

**COMMONWEALTH OF KENTUCKY  
FAYETTE CIRCUIT COURT  
FOURTH DIVISION**

**Civil Action No. 20-CI-00332**

*filed electronically*

**HAYNES PROPERTIES, LLC, *et al.***

**PLAINTIFFS**

v.

**BURLEY TOBACCO GROWERS  
COOPERATIVE ASSOCIATION, *et al.***

**DEFENDANTS**

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**Settlement Class Counsel's  
Status Report**

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Settlement Class Counsel, Katherine K. Yunker and Jason R. Hollon, hereby provide the following status report detailing actions taken in the administration of the Settlement relating to distributions to eligible class members or determinations about class membership and share eligibility. Class Counsel state as follows:

1. On December 15, 2021, the Settlement Administrator mailed checks in a baseline amount of \$5,670.00 each to 1,791 persons as those persons' initial distribution. On February 25, 2022, the Settlement Administrator mailed checks in a baseline amount of \$5,670.00 each to an additional 615 persons as those persons' initial distribution. Some of those being sent a distribution owed outstanding Tobacco Administrative Grading Service ("TAGS") fees, which were subtracted from the amount sent to each such person (individual or business entity).

2. On March 1, 2022, Class Counsel mailed 120 notices to those for which a final determination has been made that such person (individual or business entity) does not qualify as a member of the Settlement Class or is ineligible (e.g., for failure to meet deadlines or because the payment would be duplicative) for a share of dissolution proceeds. Such notices will be sent to

other persons (individuals or business entities) for which there are subsequently such final determinations.

Pursuant to the Court's November 16, 2021 Order, such persons (individuals or business entities) were and will be informed of their right to object to this determination within thirty (30) days by submitting a written objection to the Court and Settlement Class Counsel. Upon receipt of such objections, Class Counsel will make available to the Court whatever documentation requested relating to the respective person and will appear at any proceeding regarding the objections scheduled by the Court.

3. Over 200 persons (individuals or business entities) remain under consideration for membership in the Settlement Class and eligibility for a distribution share. Some of these persons have been or will be sent a letter requesting further information or documentation pertinent to their circumstances.

4. In accordance with prior Orders, McBrayer PLLC was paid an attorney's fee proportional to the first and second distributions described herein and was paid the Class Counsel fee ordered/approved in the Court's December 7, 2021 Order.

Respectfully submitted,

/s/ Katherine K. Yunker

Katherine K. Yunker (KBA # 79592)

/s/ Jason R. Hollon

Jason R. Hollon (KBA # 96148)

MCBRAYER PLLC  
201 E. Main Street, Suite 900  
Lexington, KY 40507-1361  
(859) 231-8780

*Settlement Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served this 4th day of March 2022, electronically via the e-filing system and via electronic mail upon the following:

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

Kevin G. Henry  
Charles D. Cole  
Sturgill, Turner, Barker & Maloney PLLC  
333 West Vine Street, Suite 1500  
Lexington, KY 40507  
khenry@sturgillturner.com  
ccole@sturgillturner.com

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

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

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

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

/s/ Jason R. Hollon  
Settlement Class Counsel