

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

Honorable John R. Tunheim

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

I, W. Joseph Bruckner, declare and state:

1. I am an attorney licensed to practice in the State of Minnesota. For over 30 years I have been a partner with the firm of Lockridge Grindal Nauen P.L.L.P. (“LGN”), attorneys of record for the Direct Purchaser Plaintiffs (“DPPs” or “Plaintiffs”). I make this declaration in support of the accompanying Direct Purchaser Plaintiffs’ Motion for Interim Payment of Attorneys’ Fees, Current and Ongoing Litigation Expenses, and Service Awards. I have personal knowledge of the facts in this declaration and could competently testify to them if called as a witness.

2. This Court appointed LGN and Pearson, Simon & Warshaw, LLP (“PSW”) as Interim Co-Lead Counsel for DPPs and the DPP Class in this litigation (*see* ECF No. 149), and also Settlement Class Counsel for the JBS and Smithfield Settlements (*see* ECF Nos. 631 and 838 (JBS Preliminary and Final Approval Orders); 870 and 1154 (Smithfield Preliminary and Final Approval Orders)). Before and since those appointments, our firms have committed thousands of hours of work to develop and advance this complex case. Interim Co-Lead Counsel, with the assistance of 14 other firms (collectively, “Class Counsel”), have vigorously and efficiently prosecuted this complex antitrust case. At all times, the work of Class Counsel was directed by Interim Co-Lead Counsel.

CLASS COUNSEL’S EFFORTS IN PROSECUTING THIS LITIGATION

3. On June 29, 2018, LGN and PSW filed the first direct purchaser complaint, *Maplevale Farms, Inc. v. Agri Stats, Inc., et al.*, No. 0:18-cv-01803, ECF No. 1 (D. Minn.), against the nation’s largest Pork producers alleging an antitrust conspiracy in violation of the Sherman Act, 15 U.S.C. § 1. On January 15, 2020, LGN and PSW filed the operative

Third Amended and Consolidated Class Action Complaint (No. 0:18-cv-01776, ECF No. 431).

4. Class Counsel have developed numerous case management plans and worked cooperatively with indirect purchaser class counsel, direct action plaintiffs, and Defendants to implement those plans.

5. Class Counsel have prepared and filed comprehensive memoranda of law: (a) in opposition to Defendants' motions to dismiss, (b) regarding numerous discovery issues, (c) in support of class certification, including expert reports and other exhibits, and (d) seeking preliminary and final approval of Settlements.

6. Class Counsel have conducted extensive fact and expert discovery, including preparing for and/or conducting over one hundred Rule 30(b)(1), 30(b)(6), and expert depositions. Discovery has involved more than 100 document custodians, more than 3.4 million documents and communications, millions of telephone calls and messages, many third parties, and the depositions of dozens of fact witnesses (with more than 100 anticipated by the time depositions end). Interim Co-Lead Counsel is coordinating this discovery effort against Defendants, and with the indirect class counsel and numerous Direct Action Plaintiffs. Plaintiffs and Interim Co-Lead Counsel also fulfilled their own discovery obligations, in response to fulsome discovery by Defendants.

7. Class Counsel have consulted with a wide range of experts during their pre-suit investigation and the discovery phase of this case, including their economist Russell W. Mangum III, Ph.D., who prepared a 148-page report in support of class certification. *See* ECF No. 1330.

8. To date Class Counsel have reached settlement agreements with Defendants JBS and Smithfield (“collectively “Settling Defendants”). On November 17, 2020, DPPs and JBS entered into a settlement that provided for a payment of \$24,500,000 and meaningful cooperation. On June 29, 2021, DPPs and Smithfield entered into a settlement that provided for a payment of \$83,000,000¹ and meaningful cooperation. The total amount recovered to date from just two of the Defendants in this case totals \$101,864,300. The Settling Defendants were represented by Quinn Emanuel Urquhart & Sullivan, LLP (JBS) and Gibson, Dunn & Crutcher LLP (Smithfield), leading multinational and national law firms ranked among the Vault Law 100 for most prestigious law firms. These Settlements represent a significant recovery for the DPP Class members.

9. Class Counsel have prepared and executed the class notice and claims administration programs for Settlements approved by this Court. The claims and distribution process approved by this Court is underway.

10. Class Counsel will continue to vigorously litigate this case against the remaining Defendants, including seeking discovery and handling all other necessary motion and litigation practice. With respect to the Settlements, Class Counsel will continue to supervise all aspects of settlement and claims administration, and supervise the final distribution of settlement proceeds to qualified DPP Class members.

¹ The Smithfield Settlement was subject to a \$5,635,700 reduction based on Class members who opted out during the settlement administration process. Thus, the net amount paid by Smithfield equaled \$77,364,300.

11. Class Counsel believed in DPPs' case from the beginning, invested extensive time, effort, and money into it, and prosecuted it vigorously without the benefit of a contemporaneous civil or criminal government investigation or prosecution. Class Counsel did so at the risk of no recovery and turned away other opportunities due to the complexity and high-level of time and expense the case demanded.

LGN's EFFORTS IN PROSECUTING THIS LITIGATION

12. Since the inception of this case, my firm, Lockridge Grindal Nauen P.L.L.P., has represented the interests of the DPPs and the DPP Class. Moreover, since the Court appointed our firm as Interim Co-Lead Counsel with PSW, we have led the prosecution of this matter in all regards, including the following:

- We supervised the activities of all Class Counsel and strategized and executed decisions regarding the overall prosecution of this litigation.
- We conducted factual and legal research throughout the course of the case, not only to prepare and finalize extensive and comprehensive consolidated complaints, but also on an ongoing basis as necessary to bring affirmative motions on behalf of the Class and defend motions brought by Defendants.
- We assigned responsibility for review of documents produced by the Defendants and third parties, we assisted in designing the review program to identify relevant material from this information, we participated in this review as necessary ourselves, and we reviewed and put to use the results of counsel's review of these productions.
- We prepared for and participated in defending motions to dismiss.
- We prepared for and took Rule 30(b)(1), 30(b)(6), and are preparing for expert depositions.
- We participated extensively in all settlement negotiations.

- We prepared motions for preliminary and final approval of settlements in this case, and we helped prepare and execute the class notice and claims administration program for the settlements.
- We have responded to many inquiries from class members regarding the proposed settlements as well as settlement and claims administration.
- We have also performed an extensive amount of work to position this case for class certification, including: regular exchanges with Dr. Mangum, his team, and OSKR throughout their review and analysis of Defendants' data and Dr. Mangum's preparation of his report; and drafting a motion for class certification.

13. All of these actions by my firm are through February 28, 2022, the cutoff for time submitted in support of this petition. As noted in our motion, we will continue to devote ourselves and our resources to the successful prosecution of this case.

**CLASS COUNSEL'S TIME AND EXPENSE REPORTING TO
INTERIM CO-LEAD COUNSEL**

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

15. As part of Interim Co-Lead Counsel's submission in support of our appointment to the position, we submitted and the Court approved a Time and Expense Protocol. *See* ECF No. 105-1. We subsequently sent that time and expense protocol to all Class Counsel in November 2018, and thereafter as appropriate, and instructed them to abide by it. *See* Exhibit 1. We also provided each Class Counsel templates of the required Microsoft Excel reporting form.

16. The Time and Expense Protocol requires each firm to contemporaneously record and transmit to us each month, via email, a detailed, task-based spreadsheet with their time entries. The reports contain a chronological listing of time reported for work

performed by attorneys and paralegals in specified activity categories, a complete and accurate categorization of work performed, the name and title of the person who performed the work, the hourly rate associated with each attorney and paralegal at the time the work was performed (*i.e.*, the professional's "historical" rate), and the firm's resulting lodestar reported for that month.

17. To control Class Counsel's lodestar, the Time and Expense Protocol instructed Class Counsel not to submit time for work not requested by Co-Lead Counsel, for duplicative work, reading and reviewing, preparing time and expense reports, routine clerical tasks, or for work related to any client not retained. Additionally, the Time and Expense Protocol required that each firm submit, via email, all litigation-related expenses incurred by the firm for the month. Finally, time included in this fee petition that was spent on first-tier document review has been capped at \$350.00 per hour. Due to the risk that they might never be recovered, Class Counsel endeavored to keep expenses to a minimum.

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

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

20. In preparing this petition, we asked all Class Counsel to review their monthly reported hours and expenses, and to submit a declaration attesting to the total of their allowed time and expenses incurred through February 28, 2022.

Class Counsel's Total Recorded Lodestar

21. Attached as Exhibits 2-15, and also the concurrently filed Declaration of Bobby Pouya ("Pouya Decl.") on behalf of PSW, are those declarations from Class Counsel attesting that the time and expenses they reported to Interim Co-Lead Counsel are true, accurate, and comply with the Time and Expense Protocol. Each declarant also identifies the attorneys and paralegals from the firm that have worked on the case and submitted time in the monthly reports, and the historic hourly rates for each professional that have submitted time.

22. The schedule attached hereto as Exhibit 16 is a detailed summary of the time spent by the partners, attorneys and other professional support staff of my firm who were involved in this litigation, and the lodestar calculation based on my firm's historic billing rates from inception through February 28, 2022. The schedule was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm. The hourly rates for the partners, attorneys and professional support staff in my firm included in Exhibit 16 are our usual hourly rates customarily charged and routinely awarded in litigation of this nature.

23. As detailed in Exhibit 16, the total number of hours my firm expended on this litigation from inception through February 28, 2022 is 24,486.40 hours. The total

lodestar for my firm is \$10,524,046.00. My firm's lodestar figures are based on the firm's historic billing rates.

24. PSW's detailed time reporting is attached as Exhibit 1 to the Pouya Declaration.

25. LGN and PSW, as Interim Co-Lead Counsel, were subject to the same rigorous guidelines and standards as other Class Counsel and have strictly abided by the Court's approved time reporting protocols.

26. Attached as Exhibit 17 is a summary chart with lodestar figures for attorney and paralegal time reported by each firm for their efforts on behalf of the Class from inception of the litigation through February 28, 2022. The total lodestar figure for each firm is reflected in the right-hand column of the chart, and at the end of that column is the combined lodestar for all firms. Based on the data available to me and my firm, I hereby attest that the lodestar amounts reported in Exhibit 17 accurately reflect the data reported to us by Class Counsel. The underlying data is available for the Court's *in camera* review, if requested.

27. Based on the contemptuous time records, Class Counsel have reported 47,519.75 hours of professional time expended for the benefit of the Class through February 28, 2022. This represents a lodestar of \$23,011,696.75 using Class Counsel's historic hourly rates. All Class Counsel performed this work on an entirely contingent basis.

28. Awarding a \$33,954,766.66 fee (33 1/3% \$101,864,300 Settlement Fund) would result in a conservative multiplier of 1.48 on such a lodestar.

Expenses Incurred on Behalf of the Class

29. In notifying Class members of the Settlements, Class Counsel informed Class members that they would seek repayment of current and ongoing litigation expenses in an amount not to exceed \$5 million. *See* ECF No. 1208, Exhibit A (Long Form Notice). As described below, Class Counsel have incurred reasonable and necessary expenses totaling \$2,505,505.75, which includes Class Counsel Expenses and Litigation Fund Expenses.

30. The reasonable and necessary Class Counsel incurred consist of the following two categories of expenses: (1) Class Counsel reported expenses, which are expenses incurred individually by Class Counsel firms since the inception of this case through February 28, 2022 (“Class Counsel Expenses”), and (2) common cost litigation fund expenses, which are expenses incurred from creation of the Litigation Fund² by Class Counsel through April 30, 2022 (“Litigation Fund Expenses”). The chart below summarizes the amount sought in this petition for each category of expense:

Expense Category	Amount
Class Counsel Expenses	\$58,141.22
Litigation Fund Expenses	\$2,447,364.53
<u>Total</u>	<u>\$2,505,505.75</u>

² On behalf of all Class Counsel, my firm established, monitored, and administered a common cost litigation fund (“Litigation Fund”) from which to pay litigation costs incurred for the case overall in its prosecution. The Litigation Fund is used to pay ongoing litigation expenses on behalf of the Class in this matter. The Litigation Fund initially was funded and is replenished as required by assessment payments from Class Counsel. To avoid any double counting, individual firms’ request for reimbursement of their recorded expenses do not include their assessment payments to the Litigation Fund. Instead, those assessment payments are accounted for in Class Counsel’s request for reimbursement of expenses incurred by the Litigation Fund.

31. Class Counsel Expenses. Class Counsel have incurred \$58,141.22 in reasonable and necessary litigation expenses on behalf of the Class for which they now seek reimbursement. This total is based on monthly expense reports submitted to Interim Co-Lead Counsel for the period from inception through February 28, 2022. The total expenses described in this Declaration, overall and by category, include expenses incurred separately by all Class Counsel. The allowed expense categories were contained in the Time and Expense Protocol sent to all Class Counsel by Interim Co-Lead Counsel, shortly after this litigation was commenced.

32. As detailed in Exhibit 18, my firm has incurred a total of \$17,308.25 in unreimbursed Class Counsel Expenses during the period from inception through February 28, 2022 in connection with the prosecution of this litigation. The expenses my firm incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

33. PSW's detailed expense reporting is attached as Exhibit 2 to the Pouya Declaration.

34. LGN and PSW, as Interim Co-Lead Counsel, were subject to the same rigorous guidelines and standards as other Class Counsel and have strictly abided by the Court's approved expense reporting protocols.

35. Exhibit 19, attached hereto, summarizes the Class Counsel Expenses reported as having been incurred by all Class Counsel and paid by those firms through February 28, 2022; excluding those expenses paid out of the Litigation Fund (*see infra* ¶¶

36-37). These expenses include categories such as online legal research, travel, shipping and mailing, and document imaging and copying. Outside of the expenses incurred by Interim Co-Lead Counsel (which include some early expert and consultant fees incurred before the Litigation Fund was established), the primary expenses incurred by Class Counsel relate to preparing for and attending depositions and hearings (*e.g.*, travel, exhibit copy, and exhibit shipping expenses) and legal research (*e.g.*, Westlaw charges). Class Counsel have disclosed and identified their costs separately in their declaration for reimbursement accompanying this motion (*see* Exhibits 2-15 (Non-Co-Lead Firm Declarations), Exhibit 18 (LGN); Pouya Decl. Exhibit 2 (PSW)) and have thereby attested to the reasonableness and accuracy thereof.

36. Litigation Fund Expenses. All expenses paid from the Litigation Fund were reasonably incurred and necessary to the prosecution of this case. The recorded costs and expenses incurred by Class Counsel since the inception of this case and paid by the Litigation Fund are itemized in Exhibit 20 attached hereto and total \$2,447,364.53. These expenses are for the time period from the inception of the case through April 30, 2022.³

37. The Litigation Fund costs summarized in Exhibit 20 fall into nine categories: (1) Investigators & Consultants, (2) Experts, (3) Document Scanning & Copying Services, (4) Document Database Vendor, (5) Mediators, (6) Phone Records Vendor & Subpoena

³ Settlement administration costs up to \$900,000 (*see* ECF Nos. 543-1 (\$500,000, JBS Settlement Agreement), 831-2 (\$400,000, Smithfield Settlement Agreement)) were previously approved by the Court (*see* ECF Nos. 838 (JBS Final Approval Order), 1154 (Smithfield Final Approval Order) to be paid out of the respective escrow accounts, and are therefore not included in this reimbursement request. The settlement administration costs incurred through April 30, 2022 total \$348,520.15.

Costs, (7) Deposition Costs, (8) Court Fees & Service Costs, and (9) Miscellaneous Costs. Each of these categories is described in further detail below.⁴

37.1 *Investigators & Consultants*: Class Counsel have engaged various investigators, industry consultants, economic consultants, and e-discovery consultants to assist them in investigating and litigating this case. These costs were necessary to investigate the case, confirm and bolster the allegations in the complaints, analyze various data relating to the Pork market, and assist in resolving complex e-discovery collection and search issues. Through April 30, 2022, Class Counsel have incurred \$36,135.71 for the services of investigators and consultants.

37.2 *Experts*: Class counsel have engaged the services of a testifying expert economist (Dr. Russell Mangum) as well as Dr. Mangum's team, and a prominent economic analyst firm (OSKR) to assist him and his team in standardizing and processing substantial amounts of data in preparation for class certification and merits expert work. Through April 30, 2022, Dr. Mangum and OSKR's reasonable and necessary expenses total \$2,186,108.20.

37.3 *Document Scanning & Copying Services*: Class Counsel have engaged a number of document copying and scanning vendors to scan documents from named representatives for production to Defendants, as well as scanning of documents

⁴ Upon request by the Court, Class Counsel will provide the Court further detail and documentation concerning any category, but requests that such information be submitted *in camera* to protect Class Counsel's work product from disclosure to Defendants.

made available by Defendants in this litigation. The total cost for these services through April 30, 2022 are \$17,671.17.

37.4 *Document Database Vendor*: In connection with discovery in this case, Class Counsel retained a vendor with expertise in designing and maintaining electronic databases (“Document Database Vendor”). Plaintiffs’ Document Database Vendor provided a database that enabled Class Counsel to search, review, analyze, and code a database with more than 3.4 million documents and other records produced by Defendants and various third parties. The review, analysis, and coding of documents has been integral to Class Counsel’s efforts relating to fact and expert discovery. The Document Database Vendor’s product also included a technology-assisted review (“TAR”) tool that increased the accuracy of the review and decreased the percent of the overall documents it was necessary to have manually reviewed by attorneys. Through April 30, 2022, Class Counsel have received invoices from the Document Database Vendor totaling \$152,802.06.

37.5 *Mediators*: In connection with the JBS Settlement, Class Counsel engaged the services of prominent mediator Eric Green. Through April 30, 2022 Class Counsel have spent \$14,575.00 for mediators.

37.6 *Phone Records Vendor & Subpoena Costs*: Another critical element of Class Counsel’s discovery effort has been the services provided by a vendor that has expertise in processing and analyzing phone records (“Phone Records Vendor”). Class Counsel obtained the phone records of Defendants’ employees pursuant to subpoenas to phone service providers such as AT&T and Verizon. These phone records were provided

to Plaintiffs' Phone Records Vendor, who in turn analyzed the data and provided Class Counsel with information establishing an extraordinary number of direct inter-company communications – phone calls and text messages – between Defendants' employees. The review and analysis of Defendants' phone records has been integral to Class Counsel's discovery efforts and proving Defendants engaged in unlawful conduct. Through April 30, 2022, Class Counsel have incurred costs totaling \$17,085.98 from the Phone Records Vendor, and \$7,245.00 in connection with the production of records by the phone service providers who charge a fee for obtaining the phone records. Therefore, in total, the cost for the Phone Records Vendor & Subpoena Costs category through April 30, 2021 is \$24,330.98.

37.7 *Deposition Costs:* Another critical element of fact and expert discovery has been the depositions taken by all parties. Class Counsel and Defendants retained separate vendors with expertise in providing deposition transcription services in complex antitrust litigation ("Deposition Vendors"). Deposition Vendors have assisted with the logistics of arranging depositions of Defendants (and soon third parties) around the country, including arranging for deposition conference space when necessary. Deposition Vendors were also tasked with the responsibility of providing the parties with a virtual platform to address the need to conduct depositions remotely due to the pandemic. The services provided by the Deposition Vendors have been critical to Class Counsel's efforts to prosecute Plaintiffs' claims. Through April 30, 2021, for deposition-related costs Class Counsel have incurred a total of \$14,025.75.

37.8 *Court Fees & Service Costs*: In the course of filing the complaint, serving the complaint, obtaining hearing transcripts, and serving various subpoenas in this matter, Class Counsel have incurred costs. These costs were necessary to litigate this case. In total, costs for court fees and service through April 30, 2022 are \$725.75.

37.9 *Miscellaneous Costs*: One miscellaneous cost has been incurred through April 30, 2022, which is the cost of printing checks for the Litigation Fund to permit payment of expenses. In total, Miscellaneous Costs through April 30, 2021 are \$990.09.

38. Therefore, the total amount of incurred litigation expenses is \$2,505,505.75 (*i.e.*, the total of categories 1 and 2 above (¶ 30)).

Future Expense Reserve Fund

39. In addition to the already-incurred litigation expenses, Class Counsel requests that the Court approve payment of \$2,494,494.25 in ongoing and future litigation expenses. As with the already-incurred litigation expenses, these funds will only be used for reasonable expenses incurred in the ongoing litigation against the remaining Defendants. Many of the costs described above and in the accompanying attorney declarations are not one-time expenses; they are ongoing. Six Defendants remain in the case, fact discovery continues through September 1, 2022, class certification motion practice is well underway, expert merits discovery will soon begin, followed by potential *Daubert* motion practice, dispositive motion practice and, absent acceptable settlements with the remaining Defendants, trial. *See* ECF Nos. 658, 65. The same and similar expenses

will be incurred as DPPs continue to prosecute this case, and they also will be reasonable and necessary to support this litigation.

40. In any future petition for reimbursement of expenses, or at the Court's request, Interim Co-Lead Counsel will provide an accounting to the Court of their payment of future costs from this award. If funds from this requested award of future expenses are not fully used by the time the case is resolved in its entirety, Interim Co-Lead Counsel will so report to the Court at that time and propose a method to return any such remaining funds to the benefit of the Class.

41. The sum of the litigation expenses already incurred (\$2,505,505.75, *see* ¶ 38) and the request for ongoing and future litigation expenses (\$2,494,494.25) is \$5 million. This amount is equal to the amount that was included in the notice to the Class (up to \$5 million, *see* ECF No. 1208, Exhibit A (Long Form Notice)).⁵

CLASS REPRESENTATIVES' CONTRIBUTION TO THE DEVELOPMENT AND PROSECUTION OF THIS CASE

42. The four Class Representatives in this case are: Maplevale Farms, Inc.; John Gross and Company, Inc.; Ferraro Foods, Inc. and Ferraro Foods of North Carolina, LLC; and Olean Wholesale Grocery Cooperative, Inc.⁶ Their help was instrumental to this

⁵ If the Court wishes to employ here the same methodology used in the CIIPPs' award, a 33 1/3% fee of the Settlement Fund net of settlement administration costs (\$348,520.15) and the requested future litigation expenses (\$2,494,494.25) would be \$33,007,095.20. Awarding such a fee would result in a conservative multiplier of 1.43 (*see* ¶ 27 above).

⁶ On April 1, 2022, a fifth Class Representative, Joe Christiana Food Distributors, Inc., filed with the Court a Stipulation of Voluntary Dismissal of Claims with Prejudice. *See* ECF 1246.

outstanding result and, in Interim Co-Lead Counsel's judgment, deserving of a service award.

43. Throughout this litigation, the Class Representatives advised Class Counsel and approved pleadings, reviewed and responded to written discovery, searched for, gathered, preserved, and produced documents, will prepare for and sit for depositions, kept up to date on the progress of the case, and performed other similar activities.

44. The work they have performed and their contributions to the case to date is detailed in their declarations in support of DPPs' Motion for Class Certification, and can be found at ECF Nos. 1322-4 to 1322-7.

45. The Class Representatives were never promised that they would receive any additional compensation for leading the case; rather, they devoted their time and efforts solely to recovery some portion of their own overcharges and to enable other Class members to recover theirs. The time and effort devoted by Class Representatives was instrumental in obtaining a phenomenal result for DPPs, and it should be recognized.

* * *

46. My firm has demonstrated expertise in managing complex class actions and, I respectfully submit, we have demonstrated our experience and commitment in this case. We have devoted substantial resources to prosecuting this case, and we will continue to do so to achieve a successful resolution for the DPP Class.

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

Executed on this 13th day of May, 2022 at Minneapolis, Minnesota.

/s/ W. Joseph Bruckner
W. Joseph Bruckner

EXHIBIT 1



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PEARSON | SIMON • WARSHAW LLP

44 Montgomery Street
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November 26, 2018

VIA ELECTRONIC MAIL

To All Direct Purchaser Plaintiffs' Counsel

Re: *In Re Pork Antitrust Litigation*, Case No. 0:18-cv-01776-JRT-HB (D.MN)
Time & Expense Report Instructions

Dear Counsel:

As court-appointed Interim Co-Lead Class Counsel for the Direct Purchaser Plaintiffs, we are writing to provide you with forms and protocols for reporting your time and expenses. The Court has reviewed these forms and protocols, and firms who wish to apply for payment of attorneys' fees and reimbursement of expenses from settlements or judgments in this case must follow these directives. We will request assessment payments for the litigation common cost fund in a separate letter.

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. Her phone number is 612-339-6900.

Your first time and expense report should cover the period from inception through November 30, 2018. This initial report is due on December 21, 2018. 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 **20th 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.

Direct Purchaser Plaintiff Counsel
Litigation Fund & Time & Expense Reports
November 26, 2018
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 reviewing documents is capped at \$350 per hour.
5. 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 spent in preparing and submitting 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 indirect purchaser case;
 - routine clerical tasks (such as file maintenance by a paralegal or clerical staff); or
 - time associated with work relating to any client or potential client that did not retain your firm for this case.
6. 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.
7. Routine office supplies and regular secretarial time should not be included as a case expense.
8. Internal copy charges should be capped at \$.20 per page.
9. No surcharges should be reflected in or applied to any expenses, including telephone, faxes, and copying.
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

Direct Purchaser Plaintiff Counsel
Litigation Fund & Time & Expense Reports
November 26, 2018
Page 3

an adequate description and 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.


W. Joseph Bruckner

PEARSON, SIMON & WARSHAW, LLP


Bruce L. Simon

Attachment(s)

EXHIBIT 2

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF JEFFREY C.
BLOCK IN SUPPORT OF
DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
INTERIM AWARD OF
ATTORNEYS' FEES, CURRENT
AND ONGOING LITIGATION
EXPENSES, AND SERVICE
AWARDS**

I, Jeffrey C. Block, declare as follows:

1. I am a Partner of the law firm of Block & Leviton LLP. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs:

- Discovery from Tyson and Smithfield Defendants including analyzing responses and objections to Plaintiffs' request for documents, meet and conferring re: same; preparing reports for custodians, draft motion to compel, prepare reports for search methodology and search terms;
- Discovery from Hormel and Seaboard Defendants including analyzing responses and objections to Plaintiffs' request for documents, meet and conferring re: same; preparing reports for custodians, prepare reports for search methodology and search terms
- Analysis of custodial list and oversee telephone records subpoenas, review telephone records produced and analyze those records;
- Review, analyze and code documents produced in the action;
- Oversee review of documents produced and analyzed and prepare written memoranda summarizing the evidence from the documents produced; and
- Assist in preparation for depositions and deposition strategy.

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 1,781.10 hours. The total lodestar for my firm is \$1,049,439.00. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$101.20 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 11th day of May, 2022, at Boston, Massachusetts.

/s/ Jeffrey C. Block

Jeffrey C. Block
Block & Leviton LLP

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: **Block & Leviton LLP**
Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar*
Whitney Street (2018)	P	\$750.00	1.5	\$1,125.00
Whitney Street (2019)	P	\$815.00	81.1	\$66,096.50
Whitney Street (2020)	P	\$850.00	182.3	\$154,955.00
Whitney Street (2021)	P	\$900.00	486.2	\$437,580.00
Whitney Street	P	\$350.00	4.9	\$1,715.00
Stephen Teti (2018)	A	\$600.00	4.9	\$2,940.00
Stephen Teti (2019)	A	\$650.00	92.9	\$60,385.00
Stephen Teti (2020)	A	\$675.00	0.8	\$540.00
Stephen Teti	A	\$350.00	4.7	\$1,645.00
Robert Benenson	A	\$350.00	160.0	\$56,000.00
Elizabeth Newman	A	\$350.00	760.0	\$266,000.00
Rachel Murphy	PL	\$275.00	0.3	\$82.50
Elizabeth Davey	PL	\$250.00	1.5	\$375.00
Totals			\$1,781.1	\$1,049,439.00

Title:
 Partner (P)
 Associate (A)
 Paralegal (PL)
 Of Counsel (OC)
 Law Clerk (LC)
 Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Block & Leviton LLP**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	
Experts / Consultants	
Federal Express / UPS	
Postage / U.S. Mail	
Service of Process	
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis	\$101.20
Photocopies (in House)	
Photocopies (Outside)	
Telephone / Telecopier	
Travel – Transportation*	
Travel – Meals**	
Travel – Hotels	
Miscellaneous	
Total	\$101.20

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 3

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF MICHAEL J.
BONI IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM
AWARD OF ATTORNEYS' FEES,
CURRENT AND ONGOING
LITIGATION EXPENSES, AND
SERVICE AWARDS**

I, Michael J. Boni, declare as follows:

1. I am a partner of the law firm of Boni, Zack & Snyder LLC. I am an attorney admitted to practice *pro hac vice* in the District of Minnesota in the above-captioned lawsuit. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs: Pre-complaint investigation; work on Phil's BBQ complaint.

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 3 hours. The total lodestar for my firm is \$2,500. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared

and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates that would be charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$0.40 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 8th day of April, 2022, at Bala Cynwyd, Pennsylvania.

/s/ Michael J. Boni

Michael J. Boni

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: **Boni, Zack & Snyder LLC**
Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar*
Michael J. Boni	P	\$825	1.4	\$1,155.00
Michael J. Boni	P	\$850	0.3	\$ 255.00
Michael J. Boni	P	\$900	0.9	\$ 810.00
Joshua D. Snyder	P	\$675	0.2	\$ 135.00
Joshua D. Snyder	P	\$725	0.2	\$ 145.00
Totals			3.0	\$2,500.00

Title:

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Boni, Zack & Snyder LLC**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	
Experts / Consultants	
Federal Express / UPS	
Postage / U.S. Mail	
Service of Process	
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis	
Photocopies (in House)	\$0.40
Photocopies (Outside)	
Telephone / Telecopier	
Travel – Transportation*	
Travel – Meals**	
Travel – Hotels	
Miscellaneous	
Total	\$0.40

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 4

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF BRYAN L.
BLEICHNER IN SUPPORT OF
DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
INTERIM AWARD OF
ATTORNEYS' FEES, CURRENT
AND ONGOING LITIGATION
EXPENSES, AND SERVICE
AWARDS**

I, Bryan L. Bleichner, declare as follows:

1. I am a Partner of the law firm of Chestnut Cambronne, PA. I am an attorney admitted to practice in the District of Minnesota in the above-captioned lawsuit. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs:

- Factual investigation and analysis in connection with researching and drafting an initial complaint;
- Participation in telephone conferences with lead and co-counsel to discuss litigation strategy;
- Addressing and negotiating the various defendants' imaging of key employee and executive devices, including meet and confer conferences regarding the same;
- Coordination with plaintiffs' attorneys regarding negotiation of imaging issues;
- Researching imaging and preservation obligations and caselaw cited in objection by defendants; and
- Reviewing defendants' initial disclosures in preparation for discovery.

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 148.6 hours. The total lodestar for my firm is \$89,462.50. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$2,239.16 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 22nd day of April, 2022, at Minneapolis, Minnesota.

/s/ Bryan L. Bleichner

Bryan L. Bleichner

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: **Chestnut Cambronne, PA**
Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar*
Karl L. Cambronne	P	\$795.00	0.5	\$397.50
Karl L. Cambronne	P	\$675.00	2.8	\$1,890.00
Jeffrey D. Bores	P	\$625.00	50.4	\$31,500.00
Bryan L. Bleichner	P	\$825.00	2.0	\$1,650.00
Bryan L. Bleichner	P	\$725.00	0.5	\$362.50
Bryan L. Bleichner	P	\$625.00	41.5	\$25,937.50
Christopher P. Renz	P	\$750.00	6.5	\$4,875.00
Christopher P. Renz	P	\$575.00	28.3	\$16,272.50
Gary K. Luloff	P	\$425.00	12.2	\$5,185.00
Kristen C. Hendrick	A	\$375.00	3.5	\$1,312.50
Natalie Paule	LC	\$200.00	0.4	\$80.00
Totals			148.6	\$89,462.50

Title:

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Chestnut Cambronne PA**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	\$700.00
Experts / Consultants	
Federal Express / UPS	
Postage / U.S. Mail	
Service of Process	\$1,263.06
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis	
Photocopies (in House)	
Photocopies (Outside)	
Telephone / Telecopier	
Travel – Transportation*	
Travel – Meals**	\$52.27
Travel – Hotels	
Miscellaneous	\$223.83
Total	\$2,239.16

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 5

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF JEFFREY S.
ISTVAN IN SUPPORT OF
DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
INTERIM AWARD OF
ATTORNEYS' FEES, CURRENT
AND ONGOING LITIGATION
EXPENSES, AND SERVICE
AWARDS**

I, JEFFREY S. ISTVAN, declare as follows:

1. I am a Member of the law firm of Fine, Kaplan and Black, R.P.C. I am an attorney admitted to practice *pro hac vice* in the District of Minnesota in the above-captioned lawsuit. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs:

- Case investigation and plaintiff discovery
- Factual and legal research

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 243.60 hours. The total lodestar for my firm is \$142,325.00. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly

prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$2,824.21 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 14th day of April, 2022, at Philadelphia, Pennsylvania



Jeffrey S. Istvan

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: **Fine, Kaplan, and Black, R.P.C.**
Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar*
Roberta D. Liebenberg	P	850	13.20	11,220.00
Jeffrey S. Istvan	P	750	50.90	38,175.00
Jeffrey S. Istvan	P	825	5.10	4,207.50
Adam J. Pessin	P	650	11.60	7,540.00
Mary L. Russell	A	550	58.40	32,120.00
Ria Momblanco	A	550	14.30	7,865.00
Jessica D. Khan	A	475	4.70	2,232.50
Jessica D. Khan	A	550	53.30	29,315.00
Joseph J. Borgia	A	400	.20	80.00
Nancy M. Blakeslee	PL	300	11.40	3,420.00
Allison L. Katzman	PL	300	4.5	1,350.00
Susan J. Hufnagel	PL	300	16.00	4,800.00
Totals			243.60	142,325.00

Title:

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Fine, Kaplan and Black, R.P.C.**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	
Experts / Consultants	
Federal Express / UPS	23.23
Postage / U.S. Mail	
Service of Process	
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis	2,610.48
Photocopies (in House)	151.20
Photocopies (Outside)	
Telephone / Telecopier	
Travel – Transportation*	
Travel – Meals**	
Travel – Hotels	
Miscellaneous (Pacer Service)	21.80
Miscellaneous (BAM Sec. earnings call transcript)	17.50
Total	2,824.21

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 6

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF JONATHAN
M. JAGHER IN SUPPORT OF
DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
INTERIM AWARD OF
ATTORNEYS' FEES, CURRENT
AND ONGOING LITIGATION
EXPENSES, AND SERVICE
AWARDS**

I, Jonathan M. Jagher, declare as follows:

1. I am a Partner of the law firm of Freed Kanner London & Millen LLC. I am an attorney admitted to practice *pro hac vice* in the District of Minnesota in the above-captioned lawsuit. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs:

- Prepared for and took lead role for numerous depositions of Defendant and third party fact witnesses, including several top executives;
- Analyzed Defendants' disclosures and discovery responses concerning structured data; negotiated structured data productions; interfaced with experts regarding questions about and completeness of each Defendant's structured data productions; drafted follow up correspondence to Defendants; prepared for and participated in structured data meet and confer discussions; assessed proposals for revised structured data discovery schedule; and
- Reviewed, analyzed, and coded documents produced by defendants and third parties.

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 2,469.80 hours. The total lodestar for my firm is \$1,131,939.50. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$1,179.83 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 15th day of April, 2022, at Conshohocken, Pennsylvania.

/s/ Jonathan M. Jagher

Jonathan M. Jagher

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: **Freed Kanner London & Millen LLC**
Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar*
James Gillespie	OC	\$350.00	1,840.50	\$644,175.00
Brian M. Hogan	P	\$650.00	56.00	\$36,400.00
Jonathan M. Jagher	P	\$640.00	0.90	\$576.00
Jonathan M. Jagher	P	\$775.00	235.20	\$182,280.00
Jonathan M. Jagher	P	\$825.00	89.90	\$74,167.50
Kimberly A. Justice	P	\$875.00	0.50	\$437.50
Steven A. Kanner	P	\$890.00	1.70	\$1,513.00
Marlene Khamoo	PL	\$195.00	5.50	\$1,072.50
William H. London	P	\$790.00	0.20	\$158.00
Douglas A. Millen	P	\$755.00	3.10	\$2,340.50
Douglas A. Millen	P	\$770.00	7.90	\$6,083.00
Douglas A. Millen	P	\$785.00	1.60	\$1,256.00
Douglas A. Millen	P	\$875.00	0.70	\$612.50
Douglas A. Millen	P	\$925.00	0.20	\$185.00
Danielle Millikan	PL	\$205.00	6.10	\$1,250.50
Danielle Millikan	PL	\$225.00	3.70	\$832.50
Michael E. Moskovitz	P	\$825.00	201.40	\$166,155.00
Robert J. Wozniak	P	\$800.00	1.00	\$800.00
Robert J. Wozniak	P	\$850.00	13.70	\$11,645.00
Totals			2,469.80	\$1,131,939.50

Title:

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Freed Kanner London & Millen LLC**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	\$400.00
Experts / Consultants	
Federal Express / UPS	\$134.33
Postage / U.S. Mail	
Service of Process	
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis	
Photocopies (in House)	\$336.60
Photocopies (Outside)	
Telephone / Telecopier	\$226.80
Travel – Transportation*	
Travel – Meals**	\$75.00
Travel – Hotels	
Miscellaneous	\$7.10
Total	\$1,179.83

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 7

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF ROBERT
EISLER IN SUPPORT OF
DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
INTERIM AWARD OF
ATTORNEYS' FEES, CURRENT
AND ONGOING LITIGATION
EXPENSES, AND SERVICE
AWARDS**

I, Robert Eisler, declare as follows:

1. I am a Director of the law firm of Grant & Eisenhofer P.A. I am an attorney admitted to practice *pro hac vice* in the District of Minnesota in the above-captioned lawsuit. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs: Factual research; drafted complaint; collected, reviewed and produced client documents; and reviewed Defendants' documents.

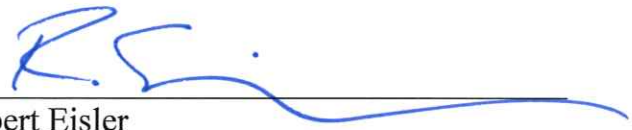
4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 607.10 hours. The total lodestar for my firm is \$272,398.00. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped

at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$2,092.57 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 12th day of April, 2022, at Wilmington, DE.


Robert Eisler

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: **Grant & Eisenhofer P.A.**
Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar*
Robert Eisler	P	\$1,100.00	2.20	\$2,420.00
Robert Eisler	P	\$985.00	81.50	\$80,277.50
Deborah Elman	P	\$775.00	4.30	\$3,352.50
Deborah Elman	P	\$750.00	0.80	\$600.00
Allison J. McCowan	A	\$475.00	34.40	\$16,340.00
Cheron Everett	A	\$440.00	7.00	\$3,080.00
Shannon Somma	A	\$440.00	7.20	\$3,168.00
Shannon Somma	A	\$350.00	460.20	\$161,070.00
Valisity Beal	PL	\$220.00	9.50	\$2,090.00
Totals			607.10	\$272,398.00

Title:

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Grant & Eisenhofer P.A.**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	\$0.00
Experts / Consultants	\$0.00
Federal Express / UPS	\$0.00
Postage / U.S. Mail	\$0.00
Service of Process	\$0.00
Messenger / Delivery	\$0.00
Hearing Transcripts	\$0.00
Investigation	\$0.00
Westlaw / Lexis	\$1,489.63
Photocopies (in House)	\$6.85
Photocopies (Outside)	\$0.00
Telephone / Telecopier	\$0.00
Travel – Transportation*	\$0.00
Travel – Meals**	\$596.09
Travel – Hotels	\$0.00
Miscellaneous	\$0.00
Total	\$2092.57

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 8

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF STEVEN A.
HART IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM
AWARD OF ATTORNEYS' FEES,
CURRENT AND ONGOING
LITIGATION EXPENSES, AND
SERVICE AWARDS**

I, Steven A. Hart, declare as follows:

1. I am a Partner of the law firm of Hart, McLaughlin & Eldridge, LLC. I am an attorney admitted to practice *pro hac vice* in the District of Minnesota in the above-captioned lawsuit. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs:

Hart, McLaughlin & Eldridge, LLC, has been engaged by leadership to perform work addressing the pleadings, legal research on theories in case, perform investigation and factual research addressing our allegations and defendants defenses, and assist in brief writing for responsive motions and discovery practice.

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 91.5 hours. The total lodestar for my firm is

\$61,395.00. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$75,232.04 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 20th day of April, 2022, at Chicago, Illinois.

/s/ Steven A. Hart

Steven A. Hart

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: **Hart McLaughlin & Eldridge, LLC**
Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar*
Steven A. Hart	P	850.00	2.6	\$2210.00
John Marrese	P	850.00	.1	85.00
Kyle Pozan	P	350.00	.9	315.00
Kyle Pozan	P	550.00	53.1	29205.00
Kyle Pozan	P	850.00	34.8	29580.
Totals			91.5	\$61,395.00

Title:

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Hart McLaughlin & Eldridge, LLC**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	\$200.00
Experts / Consultants	
Federal Express / UPS	
Postage / U.S. Mail	
Service of Process	
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis	
Photocopies (in House)	\$32.04
Photocopies (Outside)	
Telephone / Telecopier	
Travel – Transportation*	
Travel – Meals**	
Travel – Hotels	
Miscellaneous	
Total	\$232.04

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 9

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF VINCENT J.
ESADES IN SUPPORT OF
DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
INTERIM AWARD OF
ATTORNEYS' FEES, CURRENT
AND ONGOING LITIGATION
EXPENSES, AND SERVICE
AWARDS**

I, Vincent J. Esades, declare as follows:

1. I am a partner of the law firm of Heins Mills & Olson, P.L.C. I am an attorney admitted to practice *pro hac vice* in the District of Minnesota in the above-captioned lawsuit. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs: Coordinate drafting and filing complaint with co-lead counsel, assist with various legal research projects at request of lead counsel and related tasks such as coordinating the prosecution of the case, client document preservation and filing of amended complaint.


4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 104.70 hours. The total lodestar for my firm is

\$52,212.50. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$625.60 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 13th day of April 2022 at Minneapolis, Minnesota.



Vincent J. Esades

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: **Heins Mills & Olson, P.L.C.**
Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar*
Vincent J. Esades (Owner)	P	\$800.00	4.30	\$ 3,440.00
James W. Anderson (W-2)	P	\$650.00	38.10	\$24,765.00
Ian F. McFarland (W-2)	A	\$400.00	51.00	\$20,400.00
Ian F. McFarland (W-2)	A	\$375.00	5.00	\$ 1,875.00
Irene M. Kovarik (W-2)	PL	\$275.00	6.30	\$ 1,732.50
Totals			104.70	\$52,212.50

Title:

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Heins Mills & Olson, P.L.C.**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	\$600.00
Experts / Consultants	
Federal Express / UPS	
Postage / U.S. Mail	
Service of Process	
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis	\$ 25.30
Photocopies (in House)	\$.30
Photocopies (Outside)	
Telephone / Telecopier	
Travel – Transportation*	
Travel – Meals**	
Travel – Hotels	
Miscellaneous	
Total	\$625.60

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 10

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF MINDEE J.
REUBEN IN SUPPORT OF
DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
INTERIM AWARD OF
ATTORNEYS' FEES, CURRENT
AND ONGOING LITIGATION
EXPENSES, AND SERVICE
AWARDS**

I, Mindee J. Reuben, declare as follows:

1. I am a Member of the law firm of Lite DePalma Greenberg & Afanador, LLC. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs including but not limited to:

- Researching settlement- and privilege-related issues relevant to the litigation and preparing legal memoranda regarding the same
- Researching authenticity and admissibility evidentiary issues in the District and Circuit and preparing memoranda regarding the same to assist the deposition team
- Working with co-lead counsel on deposition training materials and participating in training deposition team and
- Creating and updating the Master Exhibit List for Plaintiffs.

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from

case inception through February 28, 2022, is 130.4 hours. The total lodestar for my firm is \$84,852.50. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expense summary attached to this declaration as **Exhibit B**, reflects that my firm has incurred no unreimbursed expenses in litigating this action through February 28, 2022. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 14th day of April, 2022, at Philadelphia, Pennsylvania.

/s/ Mindee J. Reuben
Mindee J. Reuben

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: **Lite DePalma Greenberg A anador, LLC**
Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar
Joseph J. DePalma	P	\$800	1.	\$1,520.00
Steven J. Greenfogel	OC	\$825	3.5	\$2,887.50
Bruce D. Greenberg	P	\$800	1.6	\$1,280.00
Mindee J. Reuben	P	\$800	68.	\$55,120.00
Mindee J. Reuben	OC	\$700	0.1	\$70.00
Dana S. Smith	OC	\$675	17.8	\$12,015.00
Jeremy N. Nash	OC	\$675	0.2	\$135.00
Catherine B. Deren e	A	\$375	21.8	\$8,175.00
Eric Henley	PL	\$250	14.6	\$3,650.00
Totals			130.4	\$84,820.00

Title:

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Lite DePalma Greenberg A anador, LLC**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	-
Experts / Consultants	-
Federal Express / UPS	-
Postage / U.S. Mail	-
Service of Process	-
Messenger / Delivery	-
Hearing Transcripts	-
Investigation	-
Westlaw / Lexis	-
Photocopies (in House)	-
Photocopies (Outside)	-
Telephone / Telecopier	-
Travel – Transportation*	-
Travel – Meals**	-
Travel – Hotels	-
Miscellaneous	-
Total	\$0.00

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 11

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF LINDA P.
NUSSBAUM IN SUPPORT OF
DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
INTERIM AWARD OF
ATTORNEYS' FEES, CURRENT
AND ONGOING LITIGATION
EXPENSES, AND SERVICE
AWARDS**

I, LINDA P. NUSSBAUM, declare as follows:

1. I am the managing director of Nussbaum Law Group, P.C. I am an attorney admitted to practice *pro hac vice* in the District of Minnesota in the above-captioned lawsuit. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked diligently and efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs:

- Investigation of the underlying facts and legal and economic theories and preparation and filing of one of the first direct purchaser class complaints.
- Industry and economic research done in support of a consolidated complaint.
- Various discovery tasks including preparation of a detailed cast of characters of industry participants, a chronology of key industry events, and a timeline of relevant pricing events.

- Various research and drafting assignments, including opposition to the joint motion to dismiss and motion for a stay.
- Work with our client with respect to discovery obligations and industry information.
- Document review projects, including the plaintiff document production.

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 1,278.3 hours. The total lodestar for my firm is \$589,595.50. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the

expenses incurred. My firm incurred a total of \$365.33 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 26th day of April, 2022, in New York, NY.

/s/ Linda P. Nussbaum

LINDA P. NUSSBAUM

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: **NUSSBAUM LAW GROUP, P.C.**
Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar*
Nussbaum, Linda	P	\$995.00	46.4	\$46,168.00
Cohen, Bart	P	\$900.00	15.5	\$13,950.00
Cohen, Bart	P	\$925.00	2.7	\$2,497.50
Isquith, Fred	OC	\$750.00	125.5	\$94,125.00
Sandler, Hugh	P	\$750.00	19.5	\$14,625.00
Schwaiger, Susan	OC	\$775.00	30.4	\$23,560.00
Schwaiger, Susan	OC	\$800.00	9.9	\$7,920.00
Wigmore, Sara	A	\$350.00	858.4	\$300,440.00
Yang, Hoyoung	A	\$375.00	5.2	\$1,950.00
Alpert, Joshua	IC	\$525.00	154.0	\$80,850.00
Shutran, Zachary	LC	\$325.00	10.8	\$3,510.00
Totals			1,278.3	\$589,595.50

Title:
 Partner (P)
 Associate (A)
 Paralegal (PL)
 Of Counsel (OC)
 Law Clerk (LC)
 Independent Contractor (IC)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Nussbaum Law Group, P.C.**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	
Experts / Consultants	
Federal Express / UPS	
Postage / U.S. Mail	
Service of Process	
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis/ Courtlink/ Pacer	\$205.23
Photocopies (in House)	\$160.10
Photocopies (Outside)	
Telephone / Telecopier	
Travel – Transportation*	
Travel – Meals**	
Travel – Hotels	
Miscellaneous	
Total	\$365.33

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 12

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF GARRETT
BLANCHFIELD, JR. IN
SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM
AWARD OF ATTORNEYS' FEES,
CURRENT AND ONGOING
LITIGATION EXPENSES, AND
SERVICE AWARDS**

I, Garrett Blanchfield, Jr., declare as follows:

1. I am a Partner of the law firm of Reinhardt Wendorf & Blanchfield. I am an attorney admitted to practice *pro hac vice* in the District of Minnesota in the above-captioned lawsuit. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs:

- Researched and analyzed industry publications for information regarding defendant-specific slaughter cutbacks.
- Researched and drafted motion to reconsider *pro hac vice* admissions of certain counsel.

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 107.1 hours. The total lodestar for my firm is \$46,236.00. The lodestar calculation is based on my firm's historic billing rates for antitrust

class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$1,692.63 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 11th day of April 2022, at St. Paul, MN.

/s/ Garrett Blanchfield Jr.
Garrett Blanchfield Jr.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: **Reinhardt Wendorf & Blanchfield**
Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar*
Garrett Blanchfield	P	720	12.4	8,928.00
Garrett Blanchfield	P	730	1.0	730.00
Garrett Blanchfield	P	745	3.7	2,756.50
Garrett Blanchfield	P	755	.2	151.00
Brant Penney	P	440	1.0	440.00
Brant Penney	P	515	.4	206.00
Mark Reinhardt	P	885	.3	265.50
Roberta Yard	P	425	.5	212.50
Roberta Yard	P	515	11.9	6,128.50
Gerard Shannon	A	350	75.0	26,250.00
Shirley Kosek	PL	240	.7	168.00
Totals			107.1	\$46,236.00

Title:

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Reinhardt Wendorf & Blanchfield**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	1,400.00
Experts / Consultants	
Federal Express / UPS	
Postage / U.S. Mail	
Service of Process	
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis	292.63
Photocopies (in House)	
Photocopies (Outside)	
Telephone / Telecopier	
Travel – Transportation*	
Travel – Meals**	
Travel – Hotels	
Miscellaneous	
Total	\$1,692.63

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 13

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF ARTHUR N.
BAILEY, ESQ. IN SUPPORT OF
DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
INTERIM AWARD OF
ATTORNEYS' FEES, CURRENT
AND ONGOING LITIGATION
EXPENSES, AND SERVICE
AWARDS**

I, Arthur N. Bailey, Esq., declare as follows:

1. I am a Partner of the law firm of Rupp Baase Pfalzgraf Cunningham, LLC I am an attorney admitted to practice *pro hac vice* in the District of Minnesota in the above-captioned lawsuit. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs:

- Maintained regular communication with named representative clients, keeping them updated on status of the case, and
- Obtained and analyzed client invoices, relevant documents and ESI, and further participated in discovery matters as instructed by lead counsel, and
- Participated in strategy sessions and case management meeting with lead counsel throughout case progression.

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 215.40 hours. The total lodestar for my firm

is \$95,890.00. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$84.22 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 8th day of April, 2022, at Jamestown, New York.

/s/ Arthur N. Bailey

ARTHUR N. BAILEY, ESQ.

In re Pork Antitrust Litigation

Case No. 18-cv-01776 (JRT/HB)

Exhibit A**Lodestar Summary**

Firm: **Rupp Baase Pfalzgraf Cunningham, LLC**
 Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar*
Arthur N. Bailey	P	\$450	183.2	\$82,440.00
Marco Cercone	P	\$425	29.6	\$12,580.00
Marco Cercone	P	\$450	.2	\$90.00
Nicolas Vona	A	\$350	1.8	\$630.00
Theresa Hobbs	PL	\$250	.6	\$150.00
Totals			215.40	\$95,890.00

Title:

Partner (P)
 Associate (A)
 Paralegal (PL)
 Of Counsel (OC)
 Law Clerk (LC)
 Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Rupp Baase Pfalzgraf Cunningham, LLC**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	
Experts / Consultants	
Federal Express / UPS	
Postage / U.S. Mail	
Service of Process	
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis	
Photocopies (in House)	\$84.22
Photocopies (Outside)	
Telephone / Telecopier	
Travel – Transportation*	
Travel – Meals**	
Travel – Hotels	
Miscellaneous	
Total	\$84.22

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 14

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF R.
ALEXANDER SAVERI IN
SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM
AWARD OF ATTORNEYS' FEES,
CURRENT AND ONGOING
LITIGATION EXPENSES, AND
SERVICE AWARDS**

I, R. Alexander Saveri, declare as follows:

1. I am the Managing Partner of the law firm of Saveri & Saveri, Inc. (the “Saveri Firm”). I submit this Declaration in support of Direct Purchaser Plaintiffs’ petition for an interim award of attorneys’ fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs’ class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Direct Purchaser Plaintiffs: The Saveri Firm has been actively involved in preparing for and taking depositions. The Saveri Firm took the depositions of Phil Clemens (former CEO of Defendant Clemens Family Corporation) and Damon Ginther (Seaboard Foods). In both depositions the Saveri Firm took the lead in researching the deponents’ documents, drafted the outline, and was lead during the deposition for the plaintiffs’ side.

The Saveri Firm completed several research projects at lead counsel’s direction. Such projects included investigating potential personal relationships between individuals employed by competitors and identifying and detailing aspects of the pork industry to provide facts and evidence needed by DPP’s expert witnesses. In addition, the Saveri Firm

conducted targeted searches and reviewed batches of documents to identify useful evidence, both for the case in general as well as for specific upcoming deponents.

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 1,594.65 hours. The total lodestar for my firm is \$644,796.25. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$166.45 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**.

Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 15th day of April, 2022, at San Francisco.

/s/ R. Alexander Saveri

R. Alexander Saveri

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: **Saveri & Saveri, Inc.**
Reporting Period: **Inception through February 28, 2022**

Professional	Title	Historic Hourly Rate	Total Hours	Total Lodestar*
Guido Saveri	P	\$950.00	1.60	\$1,520.00
Cadio Zirpoli	P	\$775.00	194.05	\$150,388.75
Sarah Van Culin	A	\$475.00	25.90	\$12,302.50
Travis Manfredi	A	\$350.00	1373.1	\$480,585.00
Totals			1,594.65	\$644,796.25

Title:

Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: **Saveri & Saveri, Inc.**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	
Experts / Consultants	
Federal Express / UPS	\$139.45
Postage / U.S. Mail	
Service of Process	
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis	
Photocopies (in House)	
Photocopies (Outside)	
Telephone / Telecopier	
Travel – Transportation*	\$27.00
Travel – Meals**	
Travel – Hotels	
Miscellaneous	
Total	\$166.45

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 15

**UNITED STATES DISTRICT COURT
DISTRICT COURT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

This Document Relates To:

THE DIRECT PURCHASER
PLAINTIFF ACTION

Case No. 18-cv-01776 (JRT-HB)

**DECLARATION OF JEFFREY
CORRIGAN IN SUPPORT OF
DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
INTERIM AWARD OF
ATTORNEYS' FEES, CURRENT
AND ONGOING LITIGATION
EXPENSES, AND SERVICE
AWARDS**

I, Jeffrey Corrigan, declare as follows:

1. I am a Partner of the law firm of Spector Roseman & Kodroff, P.C. I am an attorney admitted to practice *pro hac vice* in the District of Minnesota in the above-captioned lawsuit. I submit this Declaration in support of Direct Purchaser Plaintiffs' petition for an interim award of attorneys' fees, current and ongoing litigation expenses and service awards.

2. My firm has acted as counsel to Direct Purchaser Plaintiffs and the Direct Purchaser Plaintiffs' class in this class action.

3. During the period from case inception through February 28, 2022, and at the request of Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs (Lockridge Grindal Nauen P.L.L.P. and Pearson, Simon & Warshaw, LLP), my firm has worked efficiently on behalf of our named representative clients and the absent Class members. My firm has been involved in the following activities on behalf of the Plaintiffs:

- Working with experts on preparation of an expert report to be submitted in support of class certification.
- Legal research.
- Investigating, preparing and filing an individual complaint.

4. The schedule attached to this declaration as **Exhibit A**, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of February 28, 2022. The total number of hours expended on this litigation by my firm from case inception through February 28, 2022, is 235.4 hours. The total lodestar for my firm is

\$156,501.50. The lodestar calculation is based on my firm's historic billing rates for antitrust class action litigation, except for work done on document review which is capped at \$350 per hour. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm incurred a total of \$134.14 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses through February 28, 2022 by category is attached as **Exhibit B**. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B and will be addressed separately in another declaration.

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

Executed on this 14th day of April, 2022, at Philadelphia.

/s/ Jeffrey J. Corrigan
Jeffrey J. Corrigan

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit A

Lodestar Summary

Firm: Spector Roseman & Kodroff, P. C
Reporting Period: **Inception through February 28, 2022**

PROFESSIONAL	TITLE	RATE	HOURS	LODESTAR
Eugene Spector	P	\$ 900.00	23.3	\$ 20,970.00
David Felderman	P	\$ 695.00	0.3	\$ 208.50
Jeffrey Corrigan	P	\$ 820.00	24.4	\$ 20,008.00
Jeffrey Kodroff	P	\$ 855.00	3	\$ 2,565.00
Jeffrey Spector	P	\$ 460.00	53.5	\$ 24,610.00
William Caldes	P	\$ 750.00	17.9	\$ 13,425.00
Jon Jagher	P	\$ 585.00	8	\$ 4,680.00
Diana Zinser	A	\$ 445.00	1.5	\$ 667.50
Len Fisher	A	\$ 405.00	32.8	\$ 13,284.00
Rachel Kopp	A	\$ 500.00	7.1	\$ 3,550.00
Gerri De Marshall	PL	\$ 250.00	1.6	\$ 400.00
Chuck Briglia	PL	\$ 240.00	3.3	\$ 792.00
Eugene Spector	P	\$ 925.00	1.1	\$ 1,017.50
Jeffrey Spector	P	\$ 525.00	1.7	\$ 892.50
William Caldes	P	\$ 775.00	0.5	\$ 387.50
Jeffrey Corrigan	P	\$ 845.00	1.3	\$ 1,098.50
Eugene Spector	P	\$ 955.00	0.5	\$ 477.50
Jeffrey Spector	P	\$ 575.00	0.8	\$ 460.00
William Caldes	P	\$ 800.00	0.1	\$ 80.00
Eugene Spector	P	\$ 985.00	0.3	\$ 295.50
Jeffrey Spector	P	\$ 590.00	0.1	\$ 59.00
Eugene Spector	P	\$ 1,015.00	0.4	\$ 406.00
Jeffrey Corrigan	P	\$ 935.00	40.5	\$ 37,867.50
Jeffrey Spector	P	\$ 725.00	11.2	\$ 8,120.00
William Caldes	P	\$ 900.00	0.2	\$ 180.00
TOTALS			235.4	\$ 156,501.50

Title:

Partner (P)

Associate (A)

Paralegal (PL)

Of Counsel (OC)

Law Clerk (LC)

Legal Assistant (LA)

* Based on historic hourly rates, except for document review which is capped at \$350 per hour.

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Exhibit B

Expense Summary

Firm: Spector Roseman & Kodroff, P. C.
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	
Experts / Consultants	
Federal Express / UPS	
Postage / U.S. Mail	
Service of Process	
Messenger / Delivery	
Hearing Transcripts	
Investigation	
Westlaw / Lexis	87.30
Photocopies (in House) @ .20	41.80
Photocopies (Outside)	
Telephone / Telecopier	5.04
Travel – Transportation*	
Travel – Meals**	
Travel – Hotels	
Total	\$134.14

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 16

IN RE PORK ANTITRUST LITIGATION																										
TIME REPORT - <i>(To be submitted on the 20th of every month)</i>																										
Firm Name:	LOCKRIDGE GRINDAL NAUEN P.L.L.P.							Reporting Period:			Inception through February 28, 2022															
Categories:	1) Legal Research 2) Investigation / Factual Research 3) Discovery (Written / Deposition Taking & Defending / Meet & Confer / etc.) 4a) Document Review Tier 1 - Subject to Rate Cap 4b) Document Review Tier 2 & Deposition Preparation - Subject to Rate Cap							5) Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing) 6) Class Certification 7) Summary Judgment 8) Appeals 9) Court Appearance and Prep 10) Experts					11) Settlements & Mediation 12) Case Management 13) Class Notice 14) Trial Prep (Exhibit & Witness List/Jury Instruction/ Vior Dire/Opening Statements/Closing Arguments/Demonstratives/etc.) 15) Trial								TITLE:	(P) Partner (A) Associate (LC) Law Clerk (SPL) Senior Paralegal (PL) Paralegal				
ATTORNEYS (P, A)	1	2	3	4a	4b	5	6	7	8	9	10	11	12	13	14	15	PREVIOUS HOURS	CURRENT HOURS	CUMULATIVE HOURS	HOURLY RATE	PREVIOUS LODESTAR	CURRENT LODESTAR	CUMULATIVE LODESTAR			
Richard A. Lockridge (P)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.00	0.00	0.00	0.00	0.00	2.00	2.00	\$925.00	\$0.00	\$1,850.00	\$1,850.00			
W. Joseph Bruckner (P) 2022	0.00	0.50	2.00	0.00	0.00	5.00	12.50	0.00	0.00	6.50	3.00	16.00	5.00	0.00	0.00	0.00	0.00	50.50	50.50	\$1,150.00	\$0.00	\$58,075.00	\$58,075.00			
W. Joseph Bruckner (P)	0.00	0.50	74.00	0.00	0.00	27.30	8.00	0.00	0.00	17.50	16.50	94.00	19.70	0.00	2.50	0.00	0.00	260.00	260.00	\$1,050.00	\$0.00	\$273,000.00	\$273,000.00			
W. Joseph Bruckner (P)	0.00	0.00	9.50	0.00	0.00	50.00	0.00	0.00	2.50	36.40	0.00	97.00	10.10	0.00	0.00	0.00	0.00	205.50	205.50	\$950.00	\$0.00	\$195,225.00	\$195,225.00			
W. Joseph Bruckner (P)	0.00	0.00	1.50	0.00	0.00	36.00	1.50	0.00	0.00	86.00	4.00	22.00	4.50	0.00	0.00	0.00	0.00	155.50	155.50	\$925.00	\$0.00	\$143,837.50	\$143,837.50			
W. Joseph Bruckner (P)	0.00	6.50	5.00	0.00	0.00	97.50	0.00	0.00	0.00	45.50	0.00	10.00	58.40	0.00	0.00	0.00	0.00	222.90	222.90	\$875.00	\$0.00	\$195,037.50	\$195,037.50			
Charles N. Nauen (P)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.80	0.00	0.00	0.00	0.00	0.80	0.80	\$875.00	\$0.00	\$700.00	\$700.00			
Karen H. Riebel (P)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.20	0.00	0.00	0.00	0.00	3.20	3.20	\$950.00	\$0.00	\$3,040.00	\$3,040.00			
Heidi M. Siltan (P)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.70	0.00	0.00	0.00	0.00	1.70	1.70	\$775.00	\$0.00	\$1,317.50	\$1,317.50			
Elizabeth R. Odette (P)	0.00	0.00	0.00	0.00	0.00	3.80	0.00	0.00	0.00	0.00	0.00	0.00	1.10	0.00	0.00	0.00	0.00	4.90	4.90	\$750.00	\$0.00	\$3,675.00	\$3,675.00			
Elizabeth R. Odette (P)	0.00	0.00	23.80	0.00	0.00	12.00	0.00	0.00	0.00	2.50	0.00	0.00	3.50	0.00	0.00	0.00	0.00	41.80	41.80	\$650.00	\$0.00	\$27,170.00	\$27,170.00			
Elizabeth R. Odette (P)	0.00	1.00	6.20	0.00	0.00	47.30	0.00	0.00	0.00	3.60	0.00	0.00	8.70	0.00	0.00	0.00	0.00	66.80	66.80	\$600.00	\$0.00	\$40,080.00	\$40,080.00			
Brian D. Clark (P) 2022	0.00	0.00	14.40	0.00	0.00	1.00	0.00	0.00	0.00	5.30	3.40	9.30	5.50	0.00	0.00	0.00	0.00	38.90	38.90	\$925.00	\$0.00	\$35,982.50	\$35,982.50			
Brian D. Clark (P)	0.00	0.00	274.30	0.00	0.00	22.10	0.00	0.00	0.00	20.10	16.20	46.10	17.80	0.00	1.80	0.00	0.00	398.40	398.40	\$850.00	\$0.00	\$338,640.00	\$338,640.00			
Brian D. Clark (P)	0.00	0.30	37.60	0.00	0.00	15.90	0.00	0.00	0.00	12.80	0.00	30.20	7.40	0.00	0.00	0.00	0.00	104.20	104.20	\$750.00	\$0.00	\$78,150.00	\$78,150.00			
Brian D. Clark (P)	0.00	0.20	39.50	0.00	0.00	30.10	0.00	0.00	0.00	15.60	0.30	3.70	0.50	0.00	0.00	0.00	0.00	89.90	89.90	\$625.00	\$0.00	\$56,187.50	\$56,187.50			
Brian D. Clark (P)	0.00	2.90	10.80	0.00	0.00	63.20	0.00	0.00	0.00	12.40	0.20	2.70	1.50	0.00	0.00	0.00	0.00	93.70	93.70	\$575.00	\$0.00	\$53,877.50	\$53,877.50			
Karen H. Riebel (P)	0.00	0.00	0.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.80	0.80	\$925.00	\$0.00	\$740.00	\$740.00			
Kyle J. Pozan (A)	0.00	0.00	6.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.60	0.00	0.00	0.00	0.00	0.00	0.00	6.60	6.60	\$750.00	\$0.00	\$4,950.00	\$4,950.00			
Joseph C. Bourne (A) 2022	0.30	0.00	90.00	0.00	0.00	32.90	0.10	0.00	0.00	4.80	3.10	1.30	1.80	0.00	0.00	0.00	0.00	134.30	134.30	\$800.00	\$0.00	\$107,440.00	\$107,440.00			
Joseph C. Bourne (A)	0.00	0.00	539.50	0.00	6.40	119.50	0.00	0.00	0.00	19.70	7.60	5.20	12.40	0.00	0.10	0.00	0.00	710.40	710.40	\$750.00	\$0.00	\$532,800.00	\$532,800.00			
Steven E. Serdikoff (A)	0.00	0.00	8.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.00	8.00	\$750.00	\$0.00	\$6,000.00	\$6,000.00			
Simeon A. Morbey (A) 2022	0.00	0.00	12.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12.30	12.30	\$800.00	\$0.00	\$9,840.00	\$9,840.00			
Simeon A. Morbey (A)	0.00	0.00	245.80	0.00	25.60	0.70	0.00	0.00	0.00	0.00	0.00	1.00	0.20	1.10	0.00	0.00	0.00	274.40	274.40	\$675.00	\$0.00	\$185,220.00	\$185,220.00			
Simeon A. Morbey (A)	0.00	0.00	33.00	0.00	0.00	0.00	0.00	0.00	0.00	2.30	0.00	0.00	0.20	0.00	0.00	0.00	0.00	35.50	35.50	\$575.00	\$0.00	\$20,412.50	\$20,412.50			
Simeon A. Morbey (A)	0.00	0.20	105.40	0.00	2.70	1.90	0.00	0.00	0.00	1.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	111.70	111.70	\$500.00	\$0.00	\$55,850.00	\$55,850.00			

ATTORNEYS (P, A)	1	2	3	4a	4b	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
Simeon A. Morbey (A)	0.00	1.20	19.00	0.00	0.00	15.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	35.70	35.70	\$445.00	\$0.00	\$15,886.50	\$15,886.50
Kate M. Baxter-Kauf (A)	0.00	0.00	0.00	0.00	0.00	0.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.20	0.20	\$500.00	\$0.00	\$100.00	\$100.00
Arielle S. Wagner (A) 2022	0.00	0.00	24.00	0.00	0.00	10.60	0.00	0.00	0.00	0.00	0.00	0.00	0.40	0.00	0.00	0.00	0.00	35.00	35.00	\$675.00	\$0.00	\$23,625.00	\$23,625.00
Arielle S. Wagner (A)	0.00	1.90	365.60	0.00	18.20	52.10	3.70	0.00	0.00	19.30	0.80	1.10	4.40	0.30	1.40	0.00	0.00	468.80	468.80	\$625.00	\$0.00	\$293,000.00	\$293,000.00
Arielle S. Wagner (A)	0.70	0.00	194.70	0.00	8.50	64.70	0.00	0.00	0.00	6.20	0.00	12.10	0.00	0.00	0.00	0.00	0.00	286.90	286.90	\$575.00	\$0.00	\$164,967.50	\$164,967.50
Arielle S. Wagner (A)	0.00	0.00	24.30	0.00	0.00	12.20	0.00	0.00	0.00	4.50	0.00	0.00	0.70	0.00	0.00	0.00	0.00	41.70	41.70	\$500.00	\$0.00	\$20,850.00	\$20,850.00
Arielle S. Wagner (A)	0.00	0.00	1.30	0.00	0.00	61.50	0.00	0.00	0.00	4.60	0.00	0.00	0.50	0.00	0.00	0.00	0.00	67.90	67.90	\$475.00	\$0.00	\$32,252.50	\$32,252.50
Stephanie A. Chen (A)	0.00	0.00	16.30	0.00	0.00	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	16.60	16.60	\$600.00	\$0.00	\$9,960.00	\$9,960.00
Stephanie A. Chen (A)	0.00	0.00	14.70	0.00	0.00	4.20	0.00	0.00	0.00	5.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24.10	24.10	\$550.00	\$0.00	\$13,255.00	\$13,255.00
Stephanie A. Chen (A)	0.00	12.10	64.50	0.00	0.00	1.60	0.00	0.00	0.00	21.30	0.00	0.00	3.00	0.00	0.00	0.00	0.00	102.50	102.50	\$500.00	\$0.00	\$51,250.00	\$51,250.00
Stephanie A. Chen (A)	0.00	0.00	1.00	0.00	0.00	134.20	0.00	0.00	0.00	25.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	160.90	160.90	\$475.00	\$0.00	\$76,427.50	\$76,427.50
Stephen M. Owen (A) 2022	0.00	0.00	137.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	14.20	0.00	0.00	0.00	0.00	0.00	0.00	151.60	151.60	\$650.00	\$0.00	\$98,540.00	\$98,540.00
Stephen M. Owen (A)	0.00	0.00	472.30	0.00	1.60	54.60	2.60	0.00	0.00	0.00	12.80	0.00	0.00	0.00	1.40	0.00	0.00	545.30	545.30	\$600.00	\$0.00	\$327,180.00	\$327,180.00
Stephen M. Owen (A)	0.00	0.00	79.70	0.00	10.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	89.90	89.90	\$575.00	\$0.00	\$51,692.50	\$51,692.50
Craig S. Davis (A)	0.00	0.00	8.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.70	0.00	0.00	0.00	0.00	9.20	9.20	\$700.00	\$0.00	\$6,440.00	\$6,440.00
Rick N. Linsk (A)	0.00	0.00	0.00	0.00	0.00	4.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4.90	4.90	\$525.00	\$0.00	\$2,572.50	\$2,572.50
Jacob M. Saufley (A)	0.00	0.00	3.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.50	3.50	\$500.00	\$0.00	\$1,750.00	\$1,750.00
Robert K. Shelquist (P)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.30	0.00	0.00	0.00	0.00	0.30	0.30	\$875.00	\$0.00	\$262.50	\$262.50
Stephen J. Teti (A)	0.00	0.00	0.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.50	0.50	\$750.00	\$0.00	\$375.00	\$375.00
Eric B. Diekrager (A) 2022	0.00	0.00	0.00	0.00	258.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	258.50	258.50	\$435.00	\$0.00	\$112,447.50	\$112,447.50
Eric B. Diekrager (A)	0.00	0.00	0.00	0.00	876.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	876.50	876.50	\$425.00	\$0.00	\$372,512.50	\$372,512.50
Eric B. Diekrager (A)(rate cap)	0.00	0.00	0.00	1,552.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,552.00	1,552.00	\$350.00	\$0.00	\$543,200.00	\$543,200.00
Marian M. Hasselbalch (A)	0.00	0.00	0.00	0.00	0.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.50	0.50	\$425.00	\$0.00	\$212.50	\$212.50
Marian M. Hasselbalch (A)(rate cap)	0.00	0.00	0.00	1,677.30	6.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,683.30	1,683.30	\$350.00	\$0.00	\$589,155.00	\$589,155.00
Sarah M. Lundberg (A)	0.00	0.00	1.00	0.00	1,699.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,700.00	1,700.00	\$425.00	\$0.00	\$722,500.00	\$722,500.00
Sarah M. Lundberg (A) (rate cap)	0.00	0.00	0.00	329.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	329.80	329.80	\$350.00	\$0.00	\$115,430.00	\$115,430.00
Andrea M. Pittle (A)(rate cap)	0.00	0.00	0.00	1,482.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,482.90	1,482.90	\$350.00	\$0.00	\$519,015.00	\$519,015.00
Cynthia L. Diekrager (A)(rate cap)	0.00	0.00	0.00	258.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	258.40	258.40	\$350.00	\$0.00	\$90,440.00	\$90,440.00
Daniel R. Josephson (A)	0.00	0.00	0.00	0.00	0.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.20	0.20	\$425.00	\$0.00	\$85.00	\$85.00
Daniel R. Josephson (A)(rate cap)	0.00	0.00	0.00	1,336.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,336.70	1,336.70	\$350.00	\$0.00	\$467,845.00	\$467,845.00
Megan S. VanDyke (A)	0.00	0.00	17.70	0.00	48.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	65.70	65.70	\$425.00	\$0.00	\$27,922.50	\$27,922.50
Megan S. VanDyke (A)(rate cap)	0.00	0.00	0.00	317.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	317.30	317.30	\$350.00	\$0.00	\$111,055.00	\$111,055.00
Laura T. Hadden (A)(rate cap)	0.00	0.00	0.00	780.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	780.00	780.00	\$350.00	\$0.00	\$273,000.00	\$273,000.00
Ruslana Monya (A)(rate cap)	0.00	0.00	0.00	1,444.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,444.70	1,444.70	\$350.00	\$0.00	\$505,645.00	\$505,645.00
Lynn L. Stafford (A)(rate cap)	0.00	0.00	0.00	80.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	80.00	80.00	\$350.00	\$0.00	\$28,000.00	\$28,000.00
Craig E. Enos (A)(rate cap)	0.00	0.00	0.00	1,156.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,156.00	1,156.00	\$350.00	\$0.00	\$404,600.00	\$404,600.00
Paul E. Buchel (A)(rate cap)	0.00	0.00	0.00	1,317.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,317.00	1,317.00	\$350.00	\$0.00	\$460,950.00	\$460,950.00

ATTORNEYS (P, A)	1	2	3	4a	4b	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
Ann M. Vidoloff (A)(rate cap)	0.00	0.00	0.00	1,155.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,155.30	1,155.30	\$350.00	\$0.00	\$404,355.00	\$404,355.00
Kadi S. Braxton (A) 2022	0.00	0.00	0.00	0.00	85.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	85.00	85.00	\$435.00	\$0.00	\$36,975.00	\$36,975.00
Kadi S. Braxton (A)(rate cap)	0.00	0.00	0.00	765.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	765.00	765.00	\$350.00	\$0.00	\$267,750.00	\$267,750.00
Lucy N. Holland (A)(rate cap)	0.00	0.00	0.00	752.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	752.40	752.40	\$350.00	\$0.00	\$263,340.00	\$263,340.00
Cate D. Crowe (A)	0.00	0.00	0.00	0.00	0.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.40	0.40	\$425.00	\$0.00	\$170.00	\$170.00
Grace C. Byrne (A)	0.00	0.00	0.00	323.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	323.90	323.90	\$350.00	\$0.00	\$113,365.00	\$113,365.00
Cheri L. Brix (A)	0.00	0.00	0.00	113.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	113.50	113.50	\$350.00	\$0.00	\$39,725.00	\$39,725.00
																	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	\$0.00
SUB-TOTAL	1.00	27.30	2,985.40	14,842.20	3,047.30	982.80	28.40	0.00	2.50	379.30	82.70	351.70	176.00	1.40	7.20	0.00	0.00	22,915.20	22,915.20		\$0.00	\$10,089,179.00	\$10,089,179.00
NON-ATTORNEYS (LC, SPL, PL)	1	2	3	4a	4b	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
Katarzyna Kokoszka (LC)	0.00	9.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.40	9.40	\$200.00	\$0.00	\$1,880.00	\$1,880.00
Develyn J. Ferguson (LC)	13.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13.10	13.10	\$250.00	\$0.00	\$3,275.00	\$3,275.00
Erik W. Allerson (LC)	7.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.70	7.70	\$250.00	\$0.00	\$1,925.00	\$1,925.00
Eura Chang (LC)	30.80	0.00	18.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	49.30	49.30	\$250.00	\$0.00	\$12,325.00	\$12,325.00
Elizabeth M. Sipe (PL) 2022	0.00	0.00	10.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.30	52.30	0.00	0.00	0.00	0.00	63.70	63.70	\$375.00	\$0.00	\$23,887.50	\$23,887.50
Elizabeth M. Sipe (PL)	0.00	0.00	111.80	0.00	0.00	34.40	0.00	0.00	0.00	3.20	1.00	13.00	333.10	1.30	0.00	0.00	0.00	497.80	497.80	\$325.00	\$0.00	\$161,785.00	\$161,785.00
Elizabeth M. Sipe (PL)	0.00	1.10	43.90	2.00	0.00	51.00	0.00	0.00	0.00	2.90	0.00	2.00	272.40	0.00	0.00	0.00	0.00	375.30	375.30	\$275.00	\$0.00	\$103,207.50	\$103,207.50
Greg A. Loeding (PL) 2022	0.00	0.00	48.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	48.50	48.50	\$275.00	\$0.00	\$13,337.50	\$13,337.50
Greg A. Loeding (PL)	0.00	0.00	364.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	364.00	364.00	\$225.00	\$0.00	\$81,900.00	\$81,900.00
Greg A. Loeding (PL)	0.00	0.00	12.80	11.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24.60	24.60	\$190.00	\$0.00	\$4,674.00	\$4,674.00
Greg A. Loeding (PL)	0.00	0.00	0.00	10.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.80	10.80	\$160.00	\$0.00	\$1,728.00	\$1,728.00
Sherri L. Juell (PL)	0.00	0.00	0.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.50	0.50	\$325.00	\$0.00	\$162.50	\$162.50
Sherri L. Juell (PL)	0.00	0.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.00	1.00	\$275.00	\$0.00	\$275.00	\$275.00
Elizabeth A. Schindler (PL) 2022	0.00	0.00	6.20	0.00	0.00	1.50	0.00	0.00	0.00	0.00	0.00	0.00	2.00	0.00	0.00	0.00	0.00	9.70	9.70	\$300.00	\$0.00	\$2,910.00	\$2,910.00
Elizabeth A. Schindler (PL)	0.00	0.00	80.70	0.00	0.00	10.10	0.00	0.00	0.00	1.90	0.00	0.00	2.70	0.00	0.00	0.00	0.00	95.40	95.40	\$225.00	\$0.00	\$21,465.00	\$21,465.00
Amber M. Raak (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	0.40	0.00	0.00	0.00	0.00	0.40	0.40	\$325.00	\$0.00	\$130.00	\$130.00
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
SUB-TOTAL	51.60	10.50	698.00	24.60	0.00	97.00	0.00	0.00	0.00	8.00	1.00	16.30	662.90	1.30	0.00	0.00	0.00	1571.20	1,571.20		\$0.00	\$434,867.00	\$434,867.00
GRAND TOTAL:	52.60	37.80	3683.40	14866.80	3047.30	1079.80	28.40	0.00	2.50	387.30	83.70	368.00	838.90	2.70	7.20	0.00	0.00	24,486.40	24,486.40		\$0.00	\$10,524,046.00	\$10,524,046.00

EXHIBIT 17

<i>In re Pork Antitrust Litigation</i> , No. 0:18-cv-01776 (JRT/HB)		
Direct Purchaser Plaintiffs' Time Summary (Inception through February 28, 2022)		
Firm	Hours	Lodestar
Lockridge Grindal Nauen P.L.L.P.	24,486.40	\$10,524,046.00
Pearson, Simon & Warshaw, LLP	14,022.70	\$8,068,107.50
Block & Leviton LLP	1,781.10	\$1,049,439.00
Boni, Zack & Snyder LLC	3.00	\$2,500.00
Chestnut Cambronne, PA	148.60	\$89,462.50
Fine, Kaplan and Black, R.P.C.	243.60	\$142,325.00
Freed Kanner London & Millen LLC	2,469.80	\$1,131,939.50
Grant & Eisenhofer P.A.	607.10	\$272,398.00
Hart, McLaughlin & Eldridge, LLC	91.50	\$61,395.00
Heins Mills & Olson, P.L.C.	104.70	\$52,212.50
Lite DePalma Greenberg & Afanador, LLC	130.40	\$84,852.50
Nussbaum Law Group, P.C.	1,278.30	\$589,595.50
Reinhardt Wendorf & Blanchfield	107.10	\$46,236.00
Rupp Baase Pfalzgraf Cunningham, LLC	215.40	\$95,890.00
Saveri & Saveri, Inc.	1,594.65	\$644,796.25
Spector Roseman & Kodroff, P.C.	235.40	\$156,501.50
<u>Totals</u>	<u>47,519.75</u>	<u>\$23,011,696.75</u>

EXHIBIT 18

In re Pork Antitrust Litigation
Case No. 18-cv-01776 (JRT/HB)

Expense Summary

Firm: **Lockridge Grindal Nauen P.L.L.P.**
Reporting Period: **Inception through February 28, 2022**

Expense	Amount
Court Costs (<i>i.e.</i> , Filing Fees)	\$1,400.00
Experts / Consultants	\$0.00
Federal Express / UPS	\$363.33
Postage / U.S. Mail	\$251.06
Service of Process	\$1,860.40
Messenger / Delivery	\$384.08
Hearing Transcripts	\$73.80
Investigation	\$0.00
Westlaw / Lexis	\$9,338.23
Photocopies (in House)	\$1,171.80
Photocopies (Outside)	\$0.00
Telephone / Telecopier	\$470.32
Travel – Transportation*	\$191.00
Travel – Meals**	\$174.94
Travel – Hotels	\$121.50
Miscellaneous	\$1,507.79
Total	\$17,308.25

* Air travel is billed at coach fare.

** \$75 per person per day cap.

EXHIBIT 19

<i>In re Pork Antitrust Litigation</i> , No. 0:18-cv-01776 (JRT/HB)	
Direct Purchaser Plaintiffs' Expense Summary (Inception through February 28, 2022)	
Firm	Amount
Lockridge Grindal Nauen P.L.L.P.	\$17,308.25
Pearson, Simon & Warshaw, LLP	\$29,095.19
Block & Leviton LLP	\$101.20
Boni, Zack & Snyder LLC	\$0.40
Chestnut Cambronne, PA	\$2,239.16
Fine, Kaplan and Black, R.P.C.	\$2,824.21
Freed Kanner London & Millen LLC	\$1,179.83
Grant & Eisenhofer P.A.	\$2,092.57
Hart, McLaughlin & Eldridge, LLC	\$232.04
Heins Mills & Olson, P.L.C.	\$625.60
Lite DePalma Greenberg & Afanador, LLC	\$0.00
Nussbaum Law Group, P.C.	\$365.33
Reinhardt Wendorf & Blanchfield	\$1,692.63
Rupp Baase Pfalzgraf Cunningham, LLC	\$84.22
Saveri & Saveri, Inc.	\$166.45
Spector Roseman & Kodroff, P.C.	\$134.14
<u>Totals</u>	<u>\$58,141.22</u>

EXHIBIT 20

<i>In re Pork Antitrust Litigation</i> , No. 0:18-cv-01776 (JRT/HB)	
Direct Purchaser Plaintiffs' Litigation Fund Expenses by Category (Inception through February 28, 2022)	
Category	Amount
Investigators & Consultants	\$36,135.71
Experts	\$2,186,108.20
Document Scanning & Copying Services	\$17,671.17
Document Database Vendor	\$152,802.06
Mediators	\$14,575.00
Phone Records Vendor & Subpoena Costs	\$24,330.98
Deposition Costs	\$14,025.75
Court Fees & Service Costs	\$725.75
Miscellaneous Costs	\$990.09
<u>Total</u>	<u>\$2,447,364.53</u>