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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF MULTNOMAH

SCHEARON STEWART and JASON STEWART, individually and on behalf of all other similarly situated persons,

Plaintiffs,

v.

ALBERTSON’S COMPANIES, LLC, a foreign limited liability company; ALBERTSON’S LLC, a foreign corporation; SAFEWAY, INC., a foreign business corporation,

Defendants.

Case No. 16CV15125

**GENERAL JUDGMENT OF DISMISSAL**

Assigned Judge: Hon. Angela Franco Lucero

WHEREAS, Plaintiffs Schearon Stewart and Jason Stewart filed a complaint against Defendants Albertson’s Companies, LLC; Albertson’s LLC; and Safeway Inc. in this class-action litigation (the “Action”), on behalf of themselves and a class of certain persons who, between May 4, 2015 and September 7, 2016, purchased certain meat products at Safeway and Albertsons bannered stores in the state of Oregon, offered on a Buy One, Get One Free or Buy One, Get Two Free promotion, using their Safeway Club Card or Albertson’s coupon;

WHEREAS, on February 28, 2017, the Court entered an Order granting Defendant Albertson’s LLC’s motion to dismiss and dismissed without prejudice Plaintiffs’ claims against Albertson’s LLC.

WHEREAS, Plaintiffs agreed to a settlement of all claims against Defendants Albertson’s Companies, LLC and Safeway Inc., in accordance with a Settlement Agreement dated

1 February 17, 2023 (the “Agreement”), and this Court entered an Order Granting Final Approval  
2 of Class Settlement (the “Final Approval Order”);

3 WHEREAS, 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 NOW, 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 forth 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.

10 2. The Court hereby dismisses the Amended Complaint filed on July 11, 2016, on  
11 the merits and with prejudice, with each Party to bear their own costs, except as provided in the  
12 Final Approval Order or the Agreement.

13 3. By this General Judgment of Dismissal and as of the Effective Date of the  
14 Agreement, the Plaintiffs and all members of the Settlement Class shall have, by operation of the  
15 Final Approval Order and this General Judgment, fully, finally, and forever released,  
16 relinquished, and discharged Defendants from all Released Claims pursuant to Paragraphs 5.1,  
17 5.2 and 5.3 of the Agreement.

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





1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served the foregoing GENERAL JUDGMENT OF DISMISSAL on  
3 the following:

4 David F. Sugerman  
5 Nadia H. Dahab  
6 Sugerman Dahab  
7 707 SW Washington St., Suite 600  
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Tim Quenelle, PC  
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*Attorney for Plaintiffs*

*Attorneys for Plaintiffs*

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  by **email**
- 14  by **mail**
- 15  by **hand delivery**

16 DATED: July 14, 2023

**PERKINS COIE LLP**

18 By: /s/ Sarah J. Crooks  
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