

Flue Cured Class Action
PO Box 3518
Portland, OR 97208-3518

Lewis, et al. v. Flue-Cured Tobacco Cooperative Stabilization Corp.,
Case Nos. 05 CVS 188, 05 CVS 1938

**If You Are or Were a Member of the Flue-Cured Tobacco
Cooperative Stabilization Corporation or an Heir of a Member,
Please Read this Notice Carefully and Completely.**

**Your Rights May be Impacted by a Class Action Lawsuit Currently Pending in the North
Carolina General Court of Justice. The state court authorized this Notice.**

The North Carolina General Court of Justice, Superior Court Division certified a class action on behalf of the named Plaintiffs and all members of the Class, as set forth below, against the Flue-Cured Tobacco Cooperative Stabilization Corporation (n/k/a United States Tobacco Cooperative, Inc.) (hereafter “Stabilization”). In this case, Plaintiffs allege that Stabilization accumulated hundreds of millions of dollars from a few specific sources over the course of several decades and improperly accounted for and withheld those funds from the Class. Plaintiffs are seeking, among other things, money damages, partial distribution of Plaintiffs’ assets held by Stabilization, and a declaratory judgment that Plaintiffs retain all accompanying rights, privileges, and benefits of membership. Stabilization denies all claims made against it.

WHO IS INCLUDED IN THE LAWSUIT?

The Court decided that the Class includes:

All individuals, proprietorships, partnerships, corporations, or their heirs, representatives, executors or assigns, and other proper entities that have been members/shareholders of Stabilization at any time from its inception through the end of crop year 2004, and any heirs, representatives, executors, successors or assigns, and;

- (a) had not requested cancellation of their membership and whose membership was cancelled without a hearing, and/or
- (b) were issued a certificate of interest in capital reserve by Stabilization for any of the tobacco crop years between and including 1967-1973, and/or

- (c) delivered, consigned for sale, or sold flue-cured tobacco and paid an assessment for deposit into the No Net Cost Tobacco Fund or No Net Cost Tobacco Account during any tobacco crop years between and including 1982-2004.

WHY ARE YOU RECEIVING THIS NOTICE?

Records maintained by Stabilization show that you are likely a member of the Class. This Notice is being provided to tell you about this Class Action lawsuit, to alert you to the fact that you have been identified as a member of the Class, and to inform you of your rights and options as a member of the Class.

WHAT ARE YOUR LEGAL RIGHTS WITH RESPECT TO THIS LAWSUIT?

You have a choice. You may remain a member of the Class, exclude yourself from this case, enter an appearance through your own attorney, or intervene directly in this case.

A. Remain a Member of the Class: **If you wish to remain a member of the Class and have your rights decided in this lawsuit, you do not need to do anything.** You will automatically be included in the class.

B. Exclude Yourself: **If you do not want to be a member of the Class,** you may request the court to exclude you from the Class. Your request to be excluded must contain: your name and current address; your Stabilization membership number; a statement that you want to be excluded from the Class in *Lewis, et al. v. Flue-Cured Tobacco Cooperative Stabilization Corp.*; your signature; and the date.

You must complete, sign, and mail your request for exclusion, postmarked on or before **October 26, 2017**, to Class Counsel at this address: C. Alan Runyan, Speights & Runyan, 2015 Boundary Street, Suite 239, Beaufort, South Carolina 29902.

C. Enter an Appearance: If you do not file a timely written request for exclusion, you have the right to enter an appearance through your own attorney, retained at your own expense. If you wish to enter an appearance, your attorney must: 1) File a *Notice of Appearance* with the Clerk of Court, North Carolina General Court of Justice, Superior Court Division no later than October 26, 2017; and 2) Serve a copy of the Notice of Appearance on Class Counsel (whose address is listed above) and Counsel for Defendant Stabilization using the following addresses:

Derek L. Shaffer
Quinn Emanuel Urquhart & Sullivan, LLP
777 6th Street NW, 11th Floor
Washington, DC 20001

Lee M. Whitman
Wyrick Robbins Yates & Ponton LLP
4101 Lake Boone Trail, Suite 300
Raleigh, NC 27607

D. Intervene: If you do not file a timely written request for exclusion, you may also move to intervene in this lawsuit through your own attorney, retained at your own expense. Any motion to intervene must comply with the North Carolina Rules of Civil Procedure and applicable law and be filed with the Court and served on all Counsel of Record no later than **October 26, 2017**.

WHERE CAN I GET MORE INFORMATION?

This Notice only summarizes this lawsuit and your legal rights with respect to this case. More details are set forth in the Third Amended and Consolidated Complaint (the "Complaint"), Stabilization's Answer to the Complaint, and the Court's Amended Order on Motion for Class Certification. You can review these documents, along with a more detailed Notice of Class Action, by visiting www.fluecuredclassaction.com.

If you have any questions and would like to hear more information in the form of recorded answers to frequently asked questions, you can call 1-844-309-9755. You can also contact Class Counsel by email at jswofford@speightsrunyan.com.

The full pleadings and other records in this case may be reviewed and copied in the office of the Clerk of Court, North Carolina General Court of Justice, Superior Court Division, 316 Fayetteville St. Mall, Raleigh, NC 27601. You may also request copies of pleadings and other records from Class Counsel.