

If You Were a Retailer in Fresno or Madera Counties and Purchased Anheuser-Busch Beer from Donaghy Sales LLC, a Settlement Has Been Reached that May Affect Your Rights

The Fresno Superior Court authorized this notice. This is not a solicitation from an attorney.

- A settlement has been reached in a class action lawsuit against Anheuser-Busch LLC, (“A-B”) and Donaghy Sales LLC (“Donaghy”) (“Defendants”), regarding alleged price discrimination in wholesale prices charged to certain Fresno and Madera County retailers by Donaghy for A-B beer.
- The settlement provides payments based on the volume of A-B beer which certain Fresno and Madera County retailers purchased from Donaghy during the period starting on October 10, 2010 and ending on December 31, 2014.

Please read this Notice carefully. Your legal rights are affected, whether you act or not.

If Your Mailing Address or Contact Information Has Recently Changed, It Is Important to Update It with The Settlement Administrator by Visiting www.FresnoBeerLitigation.com or Calling 1-888-352-1373 or Emailing info@FresnoBeerLitigation.com.

A. BASIC INFORMATION

A court authorized this notice to inform you about a proposed settlement of a class action lawsuit and about all your options and associated deadlines. The name of the lawsuit is *Manmohan Dhillon, et al. v. Anheuser-Busch, LLC et al.* CASE NO. 14CECG03039 JMS (Sup. Ct. Fresno County).

This notice explains the lawsuit, the settlement, and your legal rights. You are NOT being sued. The Court still must decide whether to approve the settlement. If the settlement is approved, money will be available.

YOUR LEGAL RIGHTS AND OPTIONS		
SUBMIT A CLAIM FORM TO RECEIVE A SETTLEMENT AWARD	To receive a settlement award, You need only visit www.FresnoBeerLitigation.com and enter the information requested and electronically sign the online Claim Form. Or you may download a copy of the Claim Form and mail it to the Settlement Administrator at the address provided on the Claim Form. You must submit your claim by September 20, 2024. In order to submit your Claim, you must give up your right to sue defendants concerning the legal claims in this lawsuit, and you will be bound by the result in this lawsuit.	<i>No later than: September 20, 2024</i>
OBJECT	Write to the Court about why you do not like the proposed settlement.	<i>No later than: September 6, 2024</i>
EXCLUDE YOURSELF	Ask to opt out of the settlement. If you opt out, you are not entitled to any settlement benefits, but you keep your right to sue A-B and Donaghy in your own personal lawsuit. If you do not opt out of the settlement, you will be bound by the result of this lawsuit. If you opt out of the settlement, you cannot object to the settlement.	<i>No later than: September 20, 2024</i>

The lawsuit contends that between October 10, 2010, and December 31, 2014, A-B and Donaghy allegedly violated beer pricing and other laws by allegedly discriminating in the wholesale prices Donaghy charged to beer retailers in Fresno and Madera counties through the distribution of consumer coupons to retailers. A-B and Donaghy deny all wrongdoing and liability. The parties agreed to resolve the case before these issues were decided by the Court.

On May 21, 2024, the Court issued an order certifying this case as a class action for Settlement Purposes, defining the Class as follows:

All persons who owned retail business establishments in Fresno and Madera Counties classified in the Donaghy sales database within one of the following channel descriptions and channel id numbers (“Cid#”): a) Convenience/Cid# 190; b) Oil and Service/Cid# 195; c) Grocery/Cid# 265; d) Gas and Convenience/Cid# 294; e) Package Liquor/Cid# 200; f) Mom and Pop/Cid# 175; g) Deli/Cid# 180; h) Bodega/Cid# 185; and i) Package Liquor/Cid# 290, and which purchased from Donaghy beer manufactured and/or sold by Anheuser-Busch during the period from October 10, 2010 through December 31, 2014 excluding Vikram and Vinay Vohra and Hardeep Singh and all entities owned, controlled by or affiliated with any of them.

If you received a post card notification of this lawsuit with a claim identification number, you are within the class. If you were a beer retailer in Fresno and Madera Counties and purchased A-B beer from Donaghy between October 10, 2010 and December 31, 2014 and you are unsure whether you fell into one of these Donaghy sales category descriptions, you can inquire with the Settlement Administrator by emailing info@FresnoBeerLitigation.com or calling 1-888-352-1373.

The Court designated Manmohan Dhillon, Satnam Pabla, Serge Haitayan, Daljit Singh and Parminder Singh as the Class Representatives and appointed the law firms of Gustafson Gluek, PLLC, Freedman Boyd Hollander & Goldberg, and Coleman & Horowitz, LLP as Class Counsel.

To view the order granting preliminary approval of the proposed settlement, go to www.FresnoBeerLitigation.com.

In a class action, a person or entity called the “class representative” sues on behalf of others who have similar claims. If the class settlement is approved by the Court, the settlement resolves the case for all class members, except for those who exclude themselves from the Class.

The Class Representatives and Defendants agreed to a settlement to avoid the cost and risk of further litigation and so that the class members may receive payments more quickly. The Class Representatives and Class Counsel believe that the settlement is in the best interests of all class members.

B. THE SETTLEMENT BENEFITS—WHAT YOU GET AND HOW TO GET IT

If you are a class member, the settlement provides you with your proportionate share of the \$2.5 million dollar settlement after deduction for any allowed attorneys’ fees and expenses, service awards to the class representatives, and costs of notice and administration of the settlement. Your proportionate share will be calculated based upon your purchases of A-B beer from Donaghy during the period from October 10, 2010, through December 31, 2014 (the “class period”).

Class Members may claim in one of two ways:

- 1) If you have been identified as a class member from Donaghy’s sales records, a postcard notice will be sent to you at the last known address in Donaghy’s sales records. Using the information on that postcard notice, you can log onto the Settlement website at www.FresnoBeerLitigation.com, see your purchase total for the class period, and complete your Claim Form online.
- 2) Alternatively, you can request a Claim Form by calling 1-888-352-1373 and submit your claim by mail along with any required information.

Whether submitted online or mailed, the Claim Form must be signed and submitted online or postmarked by **September 20, 2024** to the following address:

Fresno Beer Settlement Administrator
P.O. Box 301134
Los Angeles, CA 90030-1134

It is important to keep the Settlement Administrator informed of your current mailing address and contact information. Please visit the Settlement Website at www.FresnoBeerLitigation.com, call 1-888-352-1373, or email info@FresnoBeerLitigation.com to provide updates.

If the settlement becomes final, class members who do not exclude themselves from the class will release Defendants from liability and will not be able to sue the Defendants about the issues in the lawsuit. Section 13 of the Settlement Agreement describes the released claims in necessary legal terminology, so read it carefully. The full Settlement Agreement is available at www.FresnoBeerLitigation.com. You can talk to one of the lawyers below for free or you can, of course, talk to your own lawyer at your own expense if you have questions about the released claims.

C. EXCLUDING YOURSELF FROM THE SETTLEMENT

If you want to keep the right to sue over the legal issues in the lawsuit, i.e. whether the Defendants illegally discriminated in the pricing of beer to you during the period commencing on October 10, 2010 and ending on December 31, 2014, then you must take steps to exclude yourself from this settlement. This is also known as “opting out” of the Class.

If you exclude yourself, you do not get settlement benefits, but the settlement will not prevent you from suing Defendants in the future about whether Defendants discriminated in the pricing of beer to you during the period commencing on October 10, 2010 and ending on December 31, 2014. If you exclude yourself, you will not be bound by anything that happens in this lawsuit.

Unless you exclude yourself, you give up the right to sue Defendants for the claims resolved by this settlement. If the settlement is finally approved, you will be permanently barred from initiating or continuing any lawsuit or other proceeding against Defendants about the issues resolved in the lawsuit.

To exclude yourself from the settlement, you must mail a written, signed request for exclusion postmarked or received no later than **September 20, 2024**. You must include the case name in the exclusion request: *Manmohan Dhillon, et. al. v. Anheuser Busch, LLC et al.* CASE NO. 14CECG03039 JMS (Sup. Ct. Fresno Cty.).

Mail the request for exclusion to:

Fresno Beer Settlement Administrator
P.O. Box 301134
Los Angeles, CA 90030-1134

The letter needs to include a statement indicating that you purchased A-B beer in Fresno or Madera Counties from Donaghy at some time during the period beginning on October 10, 2010, and ending on December 31, 2014 and your intent to opt out such as: "I request exclusion from the class in *Dhillon v. Anheuser Busch, LLC*." The letter must be signed by you and: (i) provide your full name; (ii) the name and address of the business which purchased A-B beer from Donaghy during the period between October 10, 2010 and December 31, 2014, (iii) your relationship to that business during that time (for example, owner) and (iv) your current contact information.

You have the right to seek independent legal advice on whether to stay in or opt out of the class.

D. OBJECTING TO THE SETTLEMENT

You can tell the court if you object to all or part of the settlement.

If you are a Class Member, and you do not exclude yourself from the Class, you can object to the settlement if you do not like some part of it or all of it.

To object, you must send a written objection signed by you.

The objection must include: (a) the name of the lawsuit *Dhillon et al. v. Anheuser Busch, LLC, et al.* CASE NO. 14CECG03039 JMS (Sup. Ct. Fresno Cty.); (b) your full name, telephone number, address and relationship to the company on whose behalf the objection is made; (c) the name of the person or company which purchased A-B beer from Donaghy at some time during the period from October 10, 2010 and December 31, 2014; d) if represented by counsel, the full name, telephone number, and address of all such counsel; (e) all of the reasons for your objection; (f) whether the objector intends to appear at the Final Approval Hearing on his or her own behalf or through counsel; and (g) the objector's dated, handwritten signature (an electronic signature or attorney's signature is not sufficient).

Objections must be mailed to four places:

Fresno County Superior Court	Dennis Stewart	Joseph Goldberg	Darryl J. Horowitz
Attn: Clerk of the Court	Gustafson Gluek PLLC	Freedman Boyd Hollander &	Coleman & Horowitz, LLP
Civil Unlimited	600 W. Broadway	Goldberg P.A.	499 W. Shaw Avenue
1130 O Street	Suite 3300	20 First Plaza	Suite 116
Fresno, CA 93721-2220	San Diego, CA 92101	Suite 700	Fresno, CA 93704
		Albuquerque, NM 87102	

Objections must be filed with the Court and received by the attorneys no later than **September 6, 2024**.

Excluding yourself is telling the court that you do not want to be part of the class. If you exclude yourself, you have no basis to object because the settlement no longer affects you. Objecting is telling the court that you do not like something about the settlement or the applications for attorneys fees, expenses or service awards to the representative Plaintiffs. You can object only if you stay in the class.

If you are a class member and you do nothing, you will remain a class member and all the Court's orders will apply to you, you will be eligible for settlement benefits, and in exchange for the benefits you will release Defendants from further liability regarding the issues in the lawsuit.

E. THE LAWYERS REPRESENTING THE CLASS

The court has appointed lawyers to represent the Class. These lawyers are called "Class Counsel." If you want to be represented by another lawyer, you may hire one at your own expense. Class Counsel's information is as follows:

Dennis Stewart	Joseph Goldberg	Darryl J. Horowitz
Gustafson Gluek PLLC	Freedman Boyd Hollander & Goldberg	Coleman & Horowitz, LLP
600 W. Broadway	P.A.	499 W. Shaw Avenue
Suite 3300	20 First Plaza	Suite 116
San Diego, CA 92101	Suite 700	Fresno, CA 93704
	Albuquerque, NM 87102	

Class Counsel will ask the Court for an award of attorneys' fees of \$625,000.00 (which is 25% of the Settlement Fund obtained for the Class) and reimbursement of litigation expenses they advanced in the course of the litigation in the approximate amount of \$750,000.00.

Class Counsel will also ask the Court to award the five (5) Class Representatives a service award in the amount of \$5,000.00 each (for a total of \$25,000.00) for the time and effort they spent representing Class Members.

The Court must approve the request for attorneys' fees and expenses and the request for the service awards. The amounts awarded will be paid out of the Settlement Fund.

F. THE FINAL APPROVAL HEARING

The Court will hold a hearing on November 5, 2024 at the Superior Court for the County of Fresno to decide whether to grant final approval to the settlement. If you have filed an objection on time and attend the hearing, you may ask to speak (provided you have previously filed a timely notice of intention to appear), but you do not have to attend or speak.

The Court will hold a Final Approval Hearing at 3:30pm on November 5, 2024 in Department 403 of the Superior Court for the State of California, County of Fresno, located at 1130 O St, Fresno, California 93724. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. At or after the hearing, the Court will decide whether to grant final approval of the settlement, and, if so, how much to pay the lawyers representing class members to reimburse them for expenses and the request for service awards for the representative Plaintiffs. We do not know how long these decisions will take.

Class Counsel will answer any questions the Court may have. But you are welcome to come at your own expense. If you send an objection, you do not have to come to Court to talk about it – but you can if you provide advance notice of your intention to appear. As long as you filed and served a written objection with all of the required information on time, the Court will consider it. You may also pay another lawyer to attend, but it is not required.

You or your attorney may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must send a letter saying that it is your “Notice of Intention to Appear” in *Manmohan Dhillon, et al. v. Anheuser-Busch, LLC et al.* CASE NO. 14CECG03039 JMS (Sup. Ct. Fresno County). to the Clerk of Court so that it is received by the Court no later than, **September 6, 2024**. You must include the name, address, and telephone number, and signature of the Class Member, and, if represented by an attorney, the full name, telephone number, and address of all such counsel. You must also send a copy of your Notice of Intention to Appear to Class Counsel and Defendants’ Counsel at:

Class Counsel

Dennis Stewart
Gustafson Gluek PLLC
600 W. Broadway
Suite 3300
San Diego, CA 92101

Joseph Goldberg
Freedman Boyd Hollander & Goldberg P.A.
20 First Plaza
Suite 700
Albuquerque, NM 87102

Darryl J. Horowitz
Coleman & Horowitz, LLP
499 W. Shaw Avenue
Suite 116
Fresno, CA 93704

Defendants’ Counsel

Brian D. Wallach
Cadwalader, Wickersham & Taft LLP
700 Sixth Street, N.W.
Washington, DC 20001

Mark E. Chielpegian
CHIELPEGIAN • COBB
5200 North Palm Avenue, Suite 201
Fresno, CA 93704

G. GETTING MORE INFORMATION

This notice summarizes the proposed settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement and other information about the settlement at www.FresnoBeerLitigation.com. Documents filed in the lawsuit can be accessed at the court at the address provided above.

The settlement will not be final unless and until the Court grants final approval of the settlement at, or after, the Final Approval Hearing and after any appeals are resolved in favor of the settlement. Please be patient and check the website identified in this notice for updates.