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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

IN RE: PACKAGED SEAFOOD
PRODUCTS ANTITRUST
LITIGATION

This filing relates to the Direct Purchaser
Plaintiff Class Action Track

Case No. 3:15-md-02670-DMS-MDD

**ORDER GRANTING DIRECT
PURCHASER PLAINTIFFS'
MOTION FOR FINAL APPROVAL
OF COSI/TUG SETTLEMENT**

RE: ECF No. 2911

1 WHEREAS, the Court, having considered the Settlement Agreement between
2 the Direct Purchaser Plaintiffs (the “DPPs”)¹ and Tri-Union Seafoods LLC d/b/a
3 Chicken of the Sea (“COSI”) and Thai Union Group PCL (“TUG”) dated March 11,
4 2021 (ECF No. 2785-3) (the “Settlement Agreement”), the Court’s Order granting the
5 DPPs’ Renewed Motion for Preliminary Approval of Settlement, dated January 26,
6 2022 (ECF No. 2733) (“Preliminary Approval Order”), and the DPPs’ Motion for
7 Final Approval of Settlement and related filings, as well as having held Fairness
8 Hearings on October 7, 2022, and February 24, 2023, due and adequate notice having
9 been given to the Settlement Class as required in the Court’s Preliminary Approval
10 Order, the 90-day period provided by the Class Action Fairness Act, 28 U.S.C. §
11 1715(d), having expired, and the Court having considered all papers filed and
12 proceedings held herein and otherwise being fully informed in the premises and good
13 cause appearing therefor,

14 **IT IS HEREBY ORDERED AS FOLLOWS:**

15 1. This Final Approval Order and Order of Final Judgment and Dismissal as
16 to the DPPs’ claims against Defendants COSI and TUG pursuant to the Settlement
17 Agreement incorporates by reference the definitions as set forth in the Settlement
18 Agreement, and all capitalized terms used but not defined herein shall have the same
19 meanings as in the Settlement Agreement.

20 2. This Court has jurisdiction over the subject matter of the Litigation² and
21 over all parties to the Settlement Agreement, including all Settlement Class Members,
22 and the administration of the Settlement and distribution of the Settlement Fund.

23 _____
24 ¹ The DPPs are Olean Wholesale Grocery Cooperative, Inc., Pacific Groservice Inc.
25 d/b/a PITCO Foods, Piggly Wiggly Alabama Distributing Co., Inc., Howard Samuels
as Trustee in Bankruptcy for Central Grocers, Inc., Trepcos Imports and Distribution
Ltd., and Benjamin Foods LLC.

26 ² As defined in the Settlement Agreement, “Litigation” means the multi-district
27 litigation captioned *In Re: Packaged Seafood Products Antitrust Litigation*, No. 15-
28 MD-2670 [DMS] (MDD), MDL No. 2670, currently pending before the Honorable
[Dana M. Sabraw] in the United States District Court for the Southern District of

1 3. The notice provisions of the Class Action Fairness Act, 28 U.S.C. § 1715,
2 have been satisfied.

3 **I. The Settlement Class**

4 4. Based on the record before the Court, including the Preliminary Approval
5 Order, the submissions in support of the Settlement the DPPs, for themselves
6 individually and on behalf of each Settlement Class Member in the Litigation, the
7 Court finds—solely for purposes of effectuating the Settlement—that all requirements
8 of Federal Rules of Civil Procedure 23(a) and 23(b)(3) have been satisfied, and hereby
9 certifies solely for settlement purposes the following Settlement Class:

10 **The Settlement Class:** All persons and entities that directly
11 purchased Packaged Tuna Products (excluding tuna salad kits and
12 cups and salvage purchases) within the United States, its territories,
13 and the District of Columbia from any Defendant at any time
14 between June 1, 2011 and July 31, 2015. Excluded from the class
15 are all governmental entities, Defendants, any parent, subsidiary or
16 affiliate thereof, and Defendants’ officers, directors, employees,
and immediate families, as well as any federal judges or their
staffs.

17 5. The Court finds that the Settlement Amount is \$13,001,961.86 based on
18 the formula set forth in the Settlement Agreement. COSI and TUG have previously
19 advanced \$75,000.00 of that amount to defray the costs of notice and administration.
20 COSI and TUG are hereby ordered to pay into the Escrow Account established
21 pursuant to the Settlement Agreement an additional \$12,926,961.86.

22 6. The Court confirms, for settlement purposes, that the Settlement Class
23 meets the applicable requirements of Fed. R. Civ. P. 23(a) and (b)(3):

24 _____
25 California, including all actions relating to the claims alleged in “Direct Purchaser
26 Plaintiffs’ Fourth Amended Consolidated Class Action Complaint” and all actions that
27 have been or are subsequently filed in or transferred for consolidation and/or
28 coordinated pretrial proceedings to the Southern District of California by the Judicial
Panel on Multidistrict Litigation as part of MDL No. 2670.

1 (a) *Numerosity*: The Settlement Class consists of hundreds of persons
2 and entities located throughout the United States and satisfies the numerosity
3 requirement of Fed. R. Civ. P. 23(a)(1). Joinder of these widely dispersed, numerous
4 Settlement Class Members into one suit would be impracticable.

5 (b) *Commonality*: The Court determines that the DPPs have alleged one
6 or more questions of fact or law common to the Settlement Class. These issues are
7 sufficient to establish commonality under Fed. R. Civ. P. 23(a)(2) for purposes of
8 settlement.

9 (c) *Typicality*: The claims of the DPPs are typical of the claims of the
10 Settlement Class Members they seek to represent for purposes of settlement.

11 (d) *Adequacy*: The DPPs' interests do not conflict with those of absent
12 members of the Settlement Class, and the DPPs' interests are co-extensive with those
13 of absent Settlement Class Members. Additionally, this Court recognizes the
14 experience of Class Counsel. The DPPs and Class Counsel have prosecuted this action
15 vigorously on behalf of the Settlement Class. The Court finds that the requirement of
16 adequate representation of the Settlement Class has been fully met under Fed. R. Civ.
17 P. 23(a)(4).

18 (e) *Predominance of Common Issues*: For settlement purposes, the
19 questions of law or fact common to the Settlement Class Members predominate over
20 any questions affecting any individual Settlement Class Member.

21 (f) *Superiority of the Class Action Mechanism*: The class action
22 mechanism provides a superior procedural vehicle for resolution of this matter
23 compared to other available alternatives. Certification of the Settlement Class
24 promotes efficiency and uniformity of judgment because the many Settlement Class
25 Members will not be forced to separately pursue claims or execute settlements in
26 various courts around the country.

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1 7. Certification of the Settlement Class is for settlement purposes only, shall
2 not constitute evidence in any other proceeding, and may not be cited in support of the
3 certification of any other proposed class.

4 8. Pursuant to Rule 23(g) of the Federal Rules of Civil Procedure, Hausfeld
5 LLP is appointed as Settlement Class Counsel for the Settlement Class.

6 9. The DPPs—Olean Wholesale Grocery Cooperative, Inc., Pacific
7 Groservice Inc. d/b/a PITCO Foods, Piggly Wiggly Alabama Distributing Co., Inc.,
8 Howard Samuels as Trustee in Bankruptcy for Central Grocers, Inc., Trepcos Imports
9 and Distribution Ltd., and Benjamin Foods LLC—are appointed as class
10 representatives on behalf of the Settlement Class.

11 **II. Notice to Settlement Class Members and Exclusions**

12 10. The record shows and the Court finds that notice has been given to the
13 Settlement Class in the manner approved by the Court in its Preliminary Approval
14 Order. The Court finds that such class notice: (i) is reasonable and constitutes the best
15 practicable notice to Settlement Class Members under the circumstances;
16 (ii) constitutes notice that was reasonably calculated, under the circumstances, to
17 apprise Settlement Class Members of the pendency of the Litigation and the terms of
18 the Settlement Agreement, their right to exclude themselves from the Settlement Class
19 or to object to all or any part of the Settlement Agreement, their right to appear at the
20 Fairness Hearing (either on their own or through counsel hired at their own expense),
21 and the binding effect of the orders on all persons and entities who or which do not
22 exclude themselves from the Settlement Class; (iii) constitutes due, adequate, and
23 sufficient notice to all persons or entities entitled to receive notice; and (iv) fully
24 satisfied the requirements of the United States Constitution (including the Due Process
25 Clause, Fed. R. Civ. P. 23, and any other applicable law).

26 11. The persons identified in Exhibit A to Supplemental Declaration of
27 Jennifer M. Keough filed in support of the motion for final approval have timely and
28

1 validly requested exclusion from the Settlement Classes and, therefore, are excluded.
2 Such persons are not included in or bound by this final judgment.

3 **III. Final Approval of Settlement Agreement**

4 12. The Court finds that the Settlement as set forth in the Settlement
5 Agreement was fairly and honestly negotiated by counsel with significant experience
6 litigating antitrust class actions and is the result of vigorous arm's-length negotiations
7 undertaken in good faith and with the assistance of United States Magistrate Judge Jan
8 Adler (Ret.), an experienced and well-regarded mediator of complex cases.

9 13. Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, the Court
10 hereby grants final approval of the Settlement as set forth in the Settlement Agreement
11 on the basis that the settlement is fair, reasonable, and adequate, and in the best
12 interests of the Settlement Class and are in full compliance with all applicable
13 requirements of the Federal Rules of Civil Procedure, the United States Constitution
14 (including the Due Process Clause), the Class Action Fairness Act, and any other
15 applicable law. The Court hereby declares that the Settlement Agreement is binding
16 on all Settlement Class Members.

17 14. The Court finds that the Settlement Agreement is fair, reasonable and
18 adequate based on the following factors, among other things: (a) the proposal was
19 negotiated at arm's length; (b) the relief provided for the class is adequate, taking into
20 account the complexity, expense, uncertainty and likely duration of the Litigation, the
21 effectiveness of any proposed method of distributing relief to the class, including the
22 method of processing class-member claims, the terms of the proposed award of
23 attorneys' fees, including timing of payment, and the absence of any other agreements
24 required to be identified under Rule 23(e)(3); (c) the Settlement treats Settlement Class
25 Members equitably relative to each other; (d) the class representatives and Class
26 Counsel have adequately represented the Settlement Class; and (e) any and all other
27 applicable factors that favor final approval.
28

1 **IV. Settlement and Claims Administration Expenses**

2 15. While the DPPs initially estimated that notice and claims administration
3 together would not cost more than \$100,000, the settlement administrator, JND,
4 received claims from third-party filers on behalf of entities that did not appear in the
5 Defendants’ transaction data and most of which made no attempt to substantiate the
6 claims with any supporting documentation proving membership in the Settlement
7 Class. Processing and review of these claims took a significant amount of time,
8 resulting in the claims administration costing more than initially anticipated.

9 16. The Settlement Agreement provides that Settlement Class Counsel may
10 withdraw funds as necessary for notice and administration from the Settlement Fund
11 up to \$500,000. Settlement Agreement, ¶ 11.4. JND estimates that total fees and
12 expenses for the claims administration and related distribution of the Settlement Fund
13 to claimants will not exceed \$325,514.00. *Id.* Class Counsel has requested that the
14 Court approve use of those funds to carry out the remaining claims administration and
15 related distribution of the Settlement Fund.

16 17. Finding good cause shown, the Court therefore approves up to
17 \$325,514.00 to be withdrawn from the Settlement Fund to pay the administrator for
18 the claims administration and distribution to be performed.

19 **V. Conclusion**

20 18. In granting final approval of the Settlement Agreement, the Court directs
21 entry of final judgment under Rule 54(b) of the Federal Rules of Civil Procedure
22 dismissing COSI and TUG with prejudice from this Litigation as to the Settlement
23 Class’s claims in accordance with this Order and the terms and conditions of the
24 Settlement Agreement. Each party shall bear its own costs and attorneys’ fees except

25 ///

26 ///

27 ///

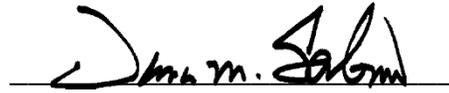
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as provided by the Settlement Agreement and Court order. The Litigation will continue with respect to all other parties.

IT IS SO ORDERED.

Dated: March 7, 2023

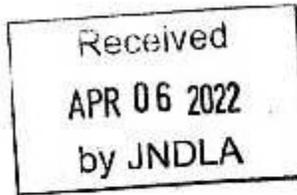


Hon. Dana M. Sabraw, Chief Judge
United States District Court

EXHIBIT A



Direct Dial: (305) 381-7472
E-mail: wblechman@knpa.com



FOUR SEASONS TOWER
1441 BRICKELL AVENUE
SUITE 1100
MIAMI, FLORIDA 33131
TELEPHONE: 305.373.1000
FACSIMILE: 305.372.1861
WWW.KNPA.COM

March 31, 2022

Via Certified Mail - R/R/R

Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
Post Office Box 91241
Seattle, Washington 98111

Re: *In Re: Packaged Seafood Products Antitrust Litigation*
No. 3:15-md-02670-JLS-MDD (S.D. Ca)

Dear Sir or Madam:

We represent The Kroger Co. ("Kroger"), Albertsons Companies, Inc. ("Albertsons"), Hy-Vee Inc. ("Hy-Vee"), H.E. Butt Grocery Company ("HEB"), Ahold U.S.A., Inc. ("Ahold"), Delhaize America, LLC ("Delhaize") (collectively the "Opt-Out Entities"), in the above-referenced matter. We hereby request that each of these companies, and their respective current and former predecessors, successors, subsidiaries, affiliates which each controls (if any), partnerships in which each has a majority interest (if any), trade names, banners and divisions under which each does business, and assignors (if any) including all their subsidiaries and affiliates listed on Exhibits 1-5, be excluded from the proposed Direct Purchaser Settlement Class in the *In Re Packaged Seafood Products Antitrust Litigation* (the "Litigation").

The Opt-Out Entities have previously filed separate, individual actions against the packaged seafood manufacturers which further evidences their intention to be excluded from the referenced Settlement Class.

We do not know how the Opt-Out Entities are identified in the information sources being used by the Claims Administrator to identify firms in the referenced Settlement Class. As such, we reserve the right to supplement the information in the Exhibits accompanying this letter, although we believe the "catch-all" language in this letter suitably and appropriately identifies all of the Opt-Out Entities and otherwise conforms to the request for information in the Notice. The Exhibits to this letter may be over-inclusive of corporate names in the interest of ensuring that a given Opt-Out Entity has excluded from the Chicken of the Sea/Thai Union Settlement Class all of its "family" of companies which might otherwise be a part of the Settlement Class.

Please accept this letter as our notice of exclusion from the referenced Settlement Class pursuant to Rule 23 of the Federal Rules of Civil Procedure. Please remove the foregoing Opt-

TEXAS OFFICE:
2630 EXPOSITION BLVD., SUITE 203A
AUSTIN, TEXAS 78703
TELEPHONE: 512.480.8023
FACSIMILE: 512.480.8037

WASHINGTON SATELLITE OFFICE:
1101 PENNSYLVANIA AVENUE, N.W., 8TH FLOOR
WASHINGTON, D.C. 20004-2436
TELEPHONE: 202.756.4373
FACSIMILE: 202.756.7323

Tuna Direct Purchaser Case – EXCLUSIONS
Page 2

March 31, 2022

Out Entities from any settlement class list that you have compiled or that you compile in the future regarding the Chicken of the Sea/Thai Union Settlement Class (as well as any litigation class that may be certified in the Litigation).

If you have any questions about this exclusion notice, please call us at the telephone number in the letterhead.

Thank you for your assistance.

Very truly yours,



William J. Blechman
Counsel for the Opt-Out Entities

WJB:mb

cc: Bonny Sweeney, Esquire
John Roberti, Esquire
Christopher Yates, Esquire
Adam Paris, Esquire

(with enclosures)

Enclosures

644820.2

Received
APR 06 2022
by JNDLA

EXHIBIT 1

In re Packaged Seafood Antitrust Litigation

**Request to be Excluded from Chicken
of the Sea/Thai Union Settlement Class**

THE KROGER CO.

Kroger	Harris Teeter, Inc.
The Kroger Co.	Harris Teeter, LLC
Kroger Limited Partnership I	Healthy Options, Inc.
KRGP Inc.	Jay C Food Stores
Kroger Texas L.P.	Junior Food Stores of West Florida, Inc.
The Kroger Co. of Michigan	Kessel
Baker's	Kessel Food Markets, Inc.
City Market	King Soopers
Copps Food Center	Mariano's Fresh Market
Dillon	Metro Market
Dillon Companies, Inc.	Owen's
FMJ, Inc.	Pick 'n Save
Food 4 Less	Pay Less Super Markets
Food 4 Less Holdings, Inc.	QFC
Fred Meyer	Ralphs
Fred Meyer, Inc.	Ralphs Grocery Company
Fred Meyer Jewelers, Inc.	Roundy's Inc.
Fred Meyer Stores, Inc.	Ruler Foods
Fry's	Smith's
Gerbes	Smith's Food & Drug Centers, Inc.
Harris Teeter	

EXHIBIT 2

Received
APR 06 2022
by JNDLA

In re Packaged Seafood Antitrust Litigation

**Request to be Excluded from Chicken
of the Sea/Thai Union Settlement Class**

ALBERTSONS COMPANIES, INC.

- | | |
|------------------------------|------------------------------|
| Albertsons | Carr-Gottstein Foods Co. |
| Albertson's, Inc. | Dominick's |
| Albertsons LLC | Dominick's Finer Foods, LLC |
| Albertsons Companies LLC | Extreme Value |
| Albertsons Companies, Inc. | Extreme Value Centers |
| Acme Markets, Inc. | Genuardi' |
| American Stores Company | Genuardi's Family Markets LP |
| American Drug Stores Company | Jerseymaid Milk Products |
| Jewel Foods | Pak 'N Save Foods |
| Jewel Foods, Inc. | Pavilions |
| Jewel Food Stores | Pavilions Place |
| Lucerne Foods, Inc. | Randall's |
| New Albertson's Inc. | Randall's Food & Drugs LP |
| Shaw's Supermarkets, Inc. | Simon David |
| Star Market | The Vons Companies, Inc. |
| Safeway | Tom Thumb Food & Drugs |
| Safeway Inc. | United Supermarkets, LLC |
| Safeway Food & Drug | Vons |
| | Vons Grocery Company |

Received
APR 06 2022
by JNDLA

EXHIBIT 3

In re Packaged Seafood Antitrust Litigation

**Request to be Excluded from Chicken
of the Sea/Thai Union Settlement Class**

HY-VEE, INC.

Hy-Vee

Hy-Vee, Inc.

Perishable Distributors of Iowa, Ltd.

Packaged seafood purchases by Topco Associates LLC or Topco Associates, Inc. (collectively "Topco"), and any of their predecessors or affiliates whom either controls, that Topco purchased from one or more Defendants and their co-conspirators and ever sold to Hy-Vee.

Received
APR 06 2022
by JNDLA

EXHIBIT 4

In re Packaged Seafood Antitrust Litigation

**Request to be Excluded from Chicken
of the Sea/Thai Union Settlement Class**

H.E. BUTT GROCERY COMPANY

H-E-B

H.E. Butt Grocery Company

H.E. Butt Grocery Company L.P.

Central Market

Received
APR 06 2022
by JNDLA

EXHIBIT 5

In re Packaged Seafood Antitrust Litigation

**Request to be Excluded from Chicken
of the Sea/Thai Union Settlement Class**

AHOLD U.S.A., INC. & DELHAIZE AMERICA LLC

Ahold

Delhaize

Ahold Delhaize

Ahold Delhaize America Holding, Inc.

Ahold Delhaize USA, Inc.

Ahold USA, Inc.

Bottom Dollar Food Northeast, LLC

Delhaize America, LLC

Delhaize America Distribution, LLC

Food Lion, LLC

Giant Brands, LLC

Giant Food, LLC

Giant Food Stores, LLC

Retail Business Services, LLC

Retained Subsidiary One, LLC

FreshDirect LLC

Giant of Maryland, LLC

Giant Martin's

Hannaford Brothers Co.

Hannaford Supermarkets

Peapod, LLC

Stop & Shop Supermarket Co. LLC

Packaged seafood purchases by C&S Wholesalers Inc. ("C&S"), and any of its predecessors or affiliates whom it controls, that C&S purchased from one or more Defendants and their co-conspirators and ever sold to Ahold or Delhaize.



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ZIP 33131
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APR 06 2022

First Class Mail

KN KENNY NACHWALTER

FOUR SEASONS TOWER, 1441 BRICHELL AVENUE, SUITE 1100, MIAMI, FLORIDA 33131

TO:

Tuna Direct Purchaser Case - EXCLUSIONS
c/o JND Legal Administration
Post Office Box 91241
Seattle, Washington 98111

K

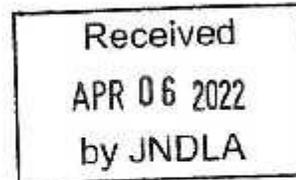
FIRST CLASS

 **STUEVE SIEGEL HANSON**

March 29, 2022

Via U.S. Mail

Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, Washington 98111



Re: Opt-Out for Associated Wholesale Grocers, Inc. and related companies and subsidiaries from the Direct Purchasers Chicken of the Sea / Thai Union Group Settlement in the *In re Packaged Seafood Antitrust Litigation*, Case No. 15-md-02670-DMS-MDD.

Dear Claims Administrator:

We represent Associated Wholesale Grocers, Inc. and its subsidiaries and related companies. We, hereby request that we be excluded from the Proposed Settlement Direct Purchaser Class in the *In re Packaged Seafood Products Antitrust Litigation*.

Entities:

Associated Wholesale Grocers, Inc. (AWG), 5000 Kansas Avenue, Kansas City, KS 66106.

Value Merchandisers Company, 5000 Kansas Avenue, Kansas City, KS 66106, AWG's wholly owned subsidiary.

If you have any questions or require any additional information, please let me know.

Respectfully,



Stephen N. Six

cc: PackagedTuna@Hausfeld.com
stein@hausfeld.com
JRoberti@CohenGresser.com

STUEVE SIEGEL HANSON

460 Nichols Road, Suite 200
Kansas City, Missouri 64112

APR 06 2022

APR 06 2022

Via U.S. Mail
Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, Washington 98111

9811191241 8300

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03/29/2022 ZIP 64112
043M302Z7239

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29 MAR 2022PM 6 L
KANSAS CITY 640



Direct Dial: (305) 381-7472
E-mail: wblechman@knpa.com

Received
APR 06 2022
by JNDLA

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1441 BRICKELL AVENUE
SUITE 1100
MIAMI, FLORIDA 33131
TELEPHONE: 305.373.1000
FACSIMILE: 305.372.1861
WWW.KNPA.COM

March 31, 2022

Via Certified Mail - R/R/R

Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
Post Office Box 91241
Seattle, Washington 98111

Re: *In Re: Packaged Seafood Products Antitrust Litigation*
No. 3:15-md-02670-JLS-MDD (S.D. Ca)

Dear Sir or Madam:

We represent The Great Atlantic & Pacific Tea Company ("A&P"), Dot Foods, Inc. ("Dot Foods"), Walgreen Company ("Walgreens") and C&S Wholesale Grocers, Inc. ("C&S"), (collectively the "Opt-Out Entities"), in the above-referenced matter. We hereby request that each of these companies, and their respective current and former predecessors, successors, subsidiaries, affiliates which each controls (if any), partnerships in which each has a majority interest (if any), trade names, banners and divisions under which each does business, and assignors (if any) including all their subsidiaries and affiliates listed on Exhibits 1-4, be excluded from the proposed Direct Purchaser Settlement Class in the *In Re Packaged Seafood Products Antitrust Litigation* (the "Litigation").

The Opt-Out Entities have previously filed separate, individual actions against the packaged seafood manufacturers which further evidences their intention to be excluded from the referenced Settlement Class.

We do not know how the Opt-Out Entities are identified in the information sources being used by the Claims Administrator to identify firms in the referenced Settlement Class. As such, we reserve the right to supplement the information in the Exhibits accompanying this letter, although we believe the "catch-all" language in this letter suitably and appropriately identifies all of the Opt-Out Entities and otherwise conforms to the request for information in the Notice. The Exhibits to this letter may be over-inclusive of corporate names in the interest of ensuring that a given Opt-Out Entity has excluded from the Chicken of the Sea/Thai Union Settlement Class all of its "family" of companies which might otherwise be a part of the Settlement Class.

Please accept this letter as our notice of exclusion from the referenced Settlement Class pursuant to Rule 23 of the Federal Rules of Civil Procedure. Please remove the foregoing Opt-

TEXAS OFFICE:
2830 EXPOSITION BLVD., SUITE 203A
AUSTIN, TEXAS 78703
TELEPHONE: 512.480.8025
FACSIMILE: 512.480.8037

WASHINGTON SATELLITE OFFICE:
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WASHINGTON, D.C. 20004-2436
TELEPHONE: 202.756.4273
FACSIMILE: 202.756.7323

Tuna Direct Purchaser Case – EXCLUSIONS
Page 2

March 31, 2022

Out Entities from any settlement class list that you have compiled or that you compile in the future regarding the Chicken of the Sea/Thai Union Settlement Class.

If you have any questions about this exclusion notice, please call us at the telephone number in the letterhead.

Thank you for your assistance.

Very truly yours,



William J. Blechman
Counsel for the Opt-Out Entities

WJB:mb

cc: Bonny Sweeney, Esquire
John Roberti, Esquire
Christopher Yates, Esquire
Adam Paris, Esquire

(with enclosures)

Enclosures

644879.2

Received
APR 06 2022
by JNDLA

EXHIBIT 1

In re Packaged Seafood Antitrust Litigation

**Request to be Excluded from Chicken
of the Sea/Thai Union Settlement Class**

THE GREAT ATLANTIC & PACIFIC TEA COMPANY (A&P)

A & P

The Great Atlantic & Pacific Tea Company, Inc.

Farmer Jack

Food Basics

Pathmark

Pathmark Stores, Inc.

Sav-A-Center

Super Fresh

The Food Emporium

Waldbaum's

Packaged seafood purchases by C&S Wholesalers Inc. ("C&S"), and any of its predecessors or affiliates whom it controls, that C&S purchased from one or more Defendants and their co-conspirators and ever sold to A&P.

EXHIBIT 2

Received
APR 06 2022
by JNDLA

In re Packaged Seafood Antitrust Litigation

**Request to be Excluded from Chicken
of the Sea/Thai Union Settlement Class**

DOT FOODS, INC.

Dot Foods

Dot Foods, Inc.

ShopHero Inc.,

Marketwest Food Group Limited Partnership,

Grabber Construction Products, Inc.

Received
APR 06 2022
by JNDLA

EXHIBIT 3

In re Packaged Seafood Antitrust Litigation

**Request to be Excluded from Chicken
of the Sea/Thai Union Settlement Class**

WALGREEN COMPANY

Walgreen

Walgreens

Walgreen Co.

Duane Reade

Duane Reade, Inc.

Received
APR 06 2022
by JNDLA

EXHIBIT 4

In re Packaged Seafood Antitrust Litigation

**Request to be Excluded from Chicken
of the Sea/Thai Union Settlement Class**

C&S WHOLESALE GROCERS, INC.

C&S

C&S Wholesale Grocers, Inc.

Grocers Supply Co., Inc.

Piggly Wiggly Carolina Co.

Entities that are not subject to this opt out notice are as follows:

- **Piggly Wiggly Alabama Distributing Co.**
- **Olean Wholesale Grocery Cooperative, Inc.**

Additionally, any purchases by C&S that were resold to BI-LO, LLC dba Southeastern Grocers, Ahold, Delhaize, The Great Atlantic & Pacific Tea Company, Inc., or Allegiance Retail Services, LLC have been assigned to those companies and those claims are not controlled by C&S.

CERTIFIED MAIL
FIRST CLASS



7015 0910 0000 5585 4779

NECPOST
03/01/2022
FIRST CLASS MAIL
US POSTAGE \$008.162
ZIP 33131
041M112946/1

APR 06 2022

First Class Mail

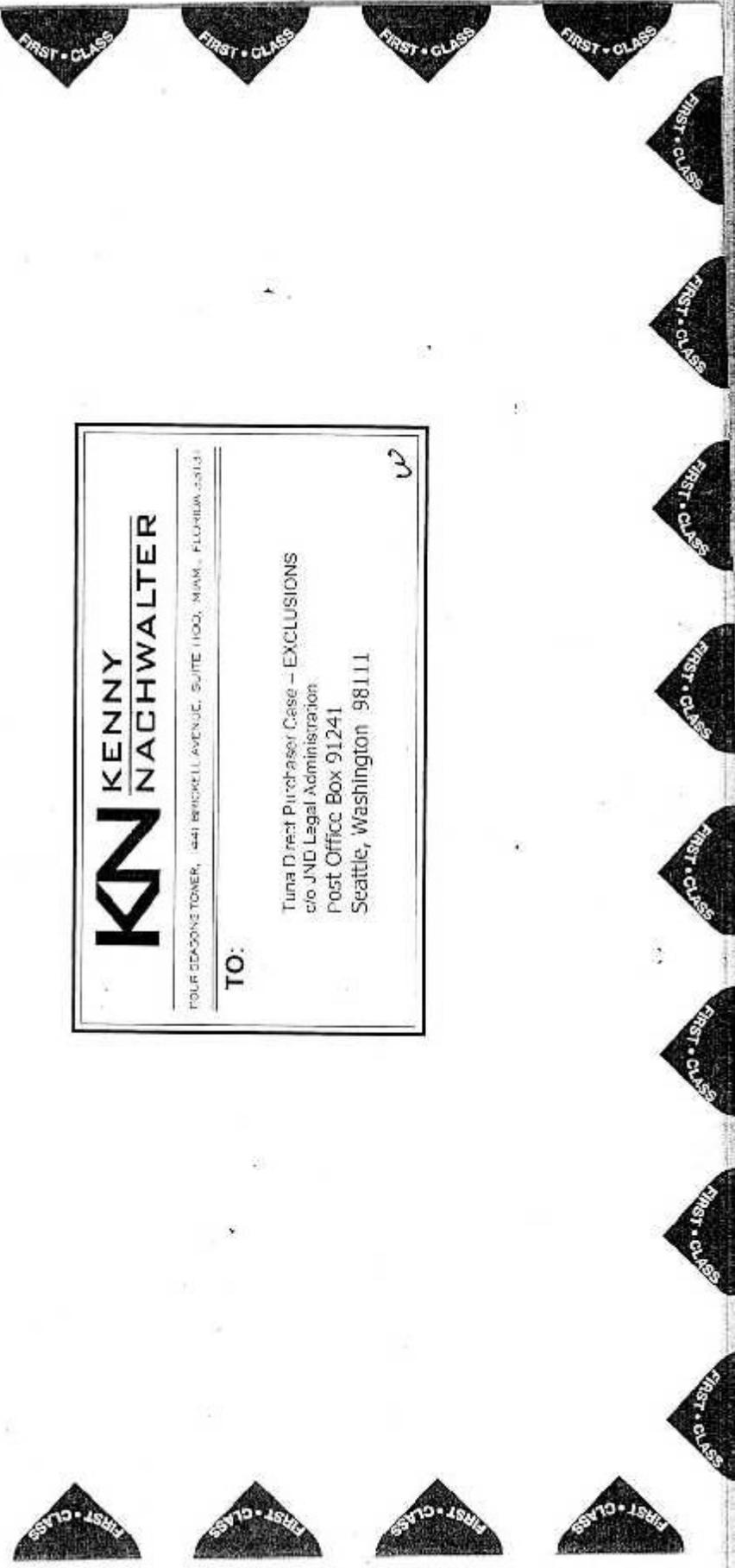
KN KENNY NACHWALTER

FOUR DEACONS TOWER, 441 BRICKELL AVENUE, SUITE 1100, MIAMI, FLORIDA 33131

TO:

Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
Post Office Box 91241
Seattle, Washington 98111

13





Seyfarth Shaw LLP
Seaport East
Two Seaport Lane, Suite 1200
Boston, MA 02210-2028
T (617) 946-4800
F (617) 946-4801

bbigelow@seyfarth.com
T (617) 946-4929

www.seyfarth.com

Received
APR 15 2022
by JNDLA

April 12, 2022

VIA EXPRESS MAIL

Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, WA 98111

Re: *In re Packaged Seafood Products Antitrust Litigation*

Dear Settlement Administrator,

I represent ALDI Inc., 1200 N Kirk Rd., Batavia, IL 60510. My client hereby requests that it be excluded from the Proposed Settlement Direct Purchaser Class in the *In re Packaged Seafood Products Antitrust Litigation*.

Please direct any questions to me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brandon L. Bigelow', written over a printed name.

Brandon L. Bigelow
Seyfarth Shaw LLP
Two Seaport Lane, Suite 300
Boston, MA 02210

**HAYNSWORTH
SINKLER BOYD**

Received
APR 18 2022
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HAYNSWORTH SINKLER BOYD, P.A.
1201 MAIN STREET, 22ND FLOOR
P.O. BOX 11889 (29211)
COLUMBIA, SOUTH CAROLINA 29201
MAIN 803.779.3080
FAX 803.765.1243
www.hsblawfirm.com

ELIZABETH H. BLACK
DIRECT 803.540.7753
eblack@hsblawfirm.com

April 13, 2022

Via First Class Mail

Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111

Re: *In re Packaged Seafood Antitrust Litigation*, Case No. 3:15-md-02670
Proposed Direct Purchaser Settlement

Dear Settlement Administrator,

This Firm represents the entities identified below. Each of the entities identified below hereby requests that it be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re Packaged Seafood Products Antitrust Litigation*, and have authorized the undersigned, as their attorneys, to sign this exclusion request on their behalf.

Entity [Subsidiaries/Affiliates Identified in Brackets]	Business Address
✓ W. Lee Flowers & Co., Inc. [Floco Foods, Inc., KJ Pharmacy, Inc. (d/b/a KJ PHARMACY – LAKE CITY and KJ PHARMACY – CLAUSSEN), TB Foods, Inc., F&T Foods, Inc. (d/b/a Kingstree IGA), Sumter Foods, Inc. (d/b/a Sumter IGA – Pinewood and Sumter IGA – Wesmark) and Bowman Foods, Inc. (d/b/a Bowman IGA and Barnwell IGA)]	127 E. W. Lee Flowers Road, Scranton, SC 29591
KJ 2019 Holdings, LLC	PO Box 4006 Florence, SC 29502

**HAYNSWORTH
SINKLER BOYD**

Tuna Direct Purchaser Case - EXCLUSIONS
April 13, 2022
Page 2

Please direct any questions to us.

Sincerely yours,

A handwritten signature in blue ink that reads "Elizabeth H. Black". The signature is written in a cursive, flowing style.

Elizabeth H. Black

**HAYNSWORTH
SINKLER BOYD**

P.O. BOX 11889
COLUMBIA, SOUTH CAROLINA 29211-1889

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COLUMBIA SC 290
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Tuna Direct Purchaser Case – EXCLUSIONS
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Seattle, WA 98111

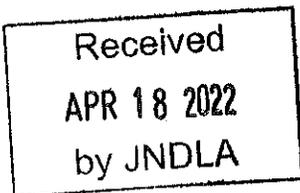
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Valle Makoff^{LLP}

11777 San Vicente Blvd., Suite 890, Los Angeles, CA 90049
Telephone (310) 476-0300 Facsimile (310) 476-0333
www.vallemakoff.com
jvalle@vallemakoff.com



April 12, 2022

VIA U.S. MAIL

Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111

Dear Settlement Administrator,

We represent Trader Joe's, 800 S. Shamrock Ave, Monrovia, CA 91016. Our client hereby requests that it be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re Packaged Seafood Products Antitrust Litigation*.

Please direct any questions to us.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Laser".

Jennifer Laser
Valle Makoff LLP
11777 San Vicente Blvd,
Suite 890
Los Angeles, CA 90049
jlaser@vallemakoff.com

Valle Makoff LLP
11777 San Vicente Blvd., Suite 890, Los Angeles, CA 90049

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Tuna Direct Purchaser Case - EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, WA 98111

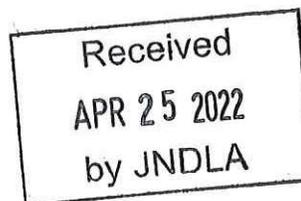


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Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111



April 12, 2022

Dear Settlement Administrator,

We represent Wegmans Food Markets, Inc., 1500 Brooks Avenue, P.O. Box 30844, Rochester, NY 14603-0844. Our client hereby requests that it be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re Packaged Seafood Products Antitrust Litigation*.

Please direct any questions to us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda P. Nussbaum".

Linda P. Nussbaum
Nussbaum Law Group, P.C
1211 Avenue of the Americas, 40th Floor,
New York,
NY 10036
lnussbaum@nussbaumpc.com

Stephen R. Van Arsdale, Esq.
Senior Vice President, General Counsel & Secretary
Wegmans Food Markets, Inc.
1500 Brooks Avenue,
P.O. Box 30844,
Rochester, NY 14603-0844
steve.vanarsdale@wegmans.com

Nussbaum Law Group, PC
1211 6th Ave, 40th Floor
New York, NY 10036

APR 25 2022

NEW YORK NY 100
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Tuna Direct Purchaser Case- EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111

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Tuna Direct Purchaser Case – EXCLUSIONS
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PO Box 91241
Seattle, WA 98111

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APR 25 2022
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April 12, 2022

Dear Settlement Administrator,

We represent Krasdale Foods, 65 West Red Oak Lane, White Plains, NY 10604. Our client hereby requests that it be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re Packaged Seafood Products Antitrust Litigation*.

Please direct any questions to us.

Sincerely,


Linda P. Nussbaum
Nussbaum Law Group, P.C
1211 Avenue of the Americas, 40th Floor,
New York,
NY 10036
lnussbaum@nussbaumpc.com

Howard Jacobs, Esq.
Vice President and Chief Legal Officer
Krasdale Foods
65 West Red Oak Lane
White Plains, NY 10604
HowardJ@krasdalefoods.com

Nussbaum Law Group, PC
211 6th Ave, 40th Floor
New York, NY 10036

APR 25 2022

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Tuna Direct Purchaser Case- EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111

98111-91241



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Received
APR 28 2022
by JNDLA

MUNGER, TOLLES & OLSON LLP
560 MISSION STREET
SAN FRANCISCO, CALIFORNIA 94105-2907
TELEPHONE (415) 512-4000
FACSIMILE (415) 512-4077

April 25, 2022

Writer's Direct Contact
(415) 512-4060
(415) 512-6960 FAX
Nicholas.Fram@mto.com

VIA U.S. MAIL

Tuna Direct Purchaser Case - EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111

Re: Exclusion of Costco from COSI/TUG Direct Purchaser Settlement Class

Dear Settlement Administrator:

We represent Costco Wholesale ("Costco"), 999 Lake Dr., Issaquah, WA 98027. Costco hereby requests that it be excluded from the **Proposed Direct Purchaser Settlement Class** for the settlement with Chicken of the Sea International ("COSI") and Thai Union Group PLC ("TUG") preliminarily certified on January 26, 2022 at docket number 2733 in the *In re Packaged Seafood Products Antitrust Litigation*, Case No. 15-md-2670 ("Action") only. For the avoidance of doubt, this notice does not apply to any other class or putative class or as to any other defendant in the Action.

Please direct any questions to us.

Sincerely,



Nicholas D. Fram

CC (via email):

John Roberti (JRoberti@CohenGresser.com)
Kyle Mach (kyle.mach@mto.com)

MUNGER, TOLLES & OLSON
560 MISSION STREET
TWENTY-SEVENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-21

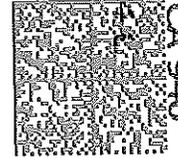
APR 28 2022

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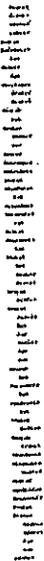


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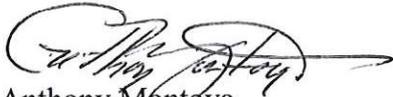
Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111

April 26, 2022

Dear Settlement Administrator,

International Sales & Marketing, Inc. hereby requests that it be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re Packaged Seafood Products Antitrust Litigation*. Please note that our request to be excluded applies only to International Sales & Marketing, Inc., and not to any other entity, including A. Sebra Foods, El Condor, Del Maximo, Family Foods, or Montalvan's.

Sincerely,



Anthony Montoya
International Sales and Marketing, Inc.
TonyM@intlsm.com
858-699-3286



Please note that our request to be excluded applies only to International Sales & Marketing, Inc., and not to any other entity.

Unique ID: DXHMFT7UEY
Access Code: 1260
INTERNAT'L SALES & MKTG

Other Entities

Unique ID: D9KCANP3XR
Access Code: 9384
DEL MAXIMO

Unique ID: DLESHF9AG5
Access Code: 7455
EL CONDOR

Unique ID: DUXQ4JCM8D
Access Code: 0786
MONTALVANS SALES

Unique ID: DGBSN9X5EC
Access Code: 4568
FAMILY FOOD DISTRIBUTORS

Unique ID: DYWBK3MCSP
Access Code: 5218
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ISM, Inc.
8734 Abbey Ridge Ave.
Las Vegas, NV 89149

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Seattle, WA 98111

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Seattle, WA 98111

April 28, 2022

**Re: *In re: Packaged Seafood Products Antitrust Litigation,*
No. 15-MD-2670 DMS (MDD), MDL No. 2670**

Dear Claims Administrator:

This letter serves as request by U.S. Foods Holding Corporation and US Foods, Inc. to opt out and be excluded from the Proposed Settlement Direct Purchaser Class in the *In re: Packaged Seafood Products Antitrust Litigation*.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Johnstone".

Andrew Johnstone
Associate General Counsel – Litigation, Employment & Risk Management
9399 West Higgins Road, Suite 100
Rosemont, Illinois 60018
andrew.johnstone@usfoods.com

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9359 W. Higgins Rd
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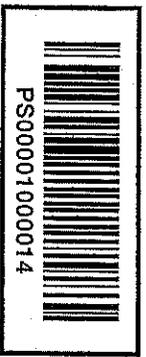
TO: Tuna Direct Purchaser
Case - EXCLUSIONS
c/o JND Legal Admin
PO Box 91241
Seattle, WA 98111

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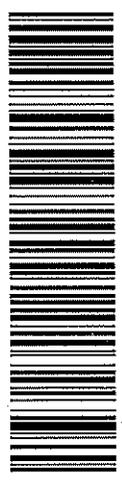
EXPECTED DELIVERY DAY: 05/02/22

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SEATTLE WA 98111-9341

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SUSMAN GODFREY L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP
SUITE 5100
1000 LOUISIANA STREET
HOUSTON, TEXAS 77002-5096
(713) 651-9366
FAX (713) 654-6666
WWW.SUSMANGODFREY.COM

Received
MAY 02 2022
by JNDLA

SUITE 1400
1900 AVENUE OF THE STARS
LOS ANGELES, CALIFORNIA 90067-6029
(310) 789-3100

SUITE 3800
1201 THIRD AVENUE
SEATTLE, WASHINGTON 98101-3000
(206) 516-3880

32ND FLOOR
1301 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK 10019-6023
(212) 336-8330

RYAN CAUGHEY
DIRECT DIAL (713) 653-7823

E-MAIL RCAUGHEY@SUSMANGODFREY.COM

April 27, 2022

VIA EMAIL AND CERTIFIED MAIL

Tuna Direct Purchaser Case—EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111

Re: *In re Packaged Seafood Products Antitrust Litigation*: Request for
Exclusion from Chicken of the Sea Settlement

To Whom it May Concern:

Walmart and all its subsidiaries and related companies including but not limited to Walmart Inc., Wal-Mart Stores Texas, LLC; Wal-Mart Louisiana, LLC; Wal-Mart Stores Arkansas, LLC; Wal-Mart Stores East LP; Sam's West, Inc.; and Sam's East, Inc. (collectively, "Walmart") hereby exclude themselves from Direct Purchaser Plaintiffs' putative class settlement with Tri-Union Seafoods LLC d/b/a Chicken of the Sea and Thai Union Group PCL (collectively, "Chicken of the Sea").

As directed by the class notice, this letter serves as a written request to the Settlement Administrator stating Walmart's intent to exclude itself from the Chicken of the Sea settlement.

This Exclusion Request includes the following information:

- (a) your name, including the name of your business which purchased Pork products, and address:

Walmart and all its subsidiaries and related companies (as defined above) including but not limited to Walmart Inc., Wal-Mart Stores Texas, LLC; Wal-Mart Louisiana, LLC; Wal-Mart Stores Arkansas, LLC; Wal-Mart Stores East LP; Sam's West, Inc.; and Sam's East, Inc. Walmart can be contacted at the following address:

April 27, 2022
Page 2

Walmart Inc.
c/o Ross Higman
Lead Counsel
Legal Department
702 S.W. 8th St., Mail Stop 0215
Bentonville, Arkansas 72716-0215

(b) A statement that you want to be excluded from the Settlement with Chicken of the Sea in *In re Packaged Seafood Products Antitrust Litigation*:

Walmart hereby requests that it be excluded from the Proposed Settlement Direct Purchaser Class in the *In re Packaged Seafood Products Antitrust Litigation*.

Sincerely,

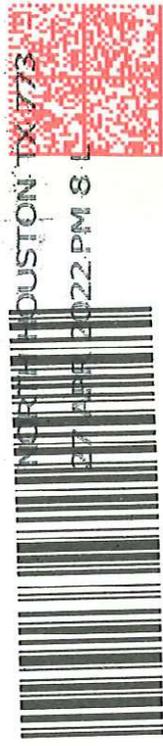


Ryan Caughey
Attorney

cc: Neal Manne [Firm]
Shawn Rabin [Firm]

SUSMAN GODFREY L.L.P.
A REGISTERED LIMITED LIABILITY PARTNERSHIP
SUITE 5100
1000 LOUISIANA
HOUSTON, TEXAS 77002-5096

MAY 02 2022



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RETURN RECEIPT REQUESTED

Tuna Direct Purchaser Case—EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111

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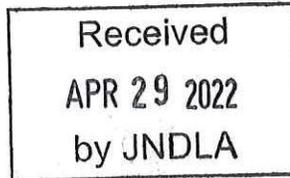
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Sperling &
Slater



David P. Germaine
dgermaine@sperling-law.com
DL +1 312 224 1505

April 26, 2022

VIA CERTIFIED MAIL

Tuna Direct Purchaser Case - EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, WA 98111

Re: *In re: Packaged Seafood Products Antitrust Litigation* (MDL No. 2670)
Exclusion Request from Proposed Settlement Direct Purchaser Class

To Whom it May Concern:

Our firm represents Super Store Industries ("SSI") located at 16888 McKinley Ave., Lathrop, CA 95330. This letter shall serve as SSI's request that SSI and its affiliates, as direct purchasers of Packaged Tuna Products, be excluded from the Proposed Settlement Direct Purchaser Class in the *In re: Packaged Seafood Products Antitrust Litigation*, as described in the Settlement Administrator's notice of Proposed Settlement Direct Purchaser Class.

Accordingly, I hereby request that SSI, in its own right and as assignee of The Save Mart Companies, 1800 Standiford Ave., Modesto, CA 95350, and all their subsidiaries, affiliates and related companies, be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re: Packaged Seafood Products Antitrust Litigation*.

In your review of this matter, please do not hesitate to contact me should you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "David Germaine".

David P. Germaine

Sperling & Slater

55 West Monroe Street, 32nd Floor
Chicago, Illinois 60603



7020 2450 0001 4656 0374

APR 29 2022

Tuna Direct Purchase Case – EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, WA 98111

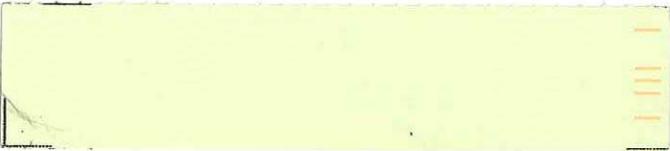
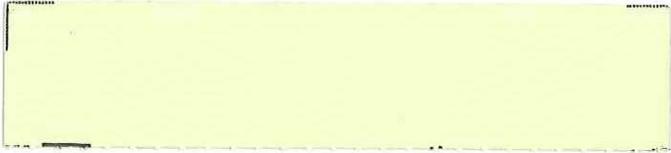
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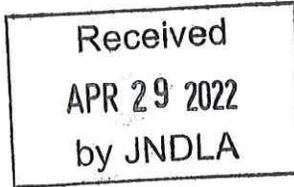


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Sperling &
Slater



David P. Germaine
dgermaine@sperling-law.com
DL +1 312 224 1505

April 26, 2022

VIA CERTIFIED MAIL

Tuna Direct Purchaser Case - EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, WA 98111

Re: *In re: Packaged Seafood Products Antitrust Litigation* (MDL No. 2670)
Exclusion Request from Proposed Settlement Direct Purchaser Class

To Whom it May Concern:

Our firm represents Meijer, Inc. and Meijer Distribution, Inc. ("Meijer") located at 2929 Walker Ave., NW, Grand Rapids, MI 49544. This letter shall serve as Meijer's request that Meijer and its affiliates, as direct purchasers of Packaged Tuna Products, be excluded from the Proposed Settlement Direct Purchaser Class in the *In re: Packaged Seafood Products Antitrust Litigation*, as described in the Settlement Administrator's notice of Proposed Settlement Direct Purchaser Class.

Accordingly, I hereby request that Meijer and all its subsidiaries, affiliates and related companies, be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re: Packaged Seafood Products Antitrust Litigation*.

In your review of this matter, please do not hesitate to contact me should you have any questions.

Very truly yours,

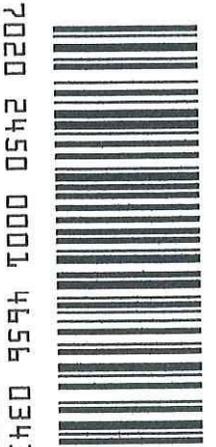
A handwritten signature in black ink, appearing to read "David P. Germaine".

David P. Germaine

55 West Monroe Street, 32nd Floor
Chicago, Illinois 60603

**Sperling &
Slater**

APR 29 2022



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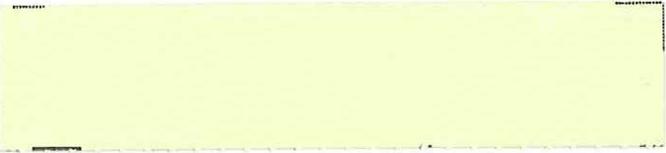
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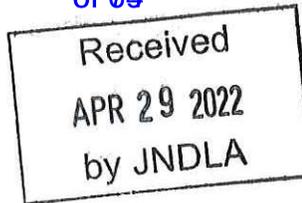
Tuna Direct Purchase Case – EXCLUSIONS
c/o JND Legal Administration
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Seattle, WA 98111

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David P. Germaine
dgermaine@sperling-law.com
DL +1 312 224 1505

April 26, 2022

VIA CERTIFIED MAIL

Tuna Direct Purchaser Case - EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, WA 98111

Re: *In re: Packaged Seafood Products Antitrust Litigation* (MDL No. 2670)
Exclusion Request from Proposed Settlement Direct Purchaser Class

To Whom it May Concern:

Our firm represents Publix Super Markets, Inc. This letter shall serve as Publix's request that Publix and its affiliates, as direct purchasers of Packaged Tuna Products, be excluded from the Proposed Settlement Direct Purchaser Class in the *In re: Packaged Seafood Products Antitrust Litigation*, as described in the Settlement Administrator's notice of Proposed Settlement Direct Purchaser Class.

Accordingly, I hereby request that Publix Super Markets, Inc., 3300 Publix Corporate Parkway, Lakeland, Florida 33811, and all its subsidiaries, affiliates and related companies, including, but not limited to, Morning Song LLC and GreenWise Market, located at the same address as Publix, be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re: Packaged Seafood Products Antitrust Litigation*.

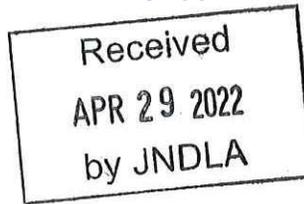
In your review of this matter, please do not hesitate to contact me should you have any questions.

Very truly yours,

A handwritten signature in black ink that reads "David P. Germaine".

David P. Germaine

Sperling &
Slater



David P. Germaine
dgermaine@sperling-law.com
DL +1 312 224 1505

April 26, 2022

VIA CERTIFIED MAIL

Tuna Direct Purchaser Case - EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, WA 98111

Re: *In re: Packaged Seafood Products Antitrust Litigation* (MDL No. 2670)
Exclusion Request from Proposed Settlement Direct Purchaser Class

To Whom it May Concern:

Our firm represents Wakefern Food Corp. ("Wakefern"), located at 5000 Riverside Dr., Keasbey, NJ 08832. This letter shall serve as Wakefern's request that Wakefern and its affiliates, as direct purchasers of Packaged Tuna Products, be excluded from the Proposed Settlement Direct Purchaser Class in the *In re: Packaged Seafood Products Antitrust Litigation*, as described in the Settlement Administrator's notice of Proposed Settlement Direct Purchaser Class.

Accordingly, I hereby request that Wakefern and all of its subsidiaries, affiliates, banners, and related companies including, but not limited to, Price Rite, ShopRite, The Fresh Grocer and the Dearborn Market, be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re: Packaged Seafood Products Antitrust Litigation*.

In your review of this matter, please do not hesitate to contact me should you have any questions.

Very truly yours,

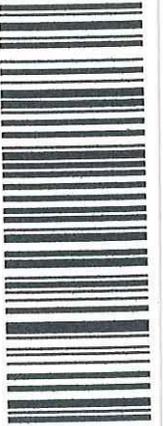
A handwritten signature in black ink, appearing to read "David P. Germaine".

David P. Germaine

Sperling & Slater

55 West Monroe Street, 32nd Floor
Chicago, Illinois 60603

APR 29 2022



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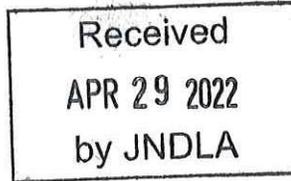
Tuna Direct Purchase Case – EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, WA 98111

98111-93444



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Sperling &
Slater



David P. Germaine
dgermaine@sperling-law.com
DL +1 312 224 1505

April 26, 2022

VIA CERTIFIED MAIL

Tuna Direct Purchaser Case - EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, WA 98111

Re: *In re: Packaged Seafood Products Antitrust Litigation* (MDL No. 2670)
Exclusion Request from Proposed Settlement Direct Purchaser Class

To Whom it May Concern:

Our firm represents Dollar General Corporation and Dolgencorp, LLC ("Dollar General") located at 100 Mission Ridge, Goodlettsville, TN 37072. This letter shall serve as Dollar General's request that Dollar General and its affiliates, as direct purchasers of Packaged Tuna Products, be excluded from the Proposed Settlement Direct Purchaser Class in the *In re: Packaged Seafood Products Antitrust Litigation*, as described in the Settlement Administrator's notice of Proposed Settlement Direct Purchaser Class.

Accordingly, I hereby request that Dollar General, and all its subsidiaries, affiliates and related companies, be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re: Packaged Seafood Products Antitrust Litigation*.

In your review of this matter, please do not hesitate to contact me should you have any questions.

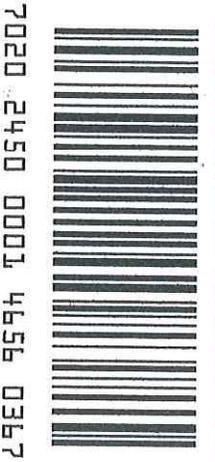
Very truly yours,

A handwritten signature in black ink, appearing to read "David Germaine".

David P. Germaine

Sperling & Slater

55 West Monroe Street, 32nd Floor
Chicago, Illinois 60603



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Tuna Direct Purchase Case – EXCLUSIONS
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Seattle, WA 98111

98111-98141



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Sperling &
Slater

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APR 29 2022
by JNDLA

David P. Germaine
dgermaine@sperling-law.com
DL +1 312 224 1505

April 26, 2022

VIA CERTIFIED MAIL

Tuna Direct Purchaser Case - EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, WA 98111

Re: *In re: Packaged Seafood Products Antitrust Litigation* (MDL No. 2670)
Exclusion Request from Proposed Settlement Direct Purchaser Class

To Whom it May Concern:

Our firm represents Moran Foods, LLC d/b/a Save-A-Lot, Ltd. ("SAL") located at 400 Northwest Plaza Drive, St. Ann, MO 63074. This letter shall serve as SAL's request that SAL and its affiliates, as direct purchasers of Packaged Tuna Products, be excluded from the Proposed Settlement Direct Purchaser Class in the *In re: Packaged Seafood Products Antitrust Litigation*, as described in the Settlement Administrator's notice of Proposed Settlement Direct Purchaser Class.

Accordingly, I hereby request that SAL and all its subsidiaries, affiliates and related companies, be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re: Packaged Seafood Products Antitrust Litigation*.

In your review of this matter, please do not hesitate to contact me should you have any questions.

Very truly yours,



David P. Germaine

55 West Monroe Street, 32nd Floor
Chicago, Illinois 60603

**Sperling &
Slater**

APR 29 2022



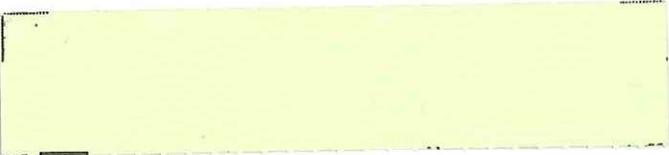
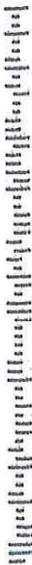
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Slater

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by JNDLA

David P. Germaine
dgermaine@sperling-law.com
DL +1 312 224 1505

April 26, 2022

VIA CERTIFIED MAIL

Tuna Direct Purchaser Case - EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, WA 98111

Re: *In re: Packaged Seafood Products Antitrust Litigation* (MDL No. 2670)
Exclusion Request from Proposed Settlement Direct Purchaser Class

To Whom it May Concern:

Our firm represents Supervalu, Inc. ("Supervalu"), Unified Grocers, Inc. ("Unified") and Associated Grocers of Florida, Inc. ("AGF"). This letter shall serve as Supervalu's, Unified's and AGF's request that they and their affiliates, as direct purchasers of Packaged Tuna Products, be excluded from the Proposed Settlement Direct Purchaser Class in the *In re: Packaged Seafood Products Antitrust Litigation*, as described in the Settlement Administrator's notice of Proposed Settlement Direct Purchaser Class.

Accordingly, I hereby request that 1) Supervalu, Inc., 7075 Flying Cloud Drive, Eden Prairie, MN 55344; 2) Unified Grocers, Inc., 5200 Sheila St. Commerce, CA 90040; and 3) Associated Grocers of Florida, Inc., 1141 SW 12th Avenue Pompano, FL 33069, and all their subsidiaries, affiliates, banners and related companies including, but not limited to, those identified in the attached **Exhibit A**, be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re: Packaged Seafood Products Antitrust Litigation*.

In your review of this matter, please do not hesitate to contact me should you have any questions.

Very truly yours,



David P. Germaine

Exhibit A

Examples of Supervalu, Inc.'s Subsidiaries, Affiliates, Banners & Related Companies

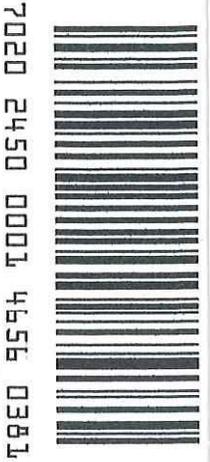
Supervalu, Inc.	Champlin 2005 L.L.C.
Unified Grocers, Inc.	Coon Rapids 2002 L.L.C.
Associated Grocers of Florida, Inc.	Crown Grocers, Inc.
Acme Markets, Inc. <i>(until March 21, 2013)</i>	Cub Foods, Inc.
Albertson's, Inc. <i>(until March 21, 2013)</i>	Cub Stores, LLC
Advantage Logistics - Southeast, Inc.	Eagan 2008 L.L.C.
Advantage Logistics Southwest, Inc.	Eagan 2014 L.L.C.
Advantage Logistics USA East L.L.C.	Eastern Beverages, Inc.
Advantage Logistics USA West L.L.C.	Eastern Region Management, LLC
American Commerce Centers, Inc.	Fargo Distribution Company, LLC
American Drug Stores, Inc. <i>(until March 21, 2013)</i>	Fargo Equipment Company, Inc.
American Drug Stores LLC <i>(until March 21, 2013)</i>	Fargo Operations Company, LLC
American Procurement and Logistics Company LLC <i>(until March 21, 2013)</i>	FF Acquisition, L.L.C.
American Stores Company <i>(until March 21, 2013)</i>	Foodarama LLC
Arden Hills 2003 LLC	Forest Lake 2000 L.L.C.
Associated Grocers Acquisition Company	Fridley 1998 L.L.C.
Billings Distribution Company, LLC	Grocers Capital Company
Billings Equipment Company, Inc.	Hastings 2002 L.L.C.
Billings Operations Company, LLC	Hazelwood Distribution Company, Inc.
Bismarck Distribution Company, LLC	Hazelwood Distribution Holdings, Inc.
Bismarck Equipment Company, Inc.	Hopkins Distribution Company, LLC
Bismarck Operations Company, LLC	Hopkins Equipment Company, Inc.
Blaine North 1996 L.L.C.	Hopkins Operations Company, LLC
Bloomington 1998 L.L.C.	Hombacher's, Inc.
Blue Nile Advertising, Inc.	International Distributors Grand Bahama Limited
Bristol Farms <i>(until March 21, 2013)</i>	Inver Grove Heights 2001 L.L.C.
Burnsville 1998 L.L.C.	Jewel Foods, Inc. <i>(until March 21, 2013)</i>
Butson Enterprises of Vermont, Inc.	Jewel Food Stores <i>(until March 21, 2013)</i>
Butson's Enterprises of Massachusetts, Inc.	Keatherly, Inc.
Butson's Enterprises, Inc.	Keltsch Bros., Inc.
Cambridge 2006 L.L.C.	Lakeville 2014 L.L.C.
Centralia Holdings, LLC	Lithia Springs Holdings, LLC
Champaign Distribution Company, LLC	Maplewood East 1996 L.L.C.
Champaign Equipment Company, Inc.	Market Company, Ltd.
Champaign Operations Company, LLC	Market Improvement Company
	Monticello 1998 L.L.C.
	NAFTA Industries Consolidated, Inc.
	NAFTA Industries, Ltd.

NC&T Supermarkets, Inc.
Nevada Bond Investment Corp.
New Albertson's, Inc. (until March 21, 2013)
Northfield 2002 L.L.C.
Oglesby Distribution Company, LLC
Oglesby Equipment Company, Inc.
Oglesby Operations Company, LLC
Plymouth 1998 L.L.C.
Preferred Products, Inc.
Richfood, Inc.
Savage 2002 L.L.C.
SFW Holding Corp.
Shakopee 1997 L.L.C.
Shaws Supermarkets, Inc. (until March 21, 2013)
Shop 'N Save East Prop, LLC
Shop 'N Save East, LLC
Shop 'N Save Prop, LLC
Shop 'N Save St. Louis, Inc.
Shop 'N Save Warehouse Foods, Inc.
Shoppers Food Warehouse Corp.
Shorewood 2001 L.L.C.
Silver Lake 1996 L.L.C.
Southstar LLC
Stevens Point Distribution Company, LLC
Stevens Point Equipment Company, Inc.
Stevens Point Operations Company, LLC
Sunflower Markets, LLC
SuperMarket Operators of America, Inc.
Super Rite Foods Equipment Company, Inc.
Super Rite Foods Operations Comp., LLC
Super Rite Foods, Inc.
SUPERVALU ASSIST, Inc.
SUPERVALU Enterprise Services, Inc.
SUPERVALU Enterprises, Inc.
SUPERVALU Foundation
SUPERVALU Gold, LLC
SUPERVALU Holdco, Inc.
SUPERVALU Holdings Equip. Comp., Inc.
SUPERVALU Holdings Operations Company, LLC

SUPERVALU Holdings PA Equipment Company, Inc.
SUPERVALU Holdings PA Operations Company, LLC
SUPERVALU Holdings, Inc.
SUPERVALU Holdings-PA LLC
SUPERVALU India, Inc.
SUPERVALU Licensing, LLC
SUPERVALU Merger Sub, Inc.
SUPERVALU Penn Equipment Company, Inc.
SUPERVALU Penn Operations Company, LLC
SUPERVALU Penn, LLC
SUPERVALU Pharmacies, Inc.
SUPERVALU Receivables Funding Corp.
SUPERVALU Services USA, Inc.
SUPERVALU Transportation, Inc.
SUPERVALU TTSJ, LLC
SUPERVALU WA, L.L.C.
SUPERVALU Wholesale Equipment Company, Inc.
SUPERVALU Wholesale Holdings, Inc.
SUPERVALU Wholesale Operations, Inc.
SUPERVALU Wholesale, Inc.
SV Markets, Inc.
SVU Legacy, LLC
TC TTSJ Aviation, Inc.
TC Michigan LLC
TTSJ Aviation, Inc.
Ultra Foods, Inc.
Unified International, Inc.
Unified Natural Foods West, Inc.
Unified Natural Trading, LLC
Valu Ventures 2, Inc.
W. Newell & Co.
W. Newell & Co. Equipment Company, Inc.
W. Newell & Co., LLC
Wetterau Insurance Co. Ltd.
Woodford Square Assoc. Ltd. Partnership
WSI Satellite, Inc.

Sperling & Slater

55 West Monroe Street, 32nd Floor
Chicago, Illinois 60603



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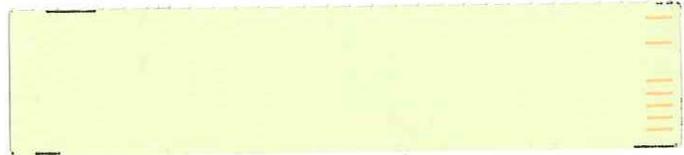
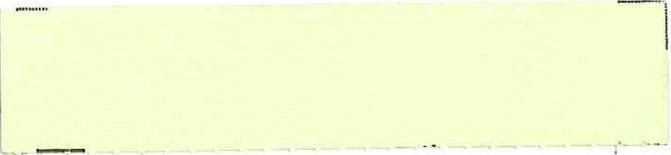


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Tuna Direct Purchase Case – EXCLUSIONS
c/o JND Legal Administration
P.O. Box 912241
Seattle, WA 98111

98111-91241



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Received
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by JNDLA



Direct: (612) 696-1464
Email: daniel.c.moore@target.com

April 26, 2022

VIA U.S. MAIL

Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111

April 26, 2022

Dear Settlement Administrator,

I'm writing on behalf of Target, Corporation, 1000 Nicollet Mall, TPS-3193, Minneapolis, MN 55403. Target Corporation hereby requests that it be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re Packaged Seafood Products Antitrust Litigation*.

Please direct any questions to me or counsel below.

Sincerely,

Daniel C. Moore,
Director Counsel – Litigation
Target Corporation
1000 Nicollet Mall, TPS-3193
Minneapolis, MN 55403
Daniel.C.Moore@Target.com

Andrew Michaelson
King & Spalding LLP
1185 Avenue of the Americas 34th Floor
New York, NY 10036
amichaelson@kslaw.com

/dcm



TARGET

P. Moore

1000 Nicollet Mall, TPS-3155
Minneapolis, MN 55403

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Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111



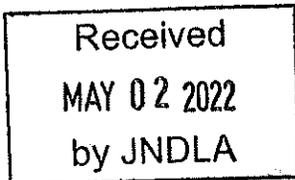
98111-934141

cc: 90039000



COHEN & GRESSER LLP

John Roberti
2001 Pennsylvania Avenue NW
Suite 300
Washington, DC 20006
Direct +1 202 851 2073
Email jroberti@cohengresser.com



April 28, 2022

VIA U.S. MAIL

Tuna Direct Purchaser Case - EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111

Dear Sir or Madam —

Enclosed please find documents indicating an intention to opt out among certain putative class members:

- A letter from Performance Food Group, Inc. to class counsel asking to be excluded from the class; and
- Complaint brought by Sysco in the MDL.

Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/ John Roberti

John Roberti

cc: Christopher Lebsack (via email)
Samantha Stein (via email)

Enclosures

VIA EMAIL

Michael P. Lehmann
Bonny E. Sweeney
Christopher L. Lebsack
Samantha Stein
HAUSFELD LLP
600 Montgomery Street, Suite 3200
San Francisco, CA 94111

mlehmann@hausfeld.com
bsweeney@hausfeld.com
clebsack@hausfeld.com
stein@hausfeld.com

February 9, 2021

Re: *In Re: Packaged Seafood Products Antitrust Litigation*,
3:15-md-02670-JLS-MDD (S.D. Ca).

Dear Counsel,

I represent Performance Food Group, Inc. in the above-referenced matter. I hereby request Performance Food Group, Inc. be excluded from the proposed Direct Purchaser Settlement Class in the In Re Packaged Seafood Products Antitrust Litigation. Please accept this letter as our notice of exclusion from the class pursuant to Rule 23 of the Federal Rules of Civil Procedure.

Sincerely,



Roxann E. Henry
Henry.Roxann@me.com

Cc: E. Eakin

Received
MAY 03 2022
by JNDLA

Ahern & Associates, P.C.
Willoughby Tower
8 South Michigan Avenue – Suite 3600
Chicago, IL 60603
www.ahernandassociatespc.com

Patrick J. Ahern
(312) 404-3760
patrick.ahern@ahernandassociatespc.com

**DESIGNATED FOR CONFIDENTIAL TREATMENT, INCLUDING UNDER
OPERATIVE PROTECTIVE ORDER(S)**

April 28, 2022

VIA CERTIFIED MAIL

Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111

Re: ***In re Packaged Seafood Antitrust Litigation***
Winn-Dixie Stores, Inc., Bi-Lo Holding, LLC, and Southeastern Grocers,
LLC Exclusion Request (Chicken of the Sea Settlement Class)

Dear Claims Administrator:

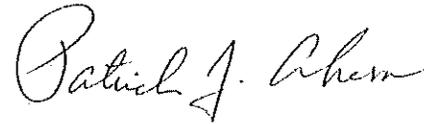
We write on behalf of Winn-Dixie Stores, Inc., Bi-Lo Holding, LLC, and Southeastern Grocers, LLC (collectively, “Winn-Dixie”) to let you know that they, together with all current and former parents, predecessors, successors, subsidiaries, agents, affiliates, partnerships in which it has a majority interest, acquisitions, divisions, departments and offices, however designated, including but not limited to the entities listed on the attached list (collectively “Winn-Dixie”), request exclusion from and intend to opt out of the Chicken of the Sea Direct Purchaser Settlement Class described in the Notice of Class Action Settlement in *In re Packaged Seafood Antitrust Litigation*. Since we do not know for certain how a given Defendant identifies our clients in its customer files, we reserve the right to supplement this list.

This opt-out letter is not intended for any purpose other than to effect Winn-Dixie’s intention to opt out of the Chicken of the Sea Settlement and the Settlement Class.

Please remove the foregoing entities from the Chicken of the Sea Settlement Class lists that you have compiled or will compile.

If you have any questions about this exclusion notice, please call me. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Patrick J. Ahern". The signature is written in black ink and is positioned above a horizontal line.

Patrick J. Ahern

Counsel for Winn-Dixie Stores, Inc., Bi-Lo
Holding LLC, and Southeastern Grocers,
Inc.

**Non-Exhaustive Schedule of Winn-Dixie Stores, Inc., Bi-Lo Holding, LLC, and
Southeastern Grocers, LLC Subsidiaries and Affiliates**

1. Southeastern Grocers LLC
2. Southeastern Grocers LLC (as assignee of C&S Wholesale Grocers, Inc.)
3. Winn-Dixie Stores, Inc.
4. Winn-Dixie Stores, Inc. (as assignee of C&S Wholesale Grocers, Inc.)
5. Winn-Dixie Procurement, Inc.
6. Harveys
7. Sweet Bay
8. Fresco Y Mas
9. Save-Rite
10. Bi-Lo
11. Bi-Lo Holding LLC
12. Bi-Lo Holding LLC (as assignee of C&S Wholesale Grocers, Inc.)
13. Bi-Lo LLC
14. Bi-Lo LLC (as assignee of C&S Wholesale Grocers, Inc.)
15. Superbrand
16. J.H. Harvey Co., LLC
17. Bi-Lo Holding Finance LLC
18. Bi-Lo, LLC
19. Bi-Lo, LLC (as assignee of C&S Wholesale Grocers, Inc.)
20. Samson Merger Sub, LLC
21. Winn-Dixie Logistics, Inc.
22. Winn-Dixie Corporation
23. Bruno's Supermarkets Incorporated
24. C&S Wholesale Grocers, Inc. (as assignor to Southeastern Grocers, LLC, Winn-Dixie Stores, Inc., Bi-Lo Holding LLC and Bi-Lo LLC, and all of their current and former parents, predecessors, successors, subsidiaries, agents, affiliates, partnerships in which it has a majority interest, acquisitions, divisions, departments and offices, however designated).

Ahern and Assoc. P.C
8 S. Michigan Ave
ste 3600
Chicago, IL 60604



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MAY 03 2022

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P.O. Box 91241
Seattle, WA 98111

98111-98141



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Received
MAY 09 2022
by JNDLA

Kaplan Fox & Kilsheimer LLP
850 Third Avenue
New York, NY 10022
phone 212.687.1980
fax 212.687.7714
email mail@kaplanfox.com
www.kaplanfox.com

April 28, 2022

Via Certified Mail & Email

Tuna Direct Purchaser Case - EXCLUSIONS
c/o JND Legal Administration
P.O. Box 91241
Seattle, Washington 98111
info@TunaDirectPurchaserCase.com

Re: *In re Packaged Seafood Products Antitrust Litigation*, No. 15-MD-2670, MDL No. 2670 (S.D. Cal.): Exclusion Requests for Proposed Direct Purchaser Plaintiff Class Settlement with Tri-Union Seafoods LLC d/b/a Chicken of the Sea and Thai Union Group PCL

Dear Sir or Madam:

We write on behalf of the entities identified below. Each of the entities identified below hereby excludes itself and any and all of its parent companies, subsidiaries, or affiliates, including those entities identified in brackets, from the Settlement Class with respect to the proposed direct purchaser plaintiff class settlement with Tri-Union Seafoods LLC d/b/a Chicken of the Sea and Thai Union Group PCL in *In re Packaged Seafood Products Antitrust Litigation*, No. 15-MD-2670, MDL No. 2670 (S.D. Cal.) and have authorized the undersigned, as their attorneys, to sign this exclusion request on their behalf.

Entity [Parent Companies/Subsidiaries/Affiliates Identified in Brackets]	Business Address
99 Cents Only Stores, LLC	4000 Union Pacific Avenue City of Commerce, CA 90023
Affiliated Foods, Inc.	1401 W. Farmers Avenue, Amarillo, TX 79118
Alex Lee, Inc. and Merchants Distributors, LLC [Lowe's Food Stores, Inc.]	120 Fourth Street SW, Hickory, NC 28602
Associated Food Stores, Inc.	1850 West 2100 South, Salt Lake City, UT 84119
Associated Grocers, Inc.	8600 Anselmo Lane, Baton Rouge, LA 70810
Associated Grocers of New England, Inc.	11 Cooperative Way, P.O. Box 6000, Pembroke, NH 03275

NEW YORK, NY

LOS ANGELES, CA

OAKLAND, CA

MORRISTOWN, NJ

CHICAGO, IL



Entity [Parent Companies/Subsidiaries/Affiliates Identified in Brackets]	Business Address
Bashas' Inc. [AJ's Fine Foods, Bashas' Dine, Food City, Eddie's Country Store]	22402 S. Basha Road, Chandler, AZ 85248
Big Y Foods, Inc. [Big Y Express, Fresh Acres Market, Table & Vine]	2145 Roosevelt Ave., P.O. Box 7840, Springfield, MA 01102
Brookshire Grocery Company [Super 1 Foods, Spring Market, Fresh by Brookshire's]	1600 West Southwest Loop 323, Tyler, TX 75701
Certco, Inc.	5321 Verona Road, Fitchburg, WI 53711
Fareway Stores, Inc.	715 Eighth Street, Boone, IA 50036
Giant Eagle, Inc. [and its affiliates Riser Foods, Inc. and The Tamarkin Company, as well as all divisions/trade names of those entities, including OK Grocery, American Seaway Foods, Fresh Foods Manufacturing, Butler Refrigerated Meats, ASF Meat, Cranberry Great Lakes Cold Storage, and Great Lakes Cold Storage]	101 Kappa Dr., Pittsburgh, PA 15238
The Golub Corporation [Market 32, Market Bistro, Price Chopper Supermarkets]	461 Nott St, Schenectady, NY 12308
Schnuck Markets, Inc	11420 Lackland Road St. Louis, MO 63146
URM Stores, Inc.	7511 N. Froya St., Spokane, WA 99217
Woodman's Food Market, Inc.	2631 Liberty Lane, Janesville, WI 53545
Brookshire Brothers, Inc. [David's Supermarkets, Inc.]	1201 Ellen Trout, Lufkin, TX 75904
SpartanNash Company [Spartan Stores, Inc., Nash-Finch Company, and Spartan Stores Distribution, LLC]	850 76 th Street SW, Byron Center, MI 49315
Dollar Tree Distribution, Inc. [a wholly-owned subsidiary of Dollar Tree, Inc.]	500 Volvo Parkway Chesapeake, VA 23320
Family Dollar Stores, Inc. [a wholly-owned subsidiary of Dollar Tree, Inc.]	500 Volvo Parkway Chesapeake, VA 23320
Kmart Corporation	3333 Beverly Road, B6-349B Hoffman Estates, IL 60179
K-VA-T Food Stores, Inc.	201 Trigg Street Abingdon, VA 24212
Marc Glassman, Inc.	5841 W. 130 th Street Cleveland, OH 44130
McLane Company, Inc.	4747 McLane Parkway Temple, TX 76504
Meadowbrook Meat Company, Inc.	2641 Meadowbrook Rd. Rocky Mount, NC 27801



JND Legal Administration
April 28, 2022
Page 3

Entity [Parent Companies/Subsidiaries/Affiliates Identified in Brackets]	Business Address
Western Family Foods, Inc. [c/o Western Family Holding Company]	45 82 nd Drive, Suite 49 Gladstone, OR 97027
Greenbrier International, Inc. [a wholly-owned subsidiary of Dollar Tree, Inc.]	500 Volvo Parkway Chesapeake, VA 23320
Family Dollar Services, LLC, f/k/a Family Dollar Services, Inc. [a wholly-owned subsidiary of Family Dollar Stores, Inc.]	500 Volvo Parkway Chesapeake, VA 23320
CVS Pharmacies, Inc.	One CVS Drive Woonsocket, RI 02895

Please contact one of the undersigned should you have any questions.

Sincerely yours,

/s/ Robert N. Kaplan

Robert N. Kaplan, Kaplan Fox & Kilsheimer LLP

/s/ Richard L. Coffman

Richard L. Coffman, The Coffman Law Firm

/s/ Eric R. Lifvendahl

Eric R. Lifvendahl, L&G Law Group, LLP

/s/ Erin G. Allen

Erin G. Allen, Marcus & Shapira, LLP

/s/ Valarie C. Williams

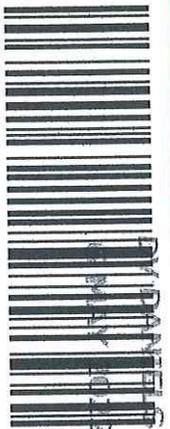
Valarie C. Williams, Alston & Bird, LLP

KAPLAN FOX

Kaplan Fox & Kishheimer LLP
850 Third Avenue
New York, NY 10022

MAY 09 2022

CERTIFIED MAIL



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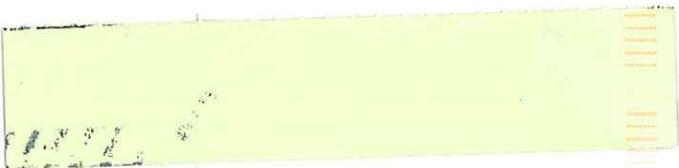
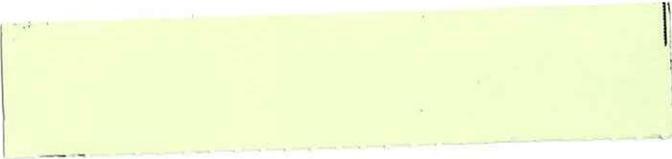


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Tuna Direct Purchaser Case - EXCLUSIONS
PO BOX 91241
SEATTLE WA 98111-9341

TKM



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE



LEGAL DEPARTMENT
LITIGATION & CLAIMS
4900 E DUBLIN GRANVILLE RD.
COLUMBUS, OHIO 43081
PHONE: (888) 244-5687

Tuna Direct Purchaser Case – EXCLUSIONS
c/o JND Legal Administration
PO Box 91241
Seattle, WA 98111

April 12, 2022

Dear Settlement Administrator,

I represent Big Lots Management, LLC, 4900 E. Dublin Granville Rd. Columbus, Ohio 43081-7651. My client hereby requests that it be excluded from the **Proposed Settlement Direct Purchaser Class** in the *In re Packaged Seafood Products Antitrust Litigation*.

Please direct any questions to me.

Sincerely,

Amber O. Dove
Litigation & Claims Counsel
614-278-4953



LESHELL L. DUNCAN
Notary Public, State of Ohio
My Commission Expires 12-21-2023