

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

JUDY JIEN, et al.,

Plaintiffs,

vs.

PERDUE FARMS, INC., et al.,

Defendants.

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

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

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

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

Date: December 7, 2022

Respectfully submitted,

/s/ Brent W. Johnson

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

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

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

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

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

Louis Katz (admitted *pro hac vice*)

Zachary Krowitz (D. Md. Bar # 22370)

COHEN MILSTEIN SELLERS & TOLL PLLC

1100 New York Avenue NW

5th Floor

Washington, DC 20005

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

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

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

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

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

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

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

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

*Co-Lead Counsel for Plaintiffs and the Proposed Class*

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

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

*Additional Counsel for Plaintiffs and the Proposed Class*

Dated: December 7, 2022

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

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

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