

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
Civil Action No.: 5:12-CV-00729-D

TERESA M. SPEAKS, TOBY SPEAKS,	)
STANLEY SMITH, EDDIE BROWN, ROBERT	)
POINDEXTER, MIKE MITCHELL, ROY L.	)
COOK, ALEX SHUGART, H. RANDLE WOOD,	)
ROBIN ROGERS and DANIEL LEE NELSON,	)
	)
Plaintiffs,	)
	)
vs.	)
	)
U.S. TOBACCO COOPERATIVE, INC. f/k/a	)
FLUE-CURED TOBACCO COOPERATIVE	)
STABILIZATION CORPORATION,	)
	)
Defendants.	)
	)

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**PLAINTIFFS' MOTION FOR CERTIFICATION OF A SETTLEMENT CLASS  
AND PRELIMINARY APPROVAL OF PROPOSED CLASS ACTION  
SETTLEMENT**

**NOW COME** the Plaintiffs herein, by and through their counsel of record, pursuant to Rules 23(a), (b)(3) and (e) of the Federal Rules of Civil Procedure, and hereby move this Court for an Order Certifying a Settlement Class and Preliminarily Approving the Stipulation of Settlement and Agreement of Class Action Compromise Settlement and Release dated September 6, 2017 attached as Exhibit A (“Stipulation of Settlement”). The Plaintiffs request that the Court: (1) certify the class set forth in the Stipulation of Settlement for settlement purposes; (2) grant preliminary approval of the Settlement; (3) approve the form and means of dissemination of the Class Notice, and (4) set a Final Fairness Hearing for one hundred and twenty (120) days after preliminary approval.

This the 8th of September, 2017.

**SHIPMAN & WRIGHT L.L.P.**

By: /s/ William G. Wright

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I have this day served the foregoing **PLAINTIFFS' MOTION FOR CERTIFICATION OF A SETTLEMENT CLASS AND PRELIMINARY APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT** on all parties to this action by using the CM/ECF System, which will send notification of such filing to the following:

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*Attorney for Defendants*

This the 8<sup>th</sup> day of September, 2017.

**SHIPMAN & WRIGHT L.L.P.**

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