

**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

UNOPPOSED MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Pursuant to Rules 15(a) and 21 of the Federal Rules of Civil Procedure and Local Rule 103.6, the United States of America respectfully moves this Court for leave to file an Amended Complaint, a copy of which is attached to this Motion as Exhibit 1; a redline showing the differences between the Complaint and proposed Amended Complaint is attached as Exhibit 2.

The proposed Amended Complaint adds two additional Defendants to this action. The proposed Amended Complaint does not otherwise add causes of action or requests for relief.

Pursuant to Local Rule 103.6(d), the United States has conferred with all counsel for the current parties and has confirmed that they do not oppose this Motion.

For these reasons and those more fully set forth in the United States' accompanying Memorandum of Law in Support, the filing of the Amended Complaint is proper, and the Court should grant the Motion to Amend and enter the attached proposed order.

Dated: May 17, 2023

Respectfully submitted,

FOR PLAINTIFF
UNITED STATES OF AMERICA

/s/ Kathleen Simpson Kiernan
Kathleen Simpson Kiernan
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CERTIFICATE OF SERVICE

I, Kathleen Simpson Kiernan, hereby certify that on May 17, 2023, I caused true and correct copies of the Unopposed Motion for Leave to File Amended Complaint to be served via the Court's CM/ECF system.

FOR PLAINTIFF
UNITED STATES OF AMERICA

/s/ Kathleen Simpson Kiernan
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