

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

Case No. 0:22-md-03031 (JRT-JFD)

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF
DANIEL E. GUSTAFSON IN
SUPPORT OF DIRECT
PURCHASER PLAINTIFFS’
MOTION FOR INTERIM
PAYMENT OF ATTORNEYS’ FEES
AND SERVICE AWARDS**

I, Daniel E. Gustafson, declare and state:

1. I am an attorney licensed to practice law in the State of Minnesota and admitted to federal Court in Minnesota. I am a founding member of Gustafson Gluek PLLC (“Gustafson Gluek”). I am one of the attorneys of record for the Direct Purchaser Plaintiffs (“DPPs”). I make this declaration in support of the accompanying Direct Purchaser Plaintiffs’ Motion for Interim Payment of Attorneys’ Fees 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 Gustafson Gluek PLLC, Hartley LLP, Hausfeld LLP, and Cotchett Pitre & McCarthy LLP as Interim Co-Lead Counsel for the DPPs. (ECF No. 71) Before and since those appointments, these firms have committed thousands of hours of work to develop and advance this complex case. Interim Co-Lead Counsel, with the assistance of 19 other firms (“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 6, 2020, Class Counsel filed the first direct purchaser complaint against the nation’s largest beef producers alleging an antitrust conspiracy in violation of the Sherman Act, 15 U.S.C. § 1. On January 18, 2022, Class Counsel filed the operative Third Amended and Consolidated Class Action Complaint (ECF No. 303).

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

5. Class Counsel has prepared and filed comprehensive memoranda of law: (a) successfully in opposition to Defendants’ motions to dismiss, (b) regarding numerous discovery issues, (c) regarding ESI Protocol, Search Methodology, and Deposition Protocol and (d) seeking preliminary and final approval of settlement with JBS.

6. Class Counsel has worked extensively with other Plaintiffs’ Counsel and met and conferred frequently with Defendants to: (a) negotiate extensive search term strings for ESI and mobile discovery, (b) review and analyze Defendants’ structured data productions, and (c) serve several mobile phone subpoenas to former Defendant employees as well as issued several third-party subpoenas.

7. Class Counsel has conducted extensive fact discovery. Discovery has involved more than one hundred thirty-five document custodians, more than 3.6 million documents and communications, millions of telephone calls and messages, many third

parties, and dozens (or hundreds) of anticipated depositions. Interim Co-Lead Counsel is coordinating this discovery effort against Defendants with cattle counsel, counsel for the indirect classes, and numerous Direct Action counsel. Plaintiffs and Interim Co-Lead Counsel are also fulfilling their own discovery obligations in response to fulsome discovery by Defendants.

8. Class Counsel have consulted with a wide range of experts during their pre-suit investigation and the discovery phase of this case.

9. On January 27, 2022, with the assistance of experienced mediator, Professor Eric Green, Class Counsel settled with JBS for \$52,500,000 and meaningful cooperation. JBS was represented by Quinn Emanuel Urquhart & Sullivan, LLP, a leading multinational and national law firm ranked among the Vault Law 100 for most prestigious law firms. This Settlement represents a significant recovery for the DPP Class members.

10. Class Counsel prepared and executed the class notice and claims administration programs for the JBS Settlement. The claims and distribution process approved by this Court is underway with prepopulated claim forms for Settlement class members' convenience.

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

12. 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 criminal government investigation or indictments. 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.

13. Since the inception of this case, Interim Co-Lead Counsel has 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 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, 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 defended motions to dismiss.
- We participated extensively in the settlement negotiations.

- We prepared a motion for preliminary and final approval of the JBS settlement and helped prepare and execute the class notice and claims administration program for the settlement.

14. All of these actions are through December 31, 2022. As noted in DPP's motion, we have since and 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

15. Interim Co-Lead Counsel is responsible for collecting all Class Counsel's contemporaneously prepared attorney and paralegal time and expense reports.

16. We sent a Time and Expense Protocol to Class Counsel and instructed them to abide by it. We also provided Class Counsel templates of the required Microsoft Excel reporting form.

17. The Time and Expense Protocol requires each firm to contemporaneously record and transmit to us each month 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 for that month.

18. To control Class Counsel's lodestar, the Time and Expense Protocol instructed Class Counsel not to submit time for work not requested by Interim Co-Lead Counsel, duplicative work, reading and reviewing, preparing time and expense reports, routine clerical tasks, or work related to any client not retained. Additionally, the Time and Expense Protocol required that each firm submit all litigation-related expenses incurred by the firm for the month. Finally, time spent on first-tier document review has been capped at \$350 per hour. Due to the risk that expenses might never be recovered, Class Counsel endeavored to keep them to a minimum.

19. 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 25th 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.

20. All monthly attorney and paralegal time and expense reports submitted by Class Counsel are retained and preserved on a computer server by Co-Lead Counsel.

21. In preparing this petition, we audited and then asked all Class Counsel to review their monthly reported hours and expenses and submit a declaration attesting to the total of their allowed time and expenses incurred through December 31, 2022.

CLASS COUNSEL'S TOTAL RECORDED LODESTAR

22. Exhibit A attached to this declaration, is a detailed summary of the time spent by the partners, attorneys, and other professional support staff of my firm, Gustafson Gluek, who were involved in this litigation and the lodestar calculation based on my firm's

historic billing rates. This Exhibit includes the total number of hours my firm expended on this litigation from inception through December 31, 2022, which is 4,909.50 hours. The total lodestar for my firm is \$2,920,395.00. My firm's lodestar figures are based on the firm's historic billing rates.

23. Exhibits 1 through 3, attached to this declaration, are the declarations from the other Interim Co-Lead Counsel attesting to their respective firm's lodestar information, reported in the same manner as my firm. Interim Co-Lead Counsel identify the attorneys and paralegals from their firms who worked on the case and submitted time in the monthly reports and the historic hourly rates for each professional who submitted time.

24. Exhibits 4 through 22, attached to this declaration, are the 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 identifies the attorneys and paralegals from the firm who worked on the case and submitted time in the monthly reports and the historic hourly rates for each professional who submitted time.

25. Exhibit B, attached hereto, 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 December 31, 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 attest that the lodestar amounts reported in this Exhibit accurately reflect the data described

therein. All counsel's underlying data is available for the Court's *in camera* review, if requested.

26. Based on the contemporaneous time records, Class Counsel have reported 23,570.6 hours of professional time expended for the benefit of the Class through December 31, 2022. This represents a lodestar of \$13,555,094.50, using Class Counsel's historic hourly rates. All Class Counsel performed this work on an entirely contingent basis.

27. Awarding a fee of one-third of the Settlement Fund or \$17,500,000 fee, plus interest,¹ would result in a conservative multiplier of 1.38 on such a lodestar.

EXPENSES INCURRED ON BEHALF OF THE CLASS

28. Interim Co-Lead Counsel, Hartley LLP, maintains the Litigation Fund for this action. Information regarding the reasonable and necessary expenses incurred on behalf of the Class to support the prosecution of this action are contained in the Declaration of Jason S. Hartley, attached hereto as Exhibit 2, ¶¶ 5-10.

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

29. The three Class Representatives' help was instrumental in this outstanding result and, in Interim Co-Lead Counsel's judgment, deserving of a service award.

¹ The total interest earned through December 31, 2023, was \$3,795,290.67. Therefore, two-thirds of this amount would go to the Class and one-third would be awarded to Class Counsel as fees. As interest continues to accrue, the interest would continue to be split between the Class and Class Counsel accordingly.

30. Throughout this litigation, the Class Representatives advised Interim Co-Lead Counsel and approved pleadings, reviewed and responded to written discovery, searched for, gathered, preserved, and produced documents, will prepare for and sit for depositions, were kept up to date on the progress of the case, and performed other similar activities. Notably, the Class Representatives have produced hundreds of thousands of documents—Samuels has produced over 78,000 documents, Redners has produced over 262,000 documents, and R&D has produced over 16,000 documents.

31. Unlike indirect purchaser plaintiffs, the named DPPs have or had a direct business relationship with the Defendants. They have exposed themselves to a substantial business risk by filing this lawsuit against the producers of beef who are key suppliers for their businesses.

32. 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 recover 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.

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 30th day of January 2024, at Minneapolis, Minnesota.

/s/ Daniel E. Gustafson
Daniel E. Gustafson

Exhibit A - TIME REPORT

Firm Name: Gustafson Gluek PLLC
 Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Daniel E. Gustafson (2019)	P	28.60	\$1,075.00	\$30,745.00
Daniel E. Gustafson (2020-2021)	P	164.40	\$1,100.00	\$180,840.00
Daniel E. Gustafson (2022)	P	95.50	\$1,200.00	\$114,600.00
Jason S. Kilene (2019)	P	94.50	\$900.00	\$85,050.00
Jason S. Kilene (2020-2021)	P	107.00	\$925.00	\$98,975.00
Jason S. Kilene (2022)	P	4.90	\$950.00	\$4,655.00
Daniel C. Hedlund (2019)	P	67.30	\$900.00	\$60,570.00
Daniel C. Hedlund (2020-2021)	P	201.10	\$925.00	\$186,017.50
Daniel C. Hedlund (2022)	P	115.20	\$1,000.00	\$115,200.00
Dennis J. Stewart (2019)	P	28.50	1,000.00	\$28,500.00
Dennis J. Stewart (2020-2021)	P	4.90	1,025.00	\$5,022.50
Dennis J. Stewart (2022)	P	0.30	1,100.00	\$330.00
Michelle J. Looby (2019)	P	27.40	650.00	\$17,810.00
Michelle J. Looby (2020-2021)	P	496.20	675.00	\$334,935.00
Michelle J. Looby (2022)	P	494.30	775.00	\$383,082.50
Joshua J. Rissman (2019)	P	218.50	\$500.00	\$109,250.00
Joshua J. Rissman (2020)	P	176.70	\$525.00	\$92,767.50
Joshua J. Rissman (2021)	P	298.50	\$600.00	\$179,100.00
Joshua J. Rissman (2022)	P	303.40	\$675.00	\$204,795.00
Brittany N. Resch (2019)	A	52.00	\$400.00	\$20,800.00
Brittany N. Resch (2020)	A	92.60	\$425.00	\$39,355.00
Brittany N. Resch (2021)	A	67.40	\$500.00	\$33,700.00
Brittany N. Resch (2022)	A	39.60	\$550.00	\$21,780.00
Abou Amara (2021)	A	53.50	\$375.00	\$20,062.50
Anthony J. Stauber (2022)	A	353.30	\$375.00	\$132,487.50
Anthony J. Stauber (2022)	A	22.80	\$350.00	\$7,980.00
Noah Cozad (2021-2022)	A	237.00	\$350.00	\$82,950.00
Frances Mahoney Mosedale (2021)	A	11.20	\$275.00	\$3,080.00
Haley Dietz (2022)	LC	15.50	\$200.00	\$3,100.00
Deborah Gilman (2022)	CR	350.50	\$350.00	\$122,675.00
Peter Nguyen (2022)	CR	233.00	\$350.00	\$81,550.00
Jamie L. Holzer (2019-2021)	PL	175.40	\$200.00	\$35,080.00
Jamie L. Holzer (2022)	PL	278.50	\$300.00	\$83,550.00
TOTAL		4,909.50		\$2,920,395.00

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

Title:

- (P) Partner
- (A) Associate
- (LC) Law Clerk
- (SPL) Senior Paralegal
- (PL) Paralegal
- (CR) Contract Reviewer

<i>IN RE DPP BEEF LITIGATION</i>		
Exhibit B		
Direct Purchaser Plaintiffs' Counsel		
Summary of Cumulative Hours and Lodestar		
For Inception through 12/31/2022		
Firm	CUMULATIVE Hours/Lodestar	
	Total Hours	Total Lodestar
Berger Montague	14.80	\$ 9,630.50
Burns Charest LLP	17.00	\$ 9,510.00
Chestnut Cambronne PA	99.60	\$ 71,967.50
Cohen & Gresser LLP	253.00	\$ 144,807.00
Cotchett, Pitre & McCarthy, LLP	5,684.60	\$ 2,826,760.00
Edelson Lechtzin LLP	780.30	\$ 276,570.00
Freed Kanner London & Millen LLC	1,694.90	\$ 1,025,166.00
Grabar Law Office	653.00	\$ 258,985.00
Gratz & Gratz, P.A.	108.30	\$ 59,045.00
Gustafson Gluek PLLC	4,909.50	\$ 2,920,395.00
Hartley LLP	3,576.50	\$ 2,612,606.50
Hausfeld LLP	2,448.70	\$ 1,504,782.00
Hellmuth & Johnson, PLLC	14.70	\$ 12,870.00
Karon LLC	1,505.10	\$ 867,146.00
Mogin Rubin LLP	389.00	\$ 176,051.50
NastLaw LLC	407.80	\$ 222,459.50
Rupp, Baase, Pfalzgraf, Cunningham LLC	206.00	\$ 92,270.00
Saltz, Mongeluzzi, & Bendesky, P.C.	6.60	\$ 4,579.50
Saveri & Saveri, Inc.	62.60	\$ 48,515.00
Tadler Law LLP	13.10	\$ 8,697.50
Taus, Cebulash & Landau, LLP	4.50	\$ 3,425.00
Steyer Lowenthal Boodrookas Alvaraz & Smith LLP	163.00	\$ 89,146.00
Wexler, Boley & Elgersma LLP	558.00	\$ 309,710.00
GRAND TOTALS:	23,570.60	\$ 13,555,094.50

EXHIBIT 1

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF ADAM J.
ZAPALA IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
COTCHETT, PITRE & MCCARTHY,
LLP**

I, Adam J. Zapala, declare and state as follows:

1. I am a partner of Cotchett, Pitre & McCarthy, LLP. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Court-appointed Interim Co-Lead Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 5,684.60 hours with a corresponding lodestar of \$2,826,760.00. This summary was prepared from

contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work that was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed our established protocols for time keeping and assignments and have audited my firm's time to comply with that protocol. In connection with representing DPPs in this litigation, my firm performed the following tasks:

- extensive pre-complaint research of the beef industry, its distribution chain and associated economics, along with the federal antitrust law in connection with drafting and filing a complaint on behalf of direct purchaser plaintiffs.
- extensive engagement with economic experts to assist in crafting the complaint and relevant economic frameworks.
- extensive research and preparation of amended complaint on behalf of direct purchaser plaintiffs, including again consulting with economic experts on appropriate economic frameworks under which to evaluate the conduct and case.
- opposing multiple motions to dismiss filed by Defendants.
- actively participating in the drafting and negotiation of multiple case management protocols, including but not limited to, discovery plans and 26(f) protocols, the ESI protocol, search methodology order, structured data order, and protective order.
- working cooperatively with other plaintiff class counsel on discovery matters, case management plans, and meet and confers.
- drafting, serving and coordinating discovery in conjunction with the other plaintiff classes, and participating in lengthy and extensive meet and confers with defendant families.
- reviewing and analyzing millions of pages of documents produced by Defendants and non-parties.
- obtaining, analyzing, and producing DPP class representative documents.
- analyzing and responding to discovery propounded to the DPP class representatives.

- consulting extensively with DPPs' expert economists to analyze Defendants' and non-parties' voluminous transactional data productions and other information.
- engaging in and prevailing in discovery motion practice related to multiple discovery disputes.
- extensive engagement in settlement negotiations with JBS.
- retaining and working with a competent class-notice and claims administration experts to formulate a notice program and claims administration process, including by utilizing pre-populated claim forms based on the extensive data received from non-parties and subsequently implementing that plan after approval by the Court.

These are just some illustrative examples of the work undertaken by Cotchett, Pitre & McCarthy, LLP in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 30, 2024, in Burlingame, California.

/s/ Adam J. Zapala
Adam J. Zapala

Exhibit A - TIME REPORT

Firm Name: Cotchett, Pitre & McCarthy, LLP
Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Adam Zapala	P	609.20	\$750.00	\$456,900.00
Alexander Barnett	P	20.80	\$600.00	\$12,480.00
Alexander Barnett	P	12.20	\$650.00	\$7,930.00
Alexander Barnett	P	606.90	\$725.00	\$440,002.50
Elizabeth Castillo	P	135.20	\$650.00	\$87,880.00
Elizabeth Castillo	P	808.10	\$725.00	\$585,872.50
Gayatri Raghunandan	A	6.60	\$350.00	\$2,310.00
Gayatri Raghunandan	A	74.90	\$425.00	\$31,832.50
James Dallal	A	1.40	\$350.00	\$490.00
James Dallal	A	108.80	\$600.00	\$65,280.00
Joseph Cotchett	P	78.10	\$950.00	\$74,195.00
Karen Sabine	SA	344.00	\$350.00	\$120,400.00
Reid Gaa	A	38.90	\$275.00	\$10,697.50
Reid Gaa	A	23.10	\$425.00	\$9,817.50
Rodney Nutt	SA	760.30	\$350.00	\$266,105.00
Tamarah Prevost	P	33.20	\$600.00	\$19,920.00
Tom Chen	SA	42.00	\$350.00	\$14,700.00
Alexandra Delavan	PL	429.10	\$275.00	\$118,002.50
Jaclyn Veerducci	SPL	918.50	\$325.00	\$298,512.50
Josephine Buchwald	PL	13.90	\$275.00	\$3,822.50
Michael Caylao	SPL	555.60	\$325.00	\$180,570.00
Nirav Engineer	SPL	29.90	\$325.00	\$9,717.50
Samantha Fong	PL	33.90	\$275.00	\$9,322.50
TOTAL		5,684.60		\$2,826,760.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**
- (SA) Staff Attorney**

EXHIBIT 2

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF JASON
HARTLEY IN SUPPORT OF
DIRECT PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
HARTLEY LLP**

I, Jason Hartley, declare and state as follows:

1. I am a founding partner of Hartley LLP. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.
2. My firm and I serve as Interim Co-Lead Counsel to the Direct Purchaser Plaintiff ("DPP") Class.
3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 3576.50 hours with a corresponding lodestar of \$2,612,606.50. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work that was performed by professional staff

at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: lengthy pre-filing factual research and investigation including interviewing witnesses, class members, clients and online research; drafting and finalizing a comprehensive complaint, briefing and preparing argument on the motion to dismiss, negotiating numerous protocols and stipulations including ESI protocol, protective order, deposition protocol, search methodology, search terms, negotiations with Defendants regarding custodians, document searches, search methodology and search terms, negotiating, drafting and finalizing settlement agreement with JBS, review of privilege logs produced by JBS and other Defendants, review of produced structured data and coordination with other plaintiff groups to develop letters identifying deficiencies in same, negotiate agreement with Defendants regarding definitions and answers to structured data questions, prepare for Defendant depositions, identify and work with Defendants regarding gaps in document productions, identify third party subpoena targets and negotiate productions, assist Class Counsel with USDA data negotiations, build case strategy based on documents, text messages, phone record subpoenas. These are just examples of the work undertaken by Hartley LLP in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in

similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. In addition, my firm maintains the Litigation Fund in this action. Therefore, I report the following with respect to the status of the Litigation Fund.

6. In notifying Class members of the Settlement, Class Counsel informed Class members that they would seek prepayment of litigation expenses of \$5,000,000. *See* ECF No. 331, Exhibit B (Long Form Notice). Because Class Counsel has not yet incurred \$5,000,000 in expenses, we are not seeking additional expense reimbursement at this time. Still, for the Court's edification, I describe the expenses incurred.

7. The reasonable and necessary expenses Class Counsel incurred consist of the following: (1) Class Counsel reported expenses, which are expenses incurred individually by Class Counsel firms since the inception of this case ("Class Counsel Expenses"),¹ and (2) common cost litigation fund expenses, which are expenses incurred by Class Counsel that are paid by Interim Co-Lead Counsel out of a Litigation Fund² ("Litigation Fund Expenses").

8. Litigation Fund Expenses include only those common cost expenses that

¹ Class Counsel Expenses have been held individually by each firm and have not yet been reimbursed from the Litigation Fund. These expenses are reported by each firm on a monthly basis and are limited to allowed expense categories contained in the Time and Expense Protocol sent to all Class Counsel by Interim Co-Lead Counsel shortly after this litigation was commenced.

² Interim Co-Lead Counsel 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.

were reasonably incurred for the prosecution of this action and are paid from the Litigation Fund. These expenses include things such as: expert consulting costs; document collection, scanning and copying costs; hearing transcripts; court fees; costs incurred related to the creation and maintenance of discovery databases; and other similar expenses.

9. My firm manages the Litigation Fund in this action. Below is a chart summarizing the amount expended from the Litigation Fund from inception through December 31, 2023:³

DESCRIPTION	TOTAL INCURRED
Consultants	\$162,794.10
Court Fees & Service Costs	\$723.00
Hearing Transcripts	\$622.00
Document Collection, Scanning, and Copying Services	\$15,263.40
Experts	\$1,303,648.37
Document Database Vendor	\$115,781.34
Phone Records Vendors & Subpoena Costs	\$17,830.00
Mediator Costs	\$7,500.00
TOTAL:	\$1,624,162.21

10. The expenses detailed above were reasonably incurred and necessary to the prosecution of this case. Because these expenses, totaling \$1,624,162.21, do not exceed the \$5,000,000 previously awarded by the Court to cover current and future litigation costs,

³ Interim Co-Lead Counsel previously reported, as part of their Motion for Establishment of a Litigation Fund to Cover Current and Future Litigation Expenses, costs totaling \$188,821.33. *See* ECF No. 560-1 (detailing Litigation Fund expenses by Category from inception through May 20, 2022). These costs are included in this chart to provide the Court with a complete picture of the expenses, which have been incurred and paid out of the Litigation Fund. If the Court would like more granular detail regarding these expenses, Interim Co-Lead Counsel are happy to provide such detail to the Court for *in camera* review.

Interim Co-Lead Counsel are not seeking additional expense reimbursement at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 30, 2024, in San Diego, California.

/s/ Jason Hartley

Jason Hartley

Exhibit A - TIME REPORT

Firm Name: Hartley LLP

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Jason Hartley	P	241.40	\$875.00	\$211,225.00
Jason Hartley	P	1,124.10	\$895.00	\$1,006,069.50
Jason Lindner	P	22.10	\$710.00	\$15,691.00
Jason Lindner	P	2.10	\$750.00	\$1,575.00
Jason Lindner	P	129.00	\$775.00	\$99,975.00
Dylan McFarland	OC	370.70	\$750.00	\$278,025.00
Dylan McFarland	OC	359.30	\$775.00	\$278,457.50
Dylan McFarland	OC	59.50	\$795.00	\$47,302.50
Maureen Forsyth	OC	552.60	\$695.00	\$384,057.00
Fatima Brizuela	A	7.80	\$415.00	\$3,237.00
Fatima Brizuela	A	2.00	\$455.00	\$910.00
Fatima Brizuela	A	256.30	\$510.00	\$130,713.00
Randy Hood	A	122.60	\$350.00	\$42,910.00
Shauna Anderson	A	306.10	\$350.00	\$107,135.00
Tina Glover	PL	14.30	\$250.00	\$3,575.00
Tina Glover	PL	6.60	\$265.00	\$1,749.00
TOTAL		3,576.50		\$2,612,606.50

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer (OC) Of Counsel**

EXHIBIT 3

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF MEGAN E.
JONES IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
HAUSFELD LLP**

I, Megan E. Jones, declare and state as follows:

1. I am a partner of Hausfeld LLP. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Interim Co-Lead Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 2,448.70 hours with a corresponding lodestar of \$1,504,782. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work that was performed by professional staff at my law firm for the

benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: (1) strategized with co-counsel regarding all aspects of the litigation, including offensive discovery, expert work, settlement-related issues, and other matters; (2) argued on behalf of DPPs in various hearings before the Court; (3) regularly met and conferred with opposing counsel regarding data and other discovery issues; (3) reviewed thousands of documents across the Defendant groups, including quality checks; (4) drafted factual research memoranda and presentations for deposition preparation; and (5) worked with experts to assess and resolve data concerns. These are just examples of the work undertaken by Hausfeld LLP in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 26, 2024, in San Francisco, California.

/s/ Megan E. Jones
Megan E. Jones

IN RE DPP BEEF LITIGATION
Exhibit A - TIME REPORT

Firm Name: Hausfeld LLP

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Megan E. Jones (2020-2021)	P	290.60	\$860.00	\$249,916.00
Megan E. Jones (2022)	P	205.50	\$960.00	\$197,280.00
Timothy S. Kearns (2020-2021)	P	396.70	\$720.00	\$285,624.00
Timothy S. Kearns (2022)	P	221.90	\$800.00	\$177,520.00
Jeannine Kenney (2020-2021)	P	0.40	\$680.00	\$272.00
Jeannine Kenney (2022)	P	105.40	\$760.00	\$80,104.00
Brittany Nieves (2020-2021)	A	140.30	\$450.00	\$63,135.00
Brittany Nieves (2022)	A	261.00	\$500.00	\$130,500.00
Camila Ringeling (2020-2021)	A	117.90	\$430.00	\$50,697.00
Camila Ringeling (2022)	A	187.40	\$460.00	\$86,204.00
William Vasquez (2022)	SA	59.00	\$425.00	\$25,075.00
William Vasquez (2022) (doc review)	SA	375.50	\$350.00	\$131,425.00
Suzanne McPhail (2020-2021)	PL	51.10	300.00	\$15,330.00
Suzanne McPhail (2022)	PL	24.10	\$325.00	\$7,832.50
Season Shimizu (2022)	PL	11.90	\$325.00	\$3,867.50
TOTAL		2,448.70		\$1,504,782.00

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

Title:

(P) Partner

(A) Associate

(SA) Staff Attorney

(LC) Law Clerk

(SPL) Senior Paralegal

(PL) Paralegal

(CR) Contract Reviewer

EXHIBIT 4

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF DANIEL J.
WALKER IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
BEGER MONTAGUE PC**

I, Daniel J. Walker, declare and state as follows:

1. I am a shareholder of Berger Montague PC, and I am a member of the bars of the District of Columbia and the State of New York. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 14.8 hours with a corresponding lodestar of \$9,630.50. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected

in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: initial investigation of claims, through the filing of the Complaint. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 25, 2024, in Washington, DC.

/s/ Daniel J. Walker
Daniel J. Walker

EXHIBIT 5

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF WARREN
BURNS IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
BURNS CHAREST LLP**

I, Warren Burns, declare and state as follows:

1. I am a partner of Burns Charest LLP. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.
2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.
3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 17 hours with a corresponding lodestar of \$9,510.00. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by

professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: reviewed and analyzed complaint and motion to dismiss briefings and discussed investigation strategies. These are just examples of the work undertaken by Burns Charest LLP in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 30, 2024, in Dallas, Texas.

/s/ Warren T. Burns
Warren T. Burns

Exhibit A - TIME REPORT

Firm Name: Burns Charest LLP

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Korey Nelson	Partner	1.50	\$750.00	\$1,125.00
Will Thompson	Partner	7.40	\$550.00	\$4,070.00
Chris Cormier	Partner	4.10	\$750.00	\$3,075.00
Mallory Biblo	Associate	0.80	\$550.00	\$440.00
Maggie Kweik	Paralegal	3.20	\$250.00	\$800.00
TOTAL		17.00		\$9,510.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 6

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF BRYAN L.
BLEICHNER IN SUPPORT OF
DIRECT PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
CHESTNUT CAMBRONNE PA**

I, Bryan L. Bleichner, declare and state as follows:

1. I am a partner of Chestnut Cambronne PA. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 99.6 hours with a corresponding lodestar of \$71,967.50. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by

professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: 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; and draft and edit written discovery. These are just examples of the work undertaken by Chestnut Cambronne PA in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 26, 2024, in Minneapolis, Minnesota.

/s/ Bryan L. Bleichner

Bryan L. Bleichner

Exhibit A - TIME REPORT

Firm Name: Chestnut Cambronne PA

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Karl L. Cambronne	P	11.00	\$795.00	\$8,745.00
Jeffrey D. Bores	P	43.10	\$725.00	\$31,247.50
Bryan L. Bleichner	P	0.50	\$825.00	\$412.50
Bryan L. Bleichner	P	41.00	\$725.00	\$29,725.00
Gary K. Luloff	P	0.50	\$525.00	\$262.50
Gary K. Luloff	P	3.50	\$450.00	\$1,575.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		99.60		\$71,967.50

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 7

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF MELISSA H.
MAXMAN IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
COHEN & GRESSER LLP**

I, Melissa H. Maxman, declare and state as follows:

1. I am a Partner of Cohen & Gresser LLP. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 253.00 hours with a corresponding lodestar of \$144,807.00. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and

was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: conducted legal research in support of the amended complaint, conducted factual and industry research into relevant companies, and assisted with the preparation and administration of mailings to potential class members. These are just examples of the work undertaken by Cohen & Gresser LLP in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 26, 2024, in Washington, DC.

/s/ Melissa H. Maxman

Melissa H. Maxman

Exhibit A - TIME REPORT

Firm Name: Cohen & Gresser LLP

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Melissa H. Maxman	Partner	21.10	\$1,200.00	\$25,320.00
Melissa H. Maxman	Partner	14.10	\$1,250.00	\$17,625.00
Erica Lai	Counsel	0.90	\$900.00	\$810.00
Erica Lai	Counsel	29.60	\$1,000.00	\$29,600.00
Erica Lai	Counsel	1.40	\$1,050.00	\$1,470.00
Derek Jackson	Associate	47.40	\$600.00	\$28,440.00
Cosette Vincent	Paralegal	0.60	\$240.00	\$144.00
Cosette Vincent	Paralegal	58.70	\$260.00	\$15,262.00
Jeffrey Sherman	Paralegal	79.20	\$330.00	\$26,136.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		253.00		\$144,807.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 8

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF MARC H.
EDELSON IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
EDELSON LECHTZIN LLC**

I, Marc H. Edelson, declare and state as follows:

1. I am a partner of Edelson Lechtzin LLC. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 780.30 hours with a corresponding lodestar of \$276,570.00. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and

was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: factual research and document review. These are just examples of the work undertaken by Edelson Lechtzin LLC in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 24, 2024, in Newtown, Pennsylvania.

/s/ Marc H. Edelson

Marc H. Edelson

Exhibit A - TIME REPORT

Firm Name: Edelson Lechtzin LLP

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Marc H. Edelson	P	6.30	\$900.00	\$5,670.00
Jeffrey Konis	A	774.00	\$350.00	\$270,900.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		780.30		\$276,570.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 9

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE CATTLE AND BEEF ANTITRUST LITIGATION	Case No. 0:22-md-03031-JRT-JFD
This Document Relates To: IN RE DPP BEEF LITIGATION	DECLARATION OF DOUGLAS A. MILLEN IN SUPPORT OF DIRECT PURCHASER PLAINTIFFS' MOTION FOR INTERIM PAYMENT OF ATTORNEYS' FEES AND SERVICE AWARDS ON BEHALF OF FREED KANNER LONDON & MILLEN LLC

I, Douglas A. Millen, declare and state as follows:

1. I am a founding partner of Freed Kanner London & Millen LLC. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve on the Direct Purchaser Beef ("DPP") Plaintiffs' Steering Committee.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 1,694.9 hours with a corresponding lodestar of \$1,025,166.00. This summary was prepared from

contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: Performed detailed factual investigation into the DPP claims ultimately brought in this case; worked with economic and industry experts regarding liability, damages and furthering institutional knowledge of the industry; helped draft initial complaint and other key pleadings; participated in discovery at the high strategic level, the document review level, the document review management level and with respect to certain third-party discovery efforts; worked with client regarding substantive issues and assisted with discovery process; managed witness proffer research, outlines, analysis and participated in proffers; strategized with co-lead counsel with respect to substantive issues; streamlining efficiency and best leveraging fruits of discovery, proffers and investigation toward DPPs' objectives in the litigation. These are just examples of the work undertaken by Freed Kanner London & Millen LLC in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 25, 2024, in Lincolnshire, Illinois.

/s/Douglas A. Millen
Douglas A. Millen

Exhibit A - TIME REPORT

Firm Name: Freed Kanner London & Millen LLC
Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Brian M. Hogan	P	37.10	\$560.00	\$20,776.00
Brian M. Hogan	P	69.00	\$600.00	\$41,400.00
Brian M. Hogan	P	36.40	\$650.00	\$23,660.00
Brian M. Hogan	P	3.30	\$725.00	\$2,392.50
Jonathan M. Jagher	P	22.30	\$640.00	\$14,272.00
Jonathan M. Jagher	P	1.10	\$775.00	\$852.50
Douglas A. Millen	P	72.00	\$785.00	\$56,520.00
Douglas A. Millen	P	134.10	\$805.00	\$107,950.50
Douglas A. Millen	P	88.90	\$875.00	\$77,787.50
Douglas A. Millen	P	306.50	\$925.00	\$283,512.50
Michael E. Moskovitz	P	5.50	\$750.00	\$4,125.00
Michael E. Moskovitz	P	11.90	\$875.00	\$10,412.50
Matthew W. Ruan	P	142.50	\$800.00	\$114,000.00
Heather Small	CR	226.30	\$350.00	\$79,205.00
Samantha Stewart	CR	538.00	\$350.00	\$188,300.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		1,694.90		\$1,025,166.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 10

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF JOSHUA H.
GRABAR IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
GRABAR LAW OFFICE**

I, Joshua H. Grabar, declare and state as follows:

1. I am the Principal of Grabar Law Office. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 653.0 hours with a corresponding lodestar of \$258,985.00. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and

was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: factual and legal research on behalf of Redner's Markets, Inc. ("Redner's") and the class, and retention of Redner's as a class representative; draft initial disclosures; work with Redner's, ESI vendor and Lead Counsel to produce discovery; meet and confer with Lead Counsel and counsel for Defendants; attend Case Management Conferences and other hearings; and review and code materials produced in discovery. These are just examples of the work undertaken by Grabar Law Office in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 24, 2024, in Philadelphia, Pennsylvania.

/s/ Joshua H. Grabar
Joshua H. Grabar

Exhibit A - TIME REPORT

Firm Name: Grabar Law Office

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Joshua H. Grabar	P	42.70	\$850.00	\$36,295.00
Joshua H. Grabar	P	15.80	\$925.00	\$14,615.00
Charles A. Mangan	A	591.40	\$350.00	\$206,990.00
Julia Varano	A	3.10	\$350.00	\$1,085.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		653.00		\$258,985.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 11

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF MICHAEL B.
GRATZ, JR. IN SUPPORT OF
DIRECT PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
GRATZ & GRATZ, P.A.**

I, Michael B. Gratz, Jr., declare and state as follows:

1. I am a partner of Gratz & Gratz, P.A. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 108.30 hours with a corresponding lodestar of \$59,045.00. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by

professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: [telephone conferences and communications with co-counsel, class attorneys and clients; meetings with clients; research; litigation and factual analysis; discovery production; review of documents, et cetera]. These are just examples of the work undertaken by Gratz & Gratz, P.A. in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 30, 2024, in Tupelo, Mississippi.

/s/ MICHAEL B. GRATZ, JR.
MICHAEL B. GRATZ, JR.

Exhibit A - TIME REPORT

Firm Name: Gratz & Gratz, P.A.

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Michael B. Gratz, Jr.	Partner	2.60	\$350.00	\$910.00
Michael B. Gratz, Jr.	Partner	101.00	\$550.00	\$55,550.00
Michael B. Gratz, Sr.	Partner	4.70	\$550.00	\$2,585.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		108.30		\$59,045.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 12

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF RICHARD M.
HAGSTROM IN SUPPORT OF
DIRECT PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
HELLMUTH & JOHNSON, PLLC**

I, Richard M. Hagstrom, declare and state as follows:

1. I am Of Counsel to Hellmuth & Johnson, PLLC (“H&J”). I submit this declaration in support of Interim Co-Lead Class Counsel’s Motion for an interim award of attorneys’ fees and service awards in connection with services rendered and expenses incurred by H&J in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. H&J and I serve as Counsel to the Direct Purchaser Plaintiff (“DPP”) Class.

3. Attached hereto as **Exhibit A** is H&J’s total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by H&J during this period was 14.7 hours with a corresponding lodestar of \$12,870.00. This summary was prepared from contemporaneous, daily time records prepared and maintained by H&J. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by professional staff at

H&J for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited this time to comply with that protocol. In connection with representing DPPs in this litigation, H&J did the following: coordinated with other firms in the initiation of this lawsuit; assisted with the pleadings; provided information and advice to co-lead counsel as requested. These are just examples of the work undertaken by H&J in this litigation. H&J's time records, submitted through the course of this litigation, fully describe the work performed by H&J on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in H&J are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. H&J is not seeking reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 26, 2024, in Fort Myers Beach, FL.

/s/ Richard M. Hagstrom

RICHARD M. HAGSTROM

E HIBIT A - TIME REPORT

Firm Name: Hellmuth Johnson, PLLC
Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Jonathan D. Prater	Partner	6.40	\$740.00	\$4,736.00
Richard M. Marr	Partner	14.70	\$900.00	\$8,134.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		14.70		\$12,870.00

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

Title:

- (P) Partner
- (A) Associate
- (LC) Law Clerk
- (SPL) Senior Paralegal
- (PL) Paralegal
- (CR) Contract Reviewer

EXHIBIT 13

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF DANIEL R.
KARON IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
KARON LLC**

I, Daniel R. Karon, declare and state as follows:

1. I am Daniel R. Karon of Karon LLC. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 1505.10 hours with a corresponding lodestar of \$867,146.00. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and

was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following investigate claim, work with experts to develop liability legal theory, investigate marketplace facts to support legal theory, draft Complaint, discussions with co-counsel regarding liability and damages, discussion with expert to quantify damages, participate in discovery calls with co-counsel, conduct document review, draft discovery, meet with client to review and compile client documents, conduct proffers of JBS witnesses, and strategize with co-counsel to make best use of proffered information . These are just examples of the work undertaken by Karon LLC in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 24, 2024, in Cleveland, Ohio.

/s/ Daniel R. Karon
DANIEL R. KARON

Exhibit A - TIME REPORT

Firm Name: Karon LLC

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Daniel Karon	P	233.00	\$840.00	\$195,720.00
Daniel Karon	P	403.70	\$845.00	\$341,126.50
Beau Hollowell	A	49.30	\$635.00	\$31,305.50
Beau Hollowell	A	37.30	\$680.00	\$25,364.00
Barry Chase	CR	578.70	\$350.00	\$202,545.00
Scott Bailey	CR	203.10	\$350.00	\$71,085.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		1,505.10		\$867,146.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 14

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF DANIEL J.
MOGIN IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
MOGINRUBIN LLP**

I, Daniel J. Mogin, declare and state as follows:

1. I am Managing Partner of MoginRubin LLP. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 389.0 hours with a corresponding lodestar of \$176,051.50. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and

was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: initial investigation and fact development, data collection from potential and retained clients, drafting of direct purchaser complaint, communications with economist and analysis of economic data/work product, communications regarding expert and litigation strategy, and preparation and attendance at hearings. These are just examples of the work undertaken by MoginRubin LLP in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 25, 2024, in San Diego, California.

/s/ Daniel J. Mogin
Daniel J. Mogin

Exhibit A - TIME REPORT

Firm Name: MoginRubin LLP

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Daniel Mogin	P	7.60	\$895.00	\$6,802.00
Daniel Mogin	P	14.00	\$925.00	\$12,950.00
Daniel Mogin	P	7.30	\$950.00	\$6,935.00
Daniel Mogin	P	0.80	\$1,000.00	\$800.00
Jodie Williams	P	3.20	\$615.00	\$1,968.00
Jodie Williams	P	63.70	\$635.00	\$40,449.50
Jernnifer Oliver	P	51.80	\$610.00	\$31,598.00
Jennifer Oliver	P	27.00	\$665.00	\$17,955.00
Jennifer Oliver	P	5.00	\$725.00	\$3,625.00
Joy Sidhwa	SC	11.30	\$575.00	\$6,497.50
Joy Sidhwa	SC	0.50	\$585.00	\$292.50
Kristy Greenberg	SA	8.00	\$555.00	\$4,440.00
Mike Kuzma	CR	13.70	\$350.00	\$4,795.00
Nicole Ambrosetti	A	19.50	\$410.00	\$7,995.00
Timothy LaComb	A	3.60	\$505.00	\$1,818.00
Timothy LaComb	A	0.50	\$525.00	\$262.50
Timothy LaComb	A	0.50	\$580.00	\$290.00
Jennie Chatfield	SPL	27.80	\$225.00	\$6,255.00
Jennie Chatfield	SPL	0.60	\$235.00	\$141.00
Norma Geraci	PL	11.10	\$155.00	\$1,720.50
Carlos Armijo	PL	98.60	\$165.00	\$16,269.00
Carlos Armijo	PL	12.90	\$170.00	\$2,193.00
TOTAL		389.00		\$176,051.50

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

Title:

- (P) Partner**
- (A) Associate**
- (SA) Senior Associate**
- (SC) Senior Counsel**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 15

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF DIANNE M.
NAST IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS FOR DIRECT
PURCHASER PLAINTIFF CLASS
REPRESENTATIVES**

I, Dianne M. Nast, declare and state as follows:

1. I am the founder and owner of NastLaw LLC. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period from inception of the case through December 31, 2022. My firm spent 407.8 hours during this period, with a corresponding lodestar of \$222,459.50. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by professional staff at

NastLaw LLC for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for timekeeping and assignments and have audited the time to comply with that protocol.

4. On September 4, 2020, this Court appointed me as a member of the Plaintiffs' Steering Committee ("PSC") for the Direct Purchaser Plaintiffs. Since then, NastLaw attorneys and I ("NastLaw") have worked closely with Lead Counsel on this case. I, or in my absence another NastLaw attorney, attended all court hearings and meetings held by DPP Co-Lead Counsel.

5. In connection with representing the DPP Class, NastLaw engaged in a variety of essential tasks to move this litigation forward. By way of example, NastLaw assisted with research, drafting, and filing a class action complaint in the District of Minnesota captioned *Olean Wholesale Grocery Cooperative, Inc. v. Cargill, Inc.*, 20-cv-01602 (D. Minn. July 17, 2020). Additionally, NastLaw assisted with drafting amended complaints and worked with co-counsel to identify potential additional class representatives.

6. Also, NastLaw was assigned projects where the attorneys performed legal research and drafted memoranda on a variety of topics including the work product doctrine, the production of non-testifying expert materials, and the extent *parens patriae* authority of State Attorneys General under federal and certain states' laws. The firm was also heavily involved with document review projects.

7. Additionally, NastLaw was asked to assist with a telephone and social media discovery project. As members of the phone record subpoena team, NastLaw attorneys researched the District of Minnesota case law that supports the discovery of telephone, text

message, and social media information; prepared notices and subpoenas for twenty-five former and current employees of Cargill; drafted correspondence to negotiate the scope of those subpoenas with Cargill's counsel (for current employees) and with independent counsel (for former employees); participated in meet and confer sessions with those attorneys; and consulted with co-counsel.

8. These are just examples of the work undertaken by NastLaw in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by NastLaw on behalf of the DPP Class.

9. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

10. NastLaw LLC is not seeking reimbursement of costs associated with this case at this time.

I declare that the foregoing is true and correct. Executed on January 26, 2024, in Philadelphia, Pennsylvania.

/s/ Dianne M. Nast

Dianne M. Nast

Exhibit A - TIME REPORT

Firm Name: NastLaw LLC

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Dianne M. Nast	P	7.80	\$1,045.00	\$8,151.00
Dianne M. Nast	P	2.50	\$995.00	\$2,487.50
Dianne M. Nast	P	38.80	\$950.00	\$36,860.00
Dianne M. Nast	P	4.70	\$895.00	\$4,206.50
Daniel N. Gallucci	A	11.90	\$780.00	\$9,282.00
Daniel N. Gallucci	A	1.10	\$740.00	\$814.00
Daniel N. Gallucci	A	7.60	\$700.00	\$5,320.00
Michele S. Burkholder	A	16.50	\$780.00	\$12,870.00
Michele S. Burkholder	A	6.60	\$700.00	\$4,620.00
Joanne E. Matusko	A	13.50	\$765.00	\$10,327.50
Michael S. Tarringer	A	40.50	\$765.00	\$30,982.50
Michael S. Tarringer	A	1.10	\$725.00	\$797.50
Michael S. Tarringer	A	3.90	\$690.00	\$2,691.00
Michael S. Tarringer	A	0.40	\$650.00	\$260.00
Michael D. Ford	A	15.40	\$510.00	\$7,854.00
Michael D. Ford	A	10.80	\$465.00	\$5,022.00
Matthew A. Reid	A	4.80	\$615.00	\$2,952.00
Matthew A. Reid	A	219.70	\$350.00	\$76,895.00
Julia R. Piccone	PL	0.20	\$335.00	\$67.00
TOTAL		407.80		\$222,459.50

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 16

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF ARTHUR N.
BAILEY IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
RUPP PFALZGRAF, LLC**

I, Arthur N. Bailey, declare and state as follows:

1. I am a partner of Rupp Pfalzgraf, LLC. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 206 hours with a corresponding lodestar of \$92,270.00. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by

professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: worked with multiple clients in gathering and analyzing purchase data and invoices; worked with various vendors, client, and co-counsel on document retrieval of clients' relevant records; maintained client communications relating to case status, relevant court filings, and document preservation matters; participated in attorney strategy meetings; collaborated with co-counsel on litigating action on behalf of plaintiffs. These are just examples of the work undertaken by Rupp Pfalzgraf in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 25, 2024, in Jamestown, New York.

/s/ Arthur N. Bailey
ARTHUR N. BAILEY

Exhibit A - TIME REPORT

Firm Name: RUPP PFALZGRAF, LLC

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Arthur N. Bailey	P	183.00	\$450.00	\$82,350.00
Marco Cercone	P	17.20	\$425.00	\$7,310.00
Marco Cercone	P	5.80	\$450.00	\$2,610.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		206.00		\$92,270.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 17

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF SIMON BAHNE
PARIS IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
SALTZ MONGELUZZI &
BENDESKY, PC**

I, Simon B. Paris, declare and state as follows:

1. I am a Partner of Saltz Mongeluzzi & Bendesky, PC. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 6.6 hours with a corresponding lodestar of \$4,579.50. This summary was prepared from contemporaneous,

daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: assisted in the initial organization of the case and filing of the complaint. These are just examples of the work undertaken by Saltz Mongeluzzi & Bendesky, PC in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 24, 2024, in Horsham, Pennsylvania.

/s/ Simon B. Paris
SIMON BAHNE PARIS

Exhibit A - TIME REPORT

Firm Name: SALTZ MONGELUZZI & BENDESKY, PC
Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
SIMON B. PARIS	P	2.70	\$685.00	\$1,849.50
SIMON B. PARIS	P	3.90	\$700.00	\$2,730.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		6.60		\$4,579.50

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 18

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF R.
ALEXANDER SAVERI IN SUPPORT
OF DIRECT PURCHASER
PLAINTIFFS' MOTION FOR
INTERIM PAYMENT OF
ATTORNEYS' FEES AND SERVICE
AWARDS ON BEHALF OF SAVERI
& SAVERI, INC.**

I, R. Alexander Saveri, declare and state as follows:

1. I am a partner of Saveri & Saveri, Inc. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 62.6 hours with a corresponding lodestar of \$48,515. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected

in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: Reviewed and edited complaint, reviewed orders of the Court, prepared client documents for production and amended complaint. These are just examples of the work undertaken by Saveri & Saveri, Inc. in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 25, 2024, in San Francisco, California.

/s/ R. Alexander Saveri
R. Alexander Saveri

Exhibit A - TIME REPORT

Firm Name: Saveri & Saveri, Inc.

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Cadio Zirpoli	P	62.60	\$775.00	\$48,515.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		62.60		\$48,515.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 19

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF ARIANA J.
TADLER IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
TADLER LAW LLP**

I, Ariana J. Tadler, declare and state as follows:

1. I am a Partner of Tadler Law LLP. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.
2. My firm and I serve among Counsel to the Direct Purchaser Plaintiff ("DPP") Class.
3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 13.1 hours with a corresponding lodestar of \$8,697.50. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected

in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: coordinated with counsel for the DPP Class regarding claims for and review and contribution to an initial complaint; discussions about selection and appointment of counsel for leadership; and pursuit of opportunities to support the prosecution of the litigation, including with respect to discovery. These are just examples of the work undertaken by Tadler Law LLP in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 30, 2024, in Clearwater, Florida.

s/ Ariana J. Tadler
Ariana J. Tadler

Exhibit A - TIME REPORT

Firm Name: Tadler Law

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Ariana J. Tadler	P	3.30	\$925.00	\$3,052.50
Brian Morrison	P	7.40	\$625.00	\$4,625.00
Jason A. Joseph	PL	2.40	\$425.00	\$1,020.00
TOTAL		13.10		\$8,697.50

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 20

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF KEVIN
LANDAU IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS’
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS’ FEES AND
SERVICE AWARDS ON BEHALF OF
TAUS, CEBULASH & LANDAU, LLP**

I, Kevin Landau, declare and state as follows:

1. I am a partner of Taus, Cebulash & Landau, LLP. I submit this declaration in support of Interim Co-Lead Class Counsel’s Motion for an interim award of attorneys’ fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff (“DPP”) Class.

3. Attached hereto as **Exhibit A** is my firm’s total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 4.5 hours with a corresponding lodestar of \$3,425.00. This summary was prepared from contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected

in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: conducted factual investigation and analysis in connection with filing the complaint. These are just examples of the work undertaken by Taus, Cebulash & Landau, LLP in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 24, 2024, in New York, New York.

/s/ Kevin Landau

Kevin Landau

Exhibit A - TIME REPORT

Firm Name: Taus, Cebulash & Landau, LLP
Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Kevin Landau	(P)	2.50	\$750.00	\$1,875.00
Kevin Landau	(P)	2.00	\$775.00	\$1,550.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		4.50		\$3,425.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 21

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF ALLAN
STEYER IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
STEYER LOWENTHAL
BOODROOKAS ALVAREZ &
SMITH LLP**

I, Allan Steyer, declare and state as follows:

1. I am a partner of Steyer Lowenthal Boodrookas Alvarez & Smith LLP. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 163.0 hours with a corresponding lodestar of \$89,146.00. This summary was prepared from contemporaneous,

daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: Work regarding discovery including document review and analysis; and litigation strategy. These are just examples of the work undertaken by Steyer Lowenthal Boodrookas Alvarez & Smith LLP in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 24, 2024, in San Francisco, California.

/s/ Allan Steyer

ALLAN STEYER

Exhibit A - TIME REPORT

Firm Name: Steyer Lowenthal Boodrookas Alvarez & Smith LLP
Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Allan Steyer	(P)	27.80	\$1,350.00	\$37,530.00
Suneel Jain	(A)	14.70	\$720.00	\$10,584.00
Cameron L. Weiss	(A)	2.10	\$395.00	\$829.50
Cameron L. Weiss	(A)	95.90	\$350.00	\$33,565.00
Samuel Abrams	(PL)	22.50	\$295.00	\$6,637.50
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
		0.00	\$0.00	\$0.00
TOTAL		163.00		\$89,146.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**

EXHIBIT 22

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

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

This Document Relates To:
IN RE DPP BEEF LITIGATION

**DECLARATION OF KENNETH A.
WEXLER IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR INTERIM PAYMENT
OF ATTORNEYS' FEES AND
SERVICE AWARDS ON BEHALF OF
WEXLER BOLEY & ELGERSMA,
LLP**

I, Kenneth A. Wexler, declare and state as follows:

1. I am the managing partner of Wexler Boley & Elgersma LLP. I submit this declaration in support of Interim Co-Lead Class Counsel's Motion for an interim award of attorneys' fees and service awards in connection with services rendered and expenses incurred by my firm in connection with this litigation. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel to the Direct Purchaser Plaintiff ("DPP") Class.

3. Attached hereto as **Exhibit A** is my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through December 31, 2022. The total number of hours spent by my firm during this period was 558.00 hours with a corresponding lodestar of \$309,710.00 This summary was prepared from

contemporaneous, daily time records prepared and maintained by my firm. The total lodestar amount reflected in Exhibit A is for work assigned by DPP Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the DPP Class. In preparing this time, I followed Co-Lead Counsels' protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing DPPs in this litigation my firm did the following: attended plaintiff steering committee meetings, conducted factual research, investigation and analysis, prepared subpoenas, reviewed and analyzed documents, conducted legal research and analysis, and review, draft and suggest edits to various pleadings. These are just examples of the work undertaken by Wexler Boley & Elgersma LLP in this litigation. The firm's time records, submitted through the course of this litigation, fully describe the work performed by my firm on behalf of the DPP Class.

4. The hourly rates for the partners, attorneys, and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in similar contingent complex litigation matters, except for work completed on document review, which is capped at \$350 per hour.

5. My firm is not seeking the reimbursement of costs associated with this case at this time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 26, 2024, in Chicago, Illinois.

/s/ Kenneth A. Wexler

KENNETH A. WEXLER

Exhibit A - TIME REPORT

Firm Name: Wexler Boley & Elgersma LLP

Reporting Period: Inception through December 31, 2022

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
Kenneth A. Wexer	P	1.30	\$900.00	\$1,170.00
Kenneth A. Wexer	P	4.80	\$925.00	\$4,440.00
Kenneth A. Wexer	P	0.90	\$950.00	\$855.00
Kenneth A. Wexer	P	6.20	\$960.00	\$5,952.00
Melinda J. Morales	P	9.30	\$925.00	\$8,602.50
Melinda J. Morales	P	147.50	\$940.00	\$138,650.00
Sarah M Stack	A	53.20	\$650.00	\$34,580.00
Elena Endrukaite	A	69.90	\$350.00	\$24,465.00
Ash Patel	CR	152.60	\$350.00	\$53,410.00
Travis Richmond	PL	1.00	\$300.00	\$300.00
Travis Richmond	PL	111.30	\$335.00	\$37,285.50
TOTAL		558.00		\$309,710.00

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

Title:

- (P) Partner**
- (A) Associate**
- (LC) Law Clerk**
- (SPL) Senior Paralegal**
- (PL) Paralegal**
- (CR) Contract Reviewer**