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9 *Class Counsel for the End Payer Plaintiffs*

10 UNITED STATES DISTRICT COURT  
 11 SOUTHERN DISTRICT OF CALIFORNIA  
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13 IN RE: PACKAGED SEAFOOD ) Case No.: 15-MD-2670 DMS (MDD)  
 14 PRODUCTS ANTITRUST )  
 15 LITIGATION ) **END PAYER PLAINTIFFS’**  
 ) **NOTICE OF MOTION AND**  
 16 \_\_\_\_\_ ) **MOTION FOR FINAL**  
 ) **APPROVAL OF PARTIAL CLASS**  
 ) **ACTION SETTLEMENT**

17 This Document Relates To: )

18 End Payer Plaintiff Class Track )

DATE: July 15, 2022  
 TIME: 1:30 p.m.  
 JUDGE: Hon. Dana M. Sabraw  
 COURT: 13A (13<sup>th</sup> Floor)

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**NOTICE OF MOTION AND MOTION**

**PLEASE TAKE NOTICE** that, on July 15, 2022 at 1:30 p.m., pursuant to the Federal Rule of Civil Procedure 23, the End Payer Plaintiffs (“EPPs”) hereby move for final approval of the proposed settlement between the EPPs and Defendants Tri-Union Seafoods LLC d/b/a Chicken of the Sea (“COSI”) and Thai Union Group PCL (“TUG”) (“COSI Settlement”).

The EPPs respectfully request that the Court: (i) Certify the Settlement Classes; (ii) Appoint EPPs’ Class Counsel and Class Representatives as Settlement Class Counsel and Settlement Class Representatives respectively; (iii) Grant final approval of the COSI Settlement as fair, reasonable, and adequate, and in the best interests of the Settlement Class; and (iv) Grant the request of the Opt-Out Entities seeking exclusion from the Settlement Class.

This Motion is further supplemented by the accompanying Memorandum of Points and Authorities, the supporting declaration, and any further briefing in this matter, and the arguments at the hearing of this Motion.

The EPPs understand that COSI and TUG do not oppose this Motion. No other party opposed the prior Motions for Preliminary Approval (ECF Nos. 2552, 2673), nor has any party objected to the Preliminary Approval Order (ECF No. 2734).

Dated: May 25, 2021

By: s/ Betsy C. Manifold  
BETSY C. MANIFOLD

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