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The Honorable Robert S. Lasnik

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BRUCE CORKER d/b/a RANCHO ALOHA;
COLEHOUR BONDERA and MELANIE
BONDERA, husband and wife d/b/a
KANALANI OHANA FARM; ROBERT SMITH
and CECELIA SMITH, husband and
wife d/b/a SMITHFARMS; and SMITHFARMS,
LLC, a Hawaii limited liability company, on behalf
of themselves and others similarly situated,

Plaintiffs,

v.

COSTCO WHOLESALE CORPORATION, a
Washington corporation; AMAZON.COM, INC., a
Delaware corporation; HAWAIIAN ISLES KONA
COFFEE, LTD., LLC, a Hawaiian limited liability
company; COST PLUS/WORLD MARKET, a
subsidiary of BED BATH & BEYOND, a New York
corporation; BCC ASSETS, LLC d/b/a BOYER'S
COFFEE COMPANY, INC., a Colorado
corporation; L&K COFFEE CO. LLC, a Michigan
limited liability company; MULVADI
CORPORATION, a Hawaii corporation; COPPER
MOON COFFEE, LLC, an Indiana limited liability
company; GOLD COFFEE ROASTERS, INC., a
Delaware corporation; CAMERON'S COFFEE
AND DISTRIBUTION COMPANY, a Minnesota
corporation; PACIFIC COFFEE, INC., a Hawaii
corporation; THE KROGER CO., an Ohio
corporation; WALMART INC., a Delaware
corporation; BED BATH & BEYOND INC., a New
York corporation; ALBERTSONS COMPANIES
INC., a Delaware Corporation; SAFEWAY INC., a
Delaware Corporation; MNS LTD., a Hawaii

CASE NO. 2:19-CV-00290-RSL

**NOTICE OF SETTLEMENT WITH
ALBERTSONS COMPANIES, INC.
AND SAFEWAY INC., AND
REQUEST TO STAY DEADLINES**

Noted for Consideration: August 30,
2021

1 Corporation; THE TJX COMPANIES d/b/a T.J.
2 MAXX, a Delaware Corporation; MARSHALLS OF
3 MA, INC. d/b/a MARSHALLS, a Massachusetts
4 corporation; SPROUTS FARMERS MARKET,
5 INC. a Delaware corporation; COSTA RICAN
6 GOLD COFFEE CO., INC., a Florida Corporation;
7 and KEVIN KIHNKE, an individual,

8 Defendants.

9 Plaintiffs notify the Court that they have reached a proposed class-wide settlement with
10 Defendants Albertsons Companies, Inc. (“Albertsons”) and Safeway Inc. (“Safeway”). The
11 settling parties have executed a settlement agreement and Plaintiffs will be presenting
12 preliminary approval papers on or before December 21, 2021. The settling parties request that
13 the Court stay all deadlines as to Albertsons and Safeway.

14 A proposed order is attached.

15 Dated: August 30, 2021

16 KARR TUTTLE CAMPBELL

17 Paul Richard Brown, WSBA #19357
18 Nathan T. Paine, WSBA #34487
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The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BRUCE CORKER d/b/a RANCHO ALOHA;
COLEHOUR BONDERA and MELANIE
BONDERA, husband and wife d/b/a
KANALANI OHANA FARM; and ROBERT
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COSTCO WHOLESALE CORPORATION, a
Washington corporation; AMAZON.COM,
INC., a Delaware corporation; HAWAIIAN
ISLES KONA COFFEE, LTD., LLC, a
Hawaiian limited liability company; COST
PLUS/WORLD MARKET, a subsidiary of
BED BATH & BEYOND, a New York
corporation; BCC ASSETS, LLC d/b/a
BOYER'S COFFEE COMPANY, INC., a
Colorado corporation; JAVA LLC, a Michigan
limited liability company; MULVADI
CORPORATION, a Hawaii corporation;
COPPER MOON COFFEE, LLC, an Indiana
limited liability company; GOLD COFFEE
ROASTERS, INC., a Florida corporation;
CAMERON'S COFFEE AND
DISTRIBUTION COMPANY, a Minnesota
corporation; PACIFIC COFFEE, INC., a
Hawaii corporation; THE KROGER CO., an
Ohio corporation; WALMART INC., a
Delaware corporation; BED BATH &
BEYOND INC., a New York corporation;
ALBERTSONS COMPANIES INC., a

CIVIL ACTION NO. 2:19-cv-00290

**[PROPOSED] ORDER STAYING CASE
DEADLINES AS TO ALBERTSONS
COMPANIES, INC. AND SAFEWAY
INC.**

1 Delaware Corporation; SAFEWAY INC., a
2 Delaware Corporation; MNS LTD., a Hawaii
3 Corporation; MARMAXX OPERATING
4 CORP. d/b/a T.J. MAXX and MARSHALLS, a
Delaware corporation; SPROUTS FARMERS
MARKET, INC. a Delaware corporation, and
KEVIN KIHNKE, an individual,

5 Defendants.

6 Plaintiffs have filed a Notice of Settlement with Albertsons Companies, Inc. (“Albertsons”)
7 and Safeway Inc. (“Safeway”). All case deadlines with respect to Albertsons and Safeway are
8 STAYED. This order does not affect discovery or deadlines as applied to any other Defendants.

9 DATED this _____ day of _____, 2021.

11 _____
The Honorable Judge Robert S. Lasnik
12 United States District Court Judge

13 Presented by:

14 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

15 /s/ Daniel E. Seltz

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