

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

CARGILL MEAT SOLUTIONS  
CORPORATION, *et al.*,

*Defendants.*

Civil Action No.: 22-cv-1821

**JOINT MOTION TO MODIFY FINAL JUDGMENT  
AND ENTER MODIFIED FINAL JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 60(b)(5) and Section XII of the final judgment entered in this matter on June 5, 2023 (ECF 59) (the “Final Judgment”), Plaintiff United States of America (“United States”) and Defendants Cargill Meat Solutions Corp., Cargill, Inc., Sanderson Farms, Inc., and Wayne Farms, LLC (collectively, “Settling Defendants”) jointly move this Court to modify the Final Judgment and enter the Modified Final Judgment, attached hereto as Exhibit 1.<sup>1</sup> For the Court’s convenience, a redline comparison of the Final Judgment and the proposed Modified Final Judgment is attached hereto as Exhibit 2.

The proposed modifications would make minor revisions to Sections X and XIV of the Final Judgment, requiring each Settling Defendant to maintain the funds equal to 10% of their Restitution Amount in a segregated interest-bearing bank account instead of requiring transfer of

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<sup>1</sup> This motion requests the same modifications as the forthcoming motion to modify the George’s, Inc. and George’s Foods, LLC final judgment (ECF 77). No modification is sought as to the final judgment with Defendants Webber, Meng, Sahl and Co., Inc., d/b/a WMS & Company, Inc. and WMS President G. Jonathan Meng (ECF 60). Defendants WMS & Company, Jonathan Meng, George’s, Inc., and George’s Foods, LLC have reviewed the proposed Modified Final Judgment and do not oppose this motion or the proposed modifications.





**CERTIFICATE OF SERVICE**

I, Jessica J. Taticchi, hereby certify that on April 8, 2024, I caused true and correct copies of the Joint Motion to Modify Final Judgment and Enter Modified Final Judgment to be served via the Court's CM/ECF system.

FOR PLAINTIFF  
UNITED STATES OF AMERICA

          /s/          

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