

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 Plaintiffs,

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,
24 Defendants.

Case No. 11-CV-04766-JSW
[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**COMPENDIUM OF CLASS
REPRESENTATIVE
DECLARATIONS IN SUPPORT OF
MOTION FOR ATTORNEYS' FEES,
COSTS, AND INCENTIVE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COMPENDIUM OF DECLARATIONS		
CLASS REPRESENTATIVE	STATE	TAB
Boys and Girls Club of the East Valley	Arizona	1
Jonathan Rizzo	Arizona	2
Matthew Edwards	California	3
Paul Thacker	D.C.	4
Scott Cook	Kansas	5
Danell Tomasella	Massachusetts	6
Kory Pentland	Michigan	7
Lori Curtis	Missouri	8
Mary Anderson	Nebraska	9
Julie Ewald	Nevada	10
Sheila Jackson	New Hampshire	11
Scott Weber	Oregon	12
Jennifer Clites	South Dakota	13
John Peychal	Tennessee	14
Kathleen Davis	Tennessee	15
John Murray	Vermont	16
Brandon Steele	West Virginia	17
Jeffrey Robb	Wisconsin	18

Respectfully submitted,

DATED: October 14, 2016

HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/ Steve W. Berman
 Steve W. Berman (*pro hac vice*)
 HAGENS BERMAN SOBOL SHAPIRO LLP
 1918 Eighth Avenue, Suite 3300
 Seattle, WA 98101
 Telephone (206) 623-7292
 steve@hbsslaw.com

Jeff D. Friedman (173886)
 715 Hearst Avenue, Suite 202
 Berkeley, CA 94710
 Telephone: (510) 725-3000
 Facsimile: (510) 725-3001
 jefff@hbsslaw.com

Elaine T. Byszewski (SBN 222304)
 HAGENS BERMAN SOBOL SHAPIRO LLP
 301 North Lake Avenue, Suite 920
 Pasadena, CA 91101
 Telephone (213) 330-7150

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Facsimile (213) 330-7152
elaine@hbsslaw.com

Daniel E. Gustafson (*pro hac vice*)
Jason S. Kilene (*pro hac vice*)
Sara Payne (*pro hac vice*)
GUSTAFSON GLUEK PLLC
650 Northstar East
608 Second Avenue South
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
dgustafson@gustafsongluek.com
jkilene@gustafsongluek.com
spayne@gustafsongluek.com

Shpetim Ademi (*pro hac vice*)
ADEMI & O'REILLY, LLP
3620 East Layton Avenue
Cudahy, Wisconsin 53110
Telephone: (414) 482-8000
Facsimile: (414) 482-8001
sademi@ademilaw.com

Mark Reinhardt
Garrett D. Blanchfield
REINHARDT WENDORF & BLANCHFIELD
332 Minnesota St., Suite 1250
St. Paul, MN 55101
Telephone: (651) 287-2100
Facsimile: (651) 287-2103
m.reinhardt@rwblawfirm.com
g.blanchfield@rwblawfirm.com

Class Counsel

TAB 1

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4
5 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
6 Berkeley, CA 94710
Telephone: (510) 725-3000
7 jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 **Plaintiffs,**

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
WORKING TOGETHER; DAIRY FARMERS
22 OF AMERICA, INC.; LAND O'LAKES, INC.;
DAIRYLEA COOPERATIVE INC.; and
23 AGRI-MARK, INC.,

24 **Defendants.**

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
BOYS AND GIRLS CLUB OF THE
EAST VALLEY IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Mark Hanke, Chief Executive Officer of plaintiff Boys and Girls Club of the East Valley,
2 am authorized to make this declaration on its behalf and declare as follows:

3 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
4 herein and, if called upon, I could and would competently testify thereto.

5 2. Boys and Girls Club of the East Valley is a class representative for the state of
6 Arizona in *Edwards et al. v. National Milk Producers Federation et al.*, filed in the United States
7 District Court for the Northern District of California. Boys and Girls Club of the East Valley
8 submits this affidavit, on behalf of itself and the settlement class, in support of plaintiffs' motion for
9 attorneys' fees, expenses, and service awards.

10 3. Over the past 5 years, Boys and Girls Club of the East Valley has diligently
11 performed its duty to assist counsel in prosecuting this case, investing significant time and effort to
12 fulfill its role as a class representative.

13 4. At the outset of its involvement in the litigation, Boys and Girls Club of the East
14 Valley thoroughly discussed the case with its attorneys and reviewed the draft complaint.

15 5. Since that time Boys and Girls Club of the East Valley has remained informed
16 regarding the status of the litigation by communicating with its attorneys, including reviewing
17 periodic update correspondence from its counsel and key case documents.

18 6. Since the outset of the litigation, Boys and Girls Club of the East Valley has also
19 diligently retained all papers or electronic information that could be relevant to the litigation and
20 provided these to its attorneys.

21 7. Throughout the case Boys and Girls Club of the East Valley has also assisted in
22 responding to discovery. This included reviewing discovery requests from defendants, discussing
23 them with counsel, reviewing proposed responses, making any corrections, and signing off on the
24 responses. This process occurred repeatedly over the years – nine times to be exact – with respect to
25 the following discrete and unique sets of discovery requests:

- 26 • Land O'Lakes First Set of Interrogatories;
- 27 • Land O'Lakes Second Set of Interrogatories;

- 1 • Land O'Lakes First Set of Requests for Production;
- 2 • Land O'Lakes Second Set of Requests for Production;
- 3 • Agri-Mark's First Set of Interrogatories;
- 4 • Agri-Mark's First Set of Requests for Production;
- 5 • Dairy Farmers of America's First Set of Interrogatories;
- 6 • Dairy Famers of America's First Set of Requests for Admission; and
- 7 • Dairy Famers of America's First Set of Requests for Production.

8 8. In total, Boys and Girls Club of the East Valley assisted counsel in responding to a
9 total of 37 interrogatories, 41 requests for production of documents, and 79 requests for admission.

10 9. Boys and Girls Club of the East Valley has also contributed to the discovery process
11 by sitting for a deposition. This involved our then-Chief Executive Officer, Ramon Elias, reviewing
12 materials to prepare, meeting with counsel, and answering questions under oath on behalf of Boys
13 and Girls Club of the East Valley.

14 10. In addition, Boys and Girls Club of the East Valley submitted a declaration in support
15 of class certification. This process involved communication with its attorneys, reviewing the draft
16 document, making any corrections, and signing off on the declaration.

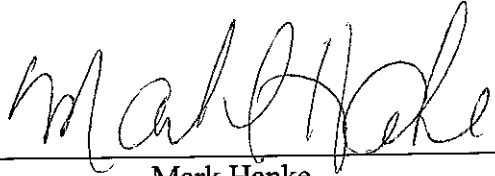
17 11. Just as Boys and Girls Club of the East Valley supported class certification of this
18 case, it also supports the settlement of this case. Our attorneys kept us informed each step of the
19 way. They provided us with copies of the term sheet and, once available, the settlement agreement
20 itself. Boys and Girls Club of the East Valley has reviewed these and supports the settlement as
21 reasonable, adequate, and fair to all class members.

22 12. Boys and Girls Club of the East Valley believes that it has provided considerable time
23 and effort on behalf of the many class members who stand to benefit from the settlement. In total, it
24 has spent approximately 40-50 hours performing all of the above-described duties on behalf of the
25 class over the past 5 years. Its attorneys have not made any promises regarding compensation for its
26 service, and it willingly agreed to participate in this case with no guarantee of personal benefit. Boys
27 and Girls Club of the East Valley believes that the time, effort, and information it provided helped to
28

1 make the settlement possible. Boys and Girls Club of the East Valley asks that the Court approve its
2 service award in the amount of \$5,000.

3 13. Boys and Girls Club of the East Valley also believes that the proposed settlement
4 achieves significant recovery for the class and is an excellent result, especially considering that there
5 is always a risk of losing at trial and walking away with nothing. Boys and Girls Club of the East
6 Valley believes the proposed settlement is in the best interests of class members and should therefore
7 be granted final approval.

8
9 I declare under penalty of perjury under the laws of the United States of America that the
10 foregoing is true and correct. Executed October 5, 2016, in Mesa, Arizona.

11
12
13 
14 _____
15 Mark Hanke
16 CEO for Boys and Girls Club of the East Valley
17
18
19
20
21
22
23
24
25
26
27
28

TAB 2

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

7 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
8 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
9 Telephone: (213) 330-7150
elaine@hbsslaw.com

10 *Class Counsel*

11 [Additional Counsel Listed on Signature Page]

12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18
19 Plaintiffs,

20 v.

21 NATIONAL MILK PRODUCERS
FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 Defendants.

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
JONATHAN RIZZO IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Jonathan Rizzo, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of Arizona in *Edwards et al. v. National Milk*
5 *Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past 5 years, I have diligently performed my duty to assist counsel in
9 prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

10 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
11 my attorneys and reviewed the draft complaint.

12 5. Since that time I have remained informed regarding the status of the litigation by
13 communicating with my attorneys, including reviewing periodic update correspondence from my
14 counsel and key case documents.

15 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
16 information that could be relevant to the litigation and provided these to my attorneys.

17 7. Throughout the case I have also assisted in responding to discovery. This included
18 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
19 proposed responses, making any corrections, and signing off on the responses. This process
20 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
21 and unique sets of discovery requests:

- 22 • Land O'Lakes First Set of Interrogatories;
- 23 • Land O'Lakes Second Set of Interrogatories;
- 24 • Land O'Lakes First Set of Requests for Production;
- 25 • Land O'Lakes Second Set of Requests for Production;
- 26 • Agri-Mark's First Set of Interrogatories;
- 27 • Agri-Mark's First Set of Requests for Production;

- 1 • Dairy Farmers of America's First Set of Interrogatories;
- 2 • Dairy Famers of America's First Set of Requests for Admission; and
- 3 • Dairy Famers of America's First Set of Requests for Production.

4 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
5 for production of documents, and 79 requests for admission.

6 9. I have also contributed to the discovery process by sitting for a deposition. This
7 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
8 oath to the best of my recollection and ability.

9 10. In addition, I submitted a declaration in support of class certification. This process
10 involved communication with my attorneys, reviewing the draft document, making any corrections,
11 and signing off on the declaration.

12 11. Just as I supported class certification of this case, I also support the settlement of this
13 case. My attorneys kept me informed each step of the way. They provided me with copies of the
14 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
15 the settlement as reasonable, adequate, and fair to all class members.

16 12. I believe that I have provided considerable time and effort on behalf of the many class
17 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
18 hours performing all of the above-described duties on behalf of the class over the past 5 years. My
19 attorneys have not made any promises regarding compensation for my service, and I willingly agreed
20 to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
21 information I provided helped to make the settlement possible. I ask that the Court approve my
22 service award in the amount of \$5,000.

23 13. I also believe that the proposed settlement achieves significant recovery for the class
24 and is an excellent result, especially considering that there is always a risk of losing at trial and
25 walking away with nothing. I believe the proposed settlement is in the best interests of class
26 members and should therefore be granted final approval.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed October 6th, 2016, in phoenix, Arizona.

3
4
5 
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
JONATHAN RIZZO

TAB 3

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 Plaintiffs,

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 Defendants.

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
MATTHEW EDWARDS IN SUPPORT
OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Matthew Edwards, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of California in *Edwards et al. v. National*
5 *Milk Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past 5 years, I have diligently performed my duty to assist counsel in
9 prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

10 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
11 my attorneys and reviewed the draft complaint.

12 5. Since that time I have remained informed regarding the status of the litigation by
13 communicating with my attorneys, including reviewing periodic update correspondence from my
14 counsel and key case documents.

15 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
16 information that could be relevant to the litigation and provided these to my attorneys.

17 7. Throughout the case I have also assisted in responding to discovery. This included
18 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
19 proposed responses, making any corrections, and signing off on the responses. This process
20 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
21 and unique sets of discovery requests:

- 22 • Land O'Lakes First Set of Interrogatories;
- 23 • Land O'Lakes Second Set of Interrogatories;
- 24 • Land O'Lakes First Set of Requests for Production;
- 25 • Land O'Lakes Second Set of Requests for Production;
- 26 • Agri-Mark's First Set of Interrogatories;
- 27 • Agri-Mark's First Set of Requests for Production;

- 1 • Dairy Farmers of America's First Set of Interrogatories;
- 2 • Dairy Famers of America's First Set of Requests for Admission; and
- 3 • Dairy Famers of America's First Set of Requests for Production.

4 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
5 for production of documents, and 79 requests for admission.

6 9. I have also contributed to the discovery process by sitting for a deposition. This
7 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
8 oath to the best of my recollection and ability.

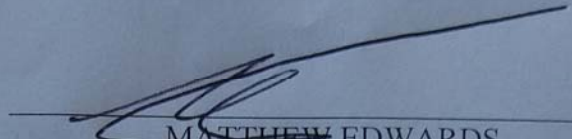
9 10. In addition, I submitted a declaration in support of class certification. This process
10 involved communication with my attorneys, reviewing the draft document, making any corrections,
11 and signing off on the declaration.

12 11. Just as I supported class certification of this case, I also support the settlement of this
13 case. My attorneys kept me informed each step of the way. They provided me with copies of the
14 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
15 the settlement as reasonable, adequate, and fair to all class members.

16 12. I believe that I have provided considerable time and effort on behalf of the many class
17 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
18 hours performing all of the above-described duties on behalf of the class over the past 5 years. My
19 attorneys have not made any promises regarding compensation for my service, and I willingly agreed
20 to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
21 information I provided helped to make the settlement possible. I ask that the Court approve my
22 service award in the amount of \$5,000.

23 13. I also believe that the proposed settlement achieves significant recovery for the class
24 and is an excellent result, especially considering that there is always a risk of losing at trial and
25 walking away with nothing. I believe the proposed settlement is in the best interests of class
26 members and should therefore be granted final approval.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed October 6, 2016, in Grants Pass, Oregon.

3
4
5 
6 MATTHEW EDWARDS
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TAB 4

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 **Plaintiffs,**

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O’LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 **Defendants.**

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
PAUL THACKER IN SUPPORT OF
PLAINTIFFS’ MOTION FOR
ATTORNEYS’ FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Paul Thacker, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the District of Columbia in *Edwards et al. v. National*
5 *Milk Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past two and a half years, I have diligently performed my duty to assist
9 counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class
10 representative.

11 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
12 my attorneys and reviewed the draft complaint.

13 5. Since that time I have remained informed regarding the status of the litigation by
14 communicating with my attorneys, including reviewing periodic update correspondence from my
15 counsel and key case documents.

16 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
17 information that could be relevant to the litigation and provided these to my attorneys.

18 7. Throughout the case I have also assisted in responding to discovery. This included
19 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
20 proposed responses, making any corrections, and signing off on the responses. This process
21 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
22 and unique sets of discovery requests:

- 23 • Land O'Lakes First Set of Interrogatories;
- 24 • Land O'Lakes Second Set of Interrogatories;
- 25 • Land O'Lakes First Set of Requests for Production;
- 26 • Land O'Lakes Second Set of Requests for Production;
- 27 • Agri-Mark's First Set of Interrogatories;

- 1 • Agri-Mark's First Set of Requests for Production;
- 2 • Dairy Farmers of America's First Set of Interrogatories;
- 3 • Dairy Famers of America's First Set of Requests for Admission; and
- 4 • Dairy Famers of America's First Set of Requests for Production.

5 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
6 for production of documents, and 79 requests for admission.

7 9. I have also contributed to the discovery process by sitting for a deposition. This
8 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
9 oath to the best of my recollection and ability.

10 10. In addition, I submitted a declaration in support of class certification. This process
11 involved communication with my attorneys, reviewing the draft document, making any corrections,
12 and signing off on the declaration.

13 11. Just as I supported class certification of this case, I also support the settlement of this
14 case. My attorneys kept me informed each step of the way. They provided me with copies of the
15 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
16 the settlement as reasonable, adequate, and fair to all class members.

17 12. I believe that I have provided considerable time and effort on behalf of the many class
18 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
19 hours performing all of the above-described duties on behalf of the class over the past two and a half
20 years. My attorneys have not made any promises regarding compensation for my service, and I
21 willingly agreed to participate in this case with no guarantee of personal benefit. I believe that the
22 time, effort, and information I provided helped to make the settlement possible. I ask that the Court
23 approve my service award in the amount of \$5,000.

24 13. I also believe that the proposed settlement achieves significant recovery for the class
25 and is an excellent result, especially considering that there is always a risk of losing at trial and
26 walking away with nothing. I believe the proposed settlement is in the best interests of class
27 members and should therefore be granted final approval.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed October 13, 2016, in Washington, D.C.

3
4
5
6
7 
8 PAUL THACKER
9

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TAB 5

1 Steve W. Berman (admitted *pro hac vice*)
2 HAGENS BERMAN SOBOL SHAPIRO LLP
3 1918 Eighth Avenue, Suite 3300
4 Seattle, WA 98101
5 Telephone: (206) 623-7292
6 steve@hbsslaw.com

7 Jeff D. Friedman (SBN 173886)
8 HAGENS BERMAN SOBOL SHAPIRO LLP
9 715 Hearst Avenue, Suite 202
10 Berkeley, CA 94710
11 Telephone: (510) 725-3000
12 jefff@hbsslaw.com

13 Elaine T. Byszewski (SBN 222304)
14 HAGENS BERMAN SOBOL SHAPIRO LLP
15 301 North Lake Avenue, Suite 920
16 Pasadena, CA 91101
17 Telephone: (213) 330-7150
18 elaine@hbsslaw.com

19 *Class Counsel*

20 [Additional Counsel Listed on Signature Page]

21 **UNITED STATES DISTRICT COURT**
22 **NORTHERN DISTRICT OF CALIFORNIA**
23 **OAKLAND DIVISION**

24 MATTHEW EDWARDS, et al., individually
25 and on behalf of all others similarly situated,
26
27 Plaintiffs,

28 v.

NATIONAL MILK PRODUCERS
FEDERATION, aka COOPERATIVES
WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,
Defendants.

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
SCOTT COOK IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Scott Cook, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of Kansas in *Edwards et al. v. National Milk*
5 *Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past 5 years, I have diligently performed my duty to assist counsel in
9 prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

10 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
11 my attorneys and reviewed the draft complaint.

12 5. Since that time I have remained informed regarding the status of the litigation by
13 communicating with my attorneys, including reviewing periodic update correspondence from my
14 counsel and key case documents.

15 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
16 information that could be relevant to the litigation and provided these to my attorneys.

17 7. Throughout the case I have also assisted in responding to discovery. This included
18 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
19 proposed responses, making any corrections, and signing off on the responses. This process
20 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
21 and unique sets of discovery requests:

- 22 • Land O'Lakes First Set of Interrogatories;
- 23 • Land O'Lakes Second Set of Interrogatories;
- 24 • Land O'Lakes First Set of Requests for Production;
- 25 • Land O'Lakes Second Set of Requests for Production;
- 26 • Agri-Mark's First Set of Interrogatories;
- 27 • Agri-Mark's First Set of Requests for Production;
- 28

- 1 • Dairy Farmers of America's First Set of Interrogatories;
- 2 • Dairy Famers of America's First Set of Requests for Admission; and
- 3 • Dairy Famers of America's First Set of Requests for Production.

4 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
5 for production of documents, and 79 requests for admission.

6 9. I have also contributed to the discovery process by sitting for a deposition. This
7 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
8 oath to the best of my recollection and ability.

9 10. In addition, I submitted a declaration in support of class certification. This process
10 involved communication with my attorneys, reviewing the draft document, making any corrections,
11 and signing off on the declaration.

12 11. Just as I supported class certification of this case, I also support the settlement of this
13 case. My attorneys kept me informed each step of the way. They provided me with copies of the
14 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
15 the settlement as reasonable, adequate, and fair to all class members.

16 12. I believe that I have provided considerable time and effort on behalf of the many class
17 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
18 hours performing all of the above-described duties on behalf of the class over the past 5 years. My
19 attorneys have not made any promises regarding compensation for my service, and I willingly agreed
20 to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
21 information I provided helped to make the settlement possible. I ask that the Court approve my
22 service award in the amount of \$5,000.

23 13. I also believe that the proposed settlement achieves significant recovery for the class
24 and is an excellent result, especially considering that there is always a risk of losing at trial and
25 walking away with nothing. I believe the proposed settlement is in the best interests of class
26 members and should therefore be granted final approval.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed October 6, 2016, in Junction City, Kansas.

3
4 

5 _____
6 SCOTT COOK
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TAB 6

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 Plaintiffs,

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 Defendants.

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
DANELL TOMASELLA IN SUPPORT
OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Danell Tomasella, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of Massachusetts in *Edwards et al. v. National*
5 *Milk Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past 5 years, I have diligently performed my duty to assist counsel in
9 prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

10 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
11 my attorneys and reviewed the draft complaint.

12 5. Since that time I have remained informed regarding the status of the litigation by
13 communicating with my attorneys, including reviewing periodic update correspondence from my
14 counsel and key case documents.

15 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
16 information that could be relevant to the litigation and provided these to my attorneys.

17 7. Throughout the case I have also assisted in responding to discovery. This included
18 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
19 proposed responses, making any corrections, and signing off on the responses. This process
20 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
21 and unique sets of discovery requests:

- 22 • Land O'Lakes First Set of Interrogatories;
- 23 • Land O'Lakes Second Set of Interrogatories;
- 24 • Land O'Lakes First Set of Requests for Production;
- 25 • Land O'Lakes Second Set of Requests for Production;
- 26 • Agri-Mark's First Set of Interrogatories;
- 27 • Agri-Mark's First Set of Requests for Production;

- 1 • Dairy Farmers of America's First Set of Interrogatories;
- 2 • Dairy Famers of America's First Set of Requests for Admission; and
- 3 • Dairy Famers of America's First Set of Requests for Production.

4 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
5 for production of documents, and 79 requests for admission.

6 9. I have also contributed to the discovery process by sitting for a deposition. This
7 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
8 oath to the best of my recollection and ability.

9 10. In addition, I submitted a declaration in support of class certification. This process
10 involved communication with my attorneys, reviewing the draft document, making any corrections,
11 and signing off on the declaration.


12 11. Just as I supported class certification of this case, I also support the settlement of this
13 case. My attorneys kept me informed each step of the way. They provided me with copies of the
14 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
15 the settlement as reasonable, adequate, and fair to all class members.

16 12. I believe that I have provided considerable time and effort on behalf of the many class
17 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
18 hours performing all of the above-described duties on behalf of the class over the past 5 years. My
19 attorneys have not made any promises regarding compensation for my service, and I willingly agreed
20 to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
21 information I provided helped to make the settlement possible. I ask that the Court approve my
22 service award in the amount of \$5,000.

23 13. I also believe that the proposed settlement achieves significant recovery for the class
24 and is an excellent result, especially considering that there is always a risk of losing at trial and
25 walking away with nothing. I believe the proposed settlement is in the best interests of class
26 members and should therefore be granted final approval.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed October 5, 2016, in Buzzards Bay, Massachusetts.


DANELL TOMASELLA

TAB 7

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 **Plaintiffs,**

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 **Defendants.**

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
KORY PENTLAND IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Kory Pentland, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of Michigan in *Edwards et al. v. National Milk*
5 *Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past 5 years, I have diligently performed my duty to assist counsel in
9 prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

10 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
11 my attorneys and reviewed the draft complaint.

12 5. Since that time I have remained informed regarding the status of the litigation by
13 communicating with my attorneys, including reviewing periodic update correspondence from my
14 counsel and key case documents.

15 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
16 information that could be relevant to the litigation and provided these to my attorneys.

17 7. Throughout the case I have also assisted in responding to discovery. This included
18 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
19 proposed responses, making any corrections, and signing off on the responses. This process
20 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
21 and unique sets of discovery requests:

- 22 • Land O'Lakes First Set of Interrogatories;
- 23 • Land O'Lakes Second Set of Interrogatories;
- 24 • Land O'Lakes First Set of Requests for Production;
- 25 • Land O'Lakes Second Set of Requests for Production;
- 26 • Agri-Mark's First Set of Interrogatories;
- 27 • Agri-Mark's First Set of Requests for Production;

- 1 • Dairy Farmers of America's First Set of Interrogatories;
- 2 • Dairy Famers of America's First Set of Requests for Admission; and
- 3 • Dairy Famers of America's First Set of Requests for Production.

4 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
5 for production of documents, and 79 requests for admission.

6 9. I have also contributed to the discovery process by sitting for a deposition. This
7 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
8 oath to the best of my recollection and ability.

9 10. In addition, I submitted a declaration in support of class certification. This process
10 involved communication with my attorneys, reviewing the draft document, making any corrections,
11 and signing off on the declaration.

12 11. Just as I supported class certification of this case, I also support the settlement of this
13 case. My attorneys kept me informed each step of the way. They provided me with copies of the
14 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
15 the settlement as reasonable, adequate, and fair to all class members.

16 12. I believe that I have provided considerable time and effort on behalf of the many class
17 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
18 hours performing all of the above-described duties on behalf of the class over the past 5 years. My
19 attorneys have not made any promises regarding compensation for my service, and I willingly agreed
20 to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
21 information I provided helped to make the settlement possible. I ask that the Court approve my
22 service award in the amount of \$5,000.

23 13. I also believe that the proposed settlement achieves significant recovery for the class
24 and is an excellent result, especially considering that there is always a risk of losing at trial and
25 walking away with nothing. I believe the proposed settlement is in the best interests of class
26 members and should therefore be granted final approval.

that the foregoing is true and correct. Executed October 5, 2016, in

Lozell, Michigan.



KORY PENTLAND

TAB 8

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
7 jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 **Plaintiffs,**

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 **Defendants.**

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
LORI CURTIS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Lori Curtis, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of Missouri in *Edwards et al. v. National Milk*
5 *Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past two and a half years, I have diligently performed my duty to assist
9 counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class
10 representative.

11 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
12 my attorneys and reviewed the draft complaint.

13 5. Since that time I have remained informed regarding the status of the litigation by
14 communicating with my attorneys, including reviewing periodic update correspondence from my
15 counsel and key case documents.

16 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
17 information that could be relevant to the litigation and provided these to my attorneys.

18 7. Throughout the case I have also assisted in responding to discovery. This included
19 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
20 proposed responses, making any corrections, and signing off on the responses. This process
21 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
22 and unique sets of discovery requests:

- 23 • Land O'Lakes First Set of Interrogatories;
- 24 • Land O'Lakes Second Set of Interrogatories;
- 25 • Land O'Lakes First Set of Requests for Production;
- 26 • Land O'Lakes Second Set of Requests for Production;
- 27 • Agri-Mark's First Set of Interrogatories;

28

- 1 • Agri-Mark's First Set of Requests for Production;
- 2 • Dairy Farmers of America's First Set of Interrogatories;
- 3 • Dairy Famers of America's First Set of Requests for Admission; and
- 4 • Dairy Famers of America's First Set of Requests for Production.

5 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
6 for production of documents, and 79 requests for admission.

7 9. I have also contributed to the discovery process by sitting for a deposition. This
8 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
9 oath to the best of my recollection and ability.

10 10. In addition, I submitted a declaration in support of class certification. This process
11 involved communication with my attorneys, reviewing the draft document, making any corrections,
12 and signing off on the declaration.

13 11. Just as I supported class certification of this case, I also support the settlement of this
14 case. My attorneys kept me informed each step of the way. They provided me with copies of the
15 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
16 the settlement as reasonable, adequate, and fair to all class members.

17 12. I believe that I have provided considerable time and effort on behalf of the many class
18 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
19 hours performing all of the above-described duties on behalf of the class over the past two and a half
20 years. My attorneys have not made any promises regarding compensation for my service, and I
21 willingly agreed to participate in this case with no guarantee of personal benefit. I believe that the
22 time, effort, and information I provided helped to make the settlement possible. I ask that the Court
23 approve my service award in the amount of \$5,000.

24 13. I also believe that the proposed settlement achieves significant recovery for the class
25 and is an excellent result, especially considering that there is always a risk of losing at trial and
26 walking away with nothing. I believe the proposed settlement is in the best interests of class
27 members and should therefore be granted final approval.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed October 6, 2016, in St. Louis, Missouri.



LORI CURTIS

TAB 9

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**

17 MATTHEW EDWARDS, et al., individually
and on behalf of all others similarly situated,
18
19 Plaintiffs,

20 v.

21 NATIONAL MILK PRODUCERS
FEDERATION, aka COOPERATIVES
WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
22 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,
23

24 Defendants.

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
MARY ANDERSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Mary Anderson, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of Nebraska in *Edwards et al. v. National Milk*
5 *Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past 5 years, I have diligently performed my duty to assist counsel in
9 prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

10 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
11 my attorneys and reviewed the draft complaint.

12 5. Since that time I have remained informed regarding the status of the litigation by
13 communicating with my attorneys, including reviewing periodic update correspondence from my
14 counsel and key case documents.

15 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
16 information that could be relevant to the litigation and provided these to my attorneys.

17 7. Throughout the case I have also assisted in responding to discovery. This included
18 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
19 proposed responses, making any corrections, and signing off on the responses. This process
20 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
21 and unique sets of discovery requests:

- 22 • Land O'Lakes First Set of Interrogatories;
- 23 • Land O'Lakes Second Set of Interrogatories;
- 24 • Land O'Lakes First Set of Requests for Production;
- 25 • Land O'Lakes Second Set of Requests for Production;
- 26 • Agri-Mark's First Set of Interrogatories;
- 27 • Agri-Mark's First Set of Requests for Production;

- 1 • Dairy Farmers of America's First Set of Interrogatories;
- 2 • Dairy Famers of America's First Set of Requests for Admission; and
- 3 • Dairy Famers of America's First Set of Requests for Production.

4 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
5 for production of documents, and 79 requests for admission.

6 9. I have also contributed to the discovery process by sitting for a deposition. This
7 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
8 oath to the best of my recollection and ability.

9 10. In addition, I submitted a declaration in support of class certification. This process
10 involved communication with my attorneys, reviewing the draft document, making any corrections,
11 and signing off on the declaration.

12 11. Just as I supported class certification of this case, I also support the settlement of this
13 case. My attorneys kept me informed each step of the way. They provided me with copies of the
14 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
15 the settlement as reasonable, adequate, and fair to all class members.

16 12. I believe that I have provided considerable time and effort on behalf of the many class
17 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
18 hours performing all of the above-described duties on behalf of the class over the past 5 years. My
19 attorneys have not made any promises regarding compensation for my service, and I willingly agreed
20 to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
21 information I provided helped to make the settlement possible. I ask that the Court approve my
22 service award in the amount of \$5,000.

23 13. I also believe that the proposed settlement achieves significant recovery for the class
24 and is an excellent result, especially considering that there is always a risk of losing at trial and
25 walking away with nothing. I believe the proposed settlement is in the best interests of class
26 members and should therefore be granted final approval.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed October 5, 2016, in Bellevue, Nebraska.

3
4 
5 _____
6 MARY ANDERSON

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TAB 10

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 Plaintiffs,

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 Defendants.

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
JULIE EWALD IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Julie Ewald, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of Nevada in *Edwards et al. v. National Milk*
5 *Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past 5 years, I have diligently performed my duty to assist counsel in
9 prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

10 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
11 my attorneys and reviewed the draft complaint.

12 5. Since that time I have remained informed regarding the status of the litigation by
13 communicating with my attorneys, including reviewing periodic update correspondence from my
14 counsel and key case documents.

15 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
16 information that could be relevant to the litigation and provided these to my attorneys.

17 7. Throughout the case I have also assisted in responding to discovery. This included
18 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
19 proposed responses, making any corrections, and signing off on the responses. This process
20 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
21 and unique sets of discovery requests:

- 22 • Land O'Lakes First Set of Interrogatories;
- 23 • Land O'Lakes Second Set of Interrogatories;
- 24 • Land O'Lakes First Set of Requests for Production;
- 25 • Land O'Lakes Second Set of Requests for Production;
- 26 • Agri-Mark's First Set of Interrogatories;
- 27 • Agri-Mark's First Set of Requests for Production;

- 1 • Dairy Farmers of America's First Set of Interrogatories;
- 2 • Dairy Famers of America's First Set of Requests for Admission; and
- 3 • Dairy Famers of America's First Set of Requests for Production.

4 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
5 for production of documents, and 79 requests for admission.

6 9. I have also contributed to the discovery process by sitting for a deposition. This
7 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
8 oath to the best of my recollection and ability.

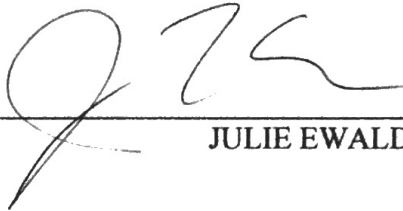
9 10. In addition, I submitted a declaration in support of class certification. This process
10 involved communication with my attorneys, reviewing the draft document, making any corrections,
11 and signing off on the declaration.

12 11. Just as I supported class certification of this case, I also support the settlement of this
13 case. My attorneys kept me informed each step of the way. They provided me with copies of the
14 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
15 the settlement as reasonable, adequate, and fair to all class members.

16 12. I believe that I have provided considerable time and effort on behalf of the many class
17 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
18 hours performing all of the above-described duties on behalf of the class over the past 5 years. My
19 attorneys have not made any promises regarding compensation for my service, and I willingly agreed
20 to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
21 information I provided helped to make the settlement possible. I ask that the Court approve my
22 service award in the amount of \$5,000.

23 13. I also believe that the proposed settlement achieves significant recovery for the class
24 and is an excellent result, especially considering that there is always a risk of losing at trial and
25 walking away with nothing. I believe the proposed settlement is in the best interests of class
26 members and should therefore be granted final approval.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed October 10, 2016, in Las Vegas, Nevada.

3
4 
5 _____
6 JULIE EWALD
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TAB 11

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
5 HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
6 Berkeley, CA 94710
Telephone: (510) 725-3000
7 jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 **Plaintiffs,**

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
WORKING TOGETHER; DAIRY FARMERS
22 OF AMERICA, INC.; LAND O'LAKES, INC.;
DAIRYLEA COOPERATIVE INC.; and
23 AGRI-MARK, INC.,

24 **Defendants.**

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
SHEILA JACKSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Sheila Jackson, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of New Hampshire in *Edwards et al. v.*
5 *National Milk Producers Federation et al.*, filed in the United States District Court for the Northern
6 District of California. I submit this affidavit, on behalf of myself and the settlement class, in support
7 of plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past two and a half years, I have diligently performed my duty to assist
9 counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class
10 representative.

11 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
12 my attorneys and reviewed the draft complaint.

13 5. Since that time I have remained informed regarding the status of the litigation by
14 communicating with my attorneys, including reviewing periodic update correspondence from my
15 counsel and key case documents.

16 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
17 information that could be relevant to the litigation and provided these to my attorneys.

18 7. Throughout the case I have also assisted in responding to discovery. This included
19 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
20 proposed responses, making any corrections, and signing off on the responses. This process
21 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
22 and unique sets of discovery requests:

- 23 • Land O'Lakes First Set of Interrogatories;
- 24 • Land O'Lakes Second Set of Interrogatories;
- 25 • Land O'Lakes First Set of Requests for Production;
- 26 • Land O'Lakes Second Set of Requests for Production;
- 27 • Agri-Mark's First Set of Interrogatories;

- 1 • Agri-Mark's First Set of Requests for Production;
- 2 • Dairy Farmers of America's First Set of Interrogatories;
- 3 • Dairy Famers of America's First Set of Requests for Admission; and
- 4 • Dairy Famers of America's First Set of Requests for Production.

5 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
6 for production of documents, and 79 requests for admission.

7 9. I have also contributed to the discovery process by sitting for a deposition. This
8 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
9 oath to the best of my recollection and ability.

10 10. In addition, I submitted a declaration in support of class certification. This process
11 involved communication with my attorneys, reviewing the draft document, making any corrections,
12 and signing off on the declaration.

13 11. Just as I supported class certification of this case, I also support the settlement of this
14 case. My attorneys kept me informed each step of the way. They provided me with copies of the
15 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
16 the settlement as reasonable, adequate, and fair to all class members.

17 12. I believe that I have provided considerable time and effort on behalf of the many class
18 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
19 hours performing all of the above-described duties on behalf of the class over the past two and a half
20 years. My attorneys have not made any promises regarding compensation for my service, and I
21 willingly agreed to participate in this case with no guarantee of personal benefit. I believe that the
22 time, effort, and information I provided helped to make the settlement possible. I ask that the Court
23 approve my service award in the amount of \$5,000.

24 13. I also believe that the proposed settlement achieves significant recovery for the class
25 and is an excellent result, especially considering that there is always a risk of losing at trial and
26 walking away with nothing. I believe the proposed settlement is in the best interests of class
27 members and should therefore be granted final approval.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed October 12, 2016, in Bradford, New Hampshire.

3
4 
5 _____
6 SHEILA JACKSON
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TAB 12

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 Plaintiffs,

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 Defendants.

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
SCOTT WEBER IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Scott Weber, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of Oregon in *Edwards et al. v. National Milk*
5 *Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past 5 years, I have diligently performed my duty to assist counsel in
9 prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

10 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
11 my attorneys and reviewed the draft complaint.

12 5. Since that time I have remained informed regarding the status of the litigation by
13 communicating with my attorneys, including reviewing periodic update correspondence from my
14 counsel and key case documents.

15 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
16 information that could be relevant to the litigation and provided these to my attorneys.

17 7. Throughout the case I have also assisted in responding to discovery. This included
18 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
19 proposed responses, making any corrections, and signing off on the responses. This process
20 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
21 and unique sets of discovery requests:

- 22 • Land O'Lakes First Set of Interrogatories;
- 23 • Land O'Lakes Second Set of Interrogatories;
- 24 • Land O'Lakes First Set of Requests for Production;
- 25 • Land O'Lakes Second Set of Requests for Production;
- 26 • Agri-Mark's First Set of Interrogatories;
- 27 • Agri-Mark's First Set of Requests for Production;

- 1 • Dairy Farmers of America's First Set of Interrogatories;
- 2 • Dairy Famers of America's First Set of Requests for Admission; and
- 3 • Dairy Famers of America's First Set of Requests for Production.

4 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
5 for production of documents, and 79 requests for admission.

6 9. I have also contributed to the discovery process by sitting for a deposition. This
7 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
8 oath to the best of my recollection and ability.

9 10. In addition, I submitted a declaration in support of class certification. This process
10 involved communication with my attorneys, reviewing the draft document, making any corrections,
11 and signing off on the declaration.

12 11. Just as I supported class certification of this case, I also support the settlement of this
13 case. My attorneys kept me informed each step of the way. They provided me with copies of the
14 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
15 the settlement as reasonable, adequate, and fair to all class members.

16 12. I believe that I have provided considerable time and effort on behalf of the many class
17 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
18 hours performing all of the above-described duties on behalf of the class over the past 5 years. My
19 attorneys have not made any promises regarding compensation for my service, and I willingly agreed
20 to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
21 information I provided helped to make the settlement possible. I ask that the Court approve my
22 service award in the amount of \$5,000.

23 13. I also believe that the proposed settlement achieves significant recovery for the class
24 and is an excellent result, especially considering that there is always a risk of losing at trial and
25 walking away with nothing. I believe the proposed settlement is in the best interests of class
26 members and should therefore be granted final approval.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed October 6, 2016, in Bend, Oregon.



SCOTT WEBER

TAB 13

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 **Plaintiffs,**

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 **Defendants.**

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
JENNIFER CLITES IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Jennifer Clites, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of South Dakota in *Edwards et al. v. National*
5 *Milk Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past 5 years, I have diligently performed my duty to assist counsel in
9 prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

10 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
11 my attorneys and reviewed the draft complaint.

12 5. Since that time I have remained informed regarding the status of the litigation by
13 communicating with my attorneys, including reviewing periodic update correspondence from my
14 counsel and key case documents.

15 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
16 information that could be relevant to the litigation and provided these to my attorneys.

17 7. Throughout the case I have also assisted in responding to discovery. This included
18 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
19 proposed responses, making any corrections, and signing off on the responses. This process
20 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
21 and unique sets of discovery requests:

- 22 • Land O'Lakes First Set of Interrogatories;
- 23 • Land O'Lakes Second Set of Interrogatories;
- 24 • Land O'Lakes First Set of Requests for Production;
- 25 • Land O'Lakes Second Set of Requests for Production;
- 26 • Agri-Mark's First Set of Interrogatories;
- 27 • Agri-Mark's First Set of Requests for Production;

- 1 • Dairy Farmers of America's First Set of Interrogatories;
- 2 • Dairy Famers of America's First Set of Requests for Admission; and
- 3 • Dairy Famers of America's First Set of Requests for Production.

4 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
5 for production of documents, and 79 requests for admission.

6 9. I have also contributed to the discovery process by sitting for a deposition. This
7 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
8 oath to the best of my recollection and ability.

9 10. In addition, I submitted a declaration in support of class certification. This process
10 involved communication with my attorneys, reviewing the draft document, making any corrections,
11 and signing off on the declaration.

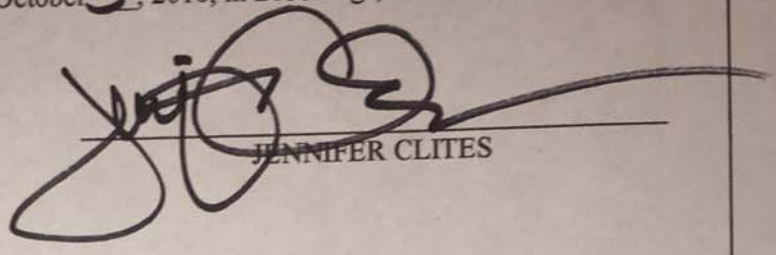
12 11. Just as I supported class certification of this case, I also support the settlement of this
13 case. My attorneys kept me informed each step of the way. They provided me with copies of the
14 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
15 the settlement as reasonable, adequate, and fair to all class members.

16 12. I believe that I have provided considerable time and effort on behalf of the many class
17 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
18 hours performing all of the above-described duties on behalf of the class over the past 5 years. My
19 attorneys have not made any promises regarding compensation for my service, and I willingly agreed
20 to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
21 information I provided helped to make the settlement possible. I ask that the Court approve my
22 service award in the amount of \$5,000.

23 13. I also believe that the proposed settlement achieves significant recovery for the class
24 and is an excellent result, especially considering that there is always a risk of losing at trial and
25 walking away with nothing. I believe the proposed settlement is in the best interests of class
26 members and should therefore be granted final approval.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed October 5, 2016, in Brookings, South Dakota.



JENNIFER CLITES

TAB 14

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 Plaintiffs,

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 Defendants.

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
JOHN PEYCHAL IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, John Peychal, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of Tennessee in *Edwards et al. v. National*
5 *Milk Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past two and a half years, I have diligently performed my duty to assist
9 counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class
10 representative.

11 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
12 my attorneys and reviewed the draft complaint.

13 5. Since that time I have remained informed regarding the status of the litigation by
14 communicating with my attorneys, including reviewing periodic update correspondence from my
15 counsel and key case documents.

16 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
17 information that could be relevant to the litigation and provided these to my attorneys.

18 7. Throughout the case I have also assisted in responding to discovery. This included
19 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
20 proposed responses, making any corrections, and signing off on the responses. This process
21 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
22 and unique sets of discovery requests:

- 23 • Land O'Lakes First Set of Interrogatories;
- 24 • Land O'Lakes Second Set of Interrogatories;
- 25 • Land O'Lakes First Set of Requests for Production;
- 26 • Land O'Lakes Second Set of Requests for Production;
- 27 • Agri-Mark's First Set of Interrogatories;

- 1 • Agri-Mark's First Set of Requests for Production;
- 2 • Dairy Farmers of America's First Set of Interrogatories;
- 3 • Dairy Famers of America's First Set of Requests for Admission; and
- 4 • Dairy Famers of America's First Set of Requests for Production.

5 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
6 for production of documents, and 79 requests for admission.

7 9. I have also contributed to the discovery process by sitting for a deposition. This
8 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
9 oath to the best of my recollection and ability.

10 10. In addition, I submitted a declaration in support of class certification. This process
11 involved communication with my attorneys, reviewing the draft document, making any corrections,
12 and signing off on the declaration.


13 11. Just as I supported class certification of this case, I also support the settlement of this
14 case. My attorneys kept me informed each step of the way. They provided me with copies of the
15 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
16 the settlement as reasonable, adequate, and fair to all class members.

17 12. I believe that I have provided considerable time and effort on behalf of the many class
18 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
19 hours performing all of the above-described duties on behalf of the class over the past two and a half
20 years. My attorneys have not made any promises regarding compensation for my service, and I
21 willingly agreed to participate in this case with no guarantee of personal benefit. I believe that the
22 time, effort, and information I provided helped to make the settlement possible. I ask that the Court
23 approve my service award in the amount of \$5,000.

24 13. I also believe that the proposed settlement achieves significant recovery for the class
25 and is an excellent result, especially considering that there is always a risk of losing at trial and
26 walking away with nothing. I believe the proposed settlement is in the best interests of class
27 members and should therefore be granted final approval.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed October 5, 2016, in SEVIERVILLE Tennessee.



JOHN PEYCHAL

TAB 15

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

MATTHEW EDWARDS, et al., individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

NATIONAL MILK PRODUCERS
FEDERATION, aka COOPERATIVES
WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
DAIRYLEA COOPERATIVE INC.; and AGRI-
MARK, INC.,

Defendants.

Case No. 11-CV-04766-JSW
[consolidated with 11-CV-04791-JSW and
11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
KATHLEEN DAVIS IN SUPPORT
OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

010263-11_903693 V1

I, Kathleen Davis, declare as follows:

I am an individual over the age of 18. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

I am a class representative for the state of Tennessee in *Edwards et al. v. National Milk Producers Federation et al.*, filed in the United States District Court for the Northern District of California. I submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion for attorneys' fees, expenses, and service awards.

Over the past two and a half years, I have diligently performed my duty to assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

At the outset of my involvement in the litigation, I thoroughly discussed the case with my attorneys and reviewed the draft complaint.

5. Since that time I have remained informed regarding the status of the litigation by communicating with my attorneys, including reviewing periodic update correspondence from my counsel and key case documents.

6. Since the outset of the litigation, I have also diligently retained all papers or

7. Throughout the case I have also assisted in responding to discovery. This included reviewing discovery requests from defendants, discussing them with my counsel, reviewing proposed responses, making any corrections, and signing off on the responses. This process occurred repeatedly over the years – nine times to be exact – with respect to the following discrete and unique sets of discovery requests:

- Land O'Lakes First Set of Interrogatories;
- Land O'Lakes Second Set of Interrogatories;
- Land O'Lakes First Set of Requests for Production;
- Land O'Lakes Second Set of Requests for Production;
- Agri-Mark's First Set of Interrogatories;
- Agri-Mark's First Set of Requests for Production;
- Dairy Farmers of America's First Set of Interrogatories;
- Dairy Famers of America's First Set of Requests for Admission; and
- Dairy Famers of America's First Set of Requests for Production.

8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests for production of documents, and 79 requests for admission.

9. I have also contributed to the discovery process by sitting for a deposition. This involved reviewing materials to prepare, meeting with my counsel, and answering questions under oath to the best of my recollection and ability.

10. In addition, I submitted a declaration in support of class certification. This process involved communication with my attorneys, reviewing the draft document, making any corrections, and signing off on the declaration.

11. Just as I supported class certification of this case, I also support the settlement of this case. My attorneys kept me informed each step of the way. They provided me with copies of the term sheet and, once available, the settlement agreement itself. I have reviewed these and support the settlement as reasonable, adequate, and fair to all class members.

12. I believe that I have provided considerable time and effort on behalf of the many class members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50 hours performing all of the above-described duties on behalf of the class over the past two and a half years. My attorneys have not made any promises regarding compensation for my service, and I willingly agreed to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and information I provided helped to make the settlement possible. I ask that the Court approve my service award in the amount of \$5,000.

13. I also believe that the proposed settlement achieves significant recovery for the class and is an excellent result, especially considering that there is always a risk of losing at trial and walking away with nothing. I believe the proposed settlement is in the best interests of class members and should therefore be granted final approval.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed October 4, 2016, in Andersonville, Tennessee.


KATHLEEN DAVIS

TAB 16

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 **Plaintiffs,**

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O’LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 **Defendants.**

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
JOHN MURRAY IN SUPPORT OF
PLAINTIFFS’ MOTION FOR
ATTORNEYS’ FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, John Murray, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of Vermont in *Edwards et al. v. National Milk*
5 *Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past 5 years, I have diligently performed my duty to assist counsel in
9 prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

10 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
11 my attorneys and reviewed the draft complaint.

12 5. Since that time I have remained informed regarding the status of the litigation by
13 communicating with my attorneys, including reviewing periodic update correspondence from my
14 counsel and key case documents.

15 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
16 information that could be relevant to the litigation and provided these to my attorneys.

17 7. Throughout the case I have also assisted in responding to discovery. This included
18 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
19 proposed responses, making any corrections, and signing off on the responses. This process
20 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
21 and unique sets of discovery requests:

- 22 • Land O'Lakes First Set of Interrogatories;
- 23 • Land O'Lakes Second Set of Interrogatories;
- 24 • Land O'Lakes First Set of Requests for Production;
- 25 • Land O'Lakes Second Set of Requests for Production;
- 26 • Agri-Mark's First Set of Interrogatories;
- 27 • Agri-Mark's First Set of Requests for Production;

- 1 • Dairy Farmers of America's First Set of Interrogatories;
- 2 • Dairy Famers of America's First Set of Requests for Admission; and
- 3 • Dairy Famers of America's First Set of Requests for Production.

4 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
5 for production of documents, and 79 requests for admission.

6 9. I have also contributed to the discovery process by sitting for a deposition. This
7 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
8 oath to the best of my recollection and ability.

9 10. In addition, I submitted a declaration in support of class certification. This process
10 involved communication with my attorneys, reviewing the draft document, making any corrections,
11 and signing off on the declaration.

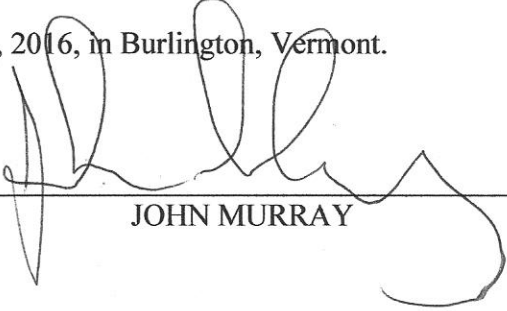
12 11. Just as I supported class certification of this case, I also support the settlement of this
13 case. My attorneys kept me informed each step of the way. They provided me with copies of the
14 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
15 the settlement as reasonable, adequate, and fair to all class members.

16 12. I believe that I have provided considerable time and effort on behalf of the many class
17 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
18 hours performing all of the above-described duties on behalf of the class over the past 5 years. My
19 attorneys have not made any promises regarding compensation for my service, and I willingly agreed
20 to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
21 information I provided helped to make the settlement possible. I ask that the Court approve my
22 service award in the amount of \$5,000.

23 13. I also believe that the proposed settlement achieves significant recovery for the class
24 and is an excellent result, especially considering that there is always a risk of losing at trial and
25 walking away with nothing. I believe the proposed settlement is in the best interests of class
26 members and should therefore be granted final approval.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed October 6, 2016, in Burlington, Vermont.



JOHN MURRAY

TAB 17

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 Plaintiffs,

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 Defendants.

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
BRANDON STEELE IN SUPPORT
OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Brandon Steele, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of West Virginia in *Edwards et al. v. National*
5 *Milk Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past 2 years, I have diligently performed my duty to assist counsel in
9 prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

10 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
11 my attorneys and reviewed the draft complaint.

12 5. Since that time I have remained informed regarding the status of the litigation by
13 communicating with my attorneys, including reviewing periodic update correspondence from my
14 counsel and key case documents.

15 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
16 information that could be relevant to the litigation and provided these to my attorneys.

17 7. Throughout the case I have also assisted in responding to discovery. This included
18 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
19 proposed responses, making any corrections, and signing off on the responses. This process
20 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
21 and unique sets of discovery requests:

- 22 • Land O'Lakes First Set of Interrogatories;
- 23 • Land O'Lakes Second Set of Interrogatories;
- 24 • Land O'Lakes First Set of Requests for Production;
- 25 • Land O'Lakes Second Set of Requests for Production;
- 26 • Agri-Mark's First Set of Interrogatories;
- 27 • Agri-Mark's First Set of Requests for Production;

- 1 • Dairy Farmers of America's First Set of Interrogatories;
- 2 • Dairy Famers of America's First Set of Requests for Admission; and
- 3 • Dairy Famers of America's First Set of Requests for Production.

4 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
5 for production of documents, and 79 requests for admission.

6 9. I have also contributed to the discovery process by sitting for a deposition. This
7 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
8 oath to the best of my recollection and ability.

9 10. I also support the settlement of this case. My attorneys kept me informed each step of
10 the way. They provided me with copies of the term sheet and, once available, the settlement
11 agreement itself. I have reviewed these and support the settlement as reasonable, adequate, and fair
12 to all class members.

13 11. I believe that I have provided considerable time and effort on behalf of the many class
14 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
15 hours performing all of the above-described duties on behalf of the class over the past 2 years. My
16 attorneys have not made any promises regarding compensation for my service, and I willingly agreed
17 to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
18 information I provided helped to make the settlement possible. I ask that the Court approve my
19 service award in the amount of \$5,000.

20 12. I also believe that the proposed settlement achieves significant recovery for the class
21 and is an excellent result, especially considering that there is always a risk of losing at trial and
22 walking away with nothing. I believe the proposed settlement is in the best interests of class
23 members and should therefore be granted final approval.

24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct. Executed October 6th, 2016, in Beckley, Raleigh County, West Virginia.

26
27 
28 BRANNDON STEELE

TAB 18

1 Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
2 1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
3 Telephone: (206) 623-7292
steve@hbsslaw.com

4 Jeff D. Friedman (SBN 173886)
HAGENS BERMAN SOBOL SHAPIRO LLP
5 715 Hearst Avenue, Suite 202
Berkeley, CA 94710
6 Telephone: (510) 725-3000
jefff@hbsslaw.com

8 Elaine T. Byszewski (SBN 222304)
HAGENS BERMAN SOBOL SHAPIRO LLP
9 301 North Lake Avenue, Suite 920
Pasadena, CA 91101
10 Telephone: (213) 330-7150
elaine@hbsslaw.com

11 *Class Counsel*

12 [Additional Counsel Listed on Signature Page]

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 MATTHEW EDWARDS, et al., individually
17 and on behalf of all others similarly situated,
18 Plaintiffs,

19 v.

20 NATIONAL MILK PRODUCERS
21 FEDERATION, aka COOPERATIVES
22 WORKING TOGETHER; DAIRY FARMERS
OF AMERICA, INC.; LAND O'LAKES, INC.;
23 DAIRYLEA COOPERATIVE INC.; and
AGRI-MARK, INC.,

24 Defendants.

Case No. 11-CV-04766-JSW

[consolidated with 11-CV-04791-JSW
and 11-CV-05253-JSW]

CLASS ACTION

**DECLARATION OF PLAINTIFF
JEFFREY ROBB IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

Date: December 16, 2016
Time: 9:00 a.m.
Dept: Courtroom 5
Judge: Hon. Jeffrey S. White

1 I, Jeffrey Robb, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters stated
3 herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative for the state of Wisconsin in *Edwards et al. v. National*
5 *Milk Producers Federation et al.*, filed in the United States District Court for the Northern District of
6 California. I submit this affidavit, on behalf of myself and the settlement class, in support of
7 plaintiffs' motion for attorneys' fees, expenses, and service awards.

8 3. Over the past 5 years, I have diligently performed my duty to assist counsel in
9 prosecuting this case, investing significant time and effort to fulfill my role as a class representative.

10 4. At the outset of my involvement in the litigation, I thoroughly discussed the case with
11 my attorneys and reviewed the draft complaint.

12 5. Since that time I have remained informed regarding the status of the litigation by
13 communicating with my attorneys, including reviewing periodic update correspondence from my
14 counsel and key case documents.

15 6. Since the outset of the litigation, I have also diligently retained all papers or electronic
16 information that could be relevant to the litigation and provided these to my attorneys.

17 7. Throughout the case I have also assisted in responding to discovery. This included
18 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
19 proposed responses, making any corrections, and signing off on the responses. This process
20 occurred repeatedly over the years – nine times to be exact – with respect to the following discrete
21 and unique sets of discovery requests:

- 22 • Land O'Lakes First Set of Interrogatories;
- 23 • Land O'Lakes Second Set of Interrogatories;
- 24 • Land O'Lakes First Set of Requests for Production;
- 25 • Land O'Lakes Second Set of Requests for Production;
- 26 • Agri-Mark's First Set of Interrogatories;
- 27 • Agri-Mark's First Set of Requests for Production;

- 1 • Dairy Farmers of America's First Set of Interrogatories;
- 2 • Dairy Famers of America's First Set of Requests for Admission; and
- 3 • Dairy Famers of America's First Set of Requests for Production.

4 8. In total, I assisted counsel in responding to a total of 37 interrogatories, 41 requests
5 for production of documents, and 79 requests for admission.

6 9. I have also contributed to the discovery process by sitting for a deposition. This
7 involved reviewing materials to prepare, meeting with my counsel, and answering questions under
8 oath to the best of my recollection and ability.

9 10. In addition, I submitted a declaration in support of class certification. This process
10 involved communication with my attorneys, reviewing the draft document, making any corrections,
11 and signing off on the declaration.

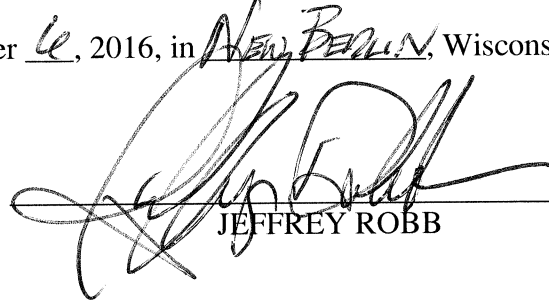
12 11. Just as I supported class certification of this case, I also support the settlement of this
13 case. My attorneys kept me informed each step of the way. They provided me with copies of the
14 term sheet and, once available, the settlement agreement itself. I have reviewed these and support
15 the settlement as reasonable, adequate, and fair to all class members.

16 12. I believe that I have provided considerable time and effort on behalf of the many class
17 members who stand to benefit from the settlement. In total, I estimate that I have spent about 40-50
18 hours performing all of the above-described duties on behalf of the class over the past 5 years. My
19 attorneys have not made any promises regarding compensation for my service, and I willingly agreed
20 to participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
21 information I provided helped to make the settlement possible. I ask that the Court approve my
22 service award in the amount of \$5,000.

23 13. I also believe that the proposed settlement achieves significant recovery for the class
24 and is an excellent result, especially considering that there is always a risk of losing at trial and
25 walking away with nothing. I believe the proposed settlement is in the best interests of class
26 members and should therefore be granted final approval.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed October 6, 2016, in New Berlin, Wisconsin.



JEFFREY ROBB