

**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**

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**Settlement Class Counsel's Response to  
Renewed Graddy Motion for Award of Attorney Fees**

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Settlement Class Counsel, Katherine K. Yunker and Jason R. Hollon, on behalf of the Settlement Class as a whole, hereby respond to the Renewed Graddy Motion for Award of Attorney's Fees and Notice filed March 17, 2023, requesting award of an amount up to 7.5% of \$1.325 million. Class Counsel will appear at and participate in the Renewed Motion hearing noticed for the Court's motion hour on March 24, 2023, but note here that they do not agree with all the positions taken or statements made in the Renewed Motion. Class Counsel also express their position that: (1) the Court denied the initial Graddy motion for an attorney-fee award (filed August 6, 2021) and the Renewed Motion does not present any reason for a differing result; and (2) assuming *arguendo* that an attorney-fee award is appropriate, the amount should not be a percentage of the amount of \$1.325 million.

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	David Barnes	Jacob Barnes
Robert E. Barton	Ben Clifford	Lincoln Clifford
Wayne Cropper	Josh Curtis	George M. Darnell
Jennifer Darnell	Brent Dunaway	Michael Furnish
William David Furnish	Leonard E. (Eddie) Gilkison	Bill G. Hall
Dudley Wayne Hatcher	Steve Lang	Berkley Marks
Bruce Quarles	Travis Quarles	Steven Quarles
Danny Townsend	Jerry Rankin	Richard Sparks
Jarrod Stephens	Addison Thomson	William A. Thomson
Judy Townsend		

/s/ Jason R. Hollon

Settlement Class Counsel