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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO
EASTERN DIVISION

IN RE: FRESH AND PROCESS POTATOES) Civil Case No. 4:10-md-02186 BLW
ANTITRUST LITIGATION)
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))
THIS DOCUMENT RELATES TO:))
))
Direct Purchaser Plaintiffs' Action.))
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_____))

DIRECT PURCHASER PLAINTIFFS' MOTION FOR:

- 1) PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;**
- 2) CERTIFICATION OF A SETTLEMENT CLASS & APPOINTMENT OF SETTLEMENT CLASS COUNSEL & EXECUTIVE COMMITTEE;**
- 3) APPROVAL OF THE NOTICE PLAN AND FORM OF NOTICE AND ORDER DIRECTING NOTICE TO THE SETTLEMENT CLASS.**

Direct Purchaser Plaintiffs ("Plaintiffs") move this Court for an Order: (1) preliminarily approving the Settlement Agreement among Plaintiffs and all Defendants, attached as Exhibit A to the accompanying memorandum in support of this motion; (2) certifying a Settlement Class and appointing Settlement Class Counsel and a Settlement Executive Committee; and (3)

approving a Notice Plan, including the form and content of the Notice, and directing Notice to the Settlement Class. In support of this Motion, Plaintiffs rely on their Memorandum in Support of the Motion, Exhibit A to that Memorandum, and supporting declarations and their accompanying Exhibits. A proposed Order is attached as Exhibit B to the Memorandum in Support.

Dated: June 1, 2015

Respectfully submitted,

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