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4	IN THE CIRCUIT COURT OF THE STATE OF OREGON		
5	FOR THE COUNTY OF MULTNOMAH		
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7	SCHEARON STEWART and JASON STEWART, individually and on behalf of all other similarly situated persons,	Case No. 16CV15125	
9	Plaintiffs,	GENERAL JUDGMENT OF DISMISSAL	
0	V.	2221120012	
1	ALBERTSON'S COMPANIES, LLC, a foreign limited liability company;	Assigned Judge: Hon. Angela Franco	
2	ALBERTSON'S LLC, a foreign corporation; SAFEWAY, INC., a foreign business	Lucero	
3	corporation,		
4	Defendants.		
15 16 17	WHEREAS, Plaintiffs Schearon Stewart Defendants Albertson's Companies, LLC; Albert	and Jason Stewart filed a complaint against tson's LLC; and Safeway Inc. in this class-	
8	action litigation (the "Action"), on behalf of themselves and a class of certain persons who,		
9	between May 4, 2015 and September 7, 2016, purchased certain meat products at Safeway and		
20	Albertsons bannered stores in the state of Oregon, offered on a Buy One, Get One Free or Buy		
21	One, Get Two Free promotion, using their Safeway Club Card or Albertson's coupon;		
22	WHEREAS, on February 28, 2017, the Court entered an Order granting Defendant		
23	Albertson's LLC's motion to dismiss and dismissed without prejudice Plaintiffs' claims against		
24	Albertson's LLC.		
25	WHEREAS, Plaintiffs agreed to a settlement of all claims against Defendants Albertson's		
26	Companies, LLC and Safeway Inc., in accordance with a Settlement Agreement dated		

PAGE 1 - GENERAL JUDGMENT OF DISMISSAL

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1	February 17,	2023 (the "Agreement"), and this Court entered an Order Granting Final Approval	
2	of Class Settlement (the "Final Approval Order");		
3	WHE	REAS, pursuant to ORCP 32 D, ORS 19.410(3), and the Agreement, the Final	
4	Approval Order authorizes entry of a General Judgment of Dismissal, dismissing all claims		
5	against Defendants in this Action;		
6	NC	OW, THEREFORE, it is hereby ordered, adjudged and declared that:	
7	1.	The Court, for purpose of this General Judgment of Dismissal, adopts all defined	
8	terms set fort	h in the Agreement, and incorporates them herein by reference as if fully set forth	
9	herein and having the full force and effect of an Order of this Court.		
0	2.	The Court hereby dismisses the Amended Complaint filed on July 11, 2016, on	
1	the merits an	d with prejudice, with each Party to bear their own costs, except as provided in the	
2	Final Approval Order or the Agreement.		
3	3.	By this General Judgment of Dismissal and as of the Effective Date of the	
4	Agreement, the Plaintiffs and all members of the Settlement Class shall have, by operation of the		
5	Final Approv	ral Order and this General Judgment, fully, finally, and forever released,	
6	relinquished, and discharged Defendants from all Released Claims pursuant to Paragraphs 5.1,		
7	5.2 and 5.3 of the Agreement.		
8	4.	Upon the Effective Date, each and every Settlement Class Member, and any	
9	person actual	ly or purportedly acting on behalf of any Settlement Class Member, is hereby	

person actually or purportedly acting on behalf of any Settlement Class Member, is hereby permanently barred and enjoined from commencing, instituting, continuing, pursuing, maintaining, prosecuting, or enforcing any Released Claims (including, without limitation, in any individual, class or putative class, representative or other action or proceeding), directly or indirectly, in any judicial, arbitral, or other forum, against the Released Parties. This permanent bar and injunction is necessary to protect and effectuate the Agreement, the Final Approval Order and this General Judgment of Dismissal, and this Court's authority to effectuate the Agreement, and is ordered in aid of this Court's jurisdiction and to protect its judgments.

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1	5.	The Court reserves continuing and exclusive jurisdiction over this Action, the		
2	Plaintiffs and the Settlement Class for the purposes of supervising the interpretation,			
3	implementation, and enforcement of the Agreement.			
4	6.	In the event that the Settlement does not become effective in accordance with the		
5	terms of the Agreement, then this General Judgment of Dismissal shall be vacated nunc pro tunc			
6	and, in such event, all orders entered and releases given in connection herewith shall be null and			
7	void.			
8	7. This General Judgment of Dismissal is intended to be a final disposition of the			
9	Action in its entirety and is intended to be immediately appealable and fully and finally resolves			
10	all claims in this Action.			
11				
12		7/20/2023 2:39:23 PM		
13		Lucia		
14		Circuit Court Judge Angela Lucero		
15				
16				
17	Presented by	<i>7</i> :		
18	Sarah J. Cro	oks, OSB No. 971512		
19	SCrooks@pe PERKINS C	erkinscoie.com		
20		or Defendants		
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1	<b>CERTIFICATE OF READINESS - Pursuant to UTCR 5.100</b>	
2	The submission is ready for judicial signature because:	
3	$\Box$ 1. Each opposing party affected by this order or judgment has stipulated to the order	
4	or judgment, as shown by each opposing party's signature on the document being submitted.	
5	☑ 2. Each opposing party affected by this order or judgment has approved the order or	
6	judgment, as shown by signature on the document being submitted or by written confirmation or	
7	approval sent to me.	
8	$\Box$ 3. I have served a copy of this order or judgment on all parties entitled to service and:	
9	$\square$ a. No objection has been served on me.	
10	$\square$ b. I received objections that I could not resolve with the opposing party	
11	despite reasonable efforts to do so. I have filed a copy of the objections I	
12	received and indicated which objections remain unresolved.	
13	☐ c. After conferring about objections _(opposing party) agreed to	
14	independently file any remaining objection.	
15	$\Box$ 4. The relief sought is against an opposing party who has been found in default.	
16	$\Box$ 5. An order of default is being requested with this proposed judgment.	
17	$\Box$ 6. Service is not required pursuant to subsection (3) of this rule, or by statute, rule or	
18	otherwise.	
19	$\Box$ 7. This is a proposed judgment that includes an award of punitive damages and notice	
20	has been served on the Director of the Crime Victims' Assistance Section as required by	
21	subsection (4) of this rule.	
22	DATED: July 14, 2023 PERKINS COIE LLP	
23	By: s/Sarah J. Crooks	
24	Sarah J. Crooks, OSB No. 971512	
25	Attorneys for Defendants.	

PAGE 1 - CERTIFICATE OF READINESS

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1	CERTIFICATE OF SERVICE						
2	I hereby certify that I served the foregoing GENERAL JUDGMENT OF DISMISSAL						
3	the following:						
4	David F. Sugerman  Tim Alan Quenelle						
5	Nadia H. Dahab Tim Quenelle, PC Sugerman Dahab 4800 SW Meadows Road, #300						
6	707 SW Washington St., Suite 600 Lake Oswego, OR 97035	Lake Oswego, OR 97035					
7	Portland, OR 97205 Tim.quenelle@gmail.com david@sugermandahab.com						
8	nadia@sugermandahab.com Attorney for Plaintiffs						
9	Attorneys for Plaintiffs						
10							
11	to be sent by the following indicated method or methods, on the date set forth below:						
12	by sending via the court's electronic filing system						
13	X by email						
14	4						
15	by hand delivery						
16							
17	DATED: July 14, 2023 PERKINS COIE LLP						
18							
19	By: <u>/s/ Sarah J. Crooks</u> Sarah J. Crooks, OSB No. 971512						
	SCrooks@perkinscoie.com 1120 N.W. Couch Street, Tenth Floor						
20	Portland, Oregon 97209-4128						
21	Telephone: +1.503.727.2000 Facsimile: +1.503.727.2222						
22							
23	Attorneys for Defendants						
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25							
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PAGE 1 - CERTIFICATE OF SERVICE

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