

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 Response to
BTGCA Bar Order Motion

Settlement Class Counsel, Katherine K. Yunker and Jason R. Hollon, hereby respond to the BTGCA Motion for Creditors' Bar Order filed April 10, 2023, asking for entry of a KRS 273.340 style order that prescribes notice and requires creditors to present claims (liquid, contingent, etc.) against the Co-op by a fixed date or be barred from participating in the distribution of the Co-op's assets. Class Counsel will appear at and participate in the Bar Order Motion hearing noticed for the Court's motion hour on April 28, 2023. Class Counsel state that they are generally supportive of the entry of such an order because, in their assessment, it will yield net benefits to the Class as a whole, expediting the final calculation and distribution of net dissolution proceeds to the Class.

Respectfully submitted,

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/s/ Jason R. Hollon

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