

Exhibit 1

LOCKRIDGE
GRINDAL
NAUEN
P. L. L. P.

Attorneys at Law

www.locklaw.com



December 23, 2019

VIA E-MAIL

To All Plaintiffs' Counsel

Re: *In re Peanut Farmers Antitrust Litigation*
Time & Expense Reporting Instructions

Dear Counsel:

As Plaintiffs' Interim Co-Lead Counsel we are writing to provide you with forms and protocols for reporting your time and expenses for this litigation. To efficiently manage and direct the prosecution of this case, Plaintiffs' Interim Co-Lead Counsel will collect time and expense reports from each firm on a monthly basis. Attached is an Excel spreadsheet time and expense report form to use for reporting your firm's time and expense data. Please submit your time and expense reports along with the detailed back up reports to Amber Raak at amraak@locklaw.com; Brian Clark at bdclark@locklaw.com; and Kimberly Justice at kjustice@fkmlaw.com. Amber and Brian may also be reached at 612-339-6900.

Your first time and expense report should cover the time period from inception through December 31, 2019. This initial report is due on January 31, 2020. Your subsequent reports should be done on a monthly basis and submitted by the 20th of the month for the preceding month. All time is to be reported at the billing rates in effect at the time the work was performed. Please keep your time and expense reporting current. Failure to do so may be grounds for denying any subsequent request for fees or expense reimbursement.

Below are the task codes to use for time entry:

- P1 = Legal Research
- P2 = Investigation / Factual Research
- P3 = Discovery (Written, Deposition Taking & Defending, Meet & Confer, etc.)
- P4 = Document Review Tier 1 – subject to rate cap

Time & Expense Protocol Letter

December 23, 2019

Page 2

- P5 = Document Review Tier 2 & Depo Prep – subject to rate cap¹
- P6 = Pleadings, Briefs & Motions (Drafting, Research, Serving & Filing)
- P7 = Class Certification & Class Notice
- P8 = Summary Judgment
- P9 = Appeals
- P10 = Court Appearances & Prep
- P11 = Experts
- P12 = Settlement & Mediation
- P13 = Case Management
- P14 = Trial Prep (Exhibit & Witness List, Jury Instructions, Voir Dire, Opening & Closing Statements, Arguments, Demonstratives, etc.)
- P15 = Trial

In your time and expense reports please adhere to these guidelines:

1. Time is to be reported in tenths of an hour.
2. Time is to be recorded by task with a specific amount of time for each task described; do not submit “block billing” with one undifferentiated total time for multiple tasks
3. Time is to be recorded at the billing rate in effect when the work is performed.
4. Time spent on Tier 1 document review is capped at \$350 per hour.
5. Time spent on Tier 2 document review & deposition preparation is capped at \$500 per hour. Tier 2 document review is generally for higher level QC or other review beyond straight review of assigned document batches.
6. Please do not submit time for any of the following. It will not be compensated or included in any fee petition:
 - work not performed at the request or under the direction of co-lead counsel;
 - duplication of efforts within a firm;
 - time spent in preparing and submitting time and expense reports;
 - “read and review” time unrelated to preparation for or performance of work specifically assigned by co-lead counsel;
 - routine clerical tasks (such as “file maintenance” by a paralegal or clerical staff); or
 - time associated with work relating to any client or potential client that did not retain your firm for this case.

¹ Unless co-lead counsel has expressly approved use of the P5 task code for a specific attorney, then it may not be used.

Time & Expense Protocol Letter

December 23, 2019

Page 3

7. Your expense report should itemize your out-of-pocket, case-related expenses. If you have a “Miscellaneous/Other” expense item on a report, please describe it with sufficient detail to identify the expense and its relation to the case.
8. Routine office supplies and regular secretarial time should *not* be included as a case expense.
9. No surcharges should be reflected in or applied to any expenses, including telephone, faxes, and copying.
10. Each expense claim must be properly documented by a sufficiently detailed receipt or some other form of proof of payment acceptable for ultimate presentation to and approval by the Court. Each firm is to maintain and preserve all detailed receipts and expense documentation for production to Plaintiffs’ Interim Co-Lead Counsel upon request. Cash advances will not be considered for reimbursement without evidence of payment made for an expense related to the case.
11. Travel expenses should follow these guidelines:
 - Flights of less than six hours should be submitted at coach class rates; flights exceeding six hours may be submitted at business class rates;
 - All flights are to be booked at the lowest fare available;
 - First class airfare should not be submitted and will not be reimbursed; and
 - For overnight travel, counsel is to be mindful in selecting reasonable hotel accommodations and restaurants.

Please feel free to contact us if you have any questions.

Thank you,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

/s Brian D. Clark

Brian D. Clark

FREED KANNER LONDON & MILLEN
LLC

/s Kimberly A. Justice

Kimberly A. Justice

Time & Expense Protocol Letter
December 23, 2019
Page 4

BDC/amr
Attachment(s)