

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

IN RE: WHOLESale GROCERY PRODUCTS ANTITRUST LITIGATION	Civil Action No. 09-md-02090 ADM/TNL MDL No. 2090
THIS DOCUMENT RELATES TO: ALL ACTIONS	

**DECLARATION OF ELIZABETH R. ODETTE
IN SUPPORT OF MIDWEST PLAINTIFFS' MOTION FOR DISTRIBUTION
OF NET SETTLEMENT FUND**

Under 28 U.S. C. § 1746, I, Elizabeth R. Odette, hereby declare as follows:

1. I am a partner with the law firm of Lockridge Grindal Nauen P.L.L.P. I am one of Plaintiffs' Co-Lead and Liaison Counsel and I submit this declaration in support of Midwest Plaintiffs' Motion for Distribution of Net Settlement Fund. I make this declaration based on my personal knowledge and am competent to testify to the matters contained in this declaration.

2. As of January 5, 2018, the Net Settlement Fund contains a balance of \$4,549,000 (\$4,574,000 minus \$25,000 to be held back to pay settlement administration expenses) after accounting for Court-approved expenses and the reservation for attorneys' fees and a service award.

3. Co-Lead Counsel will hold back \$25,000 for payment of settlement administration expenses pursuant to the Settlement Agreement (Section II. C. 2. at 12) and Court Order (ECF No. 840 at 6 ¶ 6(b)&(c)).

4. Through the claims review process, JND has informed Co-Lead Counsel that there are 23 eligible claims to be paid. Co-Lead Counsel concurs with this determination. Those 23 valid and qualified claims, and the amounts proposed to be paid for each, are identified in Exhibit 1 to this Declaration. In addition, there are 295 non-qualifying claims that failed to contain the information required to verify the individual or entity submitting the claim as a member of the Champaign DC Non-Arbitration Class and are therefore ineligible for a settlement distribution. Those non-qualifying claims are identified in Exhibit A to the Declaration of Jennifer Keough, Chief Executive Officer of JND Legal Administration LLC.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of January, 2018, Minneapolis, Minnesota.

s/ Elizabeth R. Odette

Elizabeth R. Odette