

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF
ANTITRUST LITIGATION

Case No. 22-md-3031 (JRT/JFD)

This Document Relates To:

COMMERCIAL AND
INSTITUTIONAL INDIRECT
PURCHASER PLAINTIFF ACTION

**DECLARATION OF SARAH STERLING ALDRIDGE IN SUPPORT OF
COMMERCIAL AND INSTITUTIONAL INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, SET ASIDE
FOR FUTURE LITIGATION EXPENSES, AND CLASS
REPRESENTATIVE SERVICE AWARD**

I, Sarah Sterling Aldridge, declare as follows:

1. I am an attorney admitted to practice pro hac vice in the District of Minnesota in the above-captioned lawsuit. I have practiced law since 2012 and am a partner with the firm of Barrett Law Group, P.A. in Lexington, Mississippi. I have litigated class actions and other complex matters most of my career. This declaration is submitted in support of Commercial and Institutional Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, Set Aside for Future Expenses, and Class Representative Service Award.

2. The Court appointed my firm to serve as one of the Interim Co-Lead Counsel for the Commercial Institutional Indirect Purchaser Plaintiffs (CIIPPs). We have worked in

coordination with other co-counsel for the CIIPPs. Work assignments in this case have been made by Interim Co-Lead Counsel (Larson • King, LLP, Barrett Law Group, P.A., and Cuneo Gilbert & LaDuca, LLP) to avoid duplicative efforts and my firm has worked efficiently on behalf of our named representative client and the absent class members.

3. The schedule attached to this declaration as Exhibit A, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation through the end of August 2023. The lodestar calculation is based on my firm's current billing rates for antitrust class action litigation. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit A are the customary hourly rates charged for their services in similar complex litigation. In addition, my firm has submitted fee petitions in other cases that have reported hourly rates at amounts comparable to those sought here, and courts have approved an award of attorneys' fees in such cases.

4. The total number of hours reasonably expended on this litigation by my firm from inception through August 31, 2023 is 1455.9. The total lodestar for my firm at current rates is \$479,135. Expense items are billed separately and are not duplicated in my firm's lodestar.

5. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials and accurately reflect the expenses incurred.

6. Our firm acted as treasurer of the group of attorneys representing the CIIPPs and in that capacity, under the direction of myself and the other Interim Co-Lead Counsel, have maintained and administered a litigation fund for the *Beef* litigation. In this capacity I make and receive assessments, as necessary, from the firms who are working together to pursue the CIIPP claims and use the collected money to pay expenses which are for the common benefit of the case and putative class members. Such common expenses relate to things like experts, e-discovery vendors, document and database hosting, travel expenses, copy services, and transactional data services.

7. Beginning in 2022 and running through October 31, 2023, a total of \$579,497.01 has been spent and paid by the litigation fund for common expenses in connection with pursuing the CIIPP claims. Those costs have not been reimbursed to the law firms representing the CIIPPs and were reasonable and necessary for the prosecution of this lawsuit, and are summarized in the following table:

EXPENSE	AMOUNT
Professional fees (experts/investigators, etc.)	\$172,893.02
Data gathering, hosting, processing fees (CS Disco, Ankura, Epiq, Monument Economics Group, Xact Data)	\$397,093.99
Mediator fees	\$9,000.00
Miscellaneous (service of process, messengers)	\$510.00
TOTAL	\$579,497.01

8. In addition to the expenses that have already been paid, counsel for the CIIPPs owed another **\$398,331.06** for invoices that remained unpaid as of October 31, 2023. Of that amount, \$119,907.51 is owed to Epiq Systems, Inc. for the class notice and initial administration of this settlement and \$259,136.08 is owed to the experts who are assisting the

CIIPPs. The remainder is owed to vendors for litigation support, database, and electronic discovery services.

9. In addition to assessments paid to the litigation fund, my firm has incurred and paid \$3,045.99 in expenses, all of which were reasonable and necessary for the prosecution of this litigation. A summary of those expenses by category is attached as Exhibit B. Assessments my firm paid to a litigation expense fund for this case are not included in Exhibit B.

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

Dated: November 7, 2023
Holmes County, MS

/s/ Sarah Sterling Aldridge
Sarah Sterling Aldridge

**In Re Beef and Cattle Antitrust Litigation
Commercial and Institutional Purchaser Plaintiff Action
Case No. 22-md-3031 (JRT/JFD)**

**EXHIBIT A
LODESTAR SUMMARY**

Firm: **Barrett Law Group, PA**
Reporting Period: **Inception – August 31, 2023**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Sterling Aldridge	P	\$850.00	204.8	\$174,080.00
Don Barrett	P	\$1250.00	10.1	\$12,625.00
Katherine Barrett Riley	P	\$850.00	26.7	\$22,695.00
Brandi Hamilton	P	\$700.00	1.4	\$980.00
Ben White	A	\$800.00	33.7	\$26,960.00
Nanci-Taylor Maddux	PL	\$350.00	39.7	\$13,895.00
Patricia Herlihy	SCA	\$200.00	261.5	\$52,300.00
Nicki Boland	SCA	\$200.00	878.0	\$175,600.00
TOTALS			1455.9	\$479,135.00

Status:

Partner (P)

Associate (A)

Paralegal (PL)

Of Counsel (OC)

Law Clerk (LC)

Legal Assistant (LA)

Staff/Contract Attorney (SCA)

**In Re Cattle and Beef Antitrust Litigation
Commercial and Institutional Purchaser Plaintiff Action
Case No. 22-md-3031 (JRT/JFD)**

**EXHIBIT B
EXPENSE / DISBURSEMENT SUMMARY**

Firm: **Barrett Law Group, PA**
Reporting Period: **Inception – August 31, 2023**

EXPENSE	AMOUNT
Federal Express, Local Courier, etc.	41.09\$
Postage Charges	4.20\$
Facsimile Charges	\$
Long Distance	\$
In-House Photocopying	\$
Outside Photocopying	\$
Travel (Transportation, lodging, meals, etc.)	\$
Court fees (filing, etc.)	1840.69\$
Professional Fees (expert/investigators, etc.)	\$
Witness/Service Fees	\$
Court Reporter/Transcripts	186.90\$
Computer Research	973.11\$
Miscellaneous (Describe)	\$
TOTAL	\$3,045.99