

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 on behalf of themselves and others similarly
situated,

Plaintiff,

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

Defendants.

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

**MOTION FOR PRELIMINARY
APPROVAL OF CLASS
SETTLEMENT AND
MEMORANDUM IN SUPPORT
(CORRECTED VERSION)**

The Honorable Robert S. Lasnik

Noted for consideration: September 29,
2022

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I. The Court will be able to approve the settlement as fair, reasonable, and adequate. 4

 A. Class Counsel and the Settlement Class Representatives Have Adequately
 Represented the Class. 5

 B. The Settlement Is the Result of Arm’s Length Negotiations. 6

 C. The Relief for the Class is Substantial. 7

 1. The settlement relief outweighs the costs, risks, and delay of trial
 and appeal. 7

 2. Settlement Class Members will obtain relief through a
 straightforward claims process. 8

 3. The terms of any proposed award of attorney’s fees, including
 timing of payment, will be reasonable. 9

 D. The Proposal Treats Class Members Equitably Relative to Each Other. 10

II. The Court will be able to certify the Class for settlement purposes upon final
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