

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

JUDY JIEN, et al.,

Plaintiffs,

v.

PERDUE FARMS, INC., et al.,

Defendants.

Civil Action No. 1:19-CV-2521-SAG

**ORDER GRANTING PLAINTIFFS' MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT WITH AGRI STATS, INC. AND APPROVAL OF
NOTICE AND PLAN OF NOTICE**

Upon consideration of Plaintiffs' Motion for Preliminary Approval of Settlement with Agri Stats, Inc. and Approval of Notice and Plan of Notice, it is hereby **ORDERED** as follows:

1. The motion is hereby **GRANTED**.
2. The Court finds that the proposed settlement with Agri Stats, Inc. ("Agri Stats"), as set forth in the written settlement agreement between Plaintiffs and Agri Stats ("Settlement Agreement"), has been negotiated at arm's length and is sufficiently fair, reasonable, and adequate to authorize dissemination of notice of the Settlement Agreement to the Settlement Class defined below.
3. Terms used in this Order that are defined in the Settlement Agreement are, unless otherwise defined herein, used as defined in the Settlement Agreement.
4. The Court hereby certifies the following Settlement Class for the purpose of the Settlement Agreement:

All persons employed by Defendant Processors,¹ their subsidiaries, and/or related entities at poultry processing plants, poultry hatcheries, poultry feed mills, and/or poultry complexes in the continental United States from January 1, 2000, until July 20, 2021.
5. The Settlement Class excludes complex managers, plant managers, human resources managers, human resources staff, office clerical staff, guards, watchmen, and salesmen; Defendants, co-conspirators, and any of their subsidiaries, predecessors, officers, or directors; and federal, state or local governmental entities.
6. The Court finds that the Settlement Class fully complies with the requirements of Federal Rule of Civil Procedure 23. Specifically, the Court finds (1) that the Settlement Class is so numerous that joinder of all members is impracticable; (2) there are questions of law or fact

¹ The term "Defendant Processors" refers to all Defendants except Agri Stats, Inc. and Webber, Meng, Sahl and Company, Inc.

common to the Settlement Class; (3) the claims of the Named Plaintiffs are typical of the claims of the Settlement Class; and (4) the Named Plaintiffs will fairly and adequately protect the interests of the Settlement Class. Additionally, the Court finds that the “act requirement” of 23(b)(2) is met because the Settlement Class consists of people affected by the same challenged conduct by Defendants and that the “injunction requirement” of 23(b)(2) is met because the requested relief is final injunctive relief applicable to all members of the proposed Settlement Class.

7. The Court appoints the following Named Plaintiffs as class representatives of the Settlement Class: Judy Jien, Kieo Jibidi, Elaisa Clement, Glenda Robinson, Emily Earnest, and Kevin West.

8. The Court appoints the following law firms (which currently serve as Interim Co-Lead Counsel) as Settlement Class Counsel: Hagens Berman Sobol Shapiro LLP; Handley Farah & Anderson PLLC; and Cohen Milstein Sellers & Toll, PLLC.

9. After Settlement Class Notice has been approved and disseminated, the Court shall hold a hearing (the “Fairness Hearing”) regarding the Settlement Agreement to determine whether it is fair, reasonable, and adequate and whether it should be finally approved by the Court.

10. The proposed notice plan set forth in the memorandum and the notice documents attached to the Declaration of Justin Parks give class members a fair and adequate opportunity to challenge or otherwise respond to the proposed Settlement Agreement.

11. After Settlement Class Notice has been disseminated, Settlement Class members who wish to object to the Settlement Agreement will be required to submit an appropriate and timely written statement of the grounds for objection. Settlement Class members who wish to appear in person to object to the Settlement Agreement may do so at the Fairness Hearing pursuant to directions by the Court.

12. The following deadlines govern the notice plan:

Task	Proposed Deadline
Notice campaign begins through direct email and implementation of publication notice campaign.	To commence within 30 days of the Court order granting preliminary approval.
Last day for Settlement Class members to object to the Settlement and file notices to appear at the final approval hearing.	90 days from order directing notice.
Co-Lead Counsel to provide Agri Stats with a list of all persons and entities who have timely and adequately objected to the Settlement Class.	97 days from order directing notice.
Co-Lead Counsel shall file a motion for final approval of the Settlement and all supporting documents, as well as responses to any objections to the settlement or attorneys' fees.	14 days before the Final Approval Hearing.
Final Approval Hearing and Hearing on Request for Attorneys' Fees and Expenses.	130 days after the Court's order granting preliminary approval, or as soon thereafter as may be heard by the Court.

13. If the Settlement Agreement is terminated or rescinded in accordance with its provisions, then the Settlement Agreement shall become null and void, except insofar as expressly provided otherwise in the Settlement Agreement, and without prejudice to the status quo ante rights of Plaintiffs, Agri Stats, and the members of the Settlement Class. The parties shall also comply with any terms or provisions of the Settlement Agreement applicable to termination, rescission, or the Settlement Agreement otherwise not becoming Final.

14. This litigation is hereby stayed as to the Released Parties (as that term is defined in the Settlement Agreement) except as necessary to effectuate the Settlement Agreement or otherwise agreed to by the settling parties.

IT IS SO ORDERED.

DATED: October 14, 2025

/s/

HON. STEPHANIE A. GALLAGHER
UNITED STATES DISTRICT JUDGE