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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

IN RE: PACKAGED SEAFOOD
PRODUCTS ANTITRUST LITIGATION

Case No. 15-MD-2670 DMS (MDD)

**NOTICE OF ERRATA
REGARDING MEMORANDUM IN
SUPPORT OF COMMERCIAL
FOOD PREPARER PLAINTIFFS'
MOTION FOR FINAL APPROVAL
OF PARTIAL CLASS ACTION
SETTLEMENT WITH CHICKEN
OF THE SEA INTERNATIONAL
AND THAI UNION GROUP PCL**

This Document Relates To:

All Commercial Food Preparer
Plaintiff Actions

Re: ECF No. 2861-1

1 TO THE COURT AND ALL PARTIES OF RECORD:

2 The Commercial Food Preparer Plaintiffs (“CFPs”) file this notice and the
3 accompanying Supplemental Declaration of Paul Ferruzzi of Kroll Settlement LLC
4 Regarding Requests for Exclusion (the “Ferruzzi Declaration”) to correct an
5 assertion in the Memorandum in Support of Commercial Food Preparer Plaintiffs’
6 Motion for Final Approval of Partial Class Action Settlement With Chicken of The
7 Sea International and Thai Union Group PCL (the “Memorandum”), ECF No. 2861-
8 1. In the Memorandum, CFPs wrote: “The response of the Class has been positive
9 so far, with no exclusion requests received.” *Id.* at 2:12-13. The Memorandum
10 contains parallel assertions in several other locations. *See id.* at 8:19-20; 10:14-15;
11 18:7-10; 22:26. As per the Ferruzzi Declaration, exclusion requests were
12 communicated to CFP counsel subsequent to the final approval papers’ filing, and
13 CFPs correct and replace the statements that there have been no exclusions with the
14 following: “CFPs have received eight (8) timely requests for exclusion.”

1 Dated: July 6, 2022

Respectfully submitted,

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3 *s/ Jonathan W. Cuneo*

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1 **CERTIFICATE OF SERVICE**

2 I certify that on July 6, 2022, I filed the foregoing document with the Clerk of
3 the Court for the United States District Court, Southern District of California, by
4 using the Court’s CM/ECF system, and also served counsel of record via this Court’s
5 CM/ECF system.

6 *s/ Jonathan W. Cuneo*

7 _____
Jonathan W. Cuneo