

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 JONATHAN S. ALTMAN 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, Jonathan S. Altman, 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 1992 and am a partner with the firm of Derfner & Altman, LLC in Charleston, South Carolina. 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 on the Plaintiffs' Steering Committee for the Commercial Institutional Indirect Purchaser Plaintiffs. 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 clients 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 sixty-five (65) hours. The total lodestar for my firm at current rates is Fifty-Two Thousand Five Hundred Dollars and No/Cents (\$52,500.00). 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.

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
Charleston County, SC

/s/ Jonathan S. Altman
Jonathan S. Altman

**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: **Derfner & Altman**
Reporting Period: **Inception – August 31, 2023**

Professional	Status	Hourly Rate	Total Hours To Date	Total Lodestar To Date
Armand Derfner	P	\$900.00	25	\$22,500.00
Jonathan Altman	P	\$750.00	40	\$30,000.00
TOTALS			65	\$52,500.00

Status:
Partner (P)
Associate (A)
Paralegal (PL)
Of Counsel (OC)
Law Clerk (LC)
Legal Assistant (LA)