

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 19-21551-CIV-ALTONAGA/Louis

In re:

**FARM-RAISED SALMON
AND SALMON PRODUCTS
ANTITRUST LITIGATION**

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DECLARATION OF CHRISTOPHER L. LEBSOCK

I, Christopher L. Lebsock, declare and state as follows:

1. I am a partner at Hausfeld LLP, which along with Podhurst Orseck P.A., was appointed by the Court to represent the direct purchaser plaintiffs in *In re Farm-Raised Salmon And Salmon Products Antitrust Litigation*, No. 19-21551-CIV-ALTONAGA/Louis (S.D. Fla.) (“Plaintiffs”). This declaration is submitted in support of Plaintiffs’ unopposed Motion for Final Approval of the Settlement Agreement with all Defendants. I make this declaration based on my personal knowledge and, if called as a witness, could competently testify to the following information.

2. On July 6, 2022, Plaintiffs filed their Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses. (ECF No. 533). At that time, Plaintiffs’ Counsel noted that they had borne expenses of \$1,972,768.69 and reserved the right to seek an additional amount of \$663,790.00 charged by their economists at AlixPartners if counsel in the related antitrust action filed by indirect purchaser plaintiffs did not assume this amount as their share of the cost of “cleaning” Defendants’ data productions and otherwise preparing these datasets for analysis. *See* ECF No. 533 at pg. 17, n. 4.

3. Following that filing, my colleagues and I have attempted to finalize an agreement with counsel for the indirect purchaser plaintiffs and AlixPartners in which counsel for the indirect

purchaser plaintiffs will pay \$663,790.00 of the AlixPartners' invoices. In exchange, AlixPartners will provide the Defendants' data in a cleaned-up format and will agree to provide additional services to experts retained by the indirect purchaser plaintiffs in order to facilitate their understanding of the data that is produced. That three-way agreement remains unsigned as of the date of this declaration. Counsel for the indirect purchaser plaintiffs have committed to payment of this sum but remain in negotiations with AlixPartners over the timing of the payment and other terms. Thus, we are seeking reimbursement of the additional \$663,790.00 in expenses to pay the remaining invoices at this time.

4. I, along with my colleagues, will continue our efforts to have counsel for the indirect purchaser plaintiffs, or the putative class that they represent, transfer \$663,790.00 into the settlement escrow established for the benefit of the Plaintiffs. If and when such a transfer occurs, Co-Lead counsel will move this Court for an order authorizing its distribution in an appropriate and cost-effective manner.

I declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct.

Dated: July 25, 2022

/s/ Christopher L. Lebsock
Christopher L. Lebsock