

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

---

IN RE BROILER CHICKEN ANTITRUST  
LITIGATION

Case No. 1:16-cv-08637

Hon. Thomas M. Durkin  
Magistrate Judge Jeffrey T. Gilbert

This Document Relates to:  
Direct Purchaser Plaintiff Action

**DIRECT PURCHASER PLAINTIFFS’  
NOTICE OF SETTLEMENT WITH  
TYSON DEFENDANTS**

---

Direct Purchaser Plaintiffs respectfully notify the Court that Direct Purchaser Plaintiffs have reached an agreement with Defendants Tyson Foods, Inc., Tyson Chicken, Inc., Tyson Breeders, Inc., and Tyson Poultry, Inc. (collectively referred to as “Tyson”) to settle all claims against Tyson. The parties are working to finalize and document all the terms of that agreement, which is subject to the Court’s approval pursuant to Federal Rule of Civil Procedure 23. Consistent with the Parties’ agreement, Plaintiffs will move for preliminary – and, ultimately, final – approval of a proposed settlement in the near future.

Date: January 11, 2021

W. Joseph Bruckner (MN #0147758)  
(admitted *pro hac vice*)  
Brian D. Clark (MN #0390069)  
(admitted *pro hac vice*)  
Simeon A. Morbey (MN #0391338)  
(admitted *pro hac vice*)  
LOCKRIDGE GRINDAL NAUEN P.L.L.P.  
100 Washington Avenue South, Suite 2200  
Minneapolis, MN 55401  
Telephone: (612) 339-6900  
Facsimile: (612) 339-0981  
wjbruckner@locklaw.com  
bdclark@locklaw.com  
samorbey@locklaw.com

Bruce L. Simon  
(admitted *pro hac vice*)  
PEARSON, SIMON & WARSHAW, LLP  
350 Sansome Street, Suite 680  
San Francisco, CA 94104  
Telephone: (415) 433-9000  
Facsimile: (415) 433-9008  
bsimon@pswlaw.com

Respectfully submitted,

Clifford H. Pearson  
(admitted *pro hac vice*)  
Thomas J. Nolan  
(admitted *pro hac vice*)  
Daniel L. Warshaw  
(admitted *pro hac vice*)  
Bobby Pouya  
(admitted *pro hac vice*)  
Michael H. Pearson  
(admitted *pro hac vice*)  
PEARSON SIMON & WARSHAW, LLP  
15165 Ventura Boulevard, Suite 400  
Sherman Oaks, CA 92403  
Telephone: (818) 788-8300  
Facsimile: (818) 788-8104  
cpearson@pswlaw.com  
tnolan@pswlaw.com  
dwarshaw@pswlaw.com  
bpouya@pswlaw.com  
mpearson@pswlaw.com

***Interim Co-Lead Class Counsel for  
Direct Purchaser Plaintiffs***

s/ Steven A. Hart  
Steven A. Hart (#6211008)  
Brian Eldridge (#6281336)  
John Marrese (#6306516)  
Kyle Pozan (#6306761)  
HART MCLAUGHLIN & ELDRIDGE, LLC  
22 West Washington Street, Suite 1600  
Chicago, IL 60602  
Telephone: (312) 955-0545  
Facsimile: (312) 971-9243  
shart@hmelegal.com  
beldridge@hmelegal.com  
jmarrese@hmelegal.com  
kpozan@hmelegal.com

***Interim Liaison Class Counsel for  
Direct Purchaser Plaintiffs***

**CERTIFICATE OF SERVICE**

I, Steven A. Hart, depose and state that I have served a copy of Notice of Settlement upon all counsel of record via the United States Court for the Northern District of Illinois ECF Document Filing System on January 11, 2021.

*s/Steven A. Hart*  
Steven A. Hart (IL #6211008)