

EXHIBIT E

SECOND DECLARATION OF WILLIAM BULLARD IN
SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY
JUDGMENT - 48

Case No. 2:17-cv-00223-RMP

Imported Meat Passed for Entry in the U.S. by Country
 USDA Livestock, Poultry & Grain Market News
 Source: USDA, FSI
 Thursday, January 11, 2018



For Reporting Period: 12/27/15 to 01/02/16
 Metric Tons
 Week Number 1

Country Totals	Current Week	2016 Year-to-Date	2015 Year-to-Date	Percent Change
Argentina		0	50	N/A
Australia	5,072	5,072	8,756	-42%
Brazil	469	469	418	12%
Canada	9,733	9,733	8,706	12%
Chile	746	746	439	70%
Costa Rica	144	144	190	-24%
Croatia	15	15	0	N/A
Denmark	661	661	536	23%
Finland		0	27	N/A
France		0	0	N/A
Germany	14	14	0	N/A
Honduras		0	21	N/A
Hungary		0	0	N/A
Iceland		0	0	N/A
Ireland	122	122	164	-25%
Israel	38	38	65	-41%
Italy	105	105	65	61%
Japan	5	5	1	N/A
Mexico	1,985	1,985	2,032	-2%
Netherlands	238	238	146	64%
New Zealand	2,305	2,305	3,499	-34%
Nicaragua	512	512	1,155	-56%
North Ireland	49	49	0	N/A
Poland	902	902	286	215%
South Korea		0	0	N/A
Spain	99	99	82	20%
United Kingdom	332	332	46	621%
Uruguay	499	499	499	0%
Total	24,046	24,046	27,181	-12%

24,046

Fresh Beef	AMR	Boneless Trimings	Cheek Meat	Cuts	Edible Offals	Head Meat	Other Intact	Primals & Subprimals	Weekly Total	2016		2015		Percent Change
										Year-to-Date	Year-to-Date	Year-to-Date	Year-to-Date	
Australia		1,467		397	26			958	2,847	2,847	6,865	6,865	-59%	
Canada		1,389	70		152	54	18	1,714	3,398	3,398	2,725	2,725	25%	
Chile										0	19	19	N/A	
Costa Rica		114		6	24				144	144	190	190	-24%	
Honduras										0	21	21	N/A	
Ireland										25	0	0	25	N/A
Japan									5	5	1	1	N/A	
Mexico		56									1,818	1,818	-5%	
New Zealand		1,573		288	2			15	1,879	1,879	3,002	3,002	-37%	
Nicaragua		290		146	55			19	512	512	1,155	1,155	-56%	
Uruguay		213		172			50	32	468	468	473	473	-1%	
Total		5,103	70	2,457	345	54	68	2,739	11,005	11,005	16,267	16,267	-32%	

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	Fully Cooked -		Heat Treated -		Heat Treated - Shelf Stable	Thermally Processed	2016		Percent Change
	Not Shelf Stable	Not Shelf Stable	Not Shelf Stable	Year-to-Date			Year-to-Date	2015 Year-to-Date	
Processed Beef									
Argentina						76	76	0	N/A
Australia					183	204	444	33	130%
Brazil	58				456	41	444	418	6%
Canada	1	1					498	230	116%
Mexico		23					23	1	N/A
New Zealand					22		22	60	-63%
Uruguay						32	32	26	24%
Total	58	24			661	352	1,094	817	34%

	AMR	Boneless		Cuts	Edible Offals	Other Intact	Primals & Subprimals	2016		Percent Change
		Trimming	Trimming					Year-to-Date	Year-to-Date	
Fresh Pork										
Brazil	19	229		25	322	65	3,558	25	0	N/A
Canada				7				4,237	4,286	-1%
Chile				24				24	24	0%
Denmark				376	54		167	596	536	11%
Finland								0	27	N/A
Ireland				24			74	98	164	-40%
Mexico				35	23		102	160	161	0%
Netherlands				102				102	129	-21%
North Ireland							49	49	0	N/A
Poland				45			571	616	203	203%
Spain				50			48	98	72	37%
United Kingdom				332				332	46	621%
Total	19	229		1,021	399	65	4,568	6,337	5,647	12%

	Fully Cooked -		Heat Treated -		Heat Treated - Shelf Stable	Not Heat Treated - Shelf Stable	Product with Second Inhib Not Shelf Stable	Thermally Processed	2016		Percent Change
	Not Shelf Stable	Not Shelf Stable	Not Shelf Stable	Not Shelf Stable					Year-to-Date	Year-to-Date	
Processed Pork											
Canada	83	262	69	2			42	15	0	3%	
Croatia								65	0	N/A	
Denmark	14							14	0	N/A	
Germany								14	0	N/A	
Hungary								0	0	N/A	
Italy	6					98		105	65	61%	
Mexico	17	4	16					37	34	9%	
Netherlands								0	16	N/A	
Poland	286							286	83	244%	
Spain								0	10	N/A	
Total	407	266	85	101	42	80		979	651	50%	

	Carcasses	Cuts	Edible Offal	Primals & Subprimals	2016		Percent Change
					Year-to-Date	Year-to-Date	
Goat							
Australia	100	330	2	65	497	502	-1%
Mexico					0	0	N/A
New Zealand					0	0	N/A
Total	100	330	2	65	497	502	-1%

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Lamb	Boneless Trimming	Carcasses	Cuts	Edible Offals	Primals & Subprimals	Weekly Total	2016 Year-to-Date	2015 Year-to-Date	Percent Change
Australia	19	51	993	130	0	1,194	0	0	N/A
Canada					0	0	0	0	N/A
Chile					0	0	0	0	N/A
Iceland					0	0	0	0	N/A
New Zealand	20	18	194	110	322	1,515	277	277	16%
Total		69	1,187	240	1,515	1,515	1,215	1,215	25%

Mutton	Boneless Trimming	Carcasses	Cuts	Edible Offal	Primals & Subprimals	Weekly Total	2016 Year-to-Date	2015 Year-to-Date	Percent Change
Australia		25	343	12	64	444	444	394	13%
Chile			16			16	16	46	N/A
New Zealand		25	358	12	64	460	460	440	-66%
Total						460	460	440	5%

Veal	Boneless Trimming	Carcasses	Cuts	Edible Offal	Other Intact	Primals & Subprimals	Weekly Total	2016 Year-to-Date	2015 Year-to-Date	Percent Change
Australia		10	1	28	14	31	14	14	70	-12%
Canada			67			67	67	114	67	-41%
New Zealand		10	68	28	14	31	151	219	150	-31%
Total						151	151	219	150	

Poultry	NRTE Otherwise Processed Poultry	Raw Ground, Comminuted, or Nonminuted, or Commited, or Non-Intact Chicken	Raw Ground, Comminuted, or Nonminuted, or Commited, or Non-Intact Turkey	Raw Intact Poultry - Other (Ducks, Geese, Squab)	Raw Intact Turkey	Fully Cooked Poultry	RTE Poultry	Thermally Processed	Weekly Total	2016 Year-to-Date	2015 Year-to-Date	Percent Change
Canada	35	332	451	11	42	138	351	60	990	722	397	14%
Chile									722	38	65	82%
Israel			24				38		38	38	65	-41%
Mexico	22						15		37	37	18	105%
South Korea									0	0	0	N/A
Total	57	783	24	11	180	405	405	60	1,787	1,787	1,347	33%

SECOND DECLARATION OF WILLIAM BULLARD IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT - 51

Definitions

- Raw Product - Intact
 - Raw intact beef
 - Carcasses (including carcass halves or quarters)
 - Other primals and subprimals (1) (including bone in and boneless meat cuts)
 - Beef manufacturing trimmings
 - Beef components (including head meat, cheek meat, weasand meat)
 - Edible offal (3)
 - Bench trim (trimmings from animals not slaughtered at the est.)
 - Other intact (4)
 - Raw intact pork
 - Other primals and subprimals (1) (including bone in and boneless meat cuts)
 - Edible offal (3)
 - Other intact (4)
 - Raw intact sheep, goat
 - Other primals and subprimals (1) (including bone in and boneless meat cuts)
 - Edible offal (3)
 - Other intact (4)
- Raw Product - Non-Intact
 - Raw ground, comminuted, or otherwise non-intact beef
 - Ground beef product (beef only and beef with other species)
 - Hamburger/beef patty product (beef only and beef with other species)
 - Fabricated steaks and other non-intact subprimals (1) (including bone in and boneless meats that are fabricated, restructured, mechanically tenderized or injected)
 - Advanced Meat Recovery (AMR)
 - Ammoniated beef
 - Mechanically separated product
 - Beef trim (derived from non-intact beef)
 - Bench trim (derived from non-intact beef)
 - Low temperature rendered product (includes Finely Textured Beef (FTB), Partially Defatted Chopped Beef (PDCB), or Partially Defatted Beef Fatty Tissue (PDBFT))
 - Raw ground, comminuted, or otherwise non-intact pork
 - Ground product
 - Advanced Meat Recovery (AMR)
 - Mechanically separated product
 - Other non-intact
 - Raw ground, comminuted, or otherwise non-intact meat (sheep, goat, combination species)
 - Ground product
 - Advanced Meat Recovery (AMR)
 - Mechanically separated product
 - Other non-intact
- Non Heat Treated - Self Stable, Heat Treated - Shelf Stable
 - Raw (NRTE) otherwise processed meat
 - NRTE processed meat (stuff and unstuffed)
 - RTE (2) acidified/fermented meat (without cooking)-PLE
 - RTE fermented meat (sliced and not-sliced) according to Lm Alternative (5)
 - RTE fermented meat (sliced and not-sliced) not post-lethality exposed
 - RTE (2) dried meat (PLE)
 - RTE dried meat (sliced and not-sliced according to Lm Alternative (5))
 - RTE (2) salt-cured meat (PLE)
 - RTE dried meat (sliced and not-sliced) not post-lethality exposed
 - RTE salt cured meat (sliced and not-sliced according to Lm Alternative (5))
 - RTE salt cured meat (sliced and not-sliced) not post-lethality exposed

- Heat Treated but Not Fully Cooked - Not Shelf Stable
 - Raw (NRTE) Otherwise processed meat
 - NRTE meat products (stuffed and unstuffed)
 - Product with Secondary Inhibitors - Not Shelf Stable
 - RTE (2) salt-cured meat (PLE)
 - RTE salt cured meat (sliced and not-sliced according to Lm Alternative (5))
 - RTE salt cured meat (sliced and not-sliced) not post-lethality exposed
 - Raw (NRTE) otherwise processed meat
 - NRTE meat products (stuffed and unstuffed)
 - Fully Cooked - Not Shelf Stable
 - RTE (2) fully-cooked meat (PLE)
 - Hot dog products according to Lm Alternative (5)
 - Salad/spread/pate according to Lm Alternative (5)
 - Meat + nonmeat multicomponent according to Lm Alternative (5)
 - Sausage products
 - Diced/shredded according to Lm Alternative (5)
 - Patties/nuggets according to Lm Alternative (5)
 - Other fully cooked sliced product according to Lm Alternative (5)
 - Other fully cooked not sliced product according to Lm Alternative (5)
 - RTE (2) fully-cooked meat without subsequent exposure to the environment
 - Hot dog products not post-lethality exposed
 - Salad/spread/pate not post-lethality exposed
 - Meat + nonmeat multicomponent not post-lethality exposed
 - Sausage products not post-lethality exposed
 - Diced/shredded not post-lethality exposed
 - Patties/nuggets not post-lethality exposed
 - Other fully cooked sliced product not post-lethality exposed
 - Other fully cooked not sliced product not post-lethality exposed
 - Thermally Processed - Commercially Sterile
 - Thermally processed, commercially sterile
 - Thermally processed products (includes product in cans/pails, flexible pouches, trays, jars and bag-in-box)
- (1) Subprimals includes retail cuts of beef commonly used in the beef industry
(2) RTE is defined in 9 CFR 430
(3) Edible offal includes tails, feet, etc.
(4) Other intact includes fat
(5) Listeria monocytogenes (Lm) alternatives are Alt 1; Alt 2, Choice 1; Alt 2, Choice 2; Lm Alt 3

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