

**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 George’s, Inc. and George’s Foods, 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 Settling Defendants to maintain the funds equal to 10% of their

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<sup>1</sup> This motion requests the same modifications as the previously filed motion to modify the Cargill Meat Solutions Corp., Cargill, Inc., Sanderson Farms, Inc., and Wayne Farms, LLC final judgment (ECF 59). 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, Cargill Meat Solutions Corp., Cargill, Inc., Sanderson Farms, Inc., and Wayne Farms, LLC have reviewed the proposed Modified Final Judgment and do not oppose this motion or the proposed modifications.

Restitution Amount in a segregated interest-bearing bank account instead of requiring transfer of those funds into an escrow account selected by the United States. The proposed modifications would require Settling Defendants to pay these funds and any accrued interest to the third-party claims administrator in the event of a contingency outlined in Section X.C, rather than releasing the funds to the United States. The proposed changes are intended to simplify administrative compliance with the restitution provisions of Section X while effectuating the remedies called for by the Final Judgment. Settling Defendants represent that they have entered into a settlement agreement with the plaintiffs in *Jien v. Perdue Farms, Inc.*, No. 1:19-cv-2521 (D. Md.), and have deposited the full amount of their Restitution Amount into an escrow account identified by counsel to the *Jien* plaintiffs.

For these reasons and those more fully set forth in the United States and Settling Defendants' accompanying Memorandum of Law in Support, the United States and Settling Defendants request that the Court grant their Joint Motion to Modify the Final Judgment and Enter the Modified Final Judgment.

Dated: April 8, 2024

Respectfully submitted,

FOR PLAINTIFF  
UNITED STATES OF AMERICA

\_\_\_\_\_  
/s/

Jeremy C. Keeney  
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U.S. Department of Justice  
Antitrust Division  
Civil Conduct Task Force  
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**CERTIFICATE OF SERVICE**

I, Jeremy C. Keeney, 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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