

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:22-cv-02946-STV

RON BROWN, MINKA GARMON, and JESSIE CROFT, individually and on
behalf of others similarly situated,

Plaintiffs,

v.

JBS USA FOOD COMPANY; TYSON FOODS, INC., CARGILL, INC., CARGILL
MEAT SOLUTIONS CORP.; HORMEL FOODS CORP.; AMERICAN FOODS
GROUP, LLC; TRIUMPH FOODS, LLC; SEABOARD FOODS, LLC;
NATIONAL BEEF PACKING CO., LLC; IOWA PREMIUM LLC; SMITHFIELD
FOODS INC.; SMITHFIELD PACKAGED MEATS CORP.; AGRI BEEF CO.;
WASHINGTON BEEF, LLC; PERDUE FARMS, INC.; AGRI STATS, INC.; and
WEBBER, MENG, SAHL AND COMPANY, INC. d/b/a WMS & COMPANY,
INC.,

Defendants.

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

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

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

Dated: December 7, 2022

Respectfully submitted,

/s/ Brent W. Johnson

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Dated: December 7, 2022

/s/ J. Douglas Baldrige

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