

**COMMONWEALTH OF KENTUCKY  
FAYETTE CIRCUIT COURT  
FOURTH DIVISION  
CIVIL NO. 20-CI-00332  
[ELECTRONICALLY FILED]**

**HAYNES PROPERTIES, LLC ET AL.**

**PLAINTIFFS**

**v.**

**BTGCA PROGRESS REPORT**

**BURLEY TOBACCO GROWERS COOPERATIVE  
ASSOCIATION, et al.**

**DEFENDANTS**

\* \* \* \* \*

In follow up to the hearing before the Court on November 12, 2021, and the Orders entered by the Court on November 16 and November 18, 2021, the Defendant Burley Tobacco Growers Cooperative Association (“BTGCA”), by counsel, respectfully reports to the Court and all parties on the progress which it has made thus far in liquidating assets and protecting those funds.

1. Counsel for Plaintiffs and counsel for BTGCA drafted and all six members of the Dissolution Committee signed the attached Unanimous Consent Resolution in order to facilitate the opening of two separate IntraFi Network Deposits DDA-MMDA Depository Accounts (ICS Accounts) at Traditional Bank in Lexington, (a) one to hold \$1.4 million in grant funding for Burley and Dark Tobacco Producer Association, Inc., and (b) the other to receive available cash and proceeds of liquidation of BTGCA’s securities portfolio for the Partial Settlement distribution to be channeled to Angeion Group, LLC as the Settlement Agent, which will issue partial distribution checks to the approved Class Members. See attached **Exhibit A**.

2. Undersigned counsel, together with Al Pedigo (President of BTGCA and Chair of the Dissolution Committee) and Penny Greathouse (Principal of one of the Plaintiffs and Secretary

of the Dissolution Committee) met at Traditional Bank and they executed the voluminous paperwork necessary to open the two ICS Accounts on November 17, 2021. Al and Penny are the designated persons to authorize disbursements.

3. BTGCA's marketable securities portfolio was liquidated by Wells Fargo Advisors on November 18, 2021. The settlement date will be November 22; Al Pedigo and Donna Shields will personally travel to Wells Fargo's Lexington office on November 23 to approve the wire transfer of all \$17.85 million net proceeds to the Traditional Bank Partial Distribution account that day. See the Wells Fargo report attached as **Exhibit B**.

4. On November 19, 2021, from its regular business checking account at Wells Fargo Bank, BTGCA wrote and delivered the following checks as the Court directed (copies attached as **Exhibit C**):

- (a) \$1,400,000 has been delivered to Traditional Bank for deposit into the "Burley and Dark Tobacco ICS Account, which will be held and invested as a savings account bearing interest at .03% interest for the next 12 months.
- (b) \$3 million has been delivered to Traditional Bank for deposit into the Partial Distribution ICS account.
- (c) \$5,000 checks each have been delivered to counsel for to Haynes Properties, LLC, Alvin Hayes & Sons, a Partnership, and S&GF Management, LLC for the Service Awards to the Settlement Class Representatives. BTGCA has proper W-9s from each of those payees.
- (d) \$562,900.79 to the Billings Law Firm, PLLC, and undersigned counsel hereby certifies that that sum, determined by the Court based on its hourly rates and a 1.0 lodestar multiplier, is less than 7.5% of the projected amount that will be available as the net assets from dissolution. BTGCA has a proper W-9 from the Billings Law Firm.

(e) \$18,561.16 has been delivered to the McBrayer law firm for its nontaxable costs and expenses. BTGCA has a proper W-9 from the McBrayer law firm.

5. \$100,000 initial grant funding has been reserved for Burley and Dark Tobacco Producer Association, Inc.; that check will only be delivered upon receipt of its proper amended corporate papers per the Court’s July 28, 2021 Amended Opinion and Order.

6. Upon receipt by BTGCA of Class Counsel’s (McBrayer) itemized billing statement for fees and expenses through November 12, 2021 and reimbursable expenses, BTGCA will reserve in its regular bank account the requested sum, but will not distribute any sum to McBrayer until receipt of an Order from this Court approving such fees and expenses.

7. As of Wednesday, November 24, 2021 (close of business), we expect Traditional Bank will be holding approximately:

	\$17.85 million (proceeds from sale of securities)
	\$ 3.0 million (cash in partial distribution account)
	\$ 1.75 million (cash from remaining BTGCA checking)
	<u>\$ 1.4 million (cash now in Burley &amp; Dark Tobacco reserve)<sup>1</sup></u>
	\$24.0 million
Less:	<u>&lt;\$1.8 million&gt; (McBrayer 7.5% legal fee)</u>
TOTAL	\$22.2 million net available for 12/15/21 Partial Distribution to Class Members (pro rata to currently documented Members, remainder held in reserve)

<sup>1</sup> We do not know the tax consequences of surrendering the two annuities yet, or whether BTGCA can substitute as its grant to Burley & Dark Tobacco Producers Association an in-kind assignment of existing Brighthouse Life Insurance Company fixed annuity having a value of \$1,409,485.38 (as of 10/31/21). BTGCA is awaiting advice from Blue & Co., CPAs about that. The reason we are exploring that is we are told that the cash surrender process on the Brighthouse fixed annuities owned by BTGCA will take a minimum of 3-4 weeks, thus the proceeds from surrender of those annuities likely would not be received in time for the Court’s December 15 target date for distribution to documented Class Members by Angeion Group. There is a second fixed annuity with a 10/31/21 value of \$405,280.87, which the Dissolution Committee does plan on surrendering now. The proceeds of that annuity, when received, can be held by BTGCA to help pay next year’s expenses of winding up, and the Dissolution Committee and professional fees. The larger annuity valued at \$1,409,485.38 could stay invested and not be cashed by BTGCA until it is needed to fund the new Burley and Dark Tobacco group, thereby generating better interest than the \$1.4 million reserve currently held in the Traditional Bank, ICS savings account will generate at 0.3% interest. This would free up the existing the \$1.4 million cash reserve to be transferred into the Partial Distribution account for Class Members now. We should know the accountant’s advice by December 3 or earlier, and it will not delay the initial distribution.

8. Undersigned counsel has initiated correspondence with MetLife and Brighthouse Life Insurance Company (successor to New England Life Insurance Company) about the life insurance policies (3 MetLife and 1 New England Life) owned by BTGCA on the life of its former President, Danny McKinney, that secure his Supplemental Retirement Agreement. +

9. BTGCA is obligated to pay him equal to \$3,029 per month. It appears that will take several months to find a permanent solution to satisfy that liability to Mr. McKinney. BTGCA is hoping to convert or exchange the life insurance policies for one or two annuities that can be given to Mr. McKinney in satisfaction of his Agreement. The remaining liabilities of BTGCA consist of payment of a Medicare supplement insurance reimbursement to John Blevins, a retired employee of approximately \$338 per month, payroll and severance benefits for its two employees, and several office equipment leases having a duration of about one year each. BTGCA will be on a month-to-month office lease after January 2022.

10. In direct answer to the Court's questions in paragraphs 2 and 3 of its November 18, 2021 Order, BTGCA states:

- (a) BTGCA still has Hemp inventory of minimal value (\$50,000 - \$100,000) to be sold, and Tobacco inventory from crop years 2014, 2017 and 2019 with an adjusted book value of approximately \$3.2 million. The 2014 tobacco is under contract and ready to be shipped, representing about \$2 million. We are hopeful it may ship this week. Customary payment time has been about 120-130 days after shipment. The remaining unsold tobacco would be 1253 cases, 240,450 KG, with a book value of approximately \$1.2 million.
- (b) It is uncertain when the uncommitted tobacco booked at \$1.2 million value can be sold, so current and ongoing liabilities like professional fees cannot be paid from future sale proceeds, and some cash reserve needs to be maintained.

11. Class Counsel reports that Angeion has established a qualified settlement fund trust with new tax ID number into which the initial distribution sum can be wire transferred from Traditional Bank before December 8, 2021.

To the extent that this Report reflects any minor deviations from the Court's specified dates for a task or event, BTGCA respectfully asks for the Court's indulgence. BTGCA, the Dissolution Committee and counsel for the parties have all worked diligently and cooperatively on these matters, but certain tasks simply require more time than any of us could control.

BTGCA will update the Court as tobacco is shipped or sold, and about any other developments, including any deviation from the amount actually available in the Partial Distribution account for the initial distribution to the Class Members.

Respectfully submitted,

/s/ Kevin G. Henry

Kevin G. Henry, Esq.

STURGILL, TURNER, BARKER & MOLONEY, PLLC

333 West Vine Street, Suite 1500

Lexington, Kentucky 40507

khenry@sturgillturner.com

ccole@sturgillturner.com

and

/s/ Jeremy S. Rogers

Jeremy S. Rogers, Esq.

DINSMORE & SHOHL LLP

101 South Fifth Street, Suite 2500

Louisville, Kentucky 40202

Jeremy.rogers@dinsmore.com

*Counsel for Defendant Burley Tobacco*

*Growers Cooperative Association*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2021, the foregoing document was electronically filed with the Clerk of this Court using the e-filing system and served electronically by the Clerk of this Court upon the following:

Robert E. Maclin, III, Esq.  
 Katherine K. Yunker, Esq.  
 Jason R. Hollon, Esq.  
 McBrayer PLLC  
 201 E. Main Street, Suite 900  
 Lexington, KY 40507-1361  
 remaclin@mcbayerfirm.com  
 kyunker@mcbayerfirm.com  
 jhollon@mcbayerfirm.com  
*Counsel for Plaintiffs*

John N. Billings, Esq.  
 Christopher L. Thacker, Esq.  
 Richard J. Dieffenbach, Esq.  
 Billings Law Firm, PLLC  
 145 Constitution Street  
 Lexington, Kentucky 40507  
 nbillings@blfky.com  
 cthacker@blfky.com  
 rich.dieffenbach@blfky.com  
*Counsel for Defendant, Greg Craddock on  
 behalf of himself and all others similarly  
 situated*

W. Hank Graddy, IV, Esq.  
 Dorothy T. Rush, Esq.  
 W.H. Graddy & Associates  
 137 North Main Street  
 Versailles, KY 40383  
 hgraddy@graddylaw.com  
 dtgrush2@gmail.com  
*Counsel for Objectors, Roger Quarles,  
 W. Gary Wilson, Ian Horn, Richard Horn  
 Campbell Graddy, David Lloyd and  
 Objector Roger Quarles*

David B. Tachau  
 Tachau Meek PLC  
 101 S. Fifth St., Ste. 3600  
 PNC Tower  
 Louisville, KY 40202-3120  
 dtachau@tachaulaw.com  
*Counsel for Billings Law Firm, PLLC*

and via first-class U.S. Mail, postage prepaid, on the objectors listed on Schedule A of the June 11, 2021 Opinion and Order Awarding Service Fees and Attorneys' Fees and Nontaxable Costs, at the addresses given in their respective objections:

J. B. Amburgey  
 David Barnes  
 Jacob Barnes  
 Robert E. Barton  
 Ben Clifford  
 Lincoln Clifford  
 Wayne Cropper  
 Josh Curtis  
 Clay Darnell  
 George M. Darnell  
 Jennifer Darnell  
 Brent Dunaway

Billy G. Hall  
 Dudley Wayne Hatcher  
 Steve Lang  
 Berkley Mark  
 Ben Quarles  
 Bruce Quarles  
 Steven Quarles  
 Travis Quarles  
 Jerry Rankin  
 Jarrod Stephens  
 Addison Thomson  
 William A. Thomson

Michael Furnish  
William David Furnish  
Leonard Edwin Gilkison

Danny Townsend  
Judy Townsend

/s/ Kevin G. Henry  
*Counsel for Defendant Burley Tobacco Growers  
Cooperative Association*

Courtesy Copy to:

Hon. Julie Muth Goodman  
c/o Alicia Dean ([aliciadean@kycourts.net](mailto:aliciadean@kycourts.net))

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# EXHIBIT A



**UNANIMOUS CONSENT RESOLUTION OF THE  
DISSOLUTION COMMITTEE OF THE BURLEY TOBACCO GROWERS  
COOPERATIVE ASSOCIATION (the Corporation)**

The undersigned, being all of the duly elected or appointed members of the Dissolution Committee of the Corporation previously constituted by Resolution of the Board of Directors of the Corporation and Orders of the Fayette Circuit Court entered June 11, 2021 and July 28, 2021 in *Haynes Properties, LLC, et al. v. Burley Tobacco Growers Cooperative Association*, Fayette Circuit Court Case No. 20-CI-00332, and as provided in KRS 272.171(7), hereby unanimously approve and adopt the following consent resolutions relating to the Partial Settlement approved by the Court and/or the orderly winding up of the financial affairs of the Corporation:


1. Al Pedigo, for and as Chairman of the Dissolution Committee and Penny Greathouse, for and as Secretary of the Dissolution Committee, are authorized to, and shall make, execute and deliver, for and on behalf of the Dissolution Committee, all documents, which they deem may be reasonable, necessary and required, to open and establish with Traditional Bank, 2801 Palumbo Drive, Suite 100, Lexington, Kentucky, two IntraFi Network Deposits DDA-MMDA Depository Accounts (collectively the "ICS Accounts"). Withdrawals and disbursements from the ICS Accounts shall require the signatures of both Mr. Pedigo and Ms. Greathouse, or their respective successors in office. One ICS Account (the "Dark and Burley Association ICS Account") shall be for and to hold \$1,500,000.00, of the funds of the Corporation, for the uses and benefit of the Burley and Dark Tobacco Producers Association, Inc. under and pursuant to the provisions of the Court's 6/11/21 Opinion and Opinion and Order Approving Partial Settlement entered June 11, 2021, as Amended by the Court's July 28, 2021 Amended Opinion and Order Approving Partial Settlement, and which shall bear interest. The other ICS Account (the "Partial Settlement Distribution ICS Account") shall be for and to hold, those remaining funds of the Corporation, which are to be held and disbursed, pursuant to the provisions of the Court's 6/11/21 Opinion and Opinion and Order Approving Partial Settlement entered June 11, 2021, as Amended by the Court's July 28, 2021 Amended Opinion and Order Approving Partial Settlement, and subsequent orders of the Court.

2. The Corporation, Al Pedigo and current Finance Manager, Donna Shields, for the Corporation, shall forthwith take all necessary and required actions to (i) cause Wells Fargo Bank to transfer all "available cash" (the sum left after first reserving \$750,000 for liabilities and operating expenses) - \$1,500,000.00 into the Dark and Burley Association ICS Account and the balance remaining into the Partial Settlement Distribution ICS Account, and (ii) to cause Wells Fargo Wealth

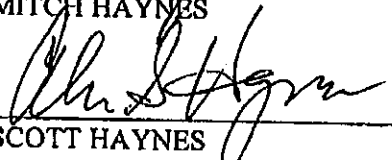
Management to liquidate all securities and like holdings of the Corporation and cause Wells Fargo Wealth Management to transfer those net funds into the Partial Settlement Distribution ICS Account.

This Resolution may be signed in multiple counterparts and such counterparts and a pdf, scan or facsimile of same shall be and have the same force and effect as single document containing original signatures.

IN WITNESS WHEREOF, each member of the Dissolution Committee has signed this Unanimous Consent Resolution, effective as of November 17, 2021.

  
\_\_\_\_\_  
MITCH HAYNES

\_\_\_\_\_  
AL PEDIGO

  
\_\_\_\_\_  
SCOTT HAYNES

\_\_\_\_\_  
EDDIE WARREN

\_\_\_\_\_  
PENNY GREATHOUSE

\_\_\_\_\_  
DONALD MITCHELL


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Management to liquidate all securities and like holdings of the Corporation and cause Wells Fargo Wealth Management to transfer those net funds into the Partial Settlement Distribution ICS Account.

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\_\_\_\_\_  
MITCH HAYNES

  
\_\_\_\_\_  
AL PEDIGO

\_\_\_\_\_  
SCOTT HAYNES

\_\_\_\_\_  
EDDIE WARREN

  
\_\_\_\_\_  
PENNY GREATHOUSE

\_\_\_\_\_  
DONALD MITCHELL

x:\wdox\clients\63798\0010\corporat\01563896.docx

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\_\_\_\_\_  
MITCH HAYNES

*Scott Haynes*  
\_\_\_\_\_  
SCOTT HAYNES

\_\_\_\_\_  
AL PEDIGO

*Eddie Warren*  
\_\_\_\_\_  
EDDIE WARREN

\_\_\_\_\_  
PENNY GREATHOUSE

\_\_\_\_\_  
DONALD MITCHELL

3

Management to liquidate all securities and like holdings of the Corporation and cause Wells Fargo Wealth Management to transfer those net funds into the Partial Settlement Distribution ICS Account.

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MITCH HAYNES

SCOTT HAYNES

PENNY GREATHOUSE

AL PEDIGO

EDDIE WARREN

DONALD MITCHELL

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# EXHIBIT B

# WELLS FARGO ADVISORS

All Brokerage Accounts

Total Value  **\$19,670,784**  
Today's Change  **\$0 (0.00%)**  
Priced as of Close on 11/18/2021  Refresh

## Account Summary

Account ▲	Securities Market Value	Today's Change	Cash & Cash Alt.	Margin Balance	Account Value
CHECKING *3606	\$1,818,122.16	\$0.00 0.00%	\$3,933,154.30	\$0.00	\$5,751,276.46
COLLATERAL *5978	\$0.00	\$0.00 0.00%	\$13,919,507.83	\$0.00	\$13,919,507.83
MORAN - DTRS *5315	\$0.00	\$0.00 0.00%	\$0.00	\$0.00	\$0.00
MORAN-CGRO *3079	\$0.00	\$0.00 0.00%	\$0.00	\$0.00	\$0.00
WFA-DSIP *0132	\$0.00	\$0.00 0.00%	\$0.00	\$0.00	\$0.00
All Brokerage Accounts	\$1,818,122.16	\$0.00 0.00%	\$17,852,662.13	\$0.00	\$19,670,784.29

## Holdings Snapshot

Asset Class	Market Value	Today's Change
Mutual Funds	\$0.00	\$0.00 (0.00%)
Fixed Income	\$0.00	-
Annuities	\$1,818,122.16	\$0.00 (0.00%)
Cash/Cash Alternatives	\$17,852,662.13	-

## Asset Allocation

REP : 000015 of 000023

# EXHIBIT C



**BURLEY TOBACCO GROWERS COOPERATIVE**

771 CORPORATE DRIVE, STE 650  
LEXINGTON, KY 40503



Wells Fargo Bank, N.A.  
43025-4

11/19/2021

PAY TO THE ORDER OF Burley Tocacco / Burley & Dark

\*\*1,400,000.00  
\$

One Million Four Hundred Thousand and 00/100\*\*\*\*\*

DOLLARS

Burley Tocacco / Burley & Dark  
771 Corporate Drive, #650  
Lexington, KY 40503

MEMO

Class Action, Settlement

⑈0 1 206 5⑈ ⑆ 1 2 1000 248⑆ 4057573594⑈

**BURLEY TOBACCO GROWERS COOPERATIVE**

Burley Tocacco / Burley & Dark

11/19/2021

012065

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
11/19/2021	Bill	55331483	1,400,000.00	1,400,000.00		1,400,000.00
					Check Amount	1,400,000.00

Wells Fargo NEW Class Action, Settlement

1,400,000.00

**BURLEY TOBACCO GROWERS COOPERATIVE**

Burley Tocacco / Burley & Dark

11/19/2021

012065

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
11/19/2021	Bill	55331483	1,400,000.00	1,400,000.00		1,400,000.00
					Check Amount	1,400,000.00

Wells Fargo NEW

Class Action, Settlement

1,400,000.00

BURLEY TOBACCO GROWERS COOPERATIVE  
771 CORPORATE DRIVE, STE 650  
LEXINGTON, KY 40503



Wells Fargo Bank, N.A.  
43025-4

11/19/2021

PAY TO THE ORDER OF Burley Tobacco Growers, Partial Distribut

\$\*\*3,000,000.00

Three Million and 00/100\*\*\*\*\*

DOLLARS

Burley Tobacco Growers, Partial Distribut  
771 Corporate Drive 650  
Lexington, KY 40503

MEMO

Partial Distribution, Class Action

⑈0 1 206 1⑈ ⑈ 1 2 1000 248⑈ 4057573594⑈

BURLEY TOBACCO GROWERS COOPERATIVE

012061

Burley Tobacco Growers, Partial Distribut

Date	Type	Reference	Original Amt.	Balance Due	11/19/2021 Discount	Payment
11/19/2021	Bill	55332099	3,000,000.00	3,000,000.00		3,000,000.00
					Check Amount	3,000,000.00

Wells Fargo NEW Partial Distribution, Class Action

3,000,000.00

BURLEY TOBACCO GROWERS COOPERATIVE

012061

Burley Tobacco Growers, Partial Distribut

Date	Type	Reference	Original Amt.	Balance Due	11/19/2021 Discount	Payment
11/19/2021	Bill	55332099	3,000,000.00	3,000,000.00		3,000,000.00
					Check Amount	3,000,000.00

Wells Fargo NEW Partial Distribution, Class Action

3,000,000.00

**BURLEY TOBACCO GROWERS COOPERATIVE**

771 CORPORATE DRIVE, STE 650  
LEXINGTON, KY 40503



Wells Fargo Bank, N.A.  
43025-4

11/19/2021

PAY TO THE ORDER OF Haynes Properties, LLC

\*\*5,000.00  
\$

Five Thousand and 00/100\*\*\*\*\*

Haynes Properties, LLC  
P.P. Box 8638  
Lexington, KY 40533

*[Handwritten Signature]*  
DOLLARS

MEMO

Service Fee, Class Action

⑈0 1 206 2⑈ ⑆ 1 2 1000 248⑆ 4057573594⑈

**BURLEY TOBACCO GROWERS COOPERATIVE**

Haynes Properties, LLC

Date Type Reference  
11/19/2021 Bill

Original Amt.  
5,000.00

Balance Due  
5,000.00

11/19/2021  
Discount

Check Amount

Payment  
5,000.00  
5,000.00

012062

Wells Fargo NEW Service Fee, Class Action

5,000.00

**BURLEY TOBACCO GROWERS COOPERATIVE**

Haynes Properties, LLC

Date Type Reference  
11/19/2021 Bill

Original Amt.  
5,000.00

Balance Due  
5,000.00

11/19/2021  
Discount

Check Amount

Payment  
5,000.00  
5,000.00

012062

Wells Fargo NEW Service Fee, Class Action

5,000.00

NOT ORIGINAL DOCUMENT

11/23/2021 09:32:30 AM

012059

11-24/1210

**BURLEY TOBACCO GROWERS COOPERATIVE**

771 CORPORATE DRIVE, STE 650  
LEXINGTON, KY 40503



Wells Fargo Bank, N.A.  
43025-4

11/19/2021

PAY TO THE ORDER OF Alvin Haynes & Sons Farm

\*\*5,000.00  
\$

Five Thousand and 00/100\*\*\*\*\*

Alvin Haynes & Sons Farm  
P.O. Box 8638  
Lexington KY 40533

DOLLARS

MEMO

Service Fee, Class Action

⑈0 1 2059⑈ ⑆ 1 2 1000 248⑆ 4057573594⑈

**BURLEY TOBACCO GROWERS COOPERATIVE**

Alvin Haynes & Sons Farm

Date Type Reference  
11/19/2021 Bill

Original Amt.  
5,000.00

Balance Due  
5,000.00

11/19/2021  
Discount

Check Amount

012059  
Payment  
5,000.00  
5,000.00

Wells Fargo NEW Service Fee, Class Action

5,000.00

**BURLEY TOBACCO GROWERS COOPERATIVE**

Alvin Haynes & Sons Farm

Date Type Reference  
11/19/2021 Bill

Original Amt.  
5,000.00

Balance Due  
5,000.00

11/19/2021  
Discount

Check Amount

012059  
Payment  
5,000.00  
5,000.00

Wells Fargo NEW  
Filed

Service Fee, Class Action  
20-CI-00332 11/22/2021

Vincent Riggs, Fayette Circuit Clerk

5,000.00

BURLEY TOBACCO GROWERS COOPERATIVE  
771 CORPORATE DRIVE, STE 650  
LEXINGTON, KY 40503



Wells Fargo Bank, N.A.  
43025-4

11/19/2021

PAY TO THE ORDER OF S&GF Management, LLC

\*\*5,000.00  
\$

Five Thousand and 00/100\*\*\*\*\*

S&GF Management, LLC  
1622 Moores Mill Rd  
Midway, KY 40347

DOLLARS

MEMO

Service Fee, Class Action

⑈0⑆2064⑈ ⑆⑆2⑆000248⑆ 4057573594⑈

BURLEY TOBACCO GROWERS COOPERATIVE

012064

S&GF Management, LLC					11/19/2021		
Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment	
11/19/2021	Bill		5,000.00	5,000.00		5,000.00	
						Check Amount	5,000.00

Wells Fargo NEW Service Fee, Class Action 5,000.00

BURLEY TOBACCO GROWERS COOPERATIVE

012064

S&GF Management, LLC					11/19/2021		
Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment	
11/19/2021	Bill		5,000.00	5,000.00		5,000.00	
						Check Amount	5,000.00

Wells Fargo NEW Service Fee, Class Action 5,000.00

**BURLEY TOBACCO GROWERS COOPERATIVE**

771 CORPORATE DRIVE, STE 650  
LEXINGTON, KY 40503



Wells Fargo Bank, N.A.  
43025-4

11/19/2021

PAY TO THE ORDER OF Billings Law Firm, PLLC

\*\*562,900.79  
\$

Five Hundred Sixty-Two Thousand Nine Hundred and 79/100\*\*\*\*\*

Billings Law Firm, PLLC  
145 Constitution Street  
Lexington, KY 40507

DOLLARS

MEMO

Class Action

⑈0 1 2060⑈ ⑆ 1 2 1000 248⑆ 4057573594⑈

**BURLEY TOBACCO GROWERS COOPERATIVE**

Billings Law Firm, PLLC

Date Type Reference  
11/19/2021 Bill

Original Amt.  
562,900.79

Balance Due  
562,900.79

11/19/2021  
Discount

012060

Payment  
562,900.79  
562,900.79

Check Amount

Wells Fargo NEW Class Action

562,900.79

**BURLEY TOBACCO GROWERS COOPERATIVE**

Billings Law Firm, PLLC

Date Type Reference  
11/19/2021 Bill

Original Amt.  
562,900.79

Balance Due  
562,900.79

11/19/2021  
Discount

012060

Payment  
562,900.79  
562,900.79

Check Amount

Wells Fargo NEW Class Action

562,900.79

**BURLEY TOBACCO GROWERS COOPERATIVE**

771 CORPORATE DRIVE, STE 650  
LEXINGTON, KY 40503



Wells Fargo Bank, N.A.  
43025-4

11/19/2021

PAY TO THE ORDER OF **McBrayer PLLC**

**\*\*18,561.16**

Eighteen Thousand Five Hundred Sixty-One and 16/100\*\*\*\*\*

McBrayer PLLC  
201 East Main Street Suite 900  
Lexington, KY 40507

*Carma Lee* DOLLARS

MEMO

Class Counsel

⑈0 1 2063⑈ ⑈ 1 2 1000 248⑈ 4057573594⑈

**BURLEY TOBACCO GROWERS COOPERATIVE**

012063

McBrayer PLLC

11/19/2021

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
11/19/2021	Bill		18,561.16	18,561.16		18,561.16
					Check Amount	18,561.16

Wells Fargo NEW Class Counsel 18,561.16

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