

# **Exhibit 1**

LOCKRIDGE  
GRINDAL  
NAUEN  
P. L. L. P.

Attorneys at Law

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**HAGENS BERMAN SOBOL SHAPIRO LLP**  
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T 206.623.7292  
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October 8, 2019

**VIA ELECTRONIC MAIL**

To All Indirect Purchaser Plaintiffs' Counsel

Re: *Beef Antitrust Litigation*, Case No. 0:19-cv-1129 (D. Minn.)  
Time & Expense Report Instructions

Dear Counsel:

As you know, on August 6, 2016, our firms were appointed as Interim Co-Lead Class Counsel, for the Consumer Indirect Purchaser Class in this case. Our First Amended Class Action Complaint was filed on July 15, 2019. The motions to dismiss are scheduled to be briefed this Fall. We're writing to provide you with forms and protocols for reporting your time and expenses, which have been approved by Judge Tunheim and Magistrate Judge Bowbeer. We also request your contribution to the common cost litigation fund.

**Time and Expense Reporting**

To efficiently manage and direct the prosecution of this case, Interim Co-Lead Counsel will collect time and expense reports from each firm. Attached are Excel spreadsheet time and expense report forms to use for reporting your firm's time and expense data. Please submit your time and expense reports along with the detailed back up reports to Elizabeth Sipe at [emsipe@locklaw.com](mailto:emsipe@locklaw.com). Her phone number is 612-339-6900.

Your first time and expense report should cover the time period from inception through August 31, 2019. This initial report is due on October \_\_, 2019. All time is to be reported at the billing rates in effect at the time the work was performed. Your subsequent reports should be done on a monthly basis and submitted by the **20<sup>th</sup> day of the month** for the preceding month. Please keep your time and expense reporting current. Failure to do so may be grounds for denying any subsequent request for fees or expense reimbursement.

Consumer Indirect Purchaser Plaintiff Counsel  
Litigation Fund & Time & Expense Reports  
October 8, 2019  
Page 2

In your time and expense report, please adhere to these guidelines:

1. Time is to be reported in tenths of an hour.
2. Time is to be recorded by task with a specific amount of time for each task described; do not submit “block billing” with one undifferentiated total time for multiple tasks
3. Time is to be recorded at the billing rate in effect when the work is performed.
4. Time spent on Tier 1 reviewing documents (Task Code 4) is capped at \$350 per hour.
5. Any attorney submitting time under Tier 2 document review and deposition preparation (Task Code 5) must submit their hourly billings rates to co-lead counsel and have those rates approved before incurring any time under this task code. As guidance, it is unlikely that rates in excess of \$500 for Tier 2 document review will be approved.
6. Please do not submit time for any of the following. It will not be compensated or included in any fee petition:
  - work not performed at the request or under the direction of co-lead counsel;
  - duplication of efforts within a firm;
  - time expended in preparing time and expense reports;
  - “read and review” time unrelated to preparation for or performance of work specifically assigned by co-lead counsel;
  - work associated with any direct purchaser case;
  - routine clerical tasks (such as “file maintenance” by a paralegal or clerical staff) unrelated to preparation for and performance of work specifically assigned by co-lead counsel; or
  - time associated with work relating to any client or potential client that did not retain your firm for this case.
7. Your expense report should itemize your out-of-pocket, case-related expenses. If you have a “Miscellaneous/Other” expense item on a report, please describe it with sufficient detail to identify the expense and its relation to the case.
8. Routine office supplies and regular secretarial time should *not* be included as a case expense.
9. No surcharges should be reflected in or applied to any expenses, including telephone, faxes, and copying.

Consumer Indirect Purchaser Plaintiff Counsel  
Litigation Fund & Time & Expense Reports  
October 8, 2019  
Page 3

10. Each expense claim must be properly documented by a sufficiently detailed receipt or some other form of proof of payment acceptable for ultimate presentation to and approval by the Court. Each firm is to maintain and preserve all detailed receipts and expense documentation for production to Lead Counsel upon request. Cash advances will not be considered for reimbursement without evidence of payment made for an expense related to the case.
11. Travel expenses should follow these guidelines:
  - Flights of less than six hours should be submitted at coach class rates; flights exceeding six hours may be submitted at business class rates; all flights are to be booked at the lowest fare available; first class airfare should not be submitted and will not be reimbursed.
  - For overnight travel, counsel is to be mindful in selecting reasonable hotel accommodations and restaurants; and
  - Per Diem expenses for travel should not exceed \$75 per person per day exclusive of lodging and transportation.

If you have any questions, please call us. We look forward to working with each of you toward a successful resolution of this case.

Very truly yours,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

HAGENS BERMAN SOBOL SHAPIRO LLP

W. Joseph Bruckner

Steven W. Berman

Attachment(s)

# **Exhibit 2**

**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  
SHANA E. SCARLETT IN SUPPORT OF CONSUMER INDIRECT  
PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT OF  
ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Shana E. Scarlett, declare under oath, as follows:

1. I am a Partner with the law firm of Hagens Berman Sobol Shapiro LLP (“Hagens Berman”). I submit this Declaration in support of Consumer Indirect Purchaser Plaintiffs’ Motion for Interim Payment of Attorneys’ Fees, Reimbursement of Litigation Costs, and Class Representative Service Awards (the “Motion”). Based on personal knowledge or discussions with counsel in my firm of the matters stated herein, if called upon, I could and would competently testify thereto.

2. Hagens Berman and Lockridge Grindal Nauen PLLP have are the Court-appointed Interim Co-Lead Counsel for the Consumer Indirect Purchaser Plaintiffs (ECF No. 68, Case No. 19-cv-1129). From the outset of this litigation in 2019, Co-Lead Counsel have worked together to vigorously and efficiently prosecute this complex antitrust case. The firm Shindler, Anderson, Goplerud, & Weese P.C. also contributed to the prosecution

of this case on behalf of the Consumer IPPs, primarily through its representation of a number of class representatives. At all times, work was directed by Co-Lead Counsel.

3. I have practiced law and specialized in antitrust class action law for over two decades. Based on my experience, the settlements achieved for the class are significant and warrant the requested interim attorneys' fees, reimbursement of litigation costs, and class representative service awards.

4. The work performed, fees incurred, costs paid from the litigation fund, and costs incurred by individual Class Counsel firms are generally set forth in the Motion and the concurrently filed Declaration of Brian D. Clark. To avoid duplication, this declaration primarily focuses on Hagens Berman's time and expenses throughout this litigation.

5. As Co-Lead Counsel, Hagens Berman has been directly involved in the management of the entire case and participated in all facets of the litigation from inception through the present. Hagens Berman has performed a considerable amount of work and incurred substantial expenses over seven years without any compensation. These efforts have resulted in the recovery of \$87.5 million for the Consumer IPP class. Hagens Berman will continue to fulfill its duties as Co-Lead Counsel as litigation proceeds against the remaining Defendants.

6. Throughout the course of this litigation, Hagens Berman has maintained contemporaneous billing records, which have been summarized and submitted to Co-Lead Counsel in time and expense reports that comport with the Court-approved Time and Expense Protocol in this litigation. In preparing this declaration, Hagens Berman conducted a further review of its billing records to ensure accuracy.

7. 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 Hagens Berman for the work they performed in this case. The lodestar calculation is based on Hagens Berman's historic hourly billing rates, except for work done on first tier document review which is capped at \$350 per hour, from inception of the case through January 31, 2026.

8. The total number of hours expended on this litigation by Hagens Berman from inception of the case through January 31, 2026, is 42,313.70 hours. The total lodestar for Hagens Berman is \$23,319,697.50. 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 Hagens Berman 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 Hagens Berman.

9. The expenses incurred in this action are reflected on the books and records of Hagens Berman. 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.

10. As detailed in **Exhibit 2**, my firm has incurred a total of \$135,601.69 in unreimbursed litigation expenses during the period from the case's inception through January 31, 2026. These expenses do not include my firm's assessment payments of

\$3,260,000.00 to the common cost litigation fund maintained by Co-Lead Counsel, which are reflected in the concurrently filed declaration of Brian D. Clark.

\* \* \*

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

Executed on March 16, 2026, at Berkeley, California.

*s/ Shana E. Scarlett*

\_\_\_\_\_  
Shana E. Scarlett

IN RE BEEF ANTITRUST LITIGATION

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

IN RE BEEF ANTITRUST LITIGATION																						
TIME REPORT - (To be submitted on the 20th of every month)																						
<b>Firm Name:</b>	<b>HAGENS BERMAN SOBOL SHAPIRO LLP</b>										<b>Reporting Period:</b>											
											<b>Inception through 01/31/2026</b>											
<b>Categories:</b>	1) Legal Research 2) Investigation / Factual Research 3) Discovery (Written / Deposition Taking & Defending / Meet & Confer / etc.) 4) Document Review Tier 1 - Subject to rate cap (\$350)					5) Document Review Tier 2 & Deposition Preparation - Subject to rate cap (\$500) 6) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing) 7) Class Certification 8) Summary Judgment					9) Appeals 10) Court Appearances & Preparation 11) Experts 12) Settlements & Mediation 13) Case Management					14) Trial Prep (Exhibit & Witness List/Jury Instruction/Vior Dire/Opening Statements/Closing Arguments/ Demonstratives/etc.) 15) Trial					<b>TITLE:</b> (P) Partner (A) Associate (SA) Staff Attorney (CA) Contract Attorney (LC) Law Clerk (I) Investigator (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 (historic)
Steve Berman (P)																27.90	0.00	27.90	\$1,500.00	\$29,742.50	\$0.00	\$29,742.50
Shana Scarlett (P)																1,043.20	0.00	1,043.20	\$1,200.00	\$1,059,207.50	\$0.00	\$1,059,207.50
Craig Spiegel (P)																44.00	0.00	44.00	\$1,100.00	\$34,162.50	\$0.00	\$34,162.50
Rio Pierce (P)																398.10	0.00	398.10	\$1,050.00	\$214,175.00	\$0.00	\$214,175.00
Breanna Van Engelen (P)																836.00	0.00	836.00	\$1,000.00	\$541,225.00	\$0.00	\$541,225.00
Jongguk Choi (SA)																1,349.20	0.00	1,349.20	\$600.00	\$676,430.00	\$0.00	\$676,430.00
Ben Harrington (P)																5.90	0.00	5.90	\$1,050.00	\$3,770.00	\$0.00	\$3,770.00
Patrick Ryan (SA)																2,170.50	0.00	2,170.50	\$600.00	\$972,930.00	\$0.00	\$972,930.00
Elaine Byszewski (P)																157.80	0.00	157.80	\$1,150.00	\$131,925.00	\$0.00	\$131,925.00
Helen Hsu (SA)																1,196.70	0.00	1,196.70	\$600.00	\$597,857.50	\$0.00	\$597,857.50
Lauren Barnes (P)																0.30	0.00	0.30	\$950.00	\$262.50	\$0.00	\$262.50
Chris O'Hara (P)																43.40	0.00	43.40	\$950.00	\$38,527.50	\$0.00	\$38,527.50
Hannah Song (A)																50.80	0.00	50.80	\$475.00	\$21,190.00	\$0.00	\$21,190.00
Abby Wolf (P)																4,027.30	0.00	4,027.30	\$900.00	\$2,686,775.00	\$0.00	\$2,686,775.00
Abigail Pershing (A)																13.00	0.00	13.00	\$550.00	\$4,372.50	\$0.00	\$4,372.50
Whitney Siehl (P)																2.40	0.00	2.40	\$800.00	\$1,117.50	\$0.00	\$1,117.50
Linda Walden (CA)																2,633.30	0.00	2,633.30	\$350.00	\$921,655.00	\$0.00	\$921,655.00
Ted Wojcik (P)																0.30	0.00	0.30	\$875.00	\$120.00	\$0.00	\$120.00
Allison Berk (A)																95.10	0.00	95.10	\$450.00	\$41,155.00	\$0.00	\$41,155.00
Allan Lundsgaarde (SA)																3,944.40	0.00	3,944.40	\$600.00	\$1,844,285.00	\$0.00	\$1,844,285.00
Matthew Arnold (CA)																5,922.60	0.00	5,922.60	\$350.00	\$2,072,910.00	\$0.00	\$2,072,910.00
Crystal Collier (CA)																1,494.20	0.00	1,494.20	\$350.00	\$522,970.00	\$0.00	\$522,970.00
Robert Willard (CA)																80.50	0.00	80.50	\$350.00	\$28,175.00	\$0.00	\$28,175.00
Alexandra Berkland (CA)																213.00	0.00	213.00	\$350.00	\$74,550.00	\$0.00	\$74,550.00
Emmanuel Ewenike (CA)																668.00	0.00	668.00	\$350.00	\$233,800.00	\$0.00	\$233,800.00
Patricia Simon (CA)																623.50	0.00	623.50	\$350.00	\$218,225.00	\$0.00	\$218,225.00

Timothy Farrell (CA)																99.50	0.00	99.50	\$350.00	\$34,825.00	\$0.00	\$34,825.00
Sarah Dupree (A)																1,459.10	0.00	1,459.10	\$650.00	\$762,785.00	\$0.00	\$762,785.00
Gayne Kalustian-Carrier (A)																3.80	0.00	3.80	\$650.00	\$1,805.00	\$0.00	\$1,805.00
John Lanou (SA)																1,002.10	0.00	1,002.10	\$525.00	\$493,080.00	\$0.00	\$493,080.00
Charles Malekzandi (CA)																473.00	0.00	473.00	\$350.00	\$165,550.00	\$0.00	\$165,550.00
Jay Mitchell (SA)																4,062.30	0.00	4,062.30	\$600.00	\$2,006,627.50	\$0.00	\$2,006,627.50
Jonah Pedersen (A)																861.90	0.00	861.90	\$675.00	\$551,282.50	\$0.00	\$551,282.50
Gabriela Labouriau (CA)																929.30	0.00	929.30	\$350.00	\$325,255.00	\$0.00	\$325,255.00
Fred Miller (CA)																958.80	0.00	958.80	\$350.00	\$335,580.00	\$0.00	\$335,580.00
Jason Vaughan (CA)																1,088.30	0.00	1,088.30	\$350.00	\$380,905.00	\$0.00	\$380,905.00
Cooper Michael (A)																660.40	0.00	660.40	\$475.00	\$299,155.00	\$0.00	\$299,155.00
Kevin Green (OC)																3.00	0.00	3.00	\$950.00	\$2,700.00	\$0.00	\$2,700.00
<b>SUB-TOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>38,642.90</b>	<b>0.00</b>	<b>38,642.90</b>		<b>\$18,331,065.00</b>	<b>\$0.00</b>	<b>\$18,331,065.00</b>
<b>NON-ATTORNEYS (LC, SPL, PL)</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>12</b>	<b>13</b>	<b>14</b>	<b>15</b>	<b>PREVIOUS HOURS</b>	<b>CURRENT HOURS</b>	<b>CUMULATIVE HOURS</b>	<b>HOURLY RATE</b>	<b>PREVIOUS LODESTAR</b>	<b>CURRENT LODESTAR</b>	<b>CUMULATIVE LODESTAR</b>
Brian Miller (SPL)																389.00	0.00	389.00	\$450.00	\$153,015.00	\$0.00	\$153,015.00
Jeaneth Decena (PL)																190.10	0.00	190.10	\$350.00	\$65,325.00	\$0.00	\$65,325.00
Matt Isaacs (I)																54.50	0.00	54.50	\$500.00	\$10,900.00	\$0.00	\$10,900.00
Chan Lovell (PL)																1,281.60	0.00	1,281.60	\$350.00	\$360,557.50	\$0.00	\$360,557.50
Jennifer Conte (PL)																88.80	0.00	88.80	\$450.00	\$28,995.00	\$0.00	\$28,995.00
Bill Stevens (PL)																358.30	0.00	358.30	\$450.00	\$147,200.00	\$0.00	\$147,200.00
Hannah Song (LC)																2.00	0.00	2.00	\$150.00	\$300.00	\$0.00	\$300.00
Dianne Grant (PL)																65.10	0.00	65.10	\$375.00	\$22,912.50	\$0.00	\$22,912.50
Shelby Taylor (PL)																6.20	0.00	6.20	\$400.00	\$1,995.00	\$0.00	\$1,995.00
Robert Haegele (PL)																3.70	0.00	3.70	\$450.00	\$1,295.00	\$0.00	\$1,295.00
Joseph Salonga (PL)																3.00	0.00	3.00	\$450.00	\$1,050.00	\$0.00	\$1,050.00
Amy Elder (PL)																772.90	0.00	772.90	\$450.00	\$313,042.50	\$0.00	\$313,042.50
Wendy Okada (PL)																35.20	0.00	35.20	\$250.00	\$8,800.00	\$0.00	\$8,800.00
Megan Meyers (PL)																208.40	0.00	208.40	\$425.00	\$83,412.50	\$0.00	\$83,412.50
Radha Kerzan (PL)																67.80	0.00	67.80	\$400.00	\$22,920.00	\$0.00	\$22,920.00
Nicolle Huerta (PL)																3.80	0.00	3.80	\$450.00	\$1,425.00	\$0.00	\$1,425.00
Amna Amin (LC)																27.10	0.00	27.10	\$300.00	\$8,130.00	\$0.00	\$8,130.00
Anastasia Grant (PL)																53.20	0.00	53.20	\$375.00	\$19,390.00	\$0.00	\$19,390.00
Riya Mehta (LC)																33.60	0.00	33.60	\$325.00	\$10,920.00	\$0.00	\$10,920.00
Liana Wang (LC)																19.70	0.00	19.70	\$325.00	\$6,402.50	\$0.00	\$6,402.50
Julia Woodbridge (PL)																2.80	0.00	2.80	\$400.00	\$1,082.50	\$0.00	\$1,082.50
Heidi Waggoner (PL)																4.00	0.00	4.00	\$175.00	\$700.00	\$0.00	\$700.00
<b>SUB-TOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>3670.80</b>	<b>0.00</b>	<b>3,670.80</b>		<b>\$1,269,770.00</b>	<b>\$0.00</b>	<b>\$1,269,770.00</b>
<b>GRAND TOTAL:</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>42313.70</b>	<b>0.00</b>	<b>42,313.70</b>		<b>\$19,600,835.00</b>	<b>\$0.00</b>	<b>\$19,600,835.00</b>

**IN RE BEEF ANTITRUST LITIGATION****EXPENSE REPORT - (To be submitted on the 20th of each month )****FIRM NAME: HAGENS BERMAN SOBOL SHAPIRO LLP****REPORTING PERIOD: Inception through 01/31/2026**

<b>CATEGORY</b>	<b>DESCRIPTION (If necessary)</b>	<b>CUMULATIVE COSTS</b>
Court Costs - Filing Fees		\$0.00
Experts/Consultants		\$77,025.00
Federal Express / UPS /Ontrac		\$14,590.57
Postage / U.S. Mail		\$8.86
Service of Process		\$1,785.25
Messenger/Delivery		\$0.00
Hearing Transcripts		\$0.00
Investigation		\$0.00
Lexis/Westlaw		\$29,998.39
Photocopies - In House		\$7,287.50
Photocopies - Outside		\$0.00
Telephone/Telecopier		\$0.00
Travel - Transportation (Airplanes - Coach Fares Only)		\$3,013.75
Travel - Meals (\$75 per person / day cap)		\$358.19
Travel - Hotels		\$1,313.21
Miscellaneous (Logitech Wireless Presenter and Flash Drive for Class Cert Hearing)		\$220.97
<b>TOTAL EXPENSES</b>		<b>\$135,601.69</b>

# **Exhibit 3**

**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  
J. BARTON GOPLERUD IN SUPPORT OF CONSUMER INDIRECT  
PURCHASER PLAINTIFFS’ MOTION FOR INTERIM PAYMENT OF  
ATTORNEY’S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, J. Barton Goplerud, declare under oath, as follows:

1. I am a Shareholder in the law firm of Shindler, Anderson, Goplerud & Weese P.C. (“SAGW”). I submit this Declaration in support of Consumer Indirect Purchaser Plaintiffs’ 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. My firm, along with the law firms of Hagens Berman Sobol Shapiro LLP and Lockridge Grindal Nauen PLLP, serve as Class Counsel in this litigation. Our firms have vigorously and efficiently prosecuted this complex antitrust case.

3. Based on my experience, the settlement achieved for the class is significant and warrants the requested attorneys’ fees, reimbursement of litigation costs, and class representative service awards.

4. The work performed, fees incurred, costs paid from the Litigation Fund, and costs incurred by individual Class Counsel firms are generally set forth in the Motion and the concurrently filed Declaration of Brian D. Clark. To avoid duplication, this declaration primarily focuses on SAGW's time and expenses throughout this litigation.

5. In its role as Class Counsel, SAGW has been involved in client engagement and motion drafting. SAGW has performed a hundreds of hours of work and incurred expenses over seven years without any compensation. These efforts assisted in the recovery of \$87.5 million for the Consumer IPP Class.

6. Throughout the course of this litigation, SAGW has maintained contemporaneous billing records, which have been summarized and submitted to Co-Lead Counsel in time and expense reports that comport with the Court-approved Time and Expense Protocol in this litigation. In preparing this declaration SAGW conducted a further review of its billing records to ensure accuracy.

7. 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 SAGW for the work they performed in this case. The lodestar calculation is based on SAGW's historic hourly billing rates, except for work done on first tier document review which is capped at \$350 per hour, from inception of the case through January 31, 2026.

8. The total number of hours expended on this litigation by SAGW from inception of the case through January 31, 2026, is 133.10 hours. The total lodestar for SAGW is \$57,305.00. 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 SAGW have been approved by courts in multiple other class action lawsuits across the country. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by SAGW.

9. The expenses incurred in this action are reflected on the books and records of SAGW. 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.

10. As detailed in **Exhibit 2**, my firm has incurred a total of \$1,716.59 in unreimbursed litigation expenses during the period from the case's inception through January 31, 2026.

\* \* \*

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

Executed on March 9, 2026, at West Des Moines, Iowa.  
(City) (State)

DocuSigned by:  
*Bart Goplerud*  
85C88CEE37AE421...  
J. Barton Goplerud

# Exhibit 1

IN RE BEEF ANTITRUST LITIGATION

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

Firm Name: Shindler, Anderson, Gopherud & Weese P.C.																						Reporting Period: Inception through 02/06/2025																					
Categories:																						TITLE:																					
1) Legal Research					5) Document Review Tier 2 & Deposition Preparation - Subject to rate cap					10) Court Appearances & Preparation					15) Trial Prep (Exhibit & Witness List/Jury Instruction/Vior Dire/Opening Statements/Closing Arguments/ Demonstratives/etc.)					(P) Partner		(A) Associate		(LC) Law Clerk		(SPL) Senior Paralegal		(PL) Paralegal															
2) Investigation / Factual Research					6) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing)					11) Experts					16) Trial																												
3) Discovery (Written / Deposition Taking & Defending / Meet & Confer / etc. )					7) Class Certification					12) Settlements & Mediation																																	
4) Document Review Tier 1 - Subject to rate cap					8) Summary Judgment					13) Case Management																																	
					9) Appeals					14) Class Notice																																	
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																					
JBG (P)																0.00	0.00	93.30	\$500.00	\$0.00	\$0.00	\$46,650.00																					
BOM (P)																0.00	0.00	28.20	\$275.00	\$0.00	\$0.00	\$7,755.00																					
BMB (A)																0.00	0.00	9.90	\$250.00	\$0.00	\$0.00	\$2,475.00																					
GWK (A)																0.00	0.00	0.10	\$250.00	\$0.00	\$0.00	\$25.00																					
MRM (A)																0.00	0.00	1.60	\$250.00	\$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																					
<b>SUB-TOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>133.10</b>		<b>\$0.00</b>	<b>\$0.00</b>	<b>\$57,305.00</b>																					
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																					
Name (LC)																0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00																					
Name (LC)																0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00																					
Name (LC)																0.00	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	\$0.00																					
Name (SPL)																0.00	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	\$0.00																					
Name (PL)																0.00	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																					
Name (PL)																0.00	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																					
<b>SUB-TOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>																					
<b>GRAND TOTAL:</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>133.10</b>		<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>																					

# Exhibit 2

**IN RE BEEF ANTITRUST LITIGATION**

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

**FIRM NAME: Shindler, Anderson, Goplerud & Weese, P.C.**

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**REPORTING PERIOD: Inception through 02/06/2025**

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<b>CATEGORY</b>	<b>CUMULATIVE COSTS</b>
Litigation Assessment	\$0.00
Court Costs - Filing Fees	\$0.00
Experts/consultants	\$0.00
Federal Express / UPS /Ontrac	\$0.00
Postage / U.S. Mail	\$0.00
Service of Process	\$0.00
Messenger/delivery	\$0.00
Hearing Transcripts	\$0.00
Investigation	\$0.00
Lexis/westlaw	\$0.00
Photocopies - in House	\$0.00
Photocopies - Outside	\$0.00
Telephone/telecopier	\$0.00
Travel - Transportation (Airplanes - Coach Fares Only)	\$1,354.50
Travel - Meals (\$75 per person / day cap)	\$362.09
Travel - Hotels	\$0.00
Miscellaneous	\$0.00
<b>TOTAL EXPENSES</b>	<b>\$1,716.59</b>

# **Exhibit 4**

**IN RE BEEF ANTITRUST LITIGATION**

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

**FIRM NAME: LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

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**REPORTING PERIOD: Inception through 01/2026**

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<b>CATEGORY</b>	<b>CUMULATIVE COSTS</b>
Court Costs - Filing Fees	\$1,100.00
Experts/consultants	\$49,395.48
Federal Express / UPS /Ontrac	\$0.69
Postage / U.S. Mail	\$1,376.18
Service of Process	\$2,905.00
Messenger/delivery	\$515.20
Hearing Transcripts	\$104.40
Investigation	\$0.00
Computer Research: Lexis/westlaw	\$20,276.68
Photocopies - in House	\$1,383.00
Photocopies - Outside	\$0.00
Telephone/telecopier	\$11.82
Travel - Transportation (Airplanes - Coach Fares Only)	\$2,906.59
Travel - Meals (\$75 per person / day cap)	\$1,794.55
Travel - Hotels	\$533.99
Miscellaneous (Everlaw database fee)	\$160.32
<b>TOTAL EXPENSES</b>	<b>\$82,463.90</b>

# **Exhibit 5**

IN RE BEEF ANTITRUST LITIGATION

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

Firm Name:		LOCKRIDGE GRINDAL NAUEN P.L.L.P.					Reporting Period:					Inception through 01/2026														
Categories:		1) Legal Research 2) Investigation / Factual Research 3) Discovery (Written / Deposition Taking & Defending / Meet & Confer / etc. ) 4) Document Review Tier 1 - Subject to rate cap					5) Document Review Tier 2 & Deposition Preparation - Subject to rate cap 6) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing) 7) Class Certification 8) Summary Judgment 9) Appeals					10) Court Appearances & Preparation 11) Experts 12) Settlements & Mediation 13) Case Management 14) Class Notice					15) Trial Prep (Exhibit & Witness List/Jury Instruction/Vior Dire/Opening Statements/Closing Arguments/ Demonstratives/etc.) 16) Trial					<b>TITLE:</b> (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				
W. Joseph Bruckner (P) 2024																96.70	0.00	96.70	1,225.00	118,457.50	0.00	118,457.50				
<b>W. Joseph Bruckner (P) 2026</b>																0.20	0.00	0.20	1,325.00	265.00	0.00	265.00				
W. Joseph Bruckner (P) 2025																66.60	0.00	66.60	1,275.00	84,915.00	0.00	84,915.00				
W. Joseph Bruckner (P) 2023																31.50	0.00	31.50	1,175.00	37,012.50	0.00	37,012.50				
W. Joseph Bruckner (P) 2022																36.80	0.00	36.80	1,150.00	42,320.00	0.00	42,320.00				
W. Joseph Bruckner (P)																41.50	0.00	41.50	\$1,050.00	43,575.00	\$0.00	\$43,575.00				
W. Joseph Bruckner (P)																58.00	0.00	58.00	\$950.00	55,100.00	\$0.00	\$55,100.00				
W. Joseph Bruckner (P)																71.80	0.00	71.80	\$925.00	66,415.00	\$0.00	\$66,415.00				
W. Joseph Bruckner (P)																1.00	0.00	1.00	\$875.00	875.00	\$0.00	\$875.00				
Elizabeth R. Odette (P)																2.60	0.00	2.60	\$750.00	1,950.00	\$0.00	\$1,950.00				
Elizabeth R. Odette (P)																12.10	0.00	12.10	\$650.00	7,865.00	\$0.00	\$7,865.00				
<b>Brian D. Clark (P) 2026</b>																3.20	0.00	3.20	\$1,275.00	4,080.00	\$0.00	\$4,080.00				
Brian D. Clark (P) 2025																142.80	0.00	142.80	\$1,175.00	167,790.00	\$0.00	\$167,790.00				
Brian D. Clark (P) 2024																321.20	0.00	321.20	\$1,100.00	353,320.00	\$0.00	\$353,320.00				
Brian D. Clark (P) 2023																43.50	0.00	43.50	\$975.00	42,412.50	\$0.00	\$42,412.50				
Brian D. Clark (P) 2022																142.00	0.00	142.00	\$925.00	131,350.00	\$0.00	\$131,350.00				
Brian D. Clark (P)																73.50	0.00	73.50	\$850.00	62,475.00	\$0.00	\$62,475.00				
Brian D. Clark (P)																66.10	0.00	66.10	\$750.00	49,575.00	\$0.00	\$49,575.00				
Brian D. Clark (P)																62.80	0.00	62.80	\$625.00	39,250.00	\$0.00	\$39,250.00				
Brian D. Clark (P)																0.30	0.00	0.30	\$575.00	172.50	\$0.00	\$172.50				
Charles N. Nauen (P) 2022																2.60	0.00	2.60	\$1,150.00	2,990.00	\$0.00	\$2,990.00				
Charles N. Nauen (P)																1.00	0.00	1.00	\$1,050.00	1,050.00	\$0.00	\$1,050.00				
Charles N. Nauen (P)																0.50	0.00	0.50	\$900.00	450.00	\$0.00	\$450.00				
Harry E. Gallaher (P)																0.90	0.00	0.90	\$725.00	652.50	\$0.00	\$652.50				
David J. Zoll (P)																0.80	0.00	0.80	\$650.00	520.00	\$0.00	\$520.00				



Franky Newcomb (A) 2024																190.40	0.00	190.40	\$475.00	68,177.50	\$0.00	\$68,177.50
Franky Newcomb (A) Rate Fixed																1,936.65	0.00	1,936.65	\$350.00	677,827.50	\$0.00	\$677,827.50
Matthew Sampson (A)																2,128.20	0.00	2,128.20	\$350.00	744,870.00	\$0.00	\$744,870.00
Develyn Mistriotti (A) 2024																119.50	0.00	119.50	\$750.00	89,625.00	\$0.00	\$89,625.00
Develyn Mistriotti (A)																74.80	0.00	74.80	\$650.00	48,620.00	\$0.00	\$48,620.00
<b>Steve Serdikoff (A) 2025</b>																139.60	0.00	139.60	\$975.00	136,110.00	\$0.00	\$136,110.00
Steve Serdikoff (A) 2024																821.20	0.00	821.20	\$925.00	759,610.00	\$0.00	\$759,610.00
Steve Serdikoff (A)																192.90	0.00	192.90	\$850.00	163,965.00	\$0.00	\$163,965.00
Steven Owen (A) 2024																865.20	0.00	865.20	\$775.00	670,530.00	\$0.00	\$670,530.00
Steven Owen (A)																93.60	0.00	93.60	\$700.00	65,520.00	\$0.00	\$65,520.00
<b>Olivia T. Levinson (A) 2026</b>																6.30	0.00	6.30	\$900.00	5,670.00	\$0.00	\$5,670.00
Olivia T. Levinson (A)																70.30	0.00	70.30	\$815.00	57,294.50	\$0.00	\$57,294.50
Steve J. Teti (SC)																0.90	0.00	0.90	\$925.00	832.50	\$0.00	\$832.50
Nash Edgerton Hall (A)																594.50	0.00	594.50	\$350.00	208,075.00	\$0.00	\$208,075.00
<b>SUB-TOTAL</b>																<b>27,053.25</b>	<b>0.00</b>	<b>27,053.25</b>		<b>14,960,181.50</b>	<b>0.00</b>	<b>14,960,181.50</b>
<b>NON-ATTORNEYS (LC, SPL, PL)</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>12</b>	<b>13</b>	<b>14</b>	<b>15</b>	<b>PREVIOUS HOURS</b>	<b>CURRENT HOURS</b>	<b>CUMULATIVE HOURS</b>	<b>HOURLY RATE</b>	<b>PREVIOUS LODESTAR</b>	<b>CURRENT LODESTAR</b>	<b>CUMULATIVE LODESTAR</b>
Souvan S. Lee (LC)																1.90	0.00	1.90	\$225.00	\$427.50	\$0.00	\$427.50
Lexi J. Pitz (LC)																10.40	0.00	10.40	\$225.00	\$2,340.00	\$0.00	\$2,340.00
Erua Chang																20.20	0.00	20.20	\$300.00	\$6,060.00	\$0.00	\$6,060.00
Elizabeth M. Sipe (PL) 2022																42.70	0.00	42.70	\$375.00	\$16,012.50	\$0.00	\$16,012.50
Elizabeth M. Sipe (PL)																64.50	0.00	64.50	\$325.00	\$20,962.50	\$0.00	\$20,962.50
Elizabeth M. Sipe (PL)																160.60	0.00	160.60	\$275.00	\$44,165.00	\$0.00	\$44,165.00
Sherri L. Juell (PL)																2.00	0.00	2.00	\$325.00	\$650.00	\$0.00	\$650.00
Sherri L. Juell (PL)																100.40	0.00	100.40	\$275.00	\$27,610.00	\$0.00	\$27,610.00
<b>Greg A. Loeding (PL) 2025</b>																90.90	0.00	90.90	\$375.00	\$34,087.50	\$0.00	\$34,087.50
Greg A. Loeding (PL) 2024																360.70	0.00	360.70	\$315.00	\$113,620.50	\$0.00	\$113,620.50
Greg A. Loeding (PL) 2023																295.20	0.00	295.20	\$285.00	\$84,132.00	\$0.00	\$84,132.00
Greg A. Loeding (PL) 2022																180.90	0.00	180.90	\$275.00	\$49,747.50	\$0.00	\$49,747.50
Greg A. Loeding (PL)																10.70	0.00	10.70	\$225.00	\$2,407.50	\$0.00	\$2,407.50
Greg A. Loeding (PL)																0.70	0.00	0.70	\$190.00	\$133.00	\$0.00	\$133.00
<b>Elizabeth A. Schindler (PL) 2026</b>																2.20	0.00	2.20	\$500.00	\$1,100.00	\$0.00	\$1,100.00
Elizabeth A. Schindler (PL) 2025																148.40	0.00	148.40	\$450.00	\$66,780.00	\$0.00	\$66,780.00
Elizabeth A. Schindler (PL) 2024																375.80	0.00	375.80	\$375.00	\$140,925.00	\$0.00	\$140,925.00
Elizabeth A. Schindler (PL) 2023																76.10	0.00	76.10	\$345.00	\$26,254.50	\$0.00	\$26,254.50
Elizabeth A. Schindler (PL) 2022																101.50	0.00	101.50	\$300.00	\$30,450.00	\$0.00	\$30,450.00
Elizabeth A. Schindler (PL)																36.60	0.00	36.60	\$225.00	\$8,235.00	\$0.00	\$8,235.00
<b>Amber M. Raak (PL) 2026</b>																0.50	0.00	0.50	\$510.00	\$255.00	\$0.00	\$255.00
Amber M. Raak (PL) 2025																147.30	0.00	147.30	\$475.00	\$69,967.50	\$0.00	\$69,967.50
Amber M. Raak (PL) 2024																195.20	0.00	195.20	\$430.00	\$83,936.00	\$0.00	\$83,936.00
Amber M. Raak (PL) 2023																65.10	0.00	65.10	\$400.00	\$26,040.00	\$0.00	\$26,040.00

Amber M. Raak (PL) 2022																23.80	0.00	23.80	\$375.00	\$8,925.00	\$0.00	<b>\$8,925.00</b>
Amber M. Raak (PL)																0.50	0.00	0.50	\$325.00	\$162.50	\$0.00	<b>\$162.50</b>
Tyler Blackmon (LC)																7.50	0.00	7.50	\$300.00	\$2,250.00	\$0.00	<b>\$2,250.00</b>
<b>Ryan Chittum 2025</b>																13.00	0.00	13.00	\$475.00	\$6,175.00	\$0.00	<b>\$6,175.00</b>
Ryan Chittum 2024																15.60	0.00	15.60	\$400.00	\$6,240.00	\$0.00	<b>\$6,240.00</b>
Ryan Chittum 2023																41.30	0.00	41.30	\$385.00	\$15,900.50	\$0.00	<b>\$15,900.50</b>
Ryan Chittum																0.40	0.00	0.40	\$350.00	\$140.00	\$0.00	<b>\$140.00</b>
Joe Dailey (PL) 2024																2.30	0.00	2.30	\$375.00	\$862.50	\$0.00	<b>\$862.50</b>
Joe Dailey (PL)																13.30	0.00	13.30	\$345.00	\$4,588.50	\$0.00	<b>\$4,588.50</b>
																0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	<b>\$0.00</b>
<b>SUB-TOTAL</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>2608.20</b>	<b>0.00</b>	<b>2,608.20</b>		<b>\$901,542.50</b>	<b>\$0.00</b>	<b>\$901,542.50</b>
<b>GRAND TOTAL:</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>29,661.45</b>	<b>0.00</b>	<b>29,661.45</b>		<b>\$15,861,724.00</b>	<b>\$0.00</b>	<b>\$15,861,724.00</b>

# **Exhibit 6**

***IN RE BEEF ANTITRUST LITIGATION***

**FIRM NAME: All Firm Summary**

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**REPORTING PERIOD: Inception - 01/31/2026**

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<b>FIRM</b>	<b>HOURS</b>	<b>LODESTAR</b>
<b>LOCKRIDGE GRINDAL NAUEN PLLP</b>	29,661.45	\$ 15,861,724.00
<b>HAGENS BERMAN SOBOL SHAPIRO LLP</b>	42,313.70	\$ 19,600,835.00
<b>SCHINDLER, ANDERSON, GOPLERUD, &amp; WEESE P.C.</b>	133.1	\$ 57,305.00
<b>TOTALS</b>	72,108.25	\$ 35,519,864.00

# **Exhibit 7**

**IN RE BEEF ANTITRUST LITIGATION****EXPENSE REPORT - (To be submitted on the 20th of each month )****FIRM NAME: All Firm Summary****REPORTING PERIOD: Inception - 01/31/2026**

<b>CATEGORY</b>	<b>CURRENT COSTS</b>
Court Costs - Filing Fees	\$1,100.00
Experts/consultants	\$126,420.48
Federal Express / UPS /Ontrac	\$14,591.26
Postage / U.S. Mail	\$1,385.04
Service of Process	\$4,690.25
Messenger/delivery	\$515.20
Hearing Transcripts	\$104.40
Investigation	\$0.00
Lexis/westlaw	\$50,275.07
Photocopies - in House	\$8,670.50
Photocopies - Outside	\$0.00
Telephone/telecopier	\$11.82
Travel - Transportation (Airplanes - Coach Fares Only)	\$7,274.84
Travel - Meals (\$75 per person / day cap)	\$2,514.83
Travel - Hotels	\$1,847.20
Miscellaneous	\$381.29
<b>TOTAL EXPENSES</b>	<b>\$219,782.18</b>

# **Exhibit 8**

**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 CINDY ABERNATHY IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Cindy Abernathy, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.

3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For over six years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on January 10, 2024 and being questioned by counsel for several hours.

7. In total, I estimate that I have spent more than 79 hours performing all the above-described duties on behalf of the class over the past more than six years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

10. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the

independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 5th day of March, 2026 in Nibley, UT.  
[City] [State]

DocuSigned by:  
*Cindy Abernathy*  
99A5657DE43041F...  
Cindy Abernathy

# **Exhibit 9**

**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 DAN CAMPBELL IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Dan Campbell, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.
3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For almost five years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on May 29, 2024 and being questioned by counsel for several hours.

7. In total, I estimate that I have spent more than 38 hours performing all the above-described duties on behalf of the class over the past nearly five years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

10. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the

independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 6 day of March, 2026 in Corvallis, Oregon.  
[City] [State]

DocuSigned by:  
*Dan Campbell*  
67883A3917E4495...  
\_\_\_\_\_  
Dan Campbell

# **Exhibit 10**

**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 KAREN CARTER IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Karen Carter, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.
3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For over six years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on June 11, 2024 and being questioned by counsel for several hours.

7. In total, I estimate that I have spent approximately 80–85 hours performing all the above-described duties on behalf of the class over the past more than six years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

10. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the

independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this <sup>6</sup> \_\_\_\_\_ day of March, 2026 in walpole, <sup>MA</sup> \_\_\_\_\_.  
[City] [State]

DocuSigned by:  
*Karen Carter*  
7779EFC8ADFA450...  
\_\_\_\_\_  
Karen Carter

# **Exhibit 11**

**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 ANDREW COHEN IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Andrew Cohen, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.
3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For over six years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on May 16, 2024 and being questioned by counsel for several hours.

7. In total, I estimate that I have spent more than 40 hours performing all the above-described duties on behalf of the class over the past more than six years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.


10. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the

independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 5th day of March, 2026 in Gilbert, AZ.  
[City] [State]

DocuSigned by:  
  
142457267635497  
Andrew Cohen

# **Exhibit 12**

**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 SHARON DAWSON-GREEN IN SUPPORT OF  
CONSUMER INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM  
PAYMENT OF ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION  
COSTS, AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Sharon Dawson-Green, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.

3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For over six years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on February 7, 2024 and being questioned by counsel for several hours.

7. In total, I estimate that I have spent approximately 70–75 hours performing all the above-described duties on behalf of the class over the past more than six years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

10. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the

independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 5th day of March, 2026 in Saint Louis, MO.  
[City] [State]

DocuSigned by:  
  
08EAB062032A4EG...  
Sharon Dawson-Green

# **Exhibit 13**

**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 JASON FALBO IN SUPPORT OF CONSUMER INDIRECT  
PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT OF  
ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Jason Falbo, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.

3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. Over the past nearly three years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on June 12, 2024 and being questioned by counsel for several hours.

7. In total, I estimate that I have spent more than 26–28 hours performing all the above-described duties on behalf of the class over the past nearly three years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

10. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the

independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 5th day of March, 2026 in Thiensville, Wi.  
[City] [State]

DocuSigned by:  
*Jason Falbo*  
90920791EEA946C...  
Jason Falbo

# **Exhibit 14**

**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 ERIC GAUCHAT IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Eric Gauchat, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.

3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. Over the past nearly three years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on June 7, 2024 and being questioned by counsel for several hours.

7. In total, I estimate that I have spent more than 24 hours performing all the above-described duties on behalf of the class over the past nearly three years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

10. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the

independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 8 day of March, 2026 in Chicago, IL.  
[City] [State]

DocuSigned by:  
  
206B66AEEAD34AD...  
Eric Gauchat

# **Exhibit 15**

**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 WILLIAM GEE IN SUPPORT OF CONSUMER INDIRECT  
PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT OF  
ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, William Gee, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.
3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For over six years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on January 18, 2024 and being questioned by counsel for several hours.

7. In total, I estimate that I have spent more than 55 hours performing all the above-described duties on behalf of the class over the past more than six years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

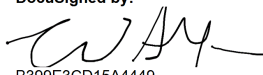
10. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the

independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 11th day of March, 2026 in Columbus, ohio.  
[City] [State]

DocuSigned by:  
  
B099E3GD16A4440...  
William Gee

# **Exhibit 16**

**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 MARTIN JARMULOWICZ IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Martin Jarmulowicz, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.
3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For almost five years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. In total, I estimate that I have spent approximately 80 hours performing all the above-described duties on behalf of the class over the past nearly five years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

7. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement

Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

8. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.


9. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements

are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 5th day of March, 2026 in Venice, FL.  
[City] [State]

Signed by:  


9EE220ACE7BA450...

Martin Jarmulowicz

# **Exhibit 17**

**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 SHARON KILLMON IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Sharon Killmon, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.
3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For over six years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. In total, I estimate that I have spent between 30–35 hours performing all the above-described duties on behalf of the class over the past more than six years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

7. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement

Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

8. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

9. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements

are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 7<sup>th</sup> day of March, 2026 in Creston, IA.  
[City] [State]

DocuSigned by:  
*Sharon Killmon*  
3AEF493238EG48D...  
Sharon Killmon

# **Exhibit 18**

**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 BRENDA KING IN SUPPORT OF CONSUMER INDIRECT  
PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT OF  
ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Brenda King, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.
3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For over six years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on September 5, 2024 and being questioned by counsel for several hours. I prepared for the deposition with counsel, discussed the deposition with counsel, and reviewed the deposition transcript.

7. In total, I estimate that I have spent between 80–100 hours performing all the above-described duties on behalf of the class over the past more than six years. My

attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

10. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 5th day of March, 2026 in New City, NY.  
[City] [State]

DocuSigned by:  
  
C087AD7F738D481...  
Brenda King

# **Exhibit 19**

**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 LINDSEY LEMOI IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Lindsey Lemoi, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.
3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. Over the past nearly three years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on July 30, 2024 and being questioned by counsel for several hours.

7. In total, I estimate that I have spent between 80–100 hours performing all the above-described duties on behalf of the class over the past nearly three years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

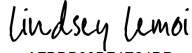
10. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the

independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 6 day of March, 2026 in Providence, RI.  
[City] [State]

Signed by:  
  
AFBDB83BF4E24DD...  
Lindsey Lemoi

# **Exhibit 20**

**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 FERNANDO “MARCELO” LOPEZ IN SUPPORT OF  
CONSUMER INDIRECT PURCHASER PLAINTIFFS’ MOTION FOR INTERIM  
PAYMENT OF ATTORNEY’S FEES, REIMBURSEMENT OF LITIGATION  
COSTS, AND CLASS REPRESENTATIVE SERVICE AWARDS**

I, Fernando “Marcelo” Lopez, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs’ (Consumer IPPs) motion for attorneys’ fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.
3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For over six years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. In total, I estimate that I have spent approximately 38–40 hours performing all the above-described duties on behalf of the class over the past more than six years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

7. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement

Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

8. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

9. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements

are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 12 day of March, 2026 in Ranch Mirage, Ca.  
[City] [State]

DocuSigned by:  
*Marcelo Lopez*  
B70743444532422

Fernando "Marcelo" Lopez

# **Exhibit 21**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

*IN RE CATTLE AND BEEF ANTITRUST  
LITIGATION*

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

This Document Relates to:

*Consumer Indirect Purchaser Plaintiff  
Action*

**DECLARATION OF CRAIG MARGULIES IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Craig Margulies, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.
3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. Over the past nearly three years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on July 29, 2024 and being questioned by counsel for several hours.

7. In total, I estimate that I have spent between 50-60 hours performing all the above-described duties on behalf of the class over the past nearly three years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

10. I believe the settlement agreements between Cargill, Tyson and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the

independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 9<sup>th</sup> day of March, 2026 in Sioux Falls, SD.  
[City] [State]

Signed by:  
Craig Margulies  
390B072ZED69476...  
Craig Margulies

# **Exhibit 22**

**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 LISA MELEGARI IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Lisa Melegari, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.
3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For over six years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on February 9, 2024 and being questioned by counsel for approximately three hours.

7. In total, I estimate that I have spent around 6 hours performing all the above-described duties on behalf of the class over the past more than six years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

10. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the

independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 6<sup>th</sup> day of March, 2026 in Deltona, Florida.  
[City] [State]

DocuSigned by:  
*Lisa Melegari*  
E7D33F41E41F492...  
\_\_\_\_\_  
Lisa Melegari

# **Exhibit 23**

**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 CHARLIE MORGAN IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Charlie Morgan, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.

3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For over six years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. I have contributed to the discovery process by sitting for a deposition on June 18, 2024 and being questioned by counsel for several hours.

7. In total, I estimate that I have spent up to 300 hours performing all the above-described duties on behalf of the class over the past more than six years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

8. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

9. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

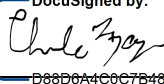
10. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the

independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 6 day of March, 2026 in Minneapolis, MN.  
[City] [State]

DocuSigned by:  
  
D88D0A4C0C7B48D...  
Charlie Morgan

# Exhibit 24

**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 HAROLD NYANJOM IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, REIMBURSEMENT OF LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Harold Nyanjom, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.

3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For almost five years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. In total, I estimate that I have spent more than 240 hours performing all the above-described duties on behalf of the class over the past nearly five years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

7. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement

Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

8. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

9. I believe the settlement agreements between Cargill, Tyson, and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements

are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 13 day of March, 2026 in wichita, Kansas.  
[City] [State]

DocuSigned by:  
*Harold Nyanjom*  
CA099A2FD8F743A...  
Harold Nyanjom

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

*IN RE CATTLE AND BEEF ANTITRUST  
LITIGATION*

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

This Document Relates to:

*Consumer Indirect Purchaser Plaintiff  
Action*

**DECLARATION OF HAROLD NYANJOM IN SUPPORT OF CONSUMER  
INDIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT  
OF ATTORNEY'S FEES, LITIGATION COSTS, AND  
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Harold Nyanjom, declare under oath, as follows:

1. I am an individual over 18 years of age. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
2. I am a class representative in *In re Cattle and Beef Antitrust Litigation*, No. 0:22-MD-03031, consolidated in the United States District Court for the District of Minnesota. I submit this declaration on behalf of myself and the settlement class, in support of Consumer Indirect Purchaser Plaintiffs' (Consumer IPPs) motion for attorneys' fees, litigation costs, and class representative service awards, and in support of approval of the settlements with the Cargill and Tyson Defendants.
3. As a class representative, I understand that it is my responsibility to be informed of the work done by my attorneys on the case and make my own judgment about the fairness of any settlement proposed by the lawyers. I also understand that in evaluating the fairness of the settlement, I am required to consider the interests of all members of the

Class, as well as my own. I am free to disagree with my attorneys about the merits of a settlement and make my views known to the court.

4. For almost five years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative. Throughout this litigation, I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents. Since the outset of the litigation, I have also diligently retained all papers or electronic information that would be relevant to the litigation and provided these to my attorneys.

5. I have also assisted in responding to discovery throughout the case. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. I assisted counsel in responding to multiple interrogatories, requests for production of documents, and requests for admission. I also spent a significant amount of time locating purchase receipts and other documents requested by defendants in this litigation.

6. In total, I estimate that I have spent more than 240 hours performing all the above-described duties on behalf of the class over the past nearly five years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee for personal benefit.

7. I have reviewed the terms of the settlements with the Cargill and Tyson Defendants, discussed those terms with my attorneys, and am aware of and approve all terms of the proposed settlements, as they affect me and the members of the Settlement

Class. Based on this reading and my discussions with Class Counsel, I understand that these defendants agree to pay \$87.5 million into a fund to be distributed to the Settlement Class, and that my attorneys seek fees and reimbursement of their costs from that fund. I understand in general terms that the money will be distributed on a pro rata basis to class members based on: (1) the number of approved purchases per class member of beef during the settlement class period; and (2) the number of valid claims filed. There will be no reversion of unclaimed funds to any defendant. To the extent that money cannot be reasonably distributed to class members, Consumer IPPs propose reverting those funds to the relevant governmental authorities responsible for enforcing the antitrust laws.

8. I believe that the proposed settlements achieve significant recovery for the Settlement Class and are excellent results in light of the risks associated with complex and costly ongoing litigation. I recognize the uncertainty of success on any or all of the claims presented in this litigation if this case were to go to trial. I believe that litigation of this case on my own behalf, and not on behalf of the class, would not be financially prudent given my damages in this case versus the resources available to the defendants. The proposed settlements also permit an immediate recovery to class members without the risk, delay, and expense of ongoing litigation.

9. I believe the settlement agreements between Cargill, Tyson and Class Counsel were reached at arms' length, and that the terms of the settlement reflect the independent evaluation of Cargill, Tyson, and Class Counsel based on their respective best interests. Based on my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreement, I believe the proposed settlements

are fair, adequate, reasonable, and in the best interests of class members, and should therefore be granted final approval.

\* \* \*

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

Executed this 27<sup>th</sup> day of February 2026 in [Wichita KS].

S/ Harold M. Nyanjom  
Harold M. Nyanjom

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**SUPPLEMENTAL DECLARATION OF HAROLD NYANJOM**

**IN SUPPORT OF CLASS REPRESENTATIVE SERVICE AWARDS**

I, Harold Nyanjom, declare under penalty of perjury as follows:

1. I am over the age of eighteen and have personal knowledge of the matters stated herein.
2. I serve as a Class Representative in this litigation and submit this declaration in support of the request for class representative service awards.
3. From the outset of this case in 2019, I understood that serving as a class representative required more than lending my name to the complaint. I understood that I owed fiduciary duties to absent class members and was responsible for remaining informed, evaluating settlement proposals independently, and ensuring that the interests of the class were adequately protected.
4. Over nearly five years, I actively fulfilled those responsibilities. My participation included:
  - o Preserving and producing purchase documentation
  - o Completing detailed multi-year consumer surveys
  - o Assisting in multiple rounds of written discovery
  - o Reviewing and verifying sworn interrogatory and admission responses
  - o Locating and producing personal purchasing records
  - o Preparing for and sitting for a full-day, video-recorded deposition
  - o Reviewing deposition materials

- o Maintaining ongoing communications with counsel regarding case developments

- o Reviewing and evaluating certification materials and settlement agreements

**5.** Based on a detailed reconstruction of my time commitment, I conservatively estimate that I have devoted more than 240 hours to fulfilling my duties as a class representative.

**6.** This estimate reflects documented discovery participation, deposition preparation and testimony, survey completion, document review, and sustained engagement over multiple years. It excludes incidental time not formally tracked.

**7.** By serving as a named plaintiff, I subjected myself to public identification in federal litigation, formal deposition examination under oath, and ongoing obligations to preserve and disclose personal purchasing information. I undertook these responsibilities voluntarily and without any guarantee of compensation.

**8.** I understand that any service award is subject to the Court's independent discretion and must be fair, reasonable, and adequate under Rule 23(e). I further understand that the purpose of such an award is to recognize the time, effort, and risk undertaken on behalf of absent class members.

**9.** Given the duration of this litigation, the documented time commitment of more than 240 hours, the discovery burden assumed, the deposition testimony provided, and the fiduciary obligations discharged over nearly five years, I believe that a service award meaningfully reflective of those contributions is appropriate and consistent with awards approved in comparable federal antitrust MDL proceedings.

**10.** I have reviewed the proposed settlements with Cargill and Tyson and believe they provide substantial and meaningful recovery to the Settlement Class in light of the risks, delay, and expense of continued litigation.

**11.** Nothing in this declaration should be construed as limiting the Court's authority to determine an appropriate service award based on the full record before it.

\* \* \*

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

Executed this 13th day of March, 2026 in Wichita KS.

DocuSigned by:  
*Harold Nyanjom*  
CA099A2FD8F743A...  
Harold M. Nyanjom