Filed 20-CI-00332 07/03/2025 Vincent Riggs, Fayette Circuit Clerk

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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. **NOTICE OF COLLECTION OF FINAL FUNDS FROM METLIFE**

BURLEY TOBACCO GROWERS COOPERATIVE ASSOCIATION — DEFENDANT

** ** ** ** ** **

The Burley Tobacco Growers Cooperative Association in dissolution ("BTGCA"), by counsel, for its last interim report on liquidation and collection of assets, is pleased to report that the last MetLife assets have been collected and deposited into the Administrative Reserve IOLTA escrow account held by this law firm for BTGCA:

- Dividends from MetLife through June 10, 2025: total $3,017.46
- Sale proceeds from remaining MetLife stock (Computershares): total $105,646.52

Accordingly, all known assets of BTGCA have been collected and liquidated.

A bill for the QuickBooks subscription maintained for BTGCA accounting and tax preparation throughout the dissolution through September 30, 2025 in the amount of $1,288.00 has just been paid. The QuickBooks reports will assist the tax preparer. The amount held in the

E923F797-3C2C-4406-B0C5-B88E6CCBAB10 : 000001 of 000004

NO : 000001 of 000004

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Administrative Reserve was $112,095.75. The undersigned this date has transferred the sum of $104,000 to the McBrayer law firm escrow account for BTGCA Class Members pending any Court Orders as to further expenses, fees, distribution and/or *cy pres* payments. This leaves a balance in the Administrative Reserve held by Sturgill Turner in escrow of $8,095.75, believed to be sufficient to pay Blue & Co., CPAs for income tax return preparation for fiscal years ending September 30, 2024 and 2025, Kentucky minimum corporate tax, the filing fee for the final Report of Dissolution, possible fees to Dissolution Committee members for their uncompensated time over the last several years and their upcoming meeting to approve and sign the final statutory Report of Dissolution, and Sturgill Turner will file one last fee legal application, not to exceed $3,500.00 plus FedEx expenses incurred to sell the MetLife stock. We will await the Court's further instructions.

Respectfully Submitted,

/s/ Kevin G. Henry

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E923F797-3C2C-4406-B0C5-B88E6CCBAB10 : 000002 of 000004

NO : 000002 of 000004

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on July 3, 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.

/s/ Kevin G. Henry
Counsel for Defendant, Burley Tobacco Growers Cooperative Association and BTGCA Dissolution Committee Members, Al Pedigo, Donald Mitchell and Eddie Warren

E923F797-3C2C-4406-B0C5-B88E6CCBAB10 : 000003 of 000004

NO : 000003 of 000004

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Fayette Cir. 20-CI-00332

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E923F797-3C2C-4406-B0C5-B88E6CCBAB10 : 000004 of 000004

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