

1 Betsy C. Manifold (182450)
manifold@whafh.com

2 Rachele R. Byrd (190634)
byrd@whafh.com

3 **WOLF HALDENSTEIN ADLER**
4 **FREEMAN & HERZ LLP**

5 750 B Street, Suite 1820
San Diego, CA 92101
6 Telephone: 619/239-4599
Facsimile: 619/234-4599

7 *Class Counsel for the End Payer Plaintiffs*

8
9 [Additional counsel appear on signature page]

10 UNITED STATES DISTRICT COURT
11
12 SOUTHERN DISTRICT OF CALIFORNIA

13 IN RE: PACKAGED SEAFOOD
14 PRODUCTS ANTITRUST
LITIGATION

) Case No. 15-MD-2670 DMS (MSB)
)
) **NOTICE OF MOTION AND**
) **MOTION FOR DISTRIBUTION**
) **OF CLASS ACTION**
) **SETTLEMENT**

) DATE: July 31, 2026
) TIME: 1:30 p.m.
) JUDGE: Hon. Dana M. Sabraw
) COURT: 13A (13th Floor)

15
16
17
18 _____
19 This Document Relates to:
20 End Payer Plaintiffs Class Track

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on July 31, 2026, at 1:30 P.M., Lead Counsel Wolf
3 Haldenstein Adler Freeman & Herz LLP (“Settlement Class Counsel”) will, and
4 hereby does, move for an Order approving the final distribution plan and directing
5 distribution of the net settlement fund as described herein.

6 Settlement Class Counsel respectfully requests that the Court: (i) approve the
7 administrative determinations of the Claims Administrator, JND Legal
8 Administration (“JND” or “Claims Administrator”) regarding the acceptance and
9 denial of Claims received; (ii) approve the processing of 310 Late Claims which are
10 claims received after the Claims Cut-Off Date (December 31, 2024), but filed within
11 an 120 day grace period after the Claims Cut-Off Date; (iii) direct the distribution of
12 the net settlement fund to Settlement Class Members with eligible claims
13 (“Authorized Claimants”), as described herein and in the Declaration of Lara Jarjoura
14 filed in support of this Motion (“Jarjoura (JND) Declaration”); (iv) authorizing an
15 additional payment to the Claims Administrator in the amount of \$628,209.58 for
16 claims administration services undertaken to date; (v) authorizing a reserve of
17 \$925,000 to cover the anticipated costs of distribution of the net settlement fund; and
18 (vi) approving the proposed schedule for distribution of the net settlement fund.

19 This Motion is based upon: (i) the accompanying Memorandum of Points and
20 Authorities; (ii) the Declaration of Betsy C Manifold (“Manifold Declaration”); (iii)
21 the Jarjoura (JND) Declaration; (iv) the Court’s Orders, the applicable Settlement
22 Agreements, pleadings, and other records on file in this Action, and (v) other such
23 matters as the Court may consider at the hearing of the Motion.

24 Dated: June 18, 2026

By: /s/ Betsy C. Manifold
BETSY C. MANIFOLD

26 **WOLF HALDENSTEIN ADLER**
27 **FREEMAN & HERZ LLP**
28 **BETSY C. MANIFOLD**

1 RACHELE R. BYRD
2 750 B Street, Suite 1820
3 San Diego, CA 92101
4 Telephone: 619/239-4599
5 Facsimile: 619/234-4599
6 manifold@whafh.com
7 byrd@whafh.com

8 **WOLF HALDENSTEIN ADLER**
9 **FREEMAN & HERZ LLP**

10 MARK C. RIFKIN
11 THOMAS H. BURT
12 270 Madison Avenue
13 New York, New York 10016
14 Telephone: 212/545-4600
15 Facsimile: 212/545-4653
16 rifkin@whafh.com
17 burt@whafh.com

18 **WOLF HALDENSTEIN ADLER**
19 **FREEMAN & HERZ LLC**

20 CARL MALMSTROM
21 111 West Jackson, Suite 1700
22 Chicago, IL 60604
23 Telephone: 312/984-0000
24 Facsimile: 312/212-4401
25 malmstrom@whafh.com

26 *Class Counsel for the End Payer Plaintiffs*
27
28