

COMMONWEALTH OF KENTUCKY
FAYETTE CIRCUIT COURT
FOURTH DIVISION

Civil Action No. 20-CI-00332

filed electronically

HAYNES PROPERTIES, LLC, *et al.*

PLAINTIFFS

v.

BURLEY TOBACCO GROWERS COOPERATIVE
ASSOCIATION, *et al.*

DEFENDANTS

Settlement Class Counsel's Motion for Scheduling Conference

NOTICE

Please take notice that this Motion will be heard on Friday, March 24, 2023, beginning at the hour of 10:00 a.m. or as soon thereafter as counsel may be heard.

MOTION

Settlement Class Counsel, Katherine K. Yunker and Jason R. Hollon, hereby move the Court to set a scheduling conference at which deadlines or benchmarks would be established to:

- effect the distribution of the \$1.5 million Fund per the Court's Amended Opinion and Order Approving Partial Settlement entered July 28, 2021; and
- complete the dissolution of the Co-op, make a final distribution of net proceeds to Class members, and provide for any remaining proceeds or returned checks.

Settlement Class Counsel respectfully suggest that establishing such deadlines or benchmarks would aid in the efficient completion of the remaining matters affecting Class interests.

Respectfully submitted,

/s/ Katherine K. Yunker

Katherine K. Yunker (KBA # 79592)

/s/ Jason R. Hollon

Jason R. Hollon (KBA # 96148)

MCBRAYER PLLC

201 E. Main Street, Suite 900

Lexington, KY 40507-1361

(859) 231-8780

Settlement Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 20th day of March 2023, electronically via the e-filing system and via electronic mail upon the following:

Kevin G. Henry
Charles D. Cole
STURGILL, TURNER, BARKER & MALONEY PLLC
333 West Vine Street, Suite 1500
Lexington, KY 40507
khenry@sturgillturner.com
ccole@sturgillturner.com

W. Henry Graddy, IV
Dorothy T. Rush
W. H. GRADDY & ASSOCIATES
137 North Main St.
Versailles, KY 40383
hgraddy@graddylaw.com
dtrush2@gmail.com

Jeremy S. Rogers
DINSMORE & SHOHL LLP
101 South Fifth Street, Suite 2500
Louisville, KY 40202
jeremy.rogers@dinsmore.com

Courtesy Copy (emailed):
Hon. Julie Muth Goodman
c/o Alicia Dean
aliciadean@kycourts.net

and via first-class U.S. Mail, postage prepaid, on unrepresented objectors listed on Schedule A of the Opinion and Order entered June 11, 2021, at addresses given in their respective objections or as thereafter updated:

J.B. Amburgey
Robert E. Barton
Wayne Cropper
Jennifer Darnell
William David Furnish
Dudley Wayne Hatcher
Bruce Quarles
Danny Townsend
Jarrod Stephens
Judy Townsend

David Barnes
Ben Clifford
Josh Curtis
Brent Dunaway
Leonard E. (Eddie) Gilkison
Steve Lang
Travis Quarles
Jerry Rankin
Addison Thomson

Jacob Barnes
Lincoln Clifford
George M. Darnell
Michael Furnish
Bill G. Hall
Berkley Marks
Steven Quarles
Richard Sparks
William A. Thomson

/s/ Jason R. Hollon

Settlement Class Counsel