

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

KYLE VENECHUK, individually and on behalf
of others similarly situated,

Plaintiffs,

v.

Case No. 3:13-CV-54-BBC

GRANDE CHEESE COMPANY,

Defendant.

JOINT NOTICE OF SETTLEMENT AND PROPOSED SCHEDULING ORDER

The parties have reached a class-wide settlement and are preparing to jointly move for class/collective certification and preliminary approval of the settlement. The parties believe that it is in the best interests of all parties to finalize the settlement so that all payments are made prior to December 31, 2013. Accordingly, the parties request that the current scheduling order be vacated and the following schedule for briefing and notice related to the upcoming motions for preliminary and final settlement approval be adopted by the Court:

- Class Action Fairness Act (“CAFA”) Notice mailed by August 22, 2013;
- Motion for Class Certification and Preliminary Settlement Approval filed by August 22, 2013;
- Class Certification and Preliminary Approval Hearing on August 30, 2013, at 2:00 p.m.;
- Class Counsel to mail notice of settlement within five (5) business days of Court’s order granting Motion for Class Certification and Preliminary Settlement Approval;
- Class members will have thirty (30) days to respond to the notice of settlement;

- Motion for Final Settlement Approval and Attorneys' Fees and Costs filed by November 13, 2013;
- Final Approval Hearing on November 20, 2013, at 2:00 p.m.;
- Plaintiffs' Counsel to provide final settlement calculation for each class member to Defendant within seven (7) days of order granting final approval of settlement agreement;
- Defendant to send settlement checks to Plaintiffs' Counsel by overnight mail one (1) business day after the thirty (30) day appeal period for final approval of the settlement agreement expires, assuming no appeal has been filed; and
- Defendant to pay Plaintiffs' Counsel's attorneys' fees and costs one (1) business day after the thirty (30) day appeal period for final approval of the settlement agreement expires, assuming no appeal has been filed.

Dated: July 29, 2013

NICHOLS KASTER, PLLP

s/Curtis P. Zaun

Rachhana T. Srey, MN Bar No. 340133

srey@nka.com

Curtis P. Zaun, MN Bar No. 266310

czaun@nka.com

4600 IDS Center

80 S. 8th Street, Suite 4600

Minneapolis, MN 55402

Tele: (612) 256-3200

Fax: (612) 338-4878

ATTORNEYS FOR PLAINTIFFS

QUARLES & BRADY LLP

s/Sean M. Scullen

Sean M. Scullen, WI Bar No. 1034221

sean.scullen@quarles.com

Christopher L. Nickels, WI Bar No. 1083481

christopher.nickels@quarles.com

411 East Wisconsin Avenue

Suite 2350

Milwaukee, Wisconsin 53202-4426

Tel: (414) 277-5519

Fax: (414) 978-8756

GILL & GILL, S.C.

Gregory B. Gill, Sr., WI Bar No. 1015838

gbgillsr@new.rr.com

128 North Durkee Street

Appleton, WI 54911-5427

Tel: (920) 739-1107

ATTORNEYS FOR DEFENDANT

IT IS SO ORDERED:

Date: July 30, 2013

Barbara B. Crabb

Judge Barbara B. Crabb

United States District Court Judge