

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

*IN RE CATTLE AND BEEF ANTITRUST  
LITIGATION*

This Document Relates to:

*Consumer Indirect Purchaser Plaintiff  
Action*

No. 0:22-md-03031-JRT-JFD

Honorable John R. Tunheim

Honorable John F. Docherty

**DECLARATION OF  
BRIAN D. CLARK IN SUPPORT OF CONSUMER INDIRECT PURCHASER  
PLAINTIFFS' MOTION FOR INTERIM PAYMENT OF ATTORNEYS' FEES,  
REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Brian D. Clark, declare and state:

1. I am a Partner with the law firm of Lockridge Grindal Nauen PLLP ("LGN").

I submit this Declaration in support of Consumer Indirect Purchaser Plaintiffs' ("Consumer IPPs") Motion for Interim Payment of Attorneys' Fees, Reimbursement of Litigation Costs, and Class Representative Service Awards (the "Motion"). I have personal knowledge of the matters stated herein and could competently testify to the same.

2. LGN and Hagens Berman Sobol Shapiro LLP ("Hagens Berman") are the Court-appointed Interim Co-Lead Counsel for Consumer IPPs in this action. They have taken this case on contingency, and to date have been paid nothing for their significant investment of time and effort in prosecuting the case. They have also paid out of pocket the significant expenses associated with investigating the beef industry, conducting fact and expert discovery, retaining experts, and hosting Defendants' documents in this complex, years-long antitrust action.

3. From the outset of this case in 2019, LGN and Hagens Berman have worked together to prosecute this complex antitrust class action vigorously and efficiently. LGN and Hagens Berman were led by attorneys whose combined over 100 years of experience helped achieve these favorable settlements for the Consumer IPP Settlement Classes.

4. On December 17, 2025, this Court preliminarily approved the settlements between Consumer IPPs Plaintiffs and Defendants Cargill, Inc. and Cargill Meat Solutions, Inc. (collectively “Cargill”), and Tyson Foods, Inc. and Tyson Fresh Meats, Inc. (collectively “Tyson”). ECF No. 1494. Under the terms of the settlements, Cargill has paid \$32,500,000 and Tyson has paid \$55,000,000 into escrow accounts (“Settlement Fund”) for the benefit of the Consumer IPP Settlement Classes. The Court Appointed Settlement Escrow Administrator, Huntington Bank, estimates the interest accrued in the settlement amounts by the May 12, 2026 fairness hearing will be \$1,203,995.80.

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

- I. Co-Lead Counsel’s efforts in advancing this litigation and the settlements achieved as a result;
- II. Co-Lead Counsel’s time reporting and total time incurred;
- III. Class Representatives’ contribution to the prosecution of this case; and
- IV. The time LGN has incurred in this case.

**I. CLASS COUNSEL’S EFFORTS IN PROSECUTING THIS LITIGATION**

6. In 2019 LGN and Hagens Berman filed the first and only Consumer IPP complaint, *Peterson v. Agri Stats*, against the nation’s largest beef producers alleging antitrust conspiracy in violation of state antitrust laws.

7. Co-Lead Counsel successfully defended against Defendants' motions to dismiss, and this case proceeded through discovery.

8. The parties produced over 4.45 million documents in discovery, which Co-Lead Counsel and their litigation teams then reviewed and analyzed.

9. During discovery, Co-Lead Counsel engaged in a demanding deposition schedule that was reflective of the complexity of this class action antitrust case. Co-Lead Counsel completed 79 depositions of Defendant employees and 13 non-party depositions noticed by Plaintiffs, as well as 25 non-party depositions noticed by Defendants; defended the depositions of the 28 Consumer IPP class representatives; deposed Defendants' class certification expert, Dr. Lauren J. Stiroh; and defended the deposition of Consumer IPPs' class certification expert, Dr. Russell W. Mangum.

10. On September 25, 2024, Consumer IPPs moved for class certification. ECF No. 868. To support their motion, Consumer IPPs engaged an expert witness, Dr. Mangum, who conducted a market structure analysis, correlation analyses, an overcharge regression, and pass-through regressions using well-accepted econometric methods. Dr. Mangum measured the impact of the conspiracy on the direct purchaser class, then traced that overcharge through to the Consumer IPP class. Co-Lead Counsel then argued in favor of class certification and against Defendants' opposition at a class certification hearing before this Court. ECF Nos. 1471, 1472.

11. While litigating this case, Co-Lead Counsel have also engaged in settlement conversations with Defendants and mediators. Through these arms-length, hard-fought negotiations, Consumer IPPs reached the instant settlements with Cargill and Tyson.

12. The long-form settlement agreement with Cargill was signed by both parties on August 22, 2025. Per the settlement, Cargill placed \$32.5 million into a settlement fund that will be used to compensate the Consumer IPP Settlement Classes and cover litigation fees and expenses, including the cost of notifying class members and administering the settlement. ECF No. 1445 at 5. Additionally, Cargill agreed to provide significant cooperation to assist Consumer IPPs as they continue litigating their claims against the remaining Defendants. *Id.* at 5-7.

13. The long-form settlement agreement with Tyson was signed by both parties on September 29, 2025. Per the settlement, Tyson placed \$55 million into a settlement fund that will be used to compensate the Consumer IPP Settlement Classes and cover litigation fees and expenses, including the cost of notifying class members and administering the settlement. ECF 1445 at 7-9. Additionally, Tyson agreed to provide significant cooperation to assist Consumer IPPs as they continue litigating their claims against the remaining Defendants. *Id.*

14. Both settlements provide for cooperation related to: (a) Access to Witnesses; (b) Authentication and Admissibility of Documents; (c) Experts; and (d) Summary Judgment.

15. A breakdown of the settlements in the case to date is provided below.

<u>Defendant</u>	<u>Settlement Amount</u>	<u>Status</u>
Cargill	\$32,500,000.00	Preliminarily Approved. ECF No. 1494.
Tyson	\$55,000,000.00	Preliminarily Approved. ECF No. 1494.
<b><u>TOTAL</u></b>	<b>\$87,500,000.00</b>	

16. Co-Lead Counsel seek interim attorneys' fees, reimbursement of litigation expenses, and class representative service awards from the proceeds of the settlements.

17. Settlement proceeds are currently being held in an interest-bearing escrow account. From funding through the May 12, 2026 fairness hearing, the interest earned on the escrow account is estimated to be \$1,203,995.80 million. Consumer IPPs propose the interest earned on the settlements be distributed to the Consumer IPP Settlement Classes *pro rata* along with the net principal amounts of the settlements. The Gross Settlement Fund equals \$88,703,995.80, which is the \$87,500,000.00 paid by Cargill and Tyson plus anticipated accrued interest of \$1,203,995.80. For purposes of distribution, the amount to be distributed to the class is the Gross Settlement Fund less (a) attorneys' fees awarded; (b) expenses and costs incurred; and (c) service awards for named Plaintiffs. This is consistent with the Settlement Agreements. *See* ECF No. 1446-1 (Cargill Settlement Agreement); ECF No. 1446-2 (Tyson Settlement Agreement).

18. Co-Lead Counsel have already obtained preliminary approval and will seek final approval from this Court by the Court-ordered April 28, 2026 deadline. ECF No. 1494, at 8. Should the Court grant final approval, Co-Lead Counsel will supervise all aspects of settlement and claims administration and supervise the distribution of settlement proceeds to qualified members of the Consumer IPP Settlement Classes.

19. Co-Lead Counsel have prepared and executed the class notice and settlement distribution plan for the Cargill and Tyson settlements that were preliminarily approved by the Court. ECF No. 1494, at 2.

## **II. CO-LEAD COUNSEL'S TIME AND EXPENSE REPORTING**

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

21. On October 8, 2019, Co-Lead Counsel established a Time and Expense Protocol for all Class Counsel, sent that Protocol to Class Counsel, and instructed them to abide by it. *See* Exhibit 1. We also provided Class Counsel with templates of the required Microsoft Excel reporting form.

22. The Time and Expense Protocol requires each firm to contemporaneously record and transmit to LGN 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.

23. To control Class Counsel's lodestar, the Time and Expense Protocol instructed Class Counsel not to submit time for work not requested by Class Counsel, for duplicative work, reading and reviewing, preparing time and expense reports, routine

clerical tasks, or for 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 (“Firm Costs”). Finally, time included in this fee petition that was spent on first-tier document review has been capped at \$350.00 per hour.

24. To ensure that time and expense entries submitted by each firm are reported in a timely matter, the Time and Expense Protocol requires that all reports be submitted to LGN 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.

25. Each month, upon receipt, LGN reviews the monthly time and expense reports from Class Counsel and requests adjustments and revisions, as appropriate, to ensure compliance with the Time and Expense Protocol.

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 Record 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 from inception of the case through January 31, 2026. In addition, we reviewed their monthly reported hours and expenses again in preparing this submission in support of Consumer IPPs’ Motion. Class Counsel have worked diligently

to ensure that throughout the case, Class Counsel's efforts have been coordinated, detailed, vigorous, and efficient.

28. Declarations from Class Counsel attesting that the time and expenses they reported are true, accurate, and comply with the Time and Expense protocol are attached as Exhibits 2 (Scarlett Declaration) – 3 (Goplerud Declaration). The firm Shindler, Anderson, Goplerud, & Weese P.C. contributed to the prosecution of this case on behalf of the Consumer IPPs, primarily through its representation of a number of class representatives. My firm's time and expenses are attached as **Exhibits 4–5**. Each declarant also identifies the attorneys and paralegals from the firm that have worked on the case and submitted time in the monthly reports, along with their historic hourly rates. A summary of all firm time, hours, and lodestar is attached as **Exhibit 6**.

29. In notifying members of the Consumer IPP Settlement Classes about the distribution of the settlements, Co-Lead Class Counsel informed members of the Settlement Classes that they would seek attorneys' fees in an amount not to exceed 33 and 1/3 percent of the proceeds of the settlements plus interest.<sup>1</sup> Given that the total gross recovery is \$87,500,000, and Huntington Bank's estimate that interest accrued through May 12, 2026 is expected to be \$1,203,995.80, the total Gross Settlement Fund is

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<sup>1</sup> See Important Legal Notice: You May Be Eligible for a Cash Payment from the Beef Price-Fixing Settlements, OverchargedForBeef Website [https://www.overchargedforbeef.com/Content/Documents/Consumer%20Indirect%20Beef%20Litigation%20-%20Email%20Notice\\_English\\_12-16-2025.pdf](https://www.overchargedforbeef.com/Content/Documents/Consumer%20Indirect%20Beef%20Litigation%20-%20Email%20Notice_English_12-16-2025.pdf) (last visited Mar. 12, 2026); ECF No. 1494 (December 17, 2025) (Amended Order Granting Consumer Indirect Purchaser Plaintiff' Motion for Preliminary Approval of Settlement Agreements With Cargill and Tyson Defendants and Approval of Notices, Plan of Notice, and Plan of Allocation).

\$88,703,995.80. Consumer IPPs request one-third of this total as attorneys' fees, which is \$29,567,998.60.

30. In the event of future recoveries, Co-Lead Counsel will petition the Court for the payment of additional attorneys' fees that reflect the continuing efforts of Class Counsel to litigate the case and achieve those recoveries.

**B. Expenses Incurred by Class Counsel on Behalf of the Consumer IPPs**

31. Class Counsel have incurred reasonable expenses that were necessary to support this litigation. There are two categories of litigation expenses at issue in the Motion: expenses that Class Counsel pay (Firm Costs, Litigation Fund Expenses, and ongoing litigation expenses), and expenses that are paid directly from the settlement escrow account (Administrative Expenses and Taxes). Class Counsel has endeavored to keep all expenses reasonable and necessary to support the litigation. In the Motion, Class Counsel seek reimbursement only for unreimbursed Firm Costs and Litigation Fund Expenses. Consumer IPPs' proposal for an award of attorneys' fees is a one-third fee from the Gross Settlement Fund, which is consistent with similar awards approved in the Eighth Circuit.

32. In notifying members of the Consumer IPP Settlement Classes of these settlements, Co-Lead Counsel noted that they would request reimbursement of the costs for notice, approval, and administration of the settlement claims process in an amount not to exceed \$1.772 million.

33. This paragraph summarizes the litigation costs at issue in the Motion. The total amount of expenses at issue here is \$8,777,606.97, for which Class Counsel request reimbursement at this time. This total amount of expenses consists of the following four

categories of expenses: (1) unreimbursed expenses incurred individually by specific Class Counsel (“Firm Costs”) from December 20, 2018 through January 31, 2026; and (2) unreimbursed common cost litigation fund expenses (“Litigation Fund Expenses”) from October 13, 2021 through January 31, 2026. The chart below provides amounts for each category of expenses. Class Counsel only seek reimbursement for unreimbursed Firm Costs and Litigation Fund Expenses.<sup>2</sup>

<b>Expense Category</b>	<b>Amount</b>	<b>Reference</b>
Unreimbursed Firm Costs	\$219,782.18	Exhibit Nos. 2–4, 6–7
Unreimbursed Litigation Fund Expenses	\$8,651,860.08	See ¶¶ 37-42
<b>Total Expenses</b>	<b>\$8,871,642.26</b>	

*i. Unreimbursed Firm Costs*

34. Class Counsel have incurred \$219,782.18 in recorded expenses in this litigation on behalf of the Consumer IPP Settlement Classes for which they now seek reimbursement. This total is based on monthly expense reports submitted to Co-Lead Counsel for the period of December 20, 2018 through January 31, 2026. The Firm Costs described in this Declaration and supporting exhibits, overall and by category, include expenses incurred separately by all Class Counsel. The allowed expense categories were contained within the Time and Expense Protocol sent to all Class Counsel by Co-Lead

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<sup>2</sup> Costs for claims administration and taxes on the escrow accounts are not included in the expense chart. The current costs for administration of the claims in this case is currently \$336,491.04. Class Counsel will report on the total claims administration costs and escrow account taxes, and request to reserve additional costs if necessary, upon moving for the distribution of costs.

Counsel in October 2019, shortly before motions to dismiss were briefed. Co-Lead Counsel are each submitting a declaration confirming they abided by the Time and Expense Protocol, and that their time and expense submission comports with the Time and Expense Protocol.

35. **Exhibit 7**, attached, summarizes the Firm Costs reported as having been incurred by all Class Counsel and paid by those firms; these do not include costs paid out of the litigation fund. These Firm Costs are from December 20, 2018 through January 31, 2026. These Firm Costs include categories such as online legal research, travel, shipping and mailing, and document imaging and copying. The primary expenses incurred by Class Counsel relate to preparing for and attending hearings (e.g., travel, and legal document copy and shipping expenses) and legal research (e.g., Westlaw charges).

36. Class Counsel have itemized their costs separately in their requests for reimbursement accompanying this Motion and have thereby attested to the reasonableness and accuracy thereof.

*ii. Unreimbursed Litigation Fund Expenses*

37. Co-Lead Counsel have established a litigation fund used to pay litigation costs in this case. The litigation fund is a common cost fund from which to pay ongoing litigation expenses for the case overall on behalf of the Consumer IPPs. The litigation fund initially was funded, and is replenished as required, by assessment payments from Co-Lead Counsel. Litigation Fund Expenses are separate from, and in addition to, the Firm Costs incurred individually by each Class Counsel, described above.

38. On behalf of all Class Counsel, LGN has maintained the litigation fund and recorded and documented all costs paid from the fund. From the inception of the case through February 28, 2026, a total of \$8,651,860.08 in Litigation Fund Expenses has been incurred. A detailed description of the costs paid from and incurred by the litigation fund is provided below. These Litigation Fund Expenses were incurred on behalf of the Consumer IPP class without any guarantee they would ultimately be recovered. These costs are primarily associated with retaining testifying and non-testifying experts and hosting documents produced in this case in an online database. All expenses paid from the litigation fund were reasonable and necessary to the prosecution of this case and recovery for the Settlement Class.

39. The Litigation Fund Expenses summarized below fall into six categories: (a) Experts (Testifying and Non-Testifying); (b) Document Database Vendor; (c) Phone Record Vendor; (d) Mediation Costs; (e) Transcript Costs; and (f) Miscellaneous Costs. Each of these six categories is described in more detail below.

**a) *Experts (Testifying and Non-Testifying)*:** Antitrust class action litigation is complex. It requires extensive analyses of data and the dedicated work of economic and industry experts to help prove defendants' liability, the impact on the class resulting from the alleged conspiracy, and the damages suffered by the class that result from the alleged conspiracy. Such expert work is also essential to demonstrate that a purported plaintiff class should be certified. This case is no exception. Co-Lead Counsel engaged experts to support Plaintiffs' class certification efforts and to provide other economic analysis in support of Plaintiffs' claims. From December

13, 2021 through February 28, 2026, Co-Lead Counsel incurred expert invoices totaling \$8,076,977.34 from the Litigation Fund. The work of experts in this case was critical to, among other things, Plaintiffs' survival of Defendants' motion to dismiss and arguments for class certification.

**b) *Document Database Vendor:*** In connection with discovery in this case, Co-Lead Counsel retained a vendor with expertise in designing and maintaining electronic databases ("Document Database Vendor"). Plaintiffs' Document Database Vendor provided the database that enabled Co-Lead Counsel to search, review, analyze, and code documents and other records produced by Defendants and various third parties. The review, analysis, and coding of documents has been integral to Co-Lead Counsel's efforts relating to fact and expert discovery and preparation for class certification motion practice. From December 13, 2021 through February 16, 2026, Co-Lead Counsel have received invoices from the Document Database Vendor totaling \$259,049.36. Co-Lead Counsel will continue to use these databases until final approval of the settlements is Ordered, and as the case proceeds against the remaining defendants. Thus, Co-Lead Counsel will continue to receive invoices for this case from the Document Database Vendor.

**c) *Phone Record Vendor and Phone Record Subpoena Expenses:*** As part of the discovery process in this case, counsel subpoenaed phone records of Defendants and relevant witnesses. The evidence obtained from those records has become integral to Consumer IPP's case in chief. From December 13, 2021 through February 28,

2026, Co-Lead Counsel received invoices from the Document Database Vendor totaling \$122,387.23.

- d) **Mediation Costs:** Co-Lead Counsel engaged the services of mediators at the outset of this litigation to jumpstart settlement discussions. From December 13, 2021 through February 28, 2026, Co-Lead Counsel received invoices related to mediation totaling \$5,900.00.
- e) **Transcript Costs:** This case has amassed tens of thousands of pages of courtroom and depositions transcript records over the past seven years. It has been critical for Co-Lead Counsel to review transcripts from hearings and depositions to prepare for arguments and motions. From December 13, 2021 through February 28, 2025, Co-Lead Counsel received invoices from transcript-related services totaling \$103,388.14.
- f) **Miscellaneous Costs:** Class Counsel have paid other miscellaneous invoices not referenced above from the inception of this matter to the present from the shared Litigation Fund. In addition to those expenses listed above, Class Counsel paid invoices from the Litigation Fund totaling \$84,158.01 from December 13, 2021 through February 28, 2026. These costs include, but are not limited to, costs for printing and banking fees.

40. The total Litigation Fund Expenses paid and incurred from the Litigation Fund from December 13, 2021 through February 28, 2026 is \$8,651,860.08. Class Counsel have not yet been reimbursed for any of these costs. As such, Class Counsel are seeking reimbursement for the full amount of Litigation Fund Expenses totaling \$8,651,860.08.

41. Co-Lead Counsel have notified members of the IPP Plaintiff class that Co-Lead Counsel will seek an award of 33 and 1/3 percent from the Settlement Fund to reimburse reasonable and necessary costs already paid and to cover reasonable ongoing litigation expenses to support this litigation. ECF No. 1494.<sup>3</sup> The deadline for members of the Consumer IPP Settlement Classes to object to this request is March 30, 2026. *See* ECF No. 1494, at 8.

42. In the event of future recoveries, Co-Lead Counsel will petition the Court for reimbursement of additional reasonable expenses necessary to support this litigation.

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

43. There are 28 class representatives in this case. Because this is a downstream consumer case, the class representatives are ordinary people who purchased beef for personal consumption. To contribute to this litigation, they had to provide documents in response to discovery requests, respond to interrogatories, and track down purchase receipts. All class representatives sat for depositions, which included preparing for the depositions with counsel and reviewing the depositions transcripts after the depositions took place.

44. Throughout this litigation, the class representatives have advised Class Counsel and approved pleadings, reviewed and responded to written discovery, searched for, gathered and preserved, and produced documents, kept up to date on the progress of

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<sup>3</sup> *See* <https://www.overchargedforbeef.com/en/Home/FAQ#faq24>.

the case, and performed other similar activities. Co-Lead Counsel maintained honest, frank, and professional relationships with class representatives.

45. Each of the 28 class representatives submitted declarations in support of this Motion for Attorneys' Fees, Litigation Costs, and Class Representative Service Awards. The declarations are attached to this Declaration as **Exhibits 8–35**. Each of the declarations outline work the class representatives did on this case, as well as their estimated hours spent working on the case.

46. The class representatives were never promised that they would receive any additional compensation for leading this case. Without the active participation of the class representatives, all of whom performed their duties with the possibility of no benefit to themselves, the instant settlements would not have been possible.

47. In the event of future recoveries, Co-Lead Counsel will petition the Court for additional class representative service awards to reflect their contributions to the Consumer IPP class.

#### **IV. TIME AND EXPENSES INCURRED BY LGN IN THIS LITIGATION**

48. My firm, Lockridge Grindal Nauen PLLP, has led the prosecution of this matter alongside Hagens Berman Sobol Shapiro LLP in all regards since it was appointed as Interim Co-Lead Counsel.

49. The schedule attached hereto as **Exhibit 5** 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 the case's inception through January 31, 2026. The scheduled was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm.

50. The hourly rates for the partners, attorneys, and professional support staff in my firm included in **Exhibit 5** are our customary hourly rates charged and routinely awarded for litigation of this nature.

51. As detailed in **Exhibit 5**, the total number of hours my firm expended on this case from inception through January 31, 2026 is 29,661.45 hours. The total lodestar for my firm is \$15,861,724.00. My firm's lodestar figures are based on the firm's current billing rates.

52. As detailed in **Exhibit 4**, my firm has incurred a total of \$82,463.90 in unreimbursed expenses from December 20, 2018 to January 31, 2026 in connection with the prosecution of this case.

53. My firm has abided by the Time and Expense Reporting Protocol (**Exhibit 1**) throughout this case. My firm's submission of its compensable time and reimbursable expenses in this Declaration and its exhibits comports with the Time and Expense Protocol.

54. 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 record of the expenses incurred.

55. LGN has not submitted any bids in antitrust actions or decreasing attorney fee recovery as the case proceeds and reaches certain litigation milestones.

**V. OBJECTIONS RECEIVED TO DATE.**

56. Consumer IPPs have only received one written objection to the settlements. In connection with their motion for final approval of the settlements, Consumer IPPs will provide copies of and responses to the objections. Any objectors will also have the opportunity to be heard at the May 12, 2026 fairness hearing.

\* \* \*

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 16th day of March, 2026 in Minneapolis, Minnesota.

s/ Brian D. Clark  
Brian D. Clark