CAROLINA, LLC IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Dean Barcelona, declare as follows:

1. I am Vice President of Ferraro Foods, Inc. and Ferraro Foods of North Carolina, LLC, named Plaintiffs and Class Representatives in this class action. I make this declaration in support of Direct Purchaser Plaintiffs' Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards. I have personal knowledge of the facts stated in this declaration and, if called as a witness, I could competently testify to them.

2. I live in Annandale, New Jersey and have worked for Ferraro Foods, Inc. and Ferraro Foods of North Carolina, LLC for 37 years.

3. During the Class Period in this case, Ferraro Foods, Inc. and Ferraro Foods of North Carolina, LLC purchased Broilers from one or more of the Defendants in this lawsuit.

4. On May 27, 2022, the Court granted Direct Purchaser Plaintiffs' Motion for Class Certification and appointed Ferraro Foods, Inc. and Ferraro Foods of North Carolina, LLC

as Class Representatives on behalf of themselves and others who purchased Broilers from at least one of the Defendants during the Class Period. (*See* ECF No. 5644.)

5. Ferraro Foods, Inc. and Ferraro Foods of North Carolina, LLC have participated fully in the litigation and acted in the best interests of the entire Class. These activities have included advising attorneys and approving pleadings, reviewing and responding to written discovery, preparing for and participating in a full day deposition, searching for, collecting, preserving, and producing documents, preparing a declaration in support of Direct Purchaser Plaintiffs’ Motion for Class Certification, performing work in consultation with Class Counsel in preparation for trial, and keeping up to date on the progress of the case.

6. The Court previously awarded interim service awards of \$15,000 for Ferraro Foods, Inc.’s and Ferraro Foods of North Carolina, LLC’s service to the Class. (*See* ECF No. 5229.) Since that time, Ferraro Foods, Inc. and Ferraro Foods of North Carolina, LLC have spent 8 hours on this litigation.

7. Ferraro Foods, Inc. and Ferraro Foods of North Carolina, LLC respectfully request that this Court grant Direct Purchaser Plaintiffs’ Motion for Payment of Attorneys’ Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4/29/2024 ___th day of April, in 2024.

DocuSigned by:
Dean Barcelona
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DEAN BARCELONA

Exhibit 31

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

IN RE BROILER CHICKEN ANTITRUST
LITIGATION,

This Document Relates To:

THE DIRECT PURCHASER PLAINTIFF
ACTION

Case No.: 1:16-cv-08637

The Honorable Thomas M. Durkin

Magistrate Judge Jeffrey T. Gilbert

**DECLARATION OF JOSEPH OSCAR CHRISTIANA, JR. OF JOE CHRISTIANA
FOOD DISTRIBUTORS, INC. IN SUPPORT OF DIRECT PURCHASER PLAINTIFFS'
MOTION FOR PAYMENT OF ATTORNEYS' FEES, REIMBURSEMENT OF
LITIGATION EXPENSES, AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Joseph Oscar Christiana, Jr., declare as follows:

1. I am formally President for Joe Christiana Food Distributors, Inc., a named Plaintiff and Class Representative in this class action. I make this declaration in support of Direct Purchaser Plaintiffs' Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards. I have personal knowledge of the facts stated in this declaration and, if called as a witness, I could competently testify to them.

2. I live in East Baton Rouge Parish, Louisiana, and have worked for Joe Christiana Food Distributors, Inc. for 44 years.

3. During the Class Period in this case, Joe Christiana Food Distributors, Inc. purchased Broilers from one or more of the Defendants in this lawsuit.

4. On May 27, 2022, the Court granted Direct Purchaser Plaintiffs' Motion for Class Certification and appointed Joe Christiana Food Distributors, Inc. as a Class

Representative on behalf of itself and others who purchased Broilers from at least one of the Defendants during the Class Period. (*See* ECF No. 5644.)

5. Joe Christiana Food Distributors, Inc. has participated fully in the litigation and acted in the best interests of the entire Class. These activities have included retaining the attorneys appointed as Class Counsel, advising attorneys and approving pleadings, reviewing and responding to written discovery, preparing for and participating in a full day deposition, searching for, collecting, preserving, and producing documents, preparing a declaration in support of Direct Purchaser Plaintiffs’ Motion for Class Certification, performing work in consultation with Class Counsel in preparation for trial, and keeping up to date on the progress of the case.

6. The Court previously awarded an interim service award of \$15,000 for Joe Christiana Food Distributors, Inc.’s service to the Class. (*See* ECF No. 5229.) Since that time, Joe Christiana Food Distributors, Inc. has spent 10 hours on this litigation.

7. Joe Christiana Food Distributors, Inc. respectfully requests that this Court grant Direct Purchaser Plaintiffs’ Motion for Payment of Attorneys’ Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of April, in 2024.

/s/ Joseph Oscar Christiana, Jr.
JOSEPH OSCAR CHRISTIANA, JR.

Exhibit 32

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

IN RE BROILER CHICKEN ANTITRUST
LITIGATION,

Case No.: 1:16-cv-08637

The Honorable Thomas M. Durkin

This Document Relates To:

Magistrate Judge Jeffrey T. Gilbert

THE DIRECT PURCHASER PLAINTIFF
ACTION

**DECLARATION OF PETER G. PAHIDES OF CEDAR FARMS CO., INC. IN SUPPORT
OF DIRECT PURCHASER PLAINTIFFS’ MOTION FOR PAYMENT OF
ATTORNEYS’ FEES, REIMBURSEMENT OF LITIGATION EXPENSES,
AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Peter G. Pahides, declare as follows:

1. I am the President and Chief Executive Officer of Cedar Farms Co., Inc., a named Plaintiff and Class Representative in this class action. I make this declaration in support of Direct Purchaser Plaintiffs’ Motion for Payment of Attorneys’ Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards. I have personal knowledge of the facts stated in this declaration and, if called as a witness, I could competently testify to them.

2. I live in Pennsylvania and have worked for Cedar Farms Co., Inc. for more than 40 years.

3. During the Class Period in this case, Cedar Farms Co., Inc. purchased Broilers from one or more of the Defendants in this lawsuit.

4. On May 27, 2022, the Court granted Direct Purchaser Plaintiffs’ Motion for Class Certification and appointed Cedar Farms Co., Inc. as a Class Representative on behalf of

itself and others who purchased Broilers from at least one of the Defendants during the Class Period. (*See* ECF No. 5644.)

5. Cedar Farms Co., Inc. has participated fully in the litigation and acted in the best interests of the entire Class. These activities have included retaining the attorneys appointed as Class Counsel, advising attorneys and approving pleadings reviewing and responding to written discovery, preparing for and participating in two full day depositions, searching for, collecting, preserving, and producing documents, preparing a declaration in support of Direct Purchaser Plaintiffs' Motion for Class Certification, performing work in consultation with Class Counsel in preparation for trial, testifying live at trial, and keeping up to date on the progress of the case.

6. The Court previously awarded an interim service award of \$15,000 for Cedar Farms Co., Inc.'s service to the Class. (*See* ECF No. 5229.) Since that time, Cedar Farms Co., Inc. has spent 132 hours on this litigation.

7. Cedar Farms Co., Inc. respectfully requests that this Court grant Direct Purchaser Plaintiffs' Motion for Payment of Attorneys' Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards.

4/29/2024 I declare under penalty of perjury that the foregoing is true and correct. Executed this
__th day of April, in 2024.

DocuSigned by:

Mr. Pahides

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PETER G. PAHIDES