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## 1 LAW OFFICES OF RONALD A. MARRON RONALD A. MARRON (SBN 175650) ron@consumersadvocates.com 2 LILACH HALPERIN (SBN 323202) 3 Superior Court of California lilach@consumersadvocates.com County of Alameda 651 Arroyo Drive 4 San Diego, California, 92103 08/20/2024 Telephone: (619) 696-9006 5 Facsimile: (619) 564-6665 6 LAW OFFICES OF JAMES M. V. FITZPATRICK JAMES M. V. FITZPATRICK (SBN 125313) 7 jim@jmvf.com 501 West Broadway, Suite 800 8 San Diego, California 92101 9 Telephone: (619) 234-3422 Facsimile: (619) 234-3163 10 Attorneys for Plaintiffs and the Proposed Classes 11 SUPERIOR COURT OF THE STATE OF CALIFORNIA 12 COUNTY OF ALAMEDA 13 14 FINN WALSH, JACK RONAN, KATHERINE Case No. RG20072409 [lead case] WALSH, and TIMOTHY WALSH, on behalf of 15 themselves and all others similarly situated,

Plaintiffs,

v.

PREMIUM PROPERTY MANAGEMENT & DEVELOPMENT, INC. DBA PREMIUM PROPERTIES, a California Corporation; HASTE PARTNERS, LLC, a California Limited Liability Company; SAM SOROKIN, an individual; CRAIG BECKERMAN, an individual; MARIA DIBLASI, an individuals; and DOES 1-1000,

Defendants.

Case No: 21SC004296 [consolidated case]

## **TROPOSED** ORDER GRANTING PRELIMINARY APPROVAL OF CLASS **ACTION SETTLEMENT**

Date: August 15, 2024

Time: 10:00 a.m.

Dept.: 23

Judge: Hon. Michael Markman

On August 15, 2024 at 10:00 a.m., in Department 23 of the Rene C. Davidson Courthouse, Plaintiffs Finn Walsh, Jack Ronan, Timothy Walsh, and Katherine Walsh's ("Plaintiffs") Unopposed Motion for Certification of the Settlement Classes & Preliminary Approval of Class Action Settlement was heard. Based on the papers filed by the parties and oral argument, for good cause shown,

## IT IS HEREBY ORDERED:

- 1. The Court preliminarily approves the Settlement Agreement of the parties and finds that the range of the settlement is reasonable and merits final approval;
- 2. The Parties are directed to send Notice of this settlement to the Settlement Classes in the manner specified in Section 6 of the Settlement Agreement;
- 3. Plaintiffs Finn Walsh, Jack Ronan, Timothy Walsh, and Katherine Walsh are determined to be members of the Settlement Classes and are appointed Class Representatives pursuant to Cal. Code Civ. P. § 382 to represent the members of the Settlement Classes in this action;
- 4. The Court hereby certifies the Settlement Classes pursuant to Cal. Code Civ. P. § 382 for the purposes of settlement only. The Settlement Classes are defined as:

<u>LEASE RENEWAL CLASS</u>. All persons and their Guarantors who rented residential property in California and who executed and delivered a written notice of lease renewal or lease renewal form to Premium Property Management & Development, Inc. regarding renewing or extending the term of their lease for a residential property in California from September 1, 2016 through November 30, 2023 (the "Class Period"), and whose entire unit vacated the property before the commencement of the renewal period.

<u>LEASE FEE CLASS</u>. All persons who rented residential property in California and were charged for roommate add-on fees, roommate replacement fees, request to be removed fees, or lease transfer fees by Premium Property Management & Development Inc. during the Class Period.

<u>SECURITY DEPOSIT CLASS</u>. All persons who rented residential property in California and were charged rent or fees as members of the Lease Renewal Class or the Lease Fee Class and who had deductions taken from their security deposits for that rent or fees by Premium Property Management & Development Inc. during the Class Period.

- 5. The Court hereby appoints The Law Offices of Ronald A. Marron, APLC as class counsel for purposes of this settlement;
- 6. The Final Approval Hearing in this matter shall be scheduled for

  at Feæt in Department 23 of the Alameda County Superior Court, Rene C. Davidson Courthouse,

  1225 Fallon Street Oakland, CA 94612;
- 7. Plaintiffs shall move for final approval, for attorneys' fees and costs, and for Plaintiffs' enhancement payments in a single motion. The briefing schedule for the Final Approval Hearing is as follows:

1	Moving papers may be no longer than 25 pages and must be filed and served no later
2	than (suggested date of 28 days before Final Approval Hearing).
3	Any opposition may be no longer than 25 pages and must be filed and served no later
4	than(suggested date of 14 days before Final Approval Hearing).
5	Any reply papers and responses to objections may be no longer than 15 pages and must
6	be filed and served no later than(suggested date of 7 days before
7	Final Approval Hearing);
8	8. The proposed Notice to the Settlement Classes is hereby approved. The Notice meets
9	the requirements of California Law and the Due Process Clause of the United States Constitution; is
10	the best practicable notice under the circumstances, and is reasonably calculated to apprise Settlement
11	Class members of the pendency of the Litigation and their right to object or opt out of participation in
12	the Settlement;
13	9. Any Settlement Class member who wishes to dispute the estimated calculation of their
14	individual settlement proceeds must submit a Request for Adjustment to the Settlement Administrator
15	no later than(30 days before the Objection/Exclusion Deadline). Any Settlement
16	Class member in multi-tenant units who wish to request that multi-tenant unit proceeds be distributed
17	other than on a pro rata basis must submit a Request for Alternative Distribution to the Settlement
18	Administrator no later than(30 days before the Objection/Exclusion Deadline).
19	10. All Settlement Class members who wish to opt out of this Settlement Agreement must
20	timely submit their Requests for Exclusion to the Settlement Administrator on or before
21	the Objection/Exclusion Deadline (suggested date of 45 days before the Final
22	Approval Hearing), as specified in Section 5 of the Settlement Agreement;
23	11. Any Settlement Class member who wishes to object in writing to the fairness,
24	reasonableness, or adequacy of the Settlement, Class Counsel's Fees, or Incentive Awards must file
25	with the Court and mail to counsel for the Settling Parties a written statement of objection no later
26	than, the Objection/Exclusion Deadline (suggested date of 45 days before the Final
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28	state: (1) the case name; (2) the name, residential address, telephone number, and email address of the

1	settlement class member; (3) a statement describing the objector's membership in the Settlement
2	Classes and identifying the specific Settlement Class(es) of which the objector is a member; (4) the
3	basis for the objection accompanied by any legal support and any documents or exhibits upon which
4	the objection is based; and (5) whether the settlement class member intends to appear at the final
5	approval/settlement fairness hearing;
6	12. Objections may, but need not, be made in writing. The court will entertain any
7	objections from participating class members at the final approval hearing;
8	13. Any Settlement Class member that does not timely submit a written Request for
9	Exclusion or Objection shall be bound by all proceedings, orders, and judgments in this action.
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11	08/20/2024 4/// / Datada
12	Dated: Hon. Michael Markman
13	JUDGE OF THE SUPERIOR COURT  Michael Markman / Judge
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## Reserved for Clerk's File Stamp SUPERIOR COURT OF CALIFORNIA **COUNTY OF ALAMEDA FILED** COURTHOUSE ADDRESS: Superior Court of California Rene C. Davidson Courthouse County of Alameda 1225 Fallon Street, Oakland, CA 94612 08/22/2024 PLAINTIFF/PETITIONER: Chad Finks Executive Officer/Clerk of the Court Finn Walsh et al Tumonon DEFENDANT/RESPONDENT: Premium Property Management Inc. et al CASE NUMBER: CERTIFICATE OF ELECTRONIC SERVICE CODE OF CIVIL RG20072409 **PROCEDURE 1010.6**

I, the below named Executive Officer/Clerk of Court of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served one copy of the Order Proposed Order Granting Preliminary Approval of Class Action Settlement entered herein upon each party or counsel of record in the above entitled action, by electronically serving the document(s) from my place of business, in accordance with standard court practices.

Ronald A Marron Law Offices of Ronald A. Marron, APLC ron@consumersadvocates.com

Dated: 08/22/2024

Chad Finke, Executive Officer / Clerk of the Court

By:

A. Tumonong, Deputy Clerk

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