

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

CASE NO. 19-21551-CIV-ALTONAGA

In re:

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

**DECLARATION OF BRONYN HEUBACH REGARDING
SETTLEMENT ADMINISTRATION**

I, Bronyn Heubach of JND Legal Administration (“JND”), having been duly sworn and cautioned, testify and declare:

1. I am an Assistant Director at JND Legal Administration (“JND”). JND is a legal administration services provider with headquarters in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class action cases.

2. JND is serving as the Claims Administrator in the above-captioned litigation (“Action”), as ordered by the Court in its May 26, 2022 Order (“Preliminary Approval Order”). The following statements are based on my personal knowledge and information provided to me by other JND employees working under my supervision, and, if called on to do so, I could and would testify competently thereto.

DIRECT NOTICE

3. On June 6, 2022, JND mailed the Court-approved Notice via first-class U.S. mail to 1,033 Settlement Class Members for whom the Class data included mailing addresses. Class

Members with multiple addresses in the Class data were mailed Notices to each address. A representative copy of the Notice is attached as Exhibit A.

4. JND conducted additional research to locate mailing addresses for Class Members in the Class data who lacked a complete address. JND located addresses for two additional Class Members and mailed the Notice to those Class Members on June 22, 2022.

5. Any Notices returned to JND with a forwarding address are promptly re-mailed to the forwarding address provided. For any Notices returned without a forwarding address, JND conducts advanced address research and re-mails to any verified updated address that is located. To date, JND has re-mailed a total of 80 Notices. As a result of this process, to date, a combined total of 1,114 Notices were mailed; Notice has been mailed to all but two Class Members, for whom complete addresses could not be located.

PRESS RELEASE

6. On June 6, 2022, JND caused a press release to be distributed to over 11,000 outlets nationwide to publicize the Settlement. An exact match of the press release was picked up 379 times—including 269 broadcast media outlets, 65 newspapers, and 22 online news sites and other influencers, among other outlets—with a potential audience of 164 million. The Press Release includes important deadlines related to the Settlement and directs Settlement Class Members to the Settlement Website for more information. A representative copy of the press release as distributed is attached as Exhibit B.

SETTLEMENT WEBSITE

7. On June 5, 2022, JND launched the Settlement Website, www.SalmonDirectPurchaserSettlement.com, which allows Settlement Class Members to learn more about the lawsuit and the Settlement, including answers to frequently asked questions, key dates and deadlines, and an online Claim Form that allows Settlement Class Members to review the net purchase values from the Class data and accept or dispute those values in their claim for Settlement benefits. The website also includes downloadable copies of important case

documents, a form that allows Settlement Class Members to register for updates regarding the Action, and email contact information for the Claims Administrator.

8. As of the date of this Declaration, JND has tracked 5,076 unique visitors who registered 8,436 page views. JND has also received 1,282 emails from Settlement Class Members through the Settlement Website. JND will continue to maintain the Settlement Website for the duration of the settlement administration.

TOLL-FREE INFORMATION LINE

9. On June 3, 2022, JND launched a settlement-specific, dedicated toll-free number, 1-877-540-1084, for Settlement Class Members to call for information related to the Settlement. The line is available 24 hours a day, seven days a week, and callers are routed to an automated phone tree with answers to frequently asked questions, including important deadlines and the option to leave a voicemail and receive a call back or request a Claim Form by mail or email.

10. As of the date of this Declaration, JND has received a total of 178 calls to the toll-free line. JND will continue to maintain the toll-free information line for the duration of the settlement administration.

REQUESTS FOR EXCLUSION

11. The Notice states that any Class Member who wished to exclude themselves from the Settlement must submit a timely, postmarked exclusion letter to the Settlement Administrator no later than July 11, 2022.

12. As of the date of this Declaration, JND has not received any requests for exclusion. If any exclusion requests are received later, JND will immediately notify Class Counsel.

OBJECTIONS

13. The Notice requires any Class Member who objects to the Settlement or any part of it to submit their objection by filing a letter with the Court detailing the reasons the Settlement should not be approved and mailing a copy to Class Counsel and Defendants' Counsel with a postmarked date no later than July 11, 2022.

14. As of the date of this Declaration, JND has not received and is not aware of any objections.

CLAIMS

15. The Notice states that Class Members who want to participate in the Settlement and be eligible to receive a payment must complete a Claim Form, either online at the Settlement Website or by mail or email, submitted electronically or postmarked no later than September 23, 2022.

16. JND will provide regular reports to Class Counsel regarding incoming Claim Forms.

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

Executed this 25th day of July, 2022, at Seattle, Washington.



Bronyn Heubach
Assistant Director, JND Legal Administration

EXHIBIT A

United States District Court for the Southern District of Florida

If you purchased farm-raised Atlantic salmon or products derived therefrom directly from one or more Defendants between April 10, 2013 and May 26, 2022, you may be affected by a class action settlement

A federal court authorized this notice. This is not a solicitation from a lawyer.

PLEASE READ THIS NOTICE CAREFULLY. YOUR LEGAL RIGHTS ARE AFFECTED WHETHER YOU ACT OR DON'T ACT.

You or your company have been identified as a member of a proposed Settlement Class. This notice is to:

- Provide information regarding a proposed Settlement with Defendants Mowi ASA (formerly known as Marine Harvest ASA), Mowi USA, LLC (formerly known as Marine Harvest USA, LLC), Mowi Canada West, Inc. (formerly known as Marine Harvest Canada, Inc.), and Mowi Ducktrap, LLC (an assumed name of Ducktrap River of Maine, LLC); Grieg Seafood ASA, Grieg Seafood BC Ltd., Grieg Seafood North America Inc. (formerly known as Ocean Quality North America Inc.), Grieg Seafood USA, Inc. (formerly known as Ocean Quality USA Inc.), Grieg Seafood Premium Brands, Inc. (formerly known as Ocean Quality Premium Brands, Inc.); Sjør AS (formerly known as Ocean Quality AS); SalMar ASA; Lerøy Seafood AS and Lerøy Seafood USA Inc.; and Cermaq Group AS, Cermaq US LLC, Cermaq Canada Ltd., and Cermaq Norway AS.
- Provide information regarding a process and deadline for filing a claim, excluding yourself from the Settlement, and objecting to the Settlement.

YOUR LEGAL RIGHTS AND OPTIONS		
You May	Explanation	Deadline
STAY IN THE SETTLEMENT CLASS, AND FILE A CLAIM	<ul style="list-style-type: none"> • File a claim to receive benefits • Give up your right to separately sue or continue to sue Defendants for the claims in this case 	September 23, 2022
STAY IN THE SETTLEMENT CLASS, AND DO NOTHING	<ul style="list-style-type: none"> • Receive no benefits • Give up your right to separately sue or continue to sue Defendants for the claims in this case 	None
STAY IN THE SETTLEMENT CLASS, BUT OBJECT TO THE SETTLEMENT	<ul style="list-style-type: none"> • Tell the Court what you do not like about the Settlement—you will still be bound by the Settlement if the Court approves it over your objection or other objections. 	Postmarked by July 11, 2022
STAY IN THE SETTLEMENT CLASS, AND ATTEND THE HEARING	<ul style="list-style-type: none"> • Ask to speak in Court about the Settlement by providing Notice of Intention to Appear • If you want your own attorney to represent you, you must pay for that attorney 	Postmarked by July 11, 2022
ASK TO BE EXCLUDED FROM THE SETTLEMENT CLASS (“OPT OUT”)	<ul style="list-style-type: none"> • Receive no benefits • Keep your right to sue or continue to sue Defendants for the claims in this case at your own expense 	Postmarked by July 11, 2022

Questions? Visit www.SalmonDirectPurchaserSettlement.com or call toll-free at 1-877-540-1084

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION 3

- 1. Why did I receive this notice?
- 2. What is this lawsuit about?
- 3. What is a class action and who is involved?
- 4. Why is there a proposed Settlement in this case?

WHO IS IN THE SETTLEMENT CLASS?..... 4

- 5. Am I part of the Settlement Class?
- 6. I am still not sure if I am included.

THE LAWYERS REPRESENTING YOU..... 4

- 7. Do I have a lawyer in this case?
- 8. How will the lawyers be paid?

SETTLEMENT BENEFITS..... 4

- 9. What does the proposed Settlement provide?
- 10. What are the Settlement benefits being used for?
- 11. How can I get a payment?
- 12. When do I get my payment?
- 13. What am I giving up by staying in the Settlement Class?

IF YOU DO NOTHING 6

- 14. What happens if I do nothing at all?

EXCLUDING YOURSELF FROM THE SETTLEMENT 6

- 15. What does it mean if I exclude myself from the Settlement Class?
- 16. How do I exclude myself from the Settlement Class?

OBJECTING TO THE SETTLEMENT..... 6

- 17. How do I tell the Court that I don't like the proposed Settlement?
- 18. What is the difference between excluding myself and objecting?

THE COURT'S FAIRNESS HEARING..... 8

- 19. When and where is the Court's Fairness Hearing?
- 20. Do I have to come to the hearing?
- 21. May I speak at the hearing?

GETTING MORE INFORMATION..... 8

- 22. How do I get more information?

Basic Information

1. Why did I receive this notice?

You received this notice because your business may have purchased farm-raised Atlantic salmon or products derived therefrom directly from one or more of the Defendants between April 10, 2013 and May 26, 2022. You have the right to know about your rights or options in the proposed Settlement.

The Court in charge of this case is the United States District Court for the Southern District of Florida, Miami Division (the “Court”). The case is called *In Re: Farm-Raised Salmon and Salmon Products Antitrust Litigation*, Master File No. 19-21551-CV-ALTONAGA. It was filed in 2019.

Plaintiffs Euclid Fish Company; Euro USA Inc.; Schneider’s Fish and Sea Food Corporation; and The Fishing Line LLC—sued on behalf of a proposed Class. The companies they sued are called the Defendants and they are: Mowi ASA (formerly known as Marine Harvest ASA), Mowi USA, LLC (formerly known as Marine Harvest USA, LLC), Mowi Canada West, Inc. (formerly known as Marine Harvest Canada, Inc.), and Mowi Ducktrap, LLC (an assumed name of Ducktrap River of Maine, LLC); Grieg Seafood ASA, Grieg Seafood BC Ltd., Grieg Seafood North America Inc. (formerly known as Ocean Quality North America Inc.); Grieg Seafood USA, Inc. (formerly known as Ocean Quality USA Inc.), Grieg Seafood Premium Brands, Inc. (formerly known as Ocean Quality Premium Brands, Inc.); Sjør AS (formerly known as Ocean Quality AS); SalMar ASA; Lerøy Seafood AS and Lerøy Seafood USA Inc.; and Cermaq Group AS, Cermaq US LLC, Cermaq Canada Ltd., and Cermaq Norway AS.

This notice explains that:

- ✓ The Settlement Class is affected by a proposed Settlement with all Defendants.
- ✓ You have legal rights and options that you may exercise before the Court decides whether to approve the Settlement.

2. What is this lawsuit about?

Plaintiffs allege that Defendants conspired to fix, raise, and maintain the prices that direct purchasers paid for the Defendants’ farm-raised Atlantic salmon and that, as a result, members of the Class paid more than they otherwise would have. Defendants deny all liability for this conduct and assert that their conduct was lawful or exempt from the antitrust laws, and that their conduct did not cause injury, among other defenses. The Court has not decided who is right. Plaintiffs and Defendants have reached a proposed Settlement to avoid the uncertainties, risks, and costs of further litigation.

3. What is a class action and who is involved?

In a class action lawsuit, one or more persons or businesses called class representatives sue on behalf of others who have similar claims, all of whom together are a “class.” Individual class members do not have to file a lawsuit to participate in the class action settlement or be bound by the judgment in the class action. One court resolves the issues for everyone in the class, except for those who exclude themselves from the class.

4. Why is there a proposed Settlement in this case?

The Court did not decide in favor of either Plaintiffs or the Defendants. Trials involve risks to both sides; therefore, Plaintiffs and the Defendants have agreed to settle the case. The proposed Settlement requires Defendants to pay money to members of the Settlement Class. Plaintiffs and their attorneys believe the Settlement is in the best interests of the Settlement Class.

Who is in the Settlement Class?

5. Am I part of the Settlement Class?

You are a Settlement Class Member if you or your company purchased farm-raised Atlantic salmon or products derived therefrom directly from one or more of the Defendants between April 10, 2013 and May 26, 2022. Excluded from the Settlement Class are the Court and its personnel and any Defendants and their parent, subsidiary, or affiliated companies.

6. I am still not sure if I am included.

If you are still not sure if you are included in the Settlement Class, please review the detailed case information, available at www.SalmonDirectPurchaserSettlement.com. You may also call the Claims Administrator toll-free at 1-877-540-1084.

The Lawyers Representing You

7. Do I have a lawyer in this case?

The Court has appointed Podhurst Orseck, P.A. and Hausfeld LLP as Class Counsel. Their contact information is provided below. If you wish to remain a Settlement Class Member, you do not need to hire your own lawyer because Class Counsel is working on your behalf.

If you wish to pursue your own case separate from this one, or if you exclude yourself from the Settlement Class, these lawyers will no longer represent you. You may need to hire your own lawyer if you wish to pursue your own lawsuit against the Defendants.

8. How will the lawyers be paid?

You will not have to pay any attorneys' fees or costs out-of-pocket. You do not have to pay Class Counsel. Class Counsel have not been paid for their services since this case began. They will seek an award of attorneys' fees out of the Settlement Fund, as well as reimbursement for litigation costs they advanced in pursuing the claims. The fees will compensate Class Counsel for investigating the facts, litigating the case, and negotiating and administering the Settlement. Class Counsel's attorneys' fee request will not exceed 30% percent of the Settlement Amount. Any attorneys' fees and costs awarded are subject to the Court's approval. Class Counsel's motion for approval of their fees and costs will be posted at www.SalmonDirectPurchaserSettlement.com prior to the deadline for objections.

Settlement Benefits

9. What does the proposed Settlement provide?

If the proposed Settlement is approved, the Defendants will pay a total Settlement Amount of \$85,000,000.00 into a Settlement Fund. After deductions for attorneys' fees, litigation costs, and other expenses (Question 10), the Fund will be distributed to Settlement Class Members who submit valid claims.

10. What are the Settlement benefits being used for?

Settlement Class Members who make a claim will be entitled to receive cash from the Settlement Fund, after deductions for legal fees (not to exceed 30% of the Settlement Amount) and litigation costs; the cost of notice, administration and the distribution of the Settlement proceeds (estimated at approximately \$75,000), as well as to pay reasonable Service Awards to each of the four named Class Representatives for their work in the case, if permitted by the Court. The remainder of the Settlement Amount will be distributed via check

on a pro rata basis to Settlement Class Members who make a claim based on the number of claims and the volume of commerce represented in those claims. Using an online portal, Settlement Class Members will be able to check their claim volume, and in the event that their own data suggests that a different claimed volume of commerce is appropriate, they can provide that information, and it will be considered by the Claims Administrator, subject to audit.

To the extent there are any undistributed funds following an initial distribution to Settlement Class Members, the Claims Administrator, upon the recommendation of Class Counsel and approval by the Court, will either make subsequent distributions to Settlement Class Members, or, if it is infeasible to do so in light of the amount of undistributed funds and the costs of Administration, will distribute those funds to the Court-approved *cy pres* recipient.

11. How can I get a payment?

You must complete and submit a timely Claim Form to be eligible to receive a payment from the Settlement. The Claim Form can be obtained online at www.SalmonDirectPurchaserSettlement.com or by writing or emailing the Claims Administrator at the address listed below. The completed Claim Form must be submitted online at www.SalmonDirectPurchaserSettlement.com or by mail to the address below postmarked by **September 23, 2022**.

Salmon Direct Purchaser Settlement
c/o JND Legal Administration
P.O. Box 91447
Seattle, WA 98111-0050

If you do not submit a valid Claim Form by September 23, 2022, you will not receive a payment, but you will be bound by the Court's judgment.

You may receive offers from companies, not affiliated with the Court or Class Counsel, that specialize in aggregating claims of Class Members who will offer to complete and file your claim in return for your agreement to pay them a percentage of the amount you receive. **YOU DO NOT NEED TO PAY ANYONE TO FILE YOUR CLAIM.** You can always seek help from the Settlement Administrator or Class Counsel at no charge.

12. When do I get my payment?

Payments will be made to Settlement Class Members who submit valid and timely Claim Form after the Court grants "final approval" to the Settlement and after all appeals are resolved. If the Court approves the Settlement, there may be appeals. It is always uncertain whether these appeals can be resolved and resolving them can take time. Please be patient.

13. What am I giving up by staying in the Settlement Class?

Unless you exclude yourself from the Settlement Class, you are staying in the Settlement Class. By staying in the Settlement Class, you cannot sue, continue to sue, or be part of any other lawsuit against Defendants that makes claims based on the same legal issues alleged or could have been alleged in this case. All Court orders will apply to you and legally bind you. The Released Claims are detailed in the Settlement Agreement, available at www.SalmonDirectPurchaserSettlement.com.

If You Do Nothing

14. What happens if I do nothing at all?

If you do nothing, you will not get a payment from the Settlement. Unless you exclude yourself, you cannot sue, continue to sue, or be part of any other lawsuit against Defendants that makes claims based on the same legal issues alleged or could have been alleged in this case. All Court orders will apply to you and legally bind you.

Excluding Yourself from the Settlement

15. What does it mean if I exclude myself from the Settlement Class?

Excluding yourself or opting out of the Settlement Class means you remove yourself from the Settlement and its benefits and releases. If you have a pending lawsuit against any of the Defendants involving the same legal issues in this case, speak to your lawyer in that case immediately.

16. How do I exclude myself from the Settlement?

To exclude yourself from the Settlement your Request for Exclusion must include: (a) the name (including any formerly known names, doing business as names, etc.), address, and telephone number of the person(s) seeking exclusion; (b) a signed statement that “I/we hereby request that I/we be excluded from the *In Re: Farm-Raised Salmon and Salmon Products Antitrust Litigation*”; (c) documents sufficient to prove membership in the Settlement Class; and (d) the signature(s) of Person(s) requesting the exclusion or an authorized representative, as well as proof of authorization to submit the request for exclusion if submitted by an authorized representative. The name of the Person(s) seeking exclusion should be as specific as possible, including any “formerly known as” names, “doing business as” names, etc. You must mail your Request for Exclusion, postmarked by **July 11, 2022**, to:

Farm Raised Salmon and Salmon Products Settlement – EXCLUSIONS
c/o JND Legal Administration
PO Box 91447
Seattle, WA 98111

Objecting to the Settlement

17. How do I tell the Court that I do not like the proposed Settlement?

If you stay in Settlement Class, you can object to the proposed Settlement if you do not like part or all of it. The Court will consider your views.

To object to the Settlement, you must send a written objection that includes:

- Your Notice of Intention to Appear;
- Proof of membership in the Settlement Class; and
- The specific grounds for the objection and any reasons why you desire to appear and be heard, as well as all documents or writings that you desire the Court to consider.

Your written objection must be filed with the Court and mailed to Class Counsel and the Defendants’ counsel at the addresses below. Your objection must be postmarked (or mailed by overnight delivery) no later than **July 11, 2022**.

The Court:

Chief Judge Cecilia M. Altonaga
Wilkie D. Ferguson, Jr. United
States Courthouse
400 North Miami Avenue
Room 13-3
Miami, Florida 33128

Class Counsel:

Peter Prieto
PODHURST ORSECK, P.A.
SunTrust International Center
One S.E. 3rd Ave, Suite 2300
Miami, FL 33131
pprieto@podhurst.com

Christopher L. Lebsack
HAUSFELD LLP
600 Montgomery St. #3200
San Francisco, CA 94111
clebsack@hausfeld.com

Defendants' Counsel:

For Cermaq
Britt M. Miller
MAYER BROWN LLP
71 S. Wacker Dr.
Chicago, IL 60606
bmiller@mayerbrown.com

For Grieg
Eric Mahr
FRESHFIELDS BRUCKHAUS
DERINGER US LLP
700 13th Street NW, 10th Floor
Washington, D.C. 20005
eric.mahr@freshfields.com

For Lerøy
D. Bruce Hoffman
CLEARY GOTTLIEB STEEN &
HAMILTON LLP
2112 Pennsylvania Avenue NW
Washington, D.C. 20037
bhoffman@cghs.com

For Mowi
Matthew M. Martino
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
One Manhattan West
New York, NY 10001
matthew.martino@skadden.com

For SalMar
Stephen Neuwirth
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
stephennuwirth@quinnemanuel.com

For Sjó
Ryan W. Marth
ROBINS KAPLAN LLP
800 LaSalle Ave, Suite 2800
Minneapolis, MN 55402
rmarth@robinskaplan.com

18. What is the difference between excluding myself and objecting?

Objecting is telling the Court that you do not like something about the Settlement. You can object only if you do not exclude yourself from the Settlement. If you exclude yourself from the Settlement, you have no standing to object because the Settlement no longer affects you.

The Court's Fairness Hearing

19. When and where is the Court's Fairness Hearing?

The Court will hold a Fairness Hearing at 9:00 a.m. on **September 8, 2022** at the United States District Court for the Southern District of Florida, Wilkie D. Ferguson, Jr. United States Courthouse, 400 North Miami Avenue, Room 13-3, Miami, Florida 33128. At the hearing, the Court will consider (i) whether the proposed Settlement should be approved as fair, reasonable, and adequate to Settlement Class Members; and (ii) whether to approve any application by Class Counsel for an award of attorneys' fees and payment of costs and expenses, and any Service Awards to the named Class Representatives.

If there are objections, the Court will consider them. You may attend and ask to speak at the Fairness Hearing if you filed an objection as instructed in Question 17, but you do not have to. The Court will listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long the Court will take to decide. The date of the hearing may change without further notice to the Settlement Class, so please check www.SalmonDirectPurchaserSettlement.com for updates.

20. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to come at your own expense. If you send an objection to the proposed Settlement, you do not have to come to the Fairness Hearing to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend the hearing or trial, but it is not necessary.

21. May I speak at the hearing?

Yes. If you did not request exclusion from the Settlement, you may ask permission for you or your own attorney to speak at the Fairness Hearing, at your own expense. To do so, you must submit a written objection as instructed in Question x. Your Notice of Intention to Appear must be postmarked no later than **July 11, 2022**, and it must be sent to the Court, Class Counsel, and Defendants' counsel at the addresses provided in Question 17. You cannot ask to speak at the hearing if you exclude yourself from the Settlement Class.

Getting More Information

22. How do I get more information?

For more detailed information about the case, visit www.SalmonDirectPurchaserSettlement.com or contact the Claims Administrator:

Salmon Direct Purchaser Settlement
c/o JND Legal Administration
P.O. Box 91447
Seattle, WA 98111-0050
info@SalmonDirectPurchaserSettlement.com
1-877-540-1084

PLEASE DO NOT CONTACT THE COURT FOR INFORMATION.

EXHIBIT B

If you purchased farm-raised Atlantic salmon or products derived therefrom directly from one or more Defendants between April 10, 2013 and May 26, 2022, you may be affected by a class action settlement

NEWS PROVIDED BY

JND Legal Administration →

Jun 06, 2022, 17:00 ET

SEATTLE, June 6, 2022 /PRNewswire/ --

JND Legal Administration announces a proposed Settlement in *In Re: Farm-Raised Salmon and Salmon Products Antitrust Litigation*, Master File No. 19-21551-CVALTONAGA. The Court in charge of this case is the United States District Court for the Southern District of Florida, Miami Division (the "Court").

Plaintiffs Euclid Fish Company; Euro USA Inc.; Schneider's Fish and Sea Food Corporation; and The Fishing Line LLC—sued on behalf of a proposed Class. The companies they sued are called the Defendants and include Mowi ASA (formerly known as Marine Harvest ASA), Mowi USA, LLC (formerly known as Marine Harvest USA, LLC), Mowi Canada West, Inc. (formerly known as Marine Harvest Canada, Inc.), and Mowi Ducktrap, LLC (an assumed name of Ducktrap River of Maine, LLC); Grieg Seafood ASA, Grieg Seafood BC Ltd., Grieg Seafood North America Inc. (formerly known as Ocean Quality North America Inc.); Grieg Seafood

USA, Inc. (formerly known as Ocean Quality USA Inc.), Greg Seafood Premium Brands, Inc. (formerly known as Ocean Quality Premium Brands, Inc.); Sjør AS (formerly known as Ocean Quality AS); SalMar ASA; Lerøy Seafood AS and Lerøy Seafood USA Inc.; and Cermaq Group AS, Cermaq US LLC, Cermaq Canada Ltd., and Cermaq Norway AS.

Who is part of the Settlement Class?

You are a Settlement Class Member if you or your company purchased farm-raised Atlantic salmon or products derived therefrom directly from one or more of the Defendants between April 10, 2013 and May 26, 2022. Excluded from the Settlement Class are the Court and its personnel and any Defendants and their parent, subsidiary, or affiliated companies.

What is this case about?

Plaintiffs allege that Defendants conspired to fix, raise, and maintain the prices that direct purchasers paid for the Defendants' farm-raised Atlantic salmon and that, as a result, members of the Class paid more than they otherwise would have.

Defendants deny all claims and have asserted a number of defenses. The Court has not decided who is right. Plaintiffs and Defendants have reached a proposed Settlement to avoid the uncertainties, risks, and costs of further litigation.

What does the Settlement provide?

If the Settlement is approved, Defendants will pay a total Settlement Amount of \$85,000,000.00 into a Settlement Fund to pay legal fees (not to exceed 30% of the Settlement Amount) and litigation costs; the cost of notice, administration, and the distribution of the Settlement proceeds (estimated at approximately \$75,000), as well as to pay reasonable Service Awards to each of the four Class Representatives for their work in the case, if permitted by the Court. The remainder of the Settlement Amount will be available for distributions to Settlement Class Members. Settlement Class Members who make a claim will receive their pro rata distribution via check based on the number of claims and the volume of commerce represented in those claims. Using an online portal, Settlement Class Members will be able to check their claim volume, and in the event that their own data suggests that a different claimed volume of commerce is appropriate, they can provide that information, and it will be considered by the Claims Administrator, subject to audit.

How can I get a payment?

You must complete and submit a timely Claim Form to be eligible to receive a payment from the Settlement. The Claim Form can be obtained online at www.salmondirectpurchasersettlement.com or by writing or emailing the Claims Administrator at the address listed below.

Farm-Raised Salmon Antitrust Settlement
c/o JND Legal Administration
P.O. Box 91447
Seattle, WA 98111-0050
info@salmondirectpurchasersettlement.com

The completed Claim Form must be submitted online or by mail postmarked by **September 23, 2022**. If you do not submit a valid Claim Form by **September 23, 2022**, you will not receive a payment, but you will be bound by the Court's judgment.

You may receive offers from companies, not affiliated with the Court or Class Counsel, that specialize in aggregating claims of Class Members who will offer to complete and file your claim in return for your agreement to pay them a percentage of the amount you receive. YOU DO NOT NEED TO PAY ANYONE TO FILE YOUR CLAIM. You can always seek help from the Settlement Administrator or Class Counsel at no charge.

When do I get my payment?

Payments will be made to Settlement Class Members who submit valid and timely Claim Forms after the Court grants "final approval" to the Settlement and after all appeals are resolved. If the Court approves the Settlement, there may be appeals. It is always uncertain whether these appeals can be resolved and resolving them can take time. Please be patient.

Do I have a lawyer and how will they be paid?



The Court has appointed Podhurst Orseck, P.A. and Hausfeld LLP as Class Counsel. You do not have to pay Class Counsel.

Class Counsel have not been paid for their services since this case began. They will seek an award of attorneys' fees out of the Settlement Fund, as well as reimbursement for litigation costs they advanced in pursuing the claims. The fees will compensate Class Counsel for investigating the facts, litigating the case, and negotiating and administering the Settlement.

Class Counsel's attorneys' fee request will not exceed 30% of the Settlement Amount. Any attorneys' fees and costs awarded are subject to the Court's approval. Class Counsel's motion for approval of that award and payment of their fees and costs will also be posted at www.salmondirectpurchasersettlement.com prior to the deadline for objections.

What are my other rights and options?

If you do not file a claim, your other options are:

STAY IN THE CLASS AND DO NOTHING. If you do nothing, you will receive no benefits and you will give up your right to separately sue or continue to sue the Defendants for the claims in this case.

STAY IN THE SETTLEMENT CLASS, BUT OBJECT TO THE SETTLEMENT. If you do not exclude yourself from the Settlement Class, you may tell the Court what you do not like about the proposed Settlement. You will still be bound by the proposed Settlement unless you exclude yourself from the Settlement Class.

ASK TO BE EXCLUDED FROM THE SETTLEMENT CLASS. This means you remove yourself from the Class entirely. You will receive no benefits and you will no longer be bound by any judgment for this case. You will keep your right to sue or continue to sue the Defendants for the legal claims in this case.

Go to www.salmondirectpurchasersettlement.com for details on how to exclude yourself or object. Exclusion requests and objections must be postmarked by **July 11, 2022**.

Fairness Hearing



The Court will hold a Fairness Hearing at 9:00 a.m. on September 8, 2022 at the United States District Court for the Southern District of Florida, Wilkie D. Ferguson Jr. United States Courthouse, 400 North Miami Avenue, Miami, FL 33128 in Courtroom 13-3. At the hearing, the Court will consider (i) whether the proposed Settlement should be approved as fair, reasonable, and adequate to Settlement Class Members; and (ii) whether to approve any application by Class Counsel for an award of attorneys' fees and payment of costs and expenses, and any Service Awards to the named Class Representatives. If there are objections, the Court will consider them. If you stay in the Settlement Class, you or your representative may ask to speak at the hearing at your own expense, but you do not have to. The date of the hearing may change, so please check www.salmondirectpurchasersettlement.com for updates.

Questions?

For more information go to www.salmondirectpurchasersettlement.com, call toll-free 1-877-540-1084, or email info@salmondirectpurchasersettlement.com.

Please do not contact the Court.

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