

**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 re Discharging Settlement Administrator
and re Dissolution QSF Remainder**

NOTICE

Please take notice that this Motion will be brought on for hearing at the Court's regular motion hour on Friday, January 24, 2025, at 10 A.M., or as soon thereafter as counsel may be heard.

MOTION

Settlement Class Counsel request an order (a) confirming the accounting from and payments to Angeion Group LLC and discharging Angeion as Settlement Administrator, (b) determining that there is to be no additional Class-wide distribution of net proceeds from the dissolution of the Burley Tobacco Growers Cooperative Association ("Co-op"), (c) establishing the residual amount from the net dissolution proceeds that were held by Angeion in its qualified settlement fund ("QSF"), and (d) determining whether there are to be any uses for the residual amount other than eventual *cy pres* distributions. In support of this Motion, Class Counsel refer generally to their Report re Compliance with Order for Ending Settlement Administration by Angeion Group LLC filed November 20, 2024 ("11/20/24 Report") and their Status Report re Dissolution Distributions and Dissolution QSF Remainder filed December 7, 2024 ("12/7/24 Status Report"), and also state as follows:

1. In the final, appealable, and unappealed Agreed Order re Disposition of Net Dissolution Proceeds entered January 24, 2024 (“1/24/24 Disposition Order”), this Court ruled *inter alia* that — “at the conclusion of the full, final distribution to Class members” — there could be a motion for the discharge of the Settlement Administrator, determination of the residual amount in the Dissolution QSF, and directions regarding eventual payment or disbursement of the residual. 1/24/24/ Disposition Order ¶15. The 1/24/24 Disposition Order provided for the full, final distribution to Class members to be made; that final distribution issued in April 2024 and has been completed and concluded.¹

Angeion Discharge

2. The Order for Ending Settlement Administration by Angeion Group LLC, entered October 2, 2024, set out steps and a schedule for ending its administration of the QSF and other functions relating to notice, communications with, and distributions to Class members. All steps were completed by Angeion in a timely manner, including turning over to McBryer PLLC the \$44,924.13 remaining in the QSF per Angeion’s accounting.²

3. The Order Directing Notice of Proposed Settlement to Settlement Class and Scheduled Fairness Hearing entered November 17, 2020 (“11/17/20 Order”) *inter alia* approved the retention of Angeion as the Settlement Administrator to implement the directed notice plan as well as to administer the proposed settlement. *See* 11/17/20 Order ¶¶ 8, 9, 11-14. Angeion’s response to a request for proposals estimated that its total fees and costs for its notice/settlement services was approximately \$110,000.³ The estimate was based on a detailed notice plan, anti-

¹ See 9/9/24 Settlement Class Counsel’s Status Report re Third (Final) Distribution of Dissolution Proceeds ¶¶ 3-5 and 12/7/24 Status Report ¶¶ 1-6.

² See 11/20/24 Report and attached Exhibits 1-3.

³ See 11/4/20 Settlement Class Representatives’ Motion to Direct Notice of Proposed Settlement to Class and Schedule Fairness Hearing for Consideration of the Proposed Settlement, p.10 ¶¶ 13-15.

pated functions in establishing Class membership and eligibility for participation in any dissolution proceeds distribution, and — if the proposed settlement was approved — facilitation of the distribution of the funds to the Settlement Class.⁴

4. As shown on Angeion's report of orders and payments for its Settlement Administrator work, 11/20/24 Report Exh.2, the amounts invoiced by and paid to Angeion totaled **\$155,887.16**.⁵ Most of the payments were made directly from Co-op funds,⁶ and the Angeion invoices were reviewed by both Co-op representatives and Class Counsel before payment was made. Angeion has informed Class Counsel in writing that it will not present any further invoice to the Co-op or Class Counsel relating to its settlement administration in this case.

5. Although this total exceeds the Angeion estimate given in late 2020, the payments made to Angeion are supported and reasonable overall:

a. The amounts invoiced are consistent with estimates' detail for pricing of individual elements such as postage or reissue of checks. The invoices also comport with work observed to have been done by Angeion with respect to notice to and communications with potential Class members, receipt and processing of Class membership and payment eligibility documentation, the three dissolution distributions (the first in four separate waves) and the Special Fund distribution. *See also* 11/20/24 Report Exhibit 3 (O. Lorenzano declaration).

b. The number of distributions was more than anticipated. Angeion's response to the request for proposals was based on the 2020 proposed settlement, which did not include indivi-

⁴ See *id.* Exhibit A (Proposed Notice Plan), especially items # 3, 5, 6.

⁵ Exhibit 2 to the 11/20/24 shows invoices and credits totaling \$165,518.17, which includes \$9631.01 mistakenly invoiced and then credited back in the first half of 2024.

⁶ The exceptions were the last two payments — \$4,615.88 to complete payments on invoices pre-dating 2023 (see 3/1/24 Settlement Class Counsel's Report re Determinations with respect to Final Dissolution Distribution ¶ 1), and \$6,547.65 to Angeion for the Special Fund distribution (see 8/16/24 Settlement Class Counsel's Status Report re Distribution to Electing Class Members and Associated Costs ¶ 5a).

dual Class members' election to have part of the \$1.5 million grant paid to them instead of to a tobacco-focused nonprofit⁷ or the consequent distribution to a subset of the Class members eligible for dissolution distributions. In addition, Angeion's estimate anticipated that there would be one dissolution distribution, with the process spanning 2021-22, rather than four waves of an initial distribution and two subsequent distributions beginning in December 2021 and ending in September 2024.

c. The unanticipated length of Angeion's settlement administration activities also increased the costs thereof. There were direct increases due to the need to file a QSF tax return for each year it was in operation and in the inflation of prices, particularly postage rates. In addition, there were indirect increases from the passage of time because of changes in Class members' addresses or to the payee for a Class member share.

6. Angeion's QSF Accounting Summary (11/20/24 Report Exh.1) showed funding from the Co-op of \$27,219,278.33, of which \$26,335,873.78 was from Co-op net dissolution proceeds.⁸ The following table expands the QSF Accounting Summary to show the allocation between the Dissolution QSF and the Special Fund portion. The Total column is as shown in Exhibit 1 of the 11/20/24 Report, the Special Fund column matches the figures from the related status report,⁹ and the Dissolution "payments to Class members" equals the amount reported therefor in 12/7/24 Status Report ¶6 (table: *cash* row, *TOTAL* column).

⁷ The Special Fund process and provisions were directed by ¶¶ 29–36 & ordering ¶ 2 in the final, appealable, and unappealed Amended Opinion and Order Approving Partial Settlement, entered July 28, 2021.

⁸ The other \$863,404.55 was the amount from the \$1.5 million grant ordered to be disbursed to Angeion in ¶¶ 5a & 6 of the final, appealable, and unappealed Order re Fund Distribution, entered August 4, 2023.

⁹ See 8/16/24 Settlement Class Counsel's Status Report re Distribution to Electing Class Members and Associated Costs ¶¶ 3, 5a, 6.

Description	Total	Dissolution	Special Fund
Settlement Funding	\$ 27,219,278.33	\$ 26,355,873.78	\$ 863,404.55
Payments to class members	-27,037,818.44	-26,188,136.36	-849,682.08
variance on uncashed checks	190.00	190.00	0.00
Attorney Fees	-125,547.23	-125,547.23	0.00
Admin fees	-11,163.53	-4,615.88	-6,547.65
Bank Fee	-15.00	-15.00	0.00
REMAINDER	\$ 44,924.13	\$ 37,749.31	7,174.82
Wire to McBrayer to close account	-\$ 44,924.13		
	\$ 0.00		

7. As stated in ¶8 of the 12/7/24 Status Report, Class Counsel has reviewed Angeion’s general ledger entries for the QSF and spreadsheets for checks issued (and reissued) for each distribution. The \$190.00 variance on uncashed checks is unexplained, but Class Counsel accepts its inclusion in the overall remainder total of \$44,924.13.

8. Angeion wired McBrayer \$44,924.13 to close the QSF account on October 17, 2024, and has since turned over to McBrayer the website it maintained. Angeion has discontinued the special phone numbers and email address it set up for settlement administration and has ceased direct communications with Class members. Any duties or obligations of Angeion relating to settlement administration after November 2024 were owed to taxing authorities (e.g., the QSF tax return and 1099s to some Class members for distributions during the 2024 tax year).

9. Class Counsel therefore request that this Court:

- a. accept or confirm (i) the \$44,924.13 turned over to McBrayer and held by it in escrow as all the funds remaining in the QSF maintained by Angeion as Settlement Administrator

and (ii) the \$155,887.16 paid to Angeion as full and final payment for its services as Settlement Administrator, with nothing due and owing to Angeion or to be refunded by Angeion; and

- b. discharge Angeion as Settlement Administrator.

No Further Distributions

10. The amount remaining from the Dissolution QSF is \$37,749.31, comprised of: \$27,849.31 in uncashed checks issued to Class members, mostly from the final distribution; \$175.00 net, in a bank fee for a dishonored check and a variance on uncashed checks; and \$9,725.00 in unused amounts reserved for Angeion work and expenses. See 12/7/24 Status Report ¶9.

11. Class Counsel recommend that there be no further Class-wide distribution of dissolution proceeds. For the reasons stated in ¶ 11 of the 12/7/24 Status Report, a fourth issuance of checks would be inefficient and impractical. In further support of the estimate that the cost of making such a distribution would use up more than 50% of the available amount, Class Counsel note as follows:

- a. Beginning with preparation of an updated list of Class member names and addresses, through mailing out the checks, allowing 90 days for checks to be cashed before voiding them, and then reporting on the distribution results and the residual amount, a Class-wide distribution would require at least six (6) months' time. Another distribution thus is likely to significantly delay finality in this case.¹⁰

- b. McBrayer internal records indicate that for the months April-July 2024 the Class Counsel team spent more than 145 hours on tasks relating to the final dissolution distribution.

¹⁰ The deadlines have passed for seeking rehearing or discretionary review of the Opinion and Order Dismissing the appeal from denial of the Graddy firm request for a fee award, issued December 13, 2024, in Case No. 2023-CA-0767.

Charging all the hours at a low paralegal rate of \$150/hour would total \$21,750 — an amount which does not include QSF or check-issuance costs.

c. The costs for the Special Fund distribution to approximately two-thirds of the Class members exceeded \$17,797.65.¹¹ With a proportionate increase for a distribution to all Class members, this total would be more than \$26,696.47.

12. McBrayer would be entitled an attorney's fee of 7.5% of the \$37,749.31 net dissolution proceeds remaining if there were to be another dissolution distribution to Class members.¹² This amounts to a further 7.5% fee of \$2,831.20 — reducing the amount to be distributed and before provision for the costs of distribution.

13. Kentucky has no law directly on point, but related authority, other jurisdiction's caselaw, and basic class-action principles support a decision not to exhaust the residual in costs and checks for a further Class wide distribution and instead to reserve the residual to meet case-closing costs (or other contingencies) and make *cy pres* payments.

a. Although not strictly applicable to this judicially-ordered dissolution of an agricultural co-operative, KRS 272.325(3) provides:

[I]f the estimated cost of making such distribution [to members], in the opinion of the [dissolution] committee approximate more than fifty percent (50%) of the amount available for distribution, the association may dispose of its net assets by converting them to cash and paying the money over to the College of Agriculture of the University of Kentucky, or to any nonprofit farm organization operating within the areas served by the cooperative.

¹¹ The costs paid out for the Special Fund distribution were \$6,547.65 to Angeion for its work and expenses and \$11,250.00 for the Class Counsel team's work; however, Class Counsel presented data supporting a significantly higher cost than the \$11,250 cap provided in ¶ 5b of the 8/4/23 Order re Fund Distribution. See 8/16/24 Motion for Rulings on Settlement Class Counsel's Status Report re Distribution to Electing Class Members and Associated Costs ¶ 6 (showing that \$20,250 understated the lodestar amount); Order on Special Distribution Status Report ¶ 2, entered September 5, 2024.

¹² See ordering ¶ 3 of the Opinion and Order Awarding Service Fees and Attorneys' Fees and Nontaxable Costs, entered June 11, 2021.

As noted in ¶ 11 above, the costs of a Class-wide distribution are projected to exceed 50% of the Dissolution QSF residual.¹³

b. Civil Rule CR 23.05(6)(b) contemplates approval of class-action settlements that provide for a residual amount, and requires that at least 25% of the residual be disbursed to the Kentucky IOLTA Fund's Civil Rule 23 Account.¹⁴ "Residual funds" are defined as:

funds that remain after the payment of all approved class member claims, expenses, litigation costs, attorneys' fees, and other court-approved disbursements to implement the relief granted.

CR 23.05(6)(a). Congruent with CR 23.05(6), payment of all approved Class member claims has occurred in accordance with Court-ordered processes for identifying and compensating Class members, and there have been Court-approved payments of expenses, litigation costs, attorneys' fees and otherwise to implement the dissolution relief granted.

c. From the net dissolution proceeds, \$10,146.00 has been distributed to each of the 2603 eligible Class members; over 99% of the \$26,436,068 distributed was received. See 12/7/24 Status Report ¶¶ 4-5. Such direct distribution of benefits to the Class is consistent with class-action purposes and common-fund principles. In addition, a potential source for a conflict

¹³ In the face of such high distribution costs relative to amounts distributed, one court limited further distributions to those in which the individual amount distributed was at least twice the average distribution cost. *In re Wells Fargo Sec. Litigation*, 991 F. Supp. 1193, 1197-98 (N.D. Cal. 1998). Courts have also accepted proposed settlements in which a minimum distribution amount was set to avoid having administrative costs disproportionate to small payments. See, e.g., *Sullivan v. DB Invests., Inc.*, 667 F.3d 273, 328 (3rd Cir. 2011) (citing cases); *New York State Retirement Sys. v. Gen'l Motors Corp.*, 315 F.R.D. 226, 241 (E.D. Mich. 2016) (referring to such thresholds as beneficial and standard in securities cases); *In re Polyurethane Foam Antitrust Litig.*, 168 F.Supp.3d 985, 1005-06 (N.D. Ohio 2016) (approving settlement that provided for *cy pres* distribution only if residual balance after initial and subsequent distributions fell below \$50,000 and the claims administrator, with class counsel, determined that "it is no longer economical to continue making distributions").

¹⁴ Kentucky was one of 16 states that, by mid-2015, adopted statutes or civil rules allowing *cy pres* distributions; like many such states, Kentucky requires a disbursement of residual funds to support legal aid to low-income individuals. See Cecily C. Shiel, *A New Generation of Class Action Cy Pres Remedies: Lessons from Washington State*, 90 WASH. L. REV. 943, 948-49 n.40, 964 n.154-55, 971-74 nn.198-206 & 213-15 (June 2015).

of interest is avoided on the issue of whether to have further distributions is avoided, because at this point there is no additional 7.5% fee awarded to McBrayer other than for a further, Class-wide distribution. *See In re Baby Prods. Antitrust Litig.*, 708 F.3d 163, 173 (3rd Cir. 2013) (discussing preference for direct distributions to the class over *cy pres* distributions).

d. “[C]y pres awards should generally represent a small percentage of total settlement funds.” *In re Baby Prods.*, 708 F.3d at 174. Even if the entire \$37,749.31 Dissolution QSF residual were paid out in *cy pres* distributions:

- that would be less than 0.15% of the more than \$26 million total in funds transferred to Angeion for dissolution distributions, distributed to, and received by Class members.¹⁵
- each of the four (4) *cy pres* designees would receive only \$9437.33, which is less than the distribution to each of the 2603 eligible Class members.

Unclaimed amounts from the first two distributions were used to increase and support further distributions, keeping any *cy pres* distributions to a relatively modest portion of the total Dissolution QSF.

e. *Cy pres* distributions are “most appropriate where further individual distributions are economically infeasible....” *In re Baby Prods.*, 708 F.3d at 173. A settlement that involves individual, direct distributions “should presumptively provide for further distributions to participating class members unless the amounts involved are too small to make individual distributions economically viable....” Am. Law Inst., PRINCIPLES OF THE LAW OF AGGREGATE LITIGATION § 3.07(b). Courts have determined that direct, individual distributions are not economically viable or feasible when the amount distributed to each class member would be *de minimis*.¹⁶

¹⁵ See ¶ 4 above and 12/7/24 Status Report ¶¶ 4-5.

¹⁶ *See, e.g., In re Easysaver Rewards Litig.*, 906 F.3d 747, 761 (9th Cir. 2018) (finding that, although technically feasible, pro rata distribution of about \$3 million residual to more than a million persons “would

One federal district court substituted a *cy pres* distribution for an inefficient, relatively minor further distribution agreed-upon by the parties as part of the settlement:

Applying the \$675,667.99 on a pro rata basis, the 77,701 Residential Simple claimants (each paid \$482.74) would each receive \$5.94 and the 110,678 Residential Simple-Additional Resident claimants (each paid \$157.99) would each receive \$1.94. It is likely, as the Parties suggest, that a great many of the checks, in sums that small, particularly after the passage of over two years since the initial distribution, would never be cashed.

Good v. West Virginia-American Water Co., No. 2:14-cv-1374, 2021 WL 6197053 *3 (S.D. W. Va. Dec. 30, 2021). Like the requested “further” distributions in that case (1.23% of the initial distributions), the projected pro rata distribution here of less than \$7.25¹⁷ is *de minimis*, less than 1% of the \$10,146 net dissolution proceeds already distributed to each Class member.

14. Class Counsel therefore request that this Court declare that there will be no further Class-wide distributions of the Co-op’s net dissolution proceeds.

Dissolution Residual Amount and Uses

15. The 1/24/24 Disposition Order (¶ 5) provides that any remaining dissolution proceeds should be disbursed “as soon as feasible” in accordance with its provisions, but allows for other uses of remaining dissolution proceeds if approved by the Court (¶ 7). Paragraph 15 directs that — at the conclusion of the full, final distribution to Class members — the residual QSF be determined and disbursed in the *cy pres* payments ordered (¶ 17) or as designated by the

be *de minimis*, ... particularly once the costs of distribution are deducted”); *Hughes v. Kore of Indiana Enter., Inc.*, 731 F.3d 672, 675 (7th Cir. 2013) (finding that class could be certified based on *cy pres* relief only, because estimated distribution of \$3.57 per claimant “ would provide no meaningful relief”); *cf. In re BankAmerica Corp. Sec. Litig.*, 775 F.3d 1060, 1063, 1066 (8th Cir. 2015) (reversing a *cy pres* distribution, but indicating it may be permissible where the amount of funds to be distributed is *de minimis*); *Klier v. Elf Atochem No. Am., Inc.*, 658 F.3d 468, 472-73, 480 (5th Cir. 2011) (determining additional distribution of associated unused funds to medical-monitoring program subclass was not economically feasible due to low participation and completion rate in the program; however, ordering unused funds to be distributed to members of a separate subclass).

¹⁷ See 12/7/24 Status Report ¶ 11.

Court “as a reserve for functions or facilities relating to the Class previously supplied by the Settlement Administrator,” with any unspent reserve eventually included in the *cy pres* payments.

16. The amount remaining in the dissolution portion of the QSF is **\$37,749.31**. See ¶¶ 6, 10, above. This Dissolution QSF residual, together with the \$7,174.82 found to be the residual amount from the Special Fund, totals to the \$44,924.13 which has been turned over to McBrayer and for which Angeion has accounted.

17. If, as requested, the Court declares that there will be no further Class-wide distribution of dissolution proceeds, then the Class as a whole has no interest in the Dissolution QSF residual and the \$37,749.31 is not subject to the constraints of a common fund. There are two potential uses of the residual other than a *cy pres* distribution; however, on practical grounds, Class Counsel does not recommend either.

18. One possible use — reserving funds for functions or facilities previously supplied by the Settlement Administrator — is specifically mentioned in ¶ 15 of the 1/24/24 Disposition Order. In the last two years of Angeion’s settlement administration, the three main functions supplied by Angeion were holding funds in trust, maintaining the Class/settlement website, and arranging for the printing and mailing of distribution checks. The first two functions have been handed off to McBrayer: the Dissolution QSF residual is being held in an existing client escrow account, and the former Angeion website pages are now presented through the McBrayer website.¹⁸ McBrayer has no direct out-of-pocket expenses relating to the escrowed funds or transferred webpages; tracking and seeking approval for compensating time spent on these handed-off functions, *e.g.*, in updating the website, is likely to be more trouble than it is worth.

¹⁸ The website is still accessible through the legacy URL < www.btgcasettlement.com > and also as sub-pages through the McBrayer URL < <https://www.mcbrayerfirm.com/burley-tobacco-growers-cooperative-association-class-action-lawsuit-settlement.html> >.

19. The other possible use is to reissue distribution checks that were not cashed, upon the payee Class member's request and appropriate documentation. There were 51 Class members to whom a check for the final distribution share (\$546) was issued but was not cashed; these outstanding checks were voided on September 30, 2024.¹⁹ In all, 65 Class members did not cash one or more of distribution checks issued to them. The \$37,749.31 residual is sufficient to pay on reissue all 51 of the uncashed final distribution checks, but not also reissued uncashed checks for the first (\$5670) or second (\$3930) distributions.²⁰ Costs of reissuance would include not only the printing and transmission of an appropriate check, but also the time spent in fielding the request and documenting that a check should be reissued, to whom, and at what address, plus delay in closing out this matter to allow time for the reissued check to clear and possible charges for voiding the reissued check (if also not cashed in time) or to file/send an appropriate 1099. In Class Counsel's estimation, a reissue process would disrupt the finality achieved for the dissolution distributions and would require an inefficient expenditure of time and resources (which should be assessed against reissued check amounts), particularly given how little apparent demand there is for a reissuance process at this late date. Class Counsel have received only one inquiry (in mid-December 2024) from a Class member about the possibility of having a voided check reissued, and some of the 51 Class members with uncashed final distribution checks expressly informed the Class Counsel team that they did not consider the \$546 amount worth the effort required for reissue, particularly if it involved an address or payee change.

¹⁹ See 12/7/24 Status Report ¶ 1. By the third full week of June 2024, Class Counsel mailed a letter or otherwise contacted each of 76 Class members who had not cashed the third distribution check; all of the 25 reissued checks requested were cashed. *Id.*

²⁰ Per ordering ¶8 of the 7/28/21 Amended Opinion and Order Approving Partial Settlement (p.27), uncashed check amounts from earlier distributions reverted to the Dissolution QSF and were included in the calculation of the next distribution; thus, those amounts are no longer generally available to reissue and pay a check from an earlier distribution.

20. Class Counsel are not aware of any demand or obligation burdening the residual \$37,749.31 now held in escrow by McBrayer and do not propose that any amount thereof be reserved for reissuance of distribution checks or for functions/facilities previously supplied by Angeion as the Settlement Administrator. Nonetheless, Class Counsel suggest that the Dissolution QSF residual and its Special Fund counterpart continue to be held in escrow by McBrayer, subject to further orders of the Court, until the amount of the Co-op Reserve is fixed and determined²¹ and this case is being closed out.

21. Therefore, Class Counsel request that the Court find that the residual amount from the Dissolution QSF is **\$37,749.31** and rule that no amount thereof is reserved for any particular use, including for reissuing uncashed distribution checks or for functions/facilities previously supplied by Angeion as the Settlement Administrator.

WHEREFORE, Settlement Class Counsel request entry of an order discharging Angeion as Settlement Administrator, declaring that no further Class-wide distribution will be made, and finding that the Dissolution QSF residual is \$37,749.31, without reserving any amount pending anticipated *cy pres* distributions.

Respectfully submitted,

/s/ Katherine K. Yunker

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Settlement Class Counsel

²¹ See 1/24/24 Disposition Order ¶¶ 6, 16. The Co-op Reserve is held in escrow by the Sturgill Turner law firm.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 16th day of January 2025, 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, and that a courtesy copy has been sent to Angeion personnel via email.

/s/ Katherine K. Yunker

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Fayette Cir. 20-CI-00332