

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
WESTERN DIVISION**

UNITED STATES OF AMERICA, STATE OF
ARIZONA, STATE OF CALIFORNIA, STATE
OF COLORADO, STATE OF CONNECTICUT,
STATE OF FLORIDA, STATE OF HAWAII,
STATE OF IOWA, STATE OF MARYLAND,
STATE OF MINNESOTA, STATE OF NEW
YORK, STATE OF NORTH CAROLINA,
STATE OF OHIO, COMMONWEALTH OF
PENNSYLVANIA, STATE OF TEXAS, STATE
OF UTAH, STATE OF VERMONT, and STATE
OF WISCONSIN,

Plaintiffs,

v.

CAL-MAINE FOODS, INC., CENTRUM
VALLEY HOLDINGS, LLC, VERSOVA
HOLDINGS, LLC, VERSOVA
MANAGEMENT COOPERATIVE, and
HICKMAN'S EGG RANCH, INC.,

Defendants.

Case No. 5:26-cv-04060

**UNITED STATES' EXPLANATION OF PROCEDURES UNDER THE ANTITRUST
PROCEDURES AND PENALTIES ACT**

The United States submits this memorandum summarizing the procedures of the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16(b)–(h) (the “APPA” or “Tunney Act”), related to the Court’s review of the proposed Stipulations and Orders (“Stipulations and Orders”) and the proposed Final Judgments in this matter, which were filed at the same time as this Explanation.

1. Plaintiffs the United States and the Plaintiff States of Arizona, California, Colorado, Connecticut, Florida, Hawaii, Iowa, Maryland, Minnesota, New York, North Carolina, Ohio, Pennsylvania, Texas, Utah, Vermont, and Wisconsin have filed proposed Final Judgments and

Stipulations and Orders between the United States, Plaintiff States, and each Defendant, to which they have agreed, and the United States will file a Competitive Impact Statement explaining the proposed settlement. The United States, Plaintiff States, and Defendants have also agreed that the Court may enter the proposed Final Judgments after the requirements of the Tunney Act have been satisfied.

2. The United States, Plaintiff States, and Defendants ask that the Court sign the Stipulations and Orders as soon as possible. The Stipulations and Orders will ensure that Defendants preserve competition during the Tunney Act proceedings by complying with the provisions of the proposed Final Judgments.

3. The Court should not sign the proposed Final Judgments until the requirements of the Tunney Act are satisfied. The Tunney Act requires that the United States (a) publish the proposed Final Judgments and the Competitive Impact Statement in the *Federal Register* and (b) cause a summary of the terms of the proposed Final Judgments and the Competitive Impact Statement to be published in one or more newspapers at least 60 days before the Court signs the proposed Final Judgments. The newspaper notice(s) will inform the public how to submit comments about the proposed Final Judgments to the United States Department of Justice's Antitrust Division. Defendants in this matter have agreed to arrange and pay for the required newspaper notice(s).

4. Members of the public who wish to submit comments will be invited to do so within 60 days following publication in the *Federal Register* and of the newspaper notice(s). The United States will prepare a response to any comments received during this period and will (a) file with the Court the comments and the United States' response and (b) publish the comments and the United States' response in the *Federal Register* unless this Court authorizes an alternative method

of public dissemination of the public comments and the response to those comments pursuant to the Tunney Act, 15 U.S.C. § 16(d). After the comments and the United States' response have been filed with the Court and published, the United States may move the Court to enter the proposed Final Judgments unless the United States has withdrawn its consent to entry of the Final Judgments, as permitted by Paragraph II.A of the Stipulations and Orders.

5. If the United States moves the Court to enter the proposed Final Judgments after compliance with the Tunney Act, the Court may enter the Final Judgments without a hearing if the Court concludes that the Final Judgments are in the public interest.

Dated: June 29, 2026

Respectfully submitted,

FOR PLAINTIFF
UNITED STATES OF AMERICA

/s/Jeffrey Vernon
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