

Electronically Filed

COMMONWEALTH OF KENTUCKY
FAYETTE CIRCUIT COURT
FOURTH DIVISION
CIVIL ACTION NO. 20-CI-00332

HAYNES PROPERTIES, LLC,
MITCH AND SCOTT HAYNES DBA
ALVIN HAYNES & SONS AND
S&GF MANAGEMENT, LLC
ON BEHALF OF THEMSELVES AND ALL
OTHERS SIMILARLY SITUATED

PLAINTIFFS

v.

**MOTION FOR APPROVAL TO PAY
PROFESSIONAL FEES**

BURLEY TOBACCO GROWERS COOPERATIVE
ASSOCIATION

DEFENDANT

** ** ** ** **

The Burley Tobacco Growers Cooperative Association (“BTGCA”), by counsel, respectfully moves the Court for an Order approving payment of the following professional legal and accounting fees from the BTGCA client escrow being held in the Sturgill Turner IOLTA account:

1. Accounting fees for Breeding Henderson & Hord PLLC: Attached as **Exhibit A** is the invoice dated August 22, 2023 for all monthly accounting services provided by Charles (Chuck) Hord, CPA from March 1 – August 31, 2023 in the amount of \$1,805.50, which includes his reviewing all bills, preparing checks for signature (by Al Pedigo or Donna Shields), making accounting entries and running monthly financial reports, running year-end transaction reports and compiling other information necessary for the preparation of BTGCA’s income tax returns, and providing other accounting advice and assistance. Mr. Hord has consulted regularly with

undersigned counsel for BTGCA as well as Al Pedigo, one of the Liquidating Officers for the Dissolution Committee of BTGCA.

2. Blue & Co., CPA's: Melinda (Lindy) Karnes, CPA and John Copeland, CPA have been the tax preparers for BTGCA for a number of years. Attached as **Exhibit B** is Blue's invoice dated August 31, 2023 for \$380.63, after payment of the base fee of \$2,400.00 for preparation and review of the latest income tax returns for BTGCA for its fiscal year ending 9/30/2022. The Blue accountants were also consulted by undersigned counsel whether federal tax laws would permit a pass-through of unused Cooperative net operating loss carry forward to Settlement Class Members.

3. Sturgill Turner: Attached as **Exhibit C** is a minimally redacted Transaction Report of all legal services performed by undersigned counsel for BTGCA in dissolution from January 1 through September 30, 2023 (the fiscal year) that have been billed. Counsel notes that there has been no increase in Sturgill's hourly rate since the commencement of this action in 2020. In addition, attached as **Exhibit D, E and F**, respectively, are the monthly invoices from Sturgill that have not been paid for expense reimbursement and services rendered in this matter during August, September and October, 2023 in the respective amounts of \$4,251.88, \$2,910.00 and \$6,357.01, total \$13,518.89.

4. The BTGCA client escrow balance held in the Sturgill Turner IOLTA account is \$31,298.45, available to pay all of the above-requested professional fees.

5. Looking ahead, undersigned counsel foresees perhaps two or three more Court appearances and minimal revision of the statutory Report of Dissolution Committee, together with perhaps three hours for review of the Appellants' Brief and review of and minimal input for the Brief for Appellees in the Roger Quarles, et al appeal concerning legal fees sought by W. H. Graddy & Associates. The most important tasks remaining for undersigned counsel will be to work with the accountants to assure final preparation and prompt filing of the last BTGCA income

tax returns for the fiscal year ending September 30, 2023, and communications with the Dissolution Committee, leading up to the filing of the statutory Report of Dissolution Committee with the appropriate state government and university offices. Optimistically, we hope such activities will not exceed 10-14 billable hours in total.

WHEREFORE, BTGCA respectfully prays the Court to enter an Order authorizing payment from the BTGCA client trust account held by Sturgill to the respective accounting firms and Sturgill law firm as requested above.

NOTICE

The foregoing Motion shall come on for hearing on Friday, November 3, 2023, at the hour of 10:00 a.m., or as soon thereafter as may be heard. Parties wishing to participate via Zoom may use this link:

<https://us02web.zoom.us/j/5816111332#success>

Zoom Meeting ID: 581 6111 332

Zoom Passcode: 313612

Call in number: 1-253-215-8782

Respectfully Submitted,

/s/ Kevin G. Henry

Kevin G. Henry, Esq. (KBA Bar #31255)
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street, Suite 1500
Lexington, KY 40507

Email: khenry@sturgillturner.com

*Counsel for Defendant, Burley Tobacco Growers
Cooperative Association and BTGCA Dissolution
Committee Members, Al Pedigo, Donald Mitchell
and Eddie Warren*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served this 30th day of October, 2023, upon counsel via the e-filing system and electronic mail and upon unrepresented persons via first class U.S. Mail, postage prepaid, as shown on the attached Service List.

/s/ Kevin G. Henry

*Counsel for Defendant, Burley Tobacco
Growers Cooperative Association and BTGCA
Dissolution Committee Members, Al Pedigo,
Donald Mitchell and Eddie Warren*

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

Courtesy Copy (emailed):
Hon. Julie Muth Goodman
c/o Joseph Guthrie
joseph.guthrie@kycourts.net

W. Hank Graddy, IV, Esq.
Dorothy T. Rush, Esq.
W.H. Graddy & Associates
137 North Main Street
Versailles, KY 40383
hgraddy@graddylaw.com
dtrush2@gmail.com
*Counsel for Objectors, Roger Quarles,
W. Gary Wilson, Ian Horn, Richard Horn
Campbell Graddy, David Lloyd and Objector
Roger Quarles*

J. B. Amburgey
P. O. Box 47
Means, KY 40346

George M. Darnell
1593 Grays Run Pike
Cynthiana, KY 41031

Berkley Marks
5399 Paris Pike
Mt. Sterling, KY 40353

David Barnes
678 Bowman Mill Road
Berry, KY 41003

Jennifer Darnell
248 Gray Lane
Cynthiana, KY 41031

Bruce Quarles, Steven
Quarles, Travis Quarles
10570 Owenton Road
Frankfort, KY 40601

Jacob Barnes
1088 Bowman Mill Road
Berry, KY 4103

Brent Dunaway
1547 KY Highway 1054 N
Berry, KY 41003

Jerry Rankin
4540 Perryville Road
Danville, KY 40422

Robert E. Barton
Barton Bros. Farm
4095 Huffman Mill Pike
Lexington, KY 40511

William David Furnish
1320 Highway 982
Cynthiana, KY 41031

Richard Sparks
1499 Thatchers Mill
Paris, KY 40361

Ben Clifford
2459 Ky. Hwy. 1284 E
Cynthiana, KY 41031

Leonard E. Gilkison
345 Calloway White Road
Winchester, KY 40391

Jarrod Stephens
504 Commonwealth Lane
Cynthiana, KY 41031

Lincoln Clifford
Ky Hwy 1284 E
Cynthiana, KY 41031

Bill G. Hall
P. O. Box 117
Means, KY 40346

Addison Thomson
2224 Mt. Vernon Park
Cynthiana, KY 41031

Wayne Cropper
5350 Raymond Road
Mayslick, KY 41055

Dudley Wayne Hatcher
648 Hood Rd.
Morgantown, KY 42261

William A. Thomson
1809 Mt. Vernon Pike
Cynthiana, KY 40131

Josh Curtis
1402 KY Hwy 1940
Cynthiana, KY 41031

Steve Lang
703 Gray Lane
Cynthiana, KY 41031

Danny Townsend
Judy Townsend
11620 Main St.
Jeffersonville, KY 40337

Service List
Fayette Cir. 20-CI-00332



1050 Monarch St, Ste 110
Lexington, KY 405131881

(859) 278-0112
<http://www.bhhkycpa.com>

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Burley Tobacco Growers Cooperative Association
771 Corporate Drive
Suite 650
Lexington, KY 40503

Date: 8/22/2023
Invoice Number: 48997
Client: 3214

For professional services rendered as follows:

Accounting assistance provided for the period from March 1, 2023 through August 31, 2023, including month end reconciliations, paying bills, and general assistance as needed.	\$1,390.00
QuickBooks online charges for the period from March 1, 2023 through August 31, 2023. Billed at cost	\$408.00
Postage charges for mailing bill payments	<u>\$7.50</u>
Invoice Total:	<u>\$1,805.50</u>

Invoices are due upon receipt. Your prompt payment is appreciated. All balances over 30 days are subject to a service charge of 18%.



CPAs / ADVISORS



Burley Tobacco Growers Cooperative Assn.
Attn Kevin Henry
333 West Vine Street
Suite 1500
Lexington, KY 40507

Invoice 10671532

Client No. 110941

Invoice Date 7/31/2023
Due Date 8/30/2023

Preparation and review of income tax filings for year ended September 30, 2022 2,775.00

Total Due 2,775.00

Remit To:

Blue & Co., LLC
2712 Solution Center
Chicago, IL 60677-2007

www.blueandco.com | Email: blue@blueandco.com

After 30 days of invoice date, a late charge of 1.5% per month will be added (minimum late charge \$1.00).
To simply pay online, please visit our website: <https://www.blueandco.com/pay>

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Burley Tobacco Growers Cooperative Assn.
Attn: Kevin Henry
333 West Vine Street
Suite 1500
Lexington, KY 40507

Client #: 110941
Statement Date: 8/31/2023

Client Statement

Entry Date	Due Date	No.	Description	Balance
10/5/2022	10/5/22	10287115	12185 10643214	(2,400.00)
7/31/2023	8/30/23	10671532	Customer Invoice	2,775.00
8/31/2023	9/30/23	10513306	Interest Charge	5.63
Balance Due :				\$380.63

REMIT TO:

Blue & Co., LLC
2712 Solution Center
Chicago, IL 60677-2007

To simply pay online, please visit our website: <https://www.blueandco.com/pay>



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Total for Statement Date mm/dd/yyyy			Billable	18.30	5,607.05	
Statement Date 02/02/2023						
63798.0010	01/05/2023	KGH	300.00	0.40	120.00	Deliver 2 checks for deposit and mail regarding Unemployment audit to Chuck Hord, CPA. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	01/06/2023	KGH	300.00	0.20	60.00	Email to Chuck Hord and Al Pedigo regarding latest collections and tax information still to come. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	01/23/2023	KGH	300.00	0.70	210.00	Emails from/to J. Hollon (3) regarding his questions and next report to Court. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	01/23/2023	KGH	300.00	0.20	60.00	Telephone call from R. Maclin. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	01/24/2023	KGH	300.00	2.00	600.00	Begin drafting Status Report to Court (and review of various files). Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	01/25/2023	KGH	300.00	1.40	420.00	Revise Status Report to Court. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	01/26/2023	KGH	300.00	0.80	240.00	Review latest mail and bills, revise Status Report. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	01/26/2023	KGH	300.00	0.40	120.00	Emails with Chuck Hord regarding records retention time period and latest bills and when John Copeland can meet. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	01/27/2023	KGH	300.00	0.70	210.00	Emails with Chuck Hord, CPA regarding 1099's received and information to add to Status Report (4). Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	01/27/2023	KGH	300.00	0.70	210.00	Revise Status Report to Court. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	01/31/2023	KGH	300.00	0.20	60.00	Emails from Chuck Hord (forward to Al and other counsel). Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	01/31/2023	KGH	300.00	1.00	300.00	Draft motion to approve amount distributable to Burley and Dark Tobacco Producer Association, Inc. and Order. Burley Tobacco Growers Coop Haynes Properties Litigation
Subtotal for Tcode 1			Billable	8.70	2,610.00	
63798.0010	01/10/2023	12200	167326		1,621.20	Thank you for your payment. Burley Tobacco Growers Coop Haynes Properties Litigation

<u>Client</u>	<u>Trans Date</u>	<u>Check Number</u>	<u>B C</u>	<u>Stmt # Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Statement Date 02/02/2023							
		Subtotal for Tcode 201		Billable Payments	0.00	0.00 1,621.20	Thank you for your payment.
Total for Statement Date 02/02/2023							
				Billable Payments	8.70	2,610.00 1,621.20	
Statement Date 03/06/2023							
63798.0010	02/01/2023	KGH		300.00	0.30	90.00	Telephone call with Jason Hollon regarding when Class Counsel will file motion regarding opt-out notices on annuity reserved to fund new nonprofit, etc. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/01/2023	KGH		300.00	0.20	60.00	Email from CPAs regarding net operating loss carryover can offset Brighthouse annuity gain/income (forward to Al Pedigo). Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/07/2023	KGH		300.00	1.00	300.00	Review report from Burley and Dark Tobacco Producer Association. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/07/2023	KGH		300.00	0.40	120.00	Telephone call with Al Pedigo about report and upcoming meetings, received permission to condense report for dissemination to Settlement Class Members. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/08/2023	KGH		300.00	0.30	90.00	Telephone call from Al Pedigo and email with Gaines Penn. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/08/2023	KGH		300.00	0.20	60.00	Review financial summary from Burley and Dark Tobacco Producer Association, Inc. - will be filed with Court here. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/09/2023	KGH		300.00	2.00	600.00	Edit and condense Report on Burley and Dark Tobacco Producer Association to send to Settlement Class Members. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/14/2023	KGH		300.00	0.30	90.00	Emails to Chuck Hord and R. Maclin regarding settlement of Dinsmore legal fees debt. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/14/2023	KGH		300.00	0.30	90.00	Telephone call from Gaines Penn regarding reports to Court here from Burley and Dark Tobacco Producer Association; email from Penn with reports. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/16/2023	KGH		300.00	0.80	240.00	Emails from K. Yunker with motions she intends to file; reply emails to K. Yunker (10 total). Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/17/2023	KGH		300.00	0.40	120.00	Review motion by Class Counsel to approve notice, claim card and procedure reserve fund for Burley & Dark Tobacco. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/17/2023	KGH		300.00	0.10	30.00	Email above motion to Al Pedigo. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/22/2023	KGH		300.00	0.30	90.00	Communicate (with client) Telephone call from Al Pedigo regarding hearing on Friday. Burley Tobacco Growers Coop Haynes Properties Litigation
63798.0010	02/22/2023	KGH		300.00	0.20	60.00	Communicate (other outside counsel) Emails to/from Gaines Penn regarding new nonprofit - website? and etc. Burley Tobacco Growers Coop Haynes Properties Litigation

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Client	Trans Date	Tkpr	Check Number	B C	Stmt # Rate	Hours to Bill	Amount	Ref #	
Statement Date 03/06/2023									
63798.0010	02/23/2023	KGH			300.00	0.60	180.00	Communicate (other outside counsel) emails from Roger Quarles objecting to payment of Dinsmore unpaid invoice from June 2020; review files and then reply to him (2 x). Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	02/23/2023	KGH			300.00	0.40	120.00	Prepare for status conference and motions to be heard. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	02/23/2023	KGH			300.00	0.20	60.00	Review Quarles response to class counsel motion regarding notice and claim process to opt out of grant to Burley and Dark Tobacco nonprofit. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	02/24/2023	KGH			300.00	2.00	600.00	Attend hearing on Class Counsel motion and BTGCA motion to disburse Interest of Burley and Dark Tobacco Producer Association. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	02/24/2023	KGH			300.00	0.30	90.00	Email and telephone call to Gaines Penn regarding Judge's questions and likely court appearance on March 24. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	02/24/2023	KGH			300.00	0.40	120.00	Draft Order on distribution of interest to Burley and Dark Tobacco. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	02/24/2023	KGH			300.00	0.40	120.00	Emails to R. Maclin (forwarded one from Roger Quarles). Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
					Billable	11.10	3,330.00		
63798.0010	02/24/2023		12203		170155		2,610.00	Thank you for your payment. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
					Billable Payments	0.00	0.00	Thank you for your payment.	
							2,610.00		
63798.0010	01/24/2023	EDS			0.200		13.80	69 Document Reproduction Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	02/20/2023	EDS			0.200		1.60	8 Document Reproduction Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
					Billable	0.00	15.40	E101 (653) Document Reproduction	
Total for Statement Date 03/06/2023					Billable Payments	11.10	3,345.40		
							2,610.00		
Statement Date 04/05/2023									
63798.0010	03/03/2023	KGH			300.00	0.30	90.00	Telephone call with AI Pedigo to advise him what Judge said she wants to see/hear regarding membership and activities of new tobacco nonprofit; discussed status of tax return and outstanding items needed. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	03/03/2023	KGH			300.00	0.50	150.00	Emails from/to Class Counsel regarding revised notice and postcard to Class Members (reserve grant fund for new tobacco nonprofit that was part of settlement to honor grant made by BTGCA Board before dissolution). Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	03/03/2023	KGH			300.00	0.20	60.00	Email to Dissolution Committee members sending	ARCH

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<u>Client</u>	<u>Trans Date</u>	<u>Check Number</u>	<u>B C</u>	<u>Stmt # Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Statement Date 04/05/2023							
						them revised notice and postcard. Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/08/2023	KGH		300.00	0.10	30.00 Email from K. Yunker regarding motions to be heard on March 24.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/13/2023	KGH		300.00	0.80	240.00 Draft letter to Class Counsel regarding details of 6/8/20 Dinsmore bill not paid or approved by Navigators.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/14/2023	KGH		300.00	0.30	90.00 Emails from/to K. Yunker regarding next motions by Class Counsel.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/22/2023	KGH		300.00	1.50	450.00 Draft/revise Response to Graddy Law Firm motion for attorneys fees.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/22/2023	KGH		300.00	0.20	60.00 Email to Al Pedigo in response to his voicemail.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/29/2023	KGH		300.00	0.60	180.00 Emails from/to K. Yunker (3) regarding agenda and completion schedule for rest of case and dissolution.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/29/2023	KGH		300.00	0.30	90.00 Emails with accountants J. Copeland and Chuck Hord regarding tax returns, etc.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/30/2023	KGH		300.00	0.40	120.00 Emails with Al Pedigo, Gaines Penn, Chuck Hord, Class Counsel and Rob Maclin on bank account balance and payment of Annuity Interest to Burley and Dark Tobacco entity from Traditional Bank.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/30/2023	KGH		300.00	1.00	300.00 Long call with K. Yunker regarding agenda for court conference and schedule for concluding case and distribution of (a) BDTPA Fund and (b) remaining Settlement funds to Class Members and other dissolution details.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/30/2023	KGH		300.00	0.30	90.00 Emails from/to Al Pedigo regarding above; final Dissolution Committee Report will be required, etc.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/31/2023	KGH		300.00	0.20	60.00 Emails from/to K. Yunker (3).	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/31/2023	KGH		300.00	0.50	150.00 Telephone call with Chuck Hord, CPA and John Copeland, CPA regarding tax returns, how to close out accounts, request for written opinion on no ability to pass-through remaining net operating loss to Class Members, etc.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	03/31/2023	KGH		300.00	0.40	120.00 Deliver dividend checks to Chuck Hord for deposit.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	
				Billable	7.60	2,280.00	
Subtotal for Tcode 1							
Total for Statement Date 04/05/2023				Billable	7.60	2,280.00	
Statement Date 05/03/2023							
63798.0010	04/04/2023	KGH		300.00	1.10	330.00 Attend status conference with Court and other counsel.	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation	

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<u>Client</u>	<u>Trans Date</u>	<u>Check Number</u>	<u>B C</u>	<u>Stmt # Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Statement Date 05/03/2023								
63798.0010	04/04/2023	KGH		300.00	0.20	60.00	Email to Dissolution Committee member Eddie Warren after Court. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/04/2023	KGH		300.00	0.30	90.00	Revise Order for payment of Interest from Brighthouse annuity to Burley and Dark Tobacco from Partial Distribution account, and emails with K. Yunker and Sarah Latham regarding same. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/04/2023	KGH		300.00	1.00	300.00	Draft Memo to Dissolution Committee regarding schedule for completion of distributions and dissolution. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/05/2023	KGH		300.00	2.00	600.00	Research regarding bar orders (outside Bankruptcy). Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/05/2023	KGH		300.00	2.00	600.00	Draft motion and Bar Order. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/06/2023	KGH		300.00	0.60	180.00	Revise motion and Bar Order Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/07/2023	KGH		300.00	0.20	60.00	Email Order for payment of annuity interest to Burley and Dark Tobacco entity to Sarah Jefferson, AI Pedigo, Gaines Penn and BTGCA accountants. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/07/2023	KGH		300.00	0.20	60.00	Email to Sarah Jefferson with bank routing information for Burley and Dark Tobacco, copied Penny Greathouse. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/10/2023	KGH		300.00	0.40	120.00	Emails from/to Traditional Bank regarding address for Burley and Dark Tobacco entity; telephone call to Gaines Penn to confirm, so wire transfer of Interest can be sent. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/10/2023	KGH		300.00	0.30	90.00	Emails with Class Counsel. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/10/2023	KGH		300.00	0.50	150.00	Revise motion for Creditors Bar Order. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/11/2023	KGH		300.00	0.20	60.00	Telephone call from Class Counsel K. Yunker regarding motion for creditor bar order, continuance, etc. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/11/2023	KGH	2	300.00	0.20	60.00	Draft re-notice of above motion to April 28. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/17/2023	KGH		300.00	0.50	150.00	Review Graddy Law Firm motion to alter, amend or set aside Order denying attorney's fee from common fund (sent to members of Dissolution Committee). Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/18/2023	KGH		300.00	0.30	90.00	Email to all counsel regarding proposal to settle Graddy legal fee motion; reply email from K. Yunker (No). Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/26/2023	KGH		300.00	0.30	90.00	Telephone call from Hank Graddy; email response to Graddy regarding his compromise offer on his claim for legal fee from common fund (the grant reserve for Burley and Dark Tobacco). Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	04/28/2023	KGH		300.00	2.00	600.00	Attend hearing - motion for Bar Order denied; Graddy motion passed to May 5.	ARCH

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Client	Trans Date	Check Number	B C	Stmt # Rate	Hours to Bill	Amount	Ref #
Statement Date 05/03/2023							
63798.0010	04/28/2023	KGH		300.00	1.00	300.00	ARCH
						Burley Tobacco Growers Coop Haynes Properties Litigation Draft/revise Order approving publication notice to creditors. Burley Tobacco Growers Coop Haynes Properties Litigation	
Subtotal for Tcode 1				Billable	13.10	3,930.00	
				Non-billable	0.20	60.00	
				Total	13.30	3,990.00	
63798.0010	04/07/2023	12206		171351		3,345.40	ARCH
						Thank you for your payment. Burley Tobacco Growers Coop Haynes Properties Litigation	
Subtotal for Tcode 201				Billable	0.00	0.00	
				Payments		3,345.40	
63798.0010	04/05/2023	EDS				40.00	ARCH
						(509) Court fees (1190.002) Kentucky State Treasurer - Filing fee for Articles of Dissolution Burley Tobacco Growers Coop Haynes Properties Litigation	
Subtotal for Tcode 509				Billable	0.00	40.00	(509) Filing/Processing Fees
Total for Statement Date 05/03/2023				Billable	13.10	3,970.00	
				Non-billable	0.20	60.00	
				Total	13.30	4,030.00	
				Payments		3,345.40	
Statement Date 06/01/2023							
63798.0010	05/02/2023	KGH		300.00	0.50	150.00	ARCH
						Email to three BTGCA members on Dissolution Committee regarding status; emails from/to Al Pedigo. Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	05/04/2023	KGH		300.00	0.30	90.00	ARCH
						Emails from/to K. Yunker regarding motion or creditor bar order. Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	05/04/2023	KGH		300.00	0.20	60.00	ARCH
						Draft notice withdrawing motion for bar order. Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	05/05/2023	KGH		300.00	0.20	60.00	ARCH
						Emails to K. Yunker regarding withdrawn motion. Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	05/05/2023	KGH		300.00	0.50	150.00	ARCH
						Monitor motion hearing via regarding Graddy fees; no discussion of withdrawn motion. Burley Tobacco Growers Coop Haynes Properties Litigation	
Subtotal for Tcode 1				Billable	1.70	510.00	
63798.0010	05/09/2023	12208				6,250.00	ARCH
						Thank you for your payment. Burley Tobacco Growers Coop Haynes Properties Litigation	
Subtotal for Tcode 201				Billable	0.00	0.00	
				Payments		6,250.00	
63798.0010	05/11/2023	EDS				55.00	ARCH
						(509) Court fees (1020.001) Fayette County Clerk - Record Articles of Dissolution Burley Tobacco Growers Coop Haynes Properties Litigation	
Subtotal for Tcode 509				Billable	0.00	55.00	(509) Filing/Processing Fees
Total for Statement Date 06/01/2023				Billable	1.70	565.00	
				Payments		6,250.00	
Statement Date 07/05/2023							
63798.0010	06/02/2023	KGH		300.00	0.50	150.00	ARCH
						Communicate (with client) review and forward	

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<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>Check Number</u>	<u>B C</u>	<u>Stmt # Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Statement Date 07/05/2023								
							Traditional Bank statement to Al Pedigo with breakdown of sums to be distributed among full class, Burley and Dark Tobacco entity and claiming class members who opt out of Burley and Dark entity. Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	06/23/2023	KGH			300.00	0.10	30.00 Email from K. Yunker regarding Class Counsel will file motion and report on opt-outs and allocation of \$1.325 million fund for Burley & Dark Tobacco entity grant, etc. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	06/23/2023	KGH			300.00	0.10	30.00 Forwarded above to Al, Donald and Edie (BTGCA members on Dissolution Committee). Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	06/26/2023	KGH			300.00	0.20	60.00 Review Notice of Appeal from H. Graddy and docket next steps. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	06/26/2023	KGH			300.00	0.20	60.00 Email to clients (Al, Donald and Eddie) regarding above and about motion by Class Counsel on distribution of grant fund. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	06/26/2023	KGH			300.00	0.20	60.00 Review motion to approve procedures for distribution of grant fund between opt-out Members and Burley & Dark Tobacco Producer Association (forwarded to clients). Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	06/26/2023	KGH			300.00	0.70	210.00 Emails from/to K. Yunker (4) regarding when their motion can be heard; that H. Graddy will appeal and my idea of amount of Bond he must post. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	06/27/2023	KGH			300.00	0.30	90.00 Emails from/to Al Pedigo Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	06/28/2023	KGH			300.00	0.70	210.00 Emails from/to Al Pedigo and Chuck Hord regarding Wells Fargo accounts when to close, etc.; Email to John Copeland, CPA Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	06/28/2023	KGH			300.00	2.00	600.00 Review Graddy's prior motions and filings regarding attorneys fees; review Notice of Appeal Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	06/28/2023	KGH			300.00	2.00	600.00 Research regarding real party in interest for possible motion to dismiss appeal, or who must file supersedeas to stay distribution Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	06/30/2023	KGH			300.00	2.00	600.00 Attend hearing on motions of Class Counsel and Hank Graddy regarding the great Fund and opt-out postcard claims results Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	06/30/2023	KGH			300.00	0.20	60.00 Review Graddy Motion for second round of postcard mailing Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	06/30/2023	KGH			300.00	0.40	120.00 Telephone call to Al Pedigo afterwards; Email to Dissolution Committee (Al, Eddie and Donald) plus Gaines Penn with numbers of Claimants opting out (1,880 want their share) Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
Subtotal for Tcode 1					Billable	9.60	2,880.00	

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Statement Date 07/05/2023								
Total for Statement Date 07/05/2023					Billable	9.60	2,880.00	
Statement Date 08/02/2023								
63798.0010	07/06/2023	KGH			300.00	0.10	30.00	Email from John Copeland regarding need to see Form 1099 sent to Class Members Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/06/2023	KGH			300.00	0.20	60.00	Email to Jason Hollan regarding above; Email from K. Yunker Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/10/2023	KGH			300.00	0.60	180.00	Review BTGCA 2021 federal and state income tax returns. Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/10/2023	KGH			300.00	1.00	300.00	Review 2021-22 tax returns; email copies to Dissolution Committee members Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/12/2023	KGH			300.00	0.40	120.00	Review H. Graddy's proposed Order on distribution of Grant Fund to Burley & Dark Tobacco entity and opt-out class Members who claimed share, with escrow of sum to cover Graddy legal fee claim during his appeal after denial of same. Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/12/2023	KGH			300.00	0.20	60.00	Review email from Class Counsel to Court regarding above (conflicting Orders, her proposal to reconcile or to ask Judge to rule on the record). Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/12/2023	KGH			300.00	0.30	90.00	Telephone call with Al Pedigo regarding signing tax returns and status of allocating \$1.3 million Fund to opt-out Class members Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/14/2023	KGH			300.00	0.20	60.00	Email from Al Pedigo; forward signature pages for 2021-22 tax returns to John Copeland Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/14/2023	KGH			300.00	0.20	60.00	Emails with Jason Hollan regarding what boxes on Form 1099 reported distribution payments to Class members Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/14/2023	KGH			300.00	0.20	60.00	Emails to Dissolution Committee members E. Warren and Donald Mitchell regarding above question (information Blue & Co. needs for opinion letter on NOL) Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/18/2023	KGH			300.00	0.20	60.00	Emails with K. Yunker regarding Grant Fund and Obtaining Objectors appeal for Graddy legal fee. Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/18/2023	KGH			300.00	0.20	60.00	Email to Dissolution Committee Members (Al, Eddie, Donald) with copy of Order and next steps. Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/18/2023	KGH			300.00	3.30	990.00	Begin drafting motion to dismiss appeal. Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/20/2023	KGH			300.00	0.70	210.00	Telephone call with K. Yunker regarding next steps and proposed Plan for division and distribution of the Grant Fund, and other fiscal year-end matters (including trying to get tax opinion from Blue regarding R. Quarles' request to pass-through unused NOL to Class Members. Burley Tobacco Growers Coop Haynes Properties Litigation ARCH
63798.0010	07/20/2023	KGH			300.00	3.00	900.00	Draft/revise motion to dismiss Objectors' appeal ARCH

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<u>Client</u>	<u>Trans Date</u>	<u>Check Tkpr</u>	<u>Number</u>	<u>B C</u>	<u>Stmnt # Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Statement Date 08/02/2023								
							regarding denial of Graddy attorneys fees. Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/21/2023	MLA			210.00	0.50	105.00 Review/analyze Appellant's Pre-Hearing Statement to determine need for our Supplemental Response.	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/21/2023	KGH			300.00	3.60	1,080.00 Drafting motion to dismiss Graddy appeal	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/24/2023	MLA			210.00	1.60	336.00 Research Kentucky case precedent regarding timely filing of Notice of Appeal and renewed Motions regarding tolling of deadline (incorporate specific citations regarding Graddy's Renewed Motion for Attorney's fee in our Motion to Dismiss).	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/24/2023	MLA			210.00	0.40	84.00 Review/analyze Graddy's Notice of Appeal to incorporate legal arguments into our Motion to Dismiss (17 pages).	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/24/2023	KGH			300.00	1.00	300.00 Continue drafting Motion to Dismiss Appeal of Objectors regarding Graddy legal fees	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/24/2023	KGH			300.00	0.20	60.00 Email to John Copeland, CPA	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/24/2023	KGH			300.00	0.20	60.00 Email to Dissolution Committee members (Al, Eddie and Donald)	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/25/2023	MLA			210.00	1.40	294.00 Draft legal argument regarding Objectors' untimely filing Notice of Appeal in Motion to Dismiss Objectors' appeal (incorporate Kentucky case precedent and Kentucky Rules of Civil Procedure) (apply to facts at hand).	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/25/2023	MLA			210.00	1.90	399.00 Draft legal argument regarding Objectors' failure to name themselves as real party in interest to appeal in Motion to Dismiss Objectors' appeal (incorporate Kentucky case precedent and Kentucky Rules of Civil Procedure) (apply to facts at hand).	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/25/2023	KGH			300.00	0.90	270.00 Review Graddy Prehearing Statement; Draft Supplemental Prehearing Statement.	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/25/2023	KGH			300.00	0.40	120.00 Emails from/to Hank Graddy regarding grant fund.	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/27/2023	KGH			300.00	0.40	120.00 Review Class Counsel Report regarding Fund (Burley & Dark grant after opt-out vote by postcards).	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/27/2023	KGH			300.00	0.10	30.00 Forwarded above for Dissolution Committee members.	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/27/2023	KGH			300.00	0.80	240.00 Draft possible position statement in response to Report by Class Counsel and prior emails by Hank Graddy - emailed to client for comment.	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
63798.0010	07/27/2023	KGH			300.00	0.20	60.00 Review McBrayer's Supplemental Prehearing Statement - forwarded to Dissolution Committee members.	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	

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<u>Client</u>	<u>Trans Date</u>	<u>Check Number</u>	<u>B C</u>	<u>Stmt # Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Statement Date 08/02/2023								
63798.0010	07/27/2023	KGH		300.00	0.20	60.00	Email to R. Maclin regarding Class Counsel Report. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	07/28/2023	KGH		300.00	0.30	90.00	Review Class Counsel motion for fees - forward to Dissolution Committee members. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
Subtotal for Tcode 1				Billable	24.90	6,948.00		
63798.0010	07/25/2023	12209		173625		3,445.00	Thank you for your payment. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
Subtotal for Tcode 201				Billable Payments	0.00	0.00	Thank you for your payment.	
Total for Statement Date 08/02/2023				Billable Payments	24.90	6,948.00		
Statement Date 09/05/2023								
63798.0010	08/01/2023	KGH		300.00	0.40	120.00	Emails from/to K. Yunker regarding proposed division and distribution of Grant Fund. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/02/2023	KGH		300.00	0.30	90.00	Telephone call with Al Pedigo regarding Class Counsel's proposed Plan and Order to distribute Fund for grant, etc. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/03/2023	KGH		300.00	0.40	120.00	Emails from/to K. Yunker and review her alternate proposed Orders. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/03/2023	KGH		300.00	0.20	60.00	Email to Al Pedigo regarding above. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/03/2023	KGH		300.00	0.20	60.00	Email from K. Yunker regarding her discussion with John Friend, counsel for Graddy. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/04/2023	KGH		300.00	2.00	600.00	Attend motion hearing on allocation and distribution of Grant Fund (BDTPA). Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/04/2023	KGH		300.00	0.30	90.00	Meet with K. Yunker before and after court. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/04/2023	KGH		300.00	0.10	30.00	Meet with Hank Graddy and John Friend before court. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/04/2023	KGH		300.00	0.50	150.00	Emails to Al Pedigo (3); Eddie Warren and Donald Mitchell and Penny Greathouse. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/04/2023	KGH		300.00	0.10	30.00	Email to Gaines Penn. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/16/2023	KGH		300.00	0.40	120.00	Emails with K. Yunker regarding BTGCA proposed disposition of net assets; Graddy/Quarles appeal. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/16/2023	KGH		300.00	0.80	240.00	Emails to Traditional Bank with copy of 8/4/2023 Order regarding Fund Disposition and proposed wire transfers; replies by other counsel and Bank. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/17/2023	KGH		300.00	0.30	90.00	Emails with Chuck Hord and Al Pedigo regarding close-out process for Wells Fargo accounts. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH

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Client	Trans Date	Tkpr	Check Number	B C	Stmt # Rate	Hours to Bill	Amount	Ref #	
Statement Date 09/05/2023									
63798.0010	08/17/2023	KGH			300.00	0.60	180.00	Emails with Johnny Friend regarding appeal by Quarles, etc. and proposed bond (4). Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/17/2023	KGH			300.00	0.20	60.00	Telephone call from R. MacIin regarding amount of bond that should be required. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/18/2023	KGH			300.00	0.30	90.00	Review Quarles' response to our Motion to Dismiss Appeal (forward to Dissolution Committee) Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/18/2023	KGH			300.00	0.20	60.00	Email from K. Yunker to J. Friend on bond on appeal Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/22/2023	KGH			300.00	0.20	60.00	Email from Johnny Friend regarding appeal over Graddy fee claim Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/22/2023	KGH			300.00	0.30	90.00	Emails with Chuck Hord regarding bank balance and payment of professionals' bills Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/22/2023	KGH			300.00	0.40	120.00	Emails regarding above to Dissolution Committee members Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/23/2023	KGH			300.00	0.70	210.00	Revise and finalize plan/motion for final disposition of net assets Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/23/2023	KGH			300.00	0.50	150.00	Review Motion to Dismiss Appeal by McBrayer (forwarded to Dissolution Committee) Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/23/2023	KGH			300.00	0.70	210.00	Telephone call with K. Yunker regarding both of the above Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/30/2023	KGH			300.00	0.60	180.00	Draft email instructions (3) to Traditional Bank regarding distributions by wire transfers from \$1,325,000 Fund per 8/4/2023 Order Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	08/30/2023	KGH			300.00	0.10	30.00	Email to K. Yunker and J. Hollon regarding above Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
					Subtotal for Tcode 1		Billable 10.80	3,240.00	
63798.0010	09/05/2023		12211		176488		6,948.00	Thank you for your payment. Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
					Subtotal for Tcode 201		Billable Payments 0.00	0.00	Thank you for your payment.
63798.0010	08/31/2023	EDS					1,011.88	(482) Other - Storage of Burley's final records at Vital Records Control for a period of 3 years and destruction of those records at the end of the 3 year period Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
					Subtotal for Tcode 482		Billable 0.00	1,011.88	(482) Miscellaneous Expense
Total for Statement Date 09/05/2023					Billable Payments	10.80	4,251.88	6,948.00	

Statement Date 10/09/2023

63798.0010	09/01/2023	KGH			300.00	0.10	30.00	Email from K. Yunker regarding September 8 hearing	ARCH
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<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>Check Number</u>	<u>B C</u>	<u>Stmt # Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Statement Date 10/09/2023								
63798.0010	09/01/2023	KGH			300.00	0.20	60.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Email to K. Yunker and Maclin regarding plan to provide last two years tax returns and 3-year transaction history to Chambers	
63798.0010	09/01/2023	KGH			300.00	0.70	210.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Emails to and telephone call with John Copeland, CPA regarding letter about no pass-through of unused NOL to members	
63798.0010	09/01/2023	KGH			300.00	0.50	150.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Assemble general ledgers and tax returns with message to Court Chambers and Yunker/Maclin	
63798.0010	09/05/2023	KGH			300.00	0.20	60.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Review email from K. Yunker regarding tax returns and closing plans	
63798.0010	09/05/2023	KGH			300.00	0.40	120.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Review Response by Quarles Objectors to McBrayer's Motion to Dismiss Appeal over Graddy legal fees	
63798.0010	09/05/2023	KGH			300.00	0.20	60.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Email above Response and message to Dissolution Committee	
63798.0010	09/06/2023	KGH			300.00	0.20	60.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Email to K. Yunker	
63798.0010	09/07/2023	KGH			300.00	0.40	120.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Telephone call from Katie Yunker regarding preparation for hearing	
63798.0010	09/07/2023	KGH			300.00	1.00	300.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Draft new separate Orders for closing Wells Fargo accounts and for wire of Traditional Bank funds to Angeion's Qualified Settlement Fund Trust account	
63798.0010	09/08/2023	KGH			300.00	1.00	300.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Attend Motion Hour to obtain Orders for transfer of bank funds to Angeion QSFT and Sturgill IOLTA	
63798.0010	09/08/2023	KGH			300.00	0.30	90.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Conference with Class Counsel after Court regarding what amount would be sufficient bond for Objectors-Appellants to cause withholding of payment to PayMe group	
63798.0010	09/12/2023	KGH			300.00	0.10	30.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Review proposed Order regarding Distribution Timing from Class Counsel	
63798.0010	09/12/2023	KGH			300.00	0.40	120.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Telephone call from Greg Craddock regarding distribution to Pay Me Group, etc.	
63798.0010	09/14/2023	KGH			300.00	0.10	30.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Email from Chuck Hord confirming balances at Wells Fargo Bank	
63798.0010	09/15/2023	KGH			300.00	0.70	210.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Emails from K. Yunker, review bond posted by John Friend & W.H. Graddy, IV for \$5950; reply email; Email from R. Maclin	
63798.0010	09/21/2023	KGH			300.00	0.50	150.00	ARCH
							Burley Tobacco Growers Coop Haynes Properties Litigation	
							Review Response by Graddy and Friend on adequacy of supersedeas bond	

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<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>Check Number</u>	<u>B C</u>	<u>Stmt # Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Statement Date 10/09/2023								
63798.0010	09/22/2023	KGH			300.00	0.30	90.00	ARCH
							Conference with K. Yunker after hearing regarding other matters in winding-up Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	09/22/2023	KGH			300.00	1.50	450.00	ARCH
							Attend motion hearing on adequacy of supersedeas bond Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	09/25/2023	KGH			300.00	0.20	60.00	ARCH
							Telephone call from K. Yunker regarding large Angeion wire was sent to McBayer escrow by mistake - agreed okay for McBayer to wire to Angeion Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	09/29/2023	KGH			300.00	0.20	60.00	ARCH
							Review Notice regarding Bond filed by Graddy Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	09/29/2023	KGH			300.00	0.20	60.00	ARCH
							Email to client reps regarding above (Al, Eddie, Donald) Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
63798.0010	09/29/2023	KGH			300.00	0.30	90.00	ARCH
							Telephone call with Al Pedigo regarding closing Wells Fargo account (x2) Burley Tobacco Growers Coop Haynes Properties Litigation	ARCH
					Billable	9.70	2,910.00	
Subtotal for Tcode 1								
Total for Statement Date 10/09/2023					Billable	9.70	2,910.00	

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Sturgill, Turner, Barker & Moloney, PLLC

333 West Vine Street, Suite 1500
Lexington, KY 40507
p: 859.255.8581 f: 859.231.0851
www.sturgillturner.com

Employer I.D. No. 61-0576615

Al Pedigo/Chuck Hord, CPA
Burley Tobacco Growers Cooperative

INVOICE OF SERVICES

Invoice Date: 09/05/2023
Invoice No: 177246
Account No: 63798.0010

Haynes Properties Litigation

					Hours
08/01/2023	KGH	C400	A107	Emails from/to K. Yunker regarding proposed division and distribution of Grant Fund.	0.40
08/02/2023	KGH	C300	A106	Telephone call with Al Pedigo regarding Class Counsel's proposed Plan and Order to distribute Fund for grant, etc.	0.30
08/03/2023	KGH	C400	A107	Emails from/to K. Yunker and review her alternate proposed Orders.	0.40
	KGH	C300	A106	Email to Al Pedigo regarding above.	0.20
	KGH	C400	A107	Email from K. Yunker regarding her discussion with John Friend, counsel for Graddy.	0.20
08/04/2023	KGH	L230	A109	Attend motion hearing on allocation and distribution of Grant Fund (BDTPA).	2.00
	KGH	C400	A107	Meet with K. Yunker before and after court.	0.30
	KGH	C400	A107	Meet with Hank Graddy and John Friend before court.	0.10
	KGH	C300	A106	Emails to Al Pedigo (3); Eddie Warren and Donald Mitchell and Penny Greathouse.	0.50
	KGH	C400	A107	Email to Gaines Penn.	0.10
08/16/2023	KGH	C400	A107	Emails with K. Yunker regarding BTGCA proposed disposition of net assets; Graddy/Quarles appeal.	0.40
	KGH	C400	A108	Emails to Traditional Bank with copy of 8/4/2023 Order regarding Fund Disposition and proposed wire transfers; replies by other counsel and Bank.	0.80
08/17/2023	KGH	C300	A106	Emails with Chuck Hord and Al Pedigo regarding close-out process for Wells Fargo accounts.	0.30
	KGH	L510	A107	Emails with Johnny Friend regarding appeal by Quarles, etc. and proposed bond (4).	0.60

Haynes Properties Litigation

					Hours		
	KGH	C400	A107	Telephone call from R. Maclin regarding amount of bond that should be required.	0.20		
08/18/2023	KGH	L510	A104	Review Quarles' response to our Motion to Dismiss Appeal (forward to Dissolution Committee)	0.30		
	KGH	C400	A107	Email from K. Yunker to J. Friend on bond on appeal	0.20		
08/22/2023	KGH	C400	A107	Email from Johnny Friend regarding appeal over Graddy fee claim	0.20		
	KGH	P100	A108	Emails with Chuck Hord regarding bank balance and payment of professionals' bills	0.30		
	KGH	C300	A106	Emails regarding above to Dissolution Committee members	0.40		
08/23/2023	KGH	L250	A103	Revise and finalize plan/motion for final disposition of net assets	0.70		
	KGH	L510	A104	Review Motion to Dismiss Appeal by McBrayer (forwarded to Dissolution Committee)	0.50		
	KGH	C400	A107	Telephone call with K. Yunker regarding both of the above	0.70		
08/30/2023	KGH	P600	A103	Draft email instructions (3) to Traditional Bank regarding distributions by wire transfers from \$1,325,000 Fund per 8/4/2023 Order	0.60		
	KGH	C400	A107	Email to K. Yunker and J. Hollon regarding above	0.10		
				For Current Services Rendered	10.80	3,240.00	

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Kevin G. Henry	Member	10.80	\$300.00	\$3,240.00

Costs

08/31/2023	L110	E124	(482) Other - Storage of Burley's final records at Vital Records Control for a period of 5 years and destruction of those records at the end of the 5 year period	1,011.88
			(482) Miscellaneous Expense	1,011.88
			Total Costs Thru 08/31/2023	1,011.88
			Total Current Work	4,251.88
			Previous Balance	\$6,948.00
09/05/2023			Thank you for your payment.	-6,948.00
			Balance Due	<u>\$4,251.88</u>

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Haynes Properties Litigation

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
C300	Analysis and Advice	510.00	0.00
C300	Analysis and Advice	510.00	0.00
C400	Third Party Communication	1230.00	0.00
C400	Third Party Communication	1,230.00	0.00
L110	Fact Investigation/Development	0.00	1011.88
L100	Do not Use-See L110-L190 Case Assessment,Development &Admin	0.00	1,011.88
L230	Court Mandated Conferences	600.00	0.00
L250	Other Written Motions and Submissions	210.00	0.00
L200	Do Not Use-See L210-L260 Pre-Trial Pleadings & Motions	810.00	0.00
L510	Appellate Motions and Submissions	420.00	0.00
L500	Do not Use - See L510 - L530 - Appeal	420.00	0.00
P100	Project Administration	90.00	0.00
P100	Project Administration	90.00	0.00
P600	Completion/Closing	180.00	0.00
P600	Completion/Closing	180.00	0.00

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PAYMENT DUE UPON RECEIPT
To ensure proper credit to your account
Please write Account 63798.0010 on your check
Thank you



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Employer I.D. No. 61-0576615

Al Pedigo/Chuck Hord, CPA
 Burley Tobacco Growers Cooperative

INVOICE OF SERVICES

Invoice Date: 10/09/2023
 Invoice No: 178224
 Account No: 63798.0010

Haynes Properties Litigation

					Hours
09/01/2023	KGH	C400	A107	Email from K. Yunker regarding September 8 hearing	0.10
	KGH	C400	A107	Email to K. Yunker and Maclin regarding plan to provide last two years tax returns and 3-year transaction history to Chambers	0.20
	KGH	P220	A107	Emails to and telephone call with John Copeland, CPA regarding letter about no pass-through of unused NOL to members	0.70
	KGH	L320	A107	Assemble general ledgers and tax returns with message to Court Chambers and Yunker/Maclin	0.50
09/05/2023	KGH	C400	A107	Review email from K. Yunker regarding tax returns and "closing plans"	0.20
	KGH	L510	A104	Review Response by Quarles Objectors to McBrayer's Motion to Dismiss Appeal over Graddy legal fees	0.40
	KGH	C300	A106	Email above Response and message to Dissolution Committee	0.20
09/06/2023	KGH	C400	A107	Email to K. Yunker	0.20
09/07/2023	KGH	C400	A107	Telephone call from Katie Yunker regarding preparation for hearing	0.40
	KGH	L250	A103	Draft new separate Orders for closing Wells Fargo accounts and for wire of Traditional Bank funds to Angeion's Qualified Settlement Fund Trust account	1.00
09/08/2023	KGH	L250	A109	Attend Motion Hour to obtain Orders for transfer of bank funds to Angeion QSFT and Sturgill IOLTA	1.00
	KGH	C400	A107	Conference with Class Counsel after Court regarding what amount would be sufficient bond for Objectors-Appellants to cause withholding of payment to PayMe group	0.30
09/12/2023	KGH	L250	A104	Review proposed Order regarding Distribution Timing from Class Counsel	0.10

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Haynes Properties Litigation

					Hours	
	KGH	C400	A108	Telephone call from Greg Craddock regarding distribution to Pay Me Group, etc.	0.40	
09/14/2023	KGH	C100	A108	Email from Chuck Hord confirming balances at Wells Fargo Bank	0.10	
09/15/2023	KGH	C400	A107	Emails from K. Yunker, review bond posted by John Friend & W.H. Graddy, IV for \$5950; reply email; Email from R. Maclin	0.70	
09/21/2023	KGH	L460	A104	Review Response by Graddy and Friend on adequacy of supersedeas bond	0.50	
09/22/2023	KGH	C400	A107	Conference with K. Yunker after hearing regarding other matters in winding-up	0.30	
	KGH	L250	A109	Attend motion hearing on adequacy of supersedeas bond	1.50	
09/25/2023	KGH	C400	A107	Telephone call from K. Yunker regarding large Angeion wire was sent to McBryer escrow by mistake - agreed okay for McBryer to wire to Angeion	0.20	
09/29/2023	KGH	L510	A104	Review Notice regarding Bond filed by Graddy	0.20	
	KGH	C300	A106	Email to client reps regarding above (AI, Eddie, Donald)	0.20	
	KGH	C300	A106	Telephone call with AI Pedigo regarding closing Wells Fargo account (x2)	0.30	
				For Current Services Rendered	9.70	2,910.00

Recapitulation

Timekeeper	Title	Hours	Hourly Rate	Total
Kevin G. Henry	Member	9.70	\$300.00	\$2,910.00
	Total Current Work			2,910.00
	Previous Balance			\$4,251.88
	Balance Due			<u>\$7,161.88</u>

Task Code Summary

		Fees	Expenses
C100	Fact Gathering	30.00	0.00
C100	Fact Gathering	30.00	0.00
C300	Analysis and Advice	210.00	0.00
C300	Analysis and Advice	210.00	0.00
C400	Third Party Communication	900.00	0.00
C400	Third Party Communication	900.00	0.00
L250	Other Written Motions and Submissions	1080.00	0.00

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Haynes Properties Litigation

		<u>Fees</u>	<u>Expenses</u>
L200	Do Not Use-See L210-L260 Pre-Trial Pleadings & Motions	1,080.00	0.00
L320	Document Production	150.00	0.00
L300	Do Not Use - See L310-L390 Discovery	150.00	0.00
L460	Post-Trial Motions and Submissions	150.00	0.00
L400	Do Not Use See - L410 - L470 Trial Preparation & Trial	150.00	0.00
L510	Appellate Motions and Submissions	180.00	0.00
L500	Do not Use - See L510 - L530 - Appeal	180.00	0.00
P220	Tax	210.00	0.00
P200	Fact Gathering/Due Dilligence	210.00	0.00

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Your trust account #3 balance is

	Opening Balance	\$0.00
09/29/2023	Met Life Dividend Payment	712.40
10/06/2023	Certfied check/Wells Fargo	30,586.05
	Closing Balance	<u>\$31,298.45</u>

PAYMENT DUE UPON RECEIPT
 To ensure proper credit to your account
 Please write Account 63798.0010 on your check
 Thank you



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Employer I.D. No. 61-0576615

Al Pedigo/Chuck Hord, CPA
Burley Tobacco Growers Cooperative

INVOICE OF SERVICES

Invoice Date: 10/30/2023
Invoice No: 178707
Account No: 63798.0010

Haynes Properties Litigation

					Hours
10/12/2023	KGH	C400	A107	Emails from/to K. Yunker regarding Quarles appeal and meeting to prepare for further reports to Court, etc.	0.40
	KGH	P600	A103	Begin drafting Statutory Report of Dissolution Committee	3.00
10/13/2023	KGH	P600	A103	Finish first draft of Report of Dissolution with review of files	2.00
10/17/2023	KGH	P600	A103	Revise statutory Final Report on Dissolution	1.20
10/19/2023	KGH	C400	A107	Emails from/to K. Yunker (5)	0.50
	KGH	C400	A107	Telephone call with Rob Maclin regarding unused net operating loss	0.30
	KGH	C100	A104	Search BTGCA records for list of prior members/patrons with contracts to sell to BTGCA 2015-19; extract list from larger Excel combined membership list prepared by former General Manager in 2020; identify number of contracts in each year 2015-19	1.90
	KGH	P600	A103	Revise Report of Dissolution (2x)	1.80
	KGH	C100	A108	Telephone call with Chuck Hord, CPA for information for Report; Email to Hord	0.40
	KGH	C100	A104	Review Traditional Bank statements for total deposits for Report	0.50
10/20/2023	KGH	C400	A107	Meet with Class Counsel and R. Maclin at McBrayer regarding motions to file, final closing details, question of unused net operating loss, and need for 2023 FYE report to Court	2.00

Haynes Properties Litigation

					Hours		
	KGH	L250	A103	Outline Report to Court on 10/1/2022-9/30/2023 fiscal year finances and activities	1.00		
10/25/2023	KGH	C400	A107	Email from Class Counsel regarding legal notice of dissolution	0.20		
	KGH	P600	A103	Revise legal notice	0.20		
	KGH	L250	A103	Continue revision of statutory Report on Dissolution	0.60		
	KGH	L250	A103	Draft status report for Court on FYE 9/30/2023 activities	2.00		
	KGH	C300	A107	Email to Class Counsel regarding notice from Court of Appeals dispensing with prehearing conference and about designation of the record	0.20		
	KGH	L510	A107	Email to J. Friend, et al regarding designation of record on appeal	0.10		
10/27/2023	KGH	L250	A103	Draft motion to approve payment of professional fees from Sturgill IOLTA escrow	1.50		
	KGH	L250	A103	Revise Status Report on 2023 fiscal year For Current Services Rendered	0.80	20.60	6,180.00

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Kevin G. Henry	Member	20.60	\$300.00	\$6,180.00

Costs

10/26/2023	L110	E124	(482) Other - Lexington Herald-Leader - Running of Legal Notice in the Herald-Leader on Sunday, October 29, 2023	177.01
			(482) Miscellaneous Expense	177.01
			Total Costs Thru 10/30/2023	177.01
			Total Current Work	6,357.01
			Previous Balance	\$7,161.88
			Balance Due	\$13,518.89

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
C100	Fact Gathering	840.00	0.00

Haynes Properties Litigation

	<u>Fees</u>	<u>Expenses</u>
C100 Fact Gathering	840.00	0.00
C300 Analysis and Advice	60.00	0.00
C300 Analysis and Advice	60.00	0.00
C400 Third Party Communication	1020.00	0.00
C400 Third Party Communication	1,020.00	0.00
L110 Fact Investigation/Development	0.00	177.01
L100 Do not Use-See L110-L190 Case Assessment,Development &Admin	0.00	177.01
L250 Other Written Motions and Submissions	1770.00	0.00
L200 Do Not Use-See L210-L260 Pre-Trial Pleadings & Motions	1,770.00	0.00
L510 Appellate Motions and Submissions	30.00	0.00
L500 Do not Use - See L510 - L530 - Appeal	30.00	0.00
P600 Completion/Closing	2460.00	0.00
P600 Completion/Closing	2,460.00	0.00

Your trust account #3 balance is

Opening Balance	\$31,298.45
Closing Balance	\$31,298.45

PAYMENT DUE UPON RECEIPT
 To ensure proper credit to your account
 Please write Account 63798.0010 on your check
 Thank you

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