

Jeffrey S. Kerr
General Counsel and
Sr. Vice President of Corporate Affairs
[REDACTED]

August 16, 2021

Adam R. Long
McNees Wallace & Nurick LLC
100 Pine St.
Harrisburg, PA 17101

Via e-mail: [REDACTED]

Re: Plainville Farms

Dear Mr. Long:

I am general counsel to People for the Ethical Treatment of Animals, Inc. (PETA) and write in response to your August 13, 2021, letter to Daniel Paden. Please direct all future correspondence related to Plainville Farms to my attention.

Thank you for confirming that the cruelty captured on video does not represent what your client holds to be accepted activities, practices and procedures adopted, used or engaged in when herding, handling and loading turkeys for transport.

Plainville Farms needs no further information or material from PETA to take corrective actions. Your client knows the identity of the person who recorded its workers viciously kicking, stomping, throwing, punching, slapping, bludgeoning, and cruelly killing turkeys and mimicking sexual acts with them. Thus, your client knows the dates that person worked, which turkey catching crews that person worked with, and at which growers' farms that person and others worked each night. Any further requests for information should be directed to the Pennsylvania State Police, in light of its criminal investigation.

Please advise your client that this cruelty to turkeys was common knowledge among your client's management—and beyond its own staff—and pervasive. Every member of all turkey catching crews the eyewitness worked with or in proximity to abused turkeys. None of

PEOPLE FOR
THE ETHICAL
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the crew leaders did anything, even once, to stop the abuse. These supervisors abused turkeys, themselves, and repeatedly instructed and encouraged workers to do the same. Further, the sadistic abuse captured on video is only a sampling of the rampant cruelty among your client's crews. One farmer requested that the vicious workers seen in PETA's video catch turkeys from his sheds because another crew had "turned [birds] into hamburger before they [were] even on the trucks."

If Plainville Farms truly wishes to identify and address all those who abused turkeys, it must immediately audit all of its catching crews; interview all those who supervise and work on these crews; interview the staff who oversee these crews; and direct senior staff to accompany and supervise all crews' shifts until it can install a video monitoring system to help prevent this abuse.

Very truly yours,

A handwritten signature in black ink, appearing to read "JKerr", written over a light gray rectangular background.

Jeffrey S. Kerr