

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

JUDY JIEN, et al.,

Plaintiffs,

vs.

PERDUE FARMS, INC., et al.,

Defendants.

C.A. No. 1:19-cv-02521-SAG

**CLASS PLAINTIFFS' AND
DEFENDANTS PERDUE FARMS, INC.
AND PERDUE FOODS LLC'S JOINT
NOTICE OF SETTLEMENT AND
STIPULATION FOR SUSPENSION OF
PROCEEDINGS**

Plaintiffs and Defendants Perdue Farms, Inc. and Perdue Foods LLC (“Perdue”) (and, together with Class Plaintiffs, the “Parties”) respectfully write to the Court to provide notice that Class Plaintiffs have reached agreement with Perdue to settle all claims against it. The proposed settlements are subject to the Court’s approval pursuant to Federal Rule of Civil Procedure 23, and Class Plaintiffs will move for preliminary approval of the settlement agreement in the near future.

The Parties further stipulate that all proceedings between them be suspended by the Court consistent with the terms of their settlement agreement, which will be provided to the Court in connection with Class Plaintiffs’ motion for preliminary approval of the proposed settlement.

Date: December 7, 2022

Respectfully submitted,

/s/ Brent W. Johnson

Brent W. Johnson (admitted *pro hac vice*)

Benjamin D. Brown (admitted *pro hac vice*)

Daniel H. Silverman (admitted *pro hac vice*)

Alison S. Deich (admitted *pro hac vice*)

Zachary R. Glubiak (D. Md. Bar # 20962)

Louis Katz (admitted *pro hac vice*)

Zachary Krowitz (D. Md. Bar # 22370)

COHEN MILSTEIN SELLERS & TOLL PLLC

1100 New York Avenue NW

5th Floor

Washington, DC 20005

Telephone: (202) 408-4600
Fax: (202) 408-4699
dsmall@cohenmilstein.com
bbrown@cohenmilstein.com
bjohnson@cohenmilstein.com
dsilverman@cohenmilstein.com
adeich@cohenmilstein.com
zglubiak@cohenmilstein.com
lkatz@cohenmilstein.com
zkowitz@cohenmilstein.com

Steven W. Berman (admitted *pro hac vice*)
Breanna Van Engelen (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
1301 Second Avenue, Suite 2000
Seattle, Washington 98101
Tel: (206) 623-7292
steve@hbsslaw.com
breannav@hbsslaw.com

Shana E. Scarlett (admitted *pro hac vice*)
Rio R. Pierce (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Tel: (510) 725-3000
shanas@hbsslaw.com
riop@hbsslaw.com

Elaine T. Byszewski (*pro hac vice* forthcoming)
HAGENS BERMAN SOBOL SHAPIRO LLP
301 North Lake Avenue, Suite 920
Pasadena, CA 91101
Tel: (213) 330-7150
elaine@hbsslaw.com

Matthew K. Handley (D. Md. Bar # 18636)
Rachel E. Nadas (admitted *pro hac vice*)
HANDLEY FARAH & ANDERSON PLLC
777 6th Street, NW, Eleventh Floor
Washington, DC 20001
Telephone: (202) 559-2433
mhandley@hfajustice.com
rnadas@hfajustice.com

George F. Farah (admitted *pro hac vice*)

Rebecca P. Chang (admitted *pro hac vice*)
HANDLEY FARAH & ANDERSON PLLC
81 Prospect Street
Brooklyn, NY 11201
Telephone: (212) 477-8090
gfarah@hfajustice.com
rchang@hfajustice.com

William H. Anderson (admitted *pro hac vice*)
HANDLEY FARAH & ANDERSON PLLC
4730 Table Mesa Drive
Suite G-200
Boulder, CO 80305
Telephone: (202) 559-2433
wanderson@hfajustice.com

Co-Lead Counsel for Plaintiffs and the Proposed Class

Brian D. Clark (admitted *pro hac vice*)
Stephen J. Teti (admitted *pro hac vice*)
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Tel: (612) 339-6900
Fax: (612) 339-0981
bdclark@locklaw.com
steti@locklaw.com

Candice J. Enders (admitted *pro hac vice*)
Julia R. McGrath (admitted *pro hac vice*)
BERGER MONTAGUE PC
1818 Market St., Suite 3600
Philadelphia, PA 19103
Tel: (215) 875-3000
Fax: (215)-875-4604
cenders@bm.net
jmcgrath@bm.net

Additional Counsel for Plaintiffs and the Proposed Class

Dated: December 7, 2022

/s/ J. Douglas Baldrige
J. Douglas Baldrige (Bar No. 11023)
Lisa Jose Fales (Bar No. 08141)
Danielle R. Foley (Bar No. 21113)

Andrew T. Hernacki (Bar No. 21107)
VENABLE LLP
600 Massachusetts Ave., NW
Washington, DC 20001
(202) 344-4000
jdbaldridge@venable.com
ljfales@venable.com
drfoley@venable.com
athernacki@venable.com

*Attorneys for Perdue Foods, LLC and Perdue
Farms, Inc.*