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**ELECTRONICALLY FILED**  
Superior Court of California,  
County of Alameda  
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6  
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ALAN WOFSY & ASSOCIATES  
8 dba Hearst Commons

9  
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **COUNTY OF ALAMEDA**

12  
13 ALAN WOFSY & ASSOCIATES, a  
California corporation (dba Hearst Commons)  
14 on behalf of itself and all others similarly  
situated,

15 Plaintiff,

16 v.

17  
18 CITY OF BERKELEY and BERKELEY  
RENT STABILIZATION BOARD,

19 Defendants.  
20

Case No. 23CV043503

ASSIGNED FOR ALL PURPOSES TO:  
JUDGE BRAD SELIGMAN  
DEPARTMENT 22

**AMENDED JOINT CLASS NOTICE  
PLAN**

Action Filed: September 11, 2023  
Trial Date: April 7, 2025

1 On October 21, 2024, the Court certified a class of “All persons who currently own or have  
2 owned units to which Measure MM applies at any time from January 1, 2021, through the present,  
3 excluding all persons exempt from Measure MM and all affordable housing projects managed by a  
4 nonprofit with an operative regulatory agreement with the City of Berkeley through its Affordable  
5 Housing Trust Fund program.” Pursuant to the October 21 Order, the Parties then submitted a  
6 proposed notice plan on November 19, 2024. On November 20, the Court issued an Order stating  
7 that it was “generally inclined to approve the notice” but requested that the Administrator  
8 “perform some manner of reasonable search and remailing” and that the “time limits for response  
9 [to register any opt-out] should be extended.” The Court then ordered the Parties to confer and  
10 submit a modified class-notice plan. Pursuant to the Court’s October 21 and November 20, 2024  
11 Orders, Plaintiff Alan Wofsy & Associates (“Plaintiff”) and Defendant Berkeley Rent  
12 Stabilization Board (the “Board”) hereby proposed the following amended class-notice plan  
13 (“Notice Plan”).

14 **I. The Proposed Notice Plan**

15 Subject to the Court’s approval, the Parties propose the following Notice Plan:

- 16 • The Court shall appoint SSI as a Class Administrator. SSI is a wholly owned  
17 subsidiary of Epiq, which is an experienced class administrator. Epiq’s credentials  
18 are documented in Exhibit C to this Notice Plan.
- 19 • Notice shall be given to class members using (a) a Short-Form Notice that will be  
20 mailed out to class members; (b) a Long-Form Notice included in a public website.  
21 The Short-Form Notice shall include a link to the Long-Form Notice. A copy of the  
22 proposed Short and Long Form Notices are respectively attached as Exhibit A and  
23 Exhibit B hereto.
- 24 • The Board shall provide Plaintiff and the Administrator with a list of the identities  
25 and addresses of each unit holder that is part of the class as soon as practicable, and  
26 no later than 14 days after the Court’s order approving the Notice Plan
- 27 • Prior to mailing any Short Form Notice, the Administrator shall verify the provided  
28 addresses by using the United States Postal Service’s (“USPS”) NCOA database of

1 registered addresses, and update any addresses based on the information provided  
2 by the USPS.

- 3 • After receipt of the above class member information, the Administrator shall mail  
4 out the Short Form Notice as a postcard to each class member. The Administrator  
5 shall mail out all Short Form Notices no later than 21 days after receipt of the  
6 identities and addresses of each class member. If any Short Form Notices were  
7 delivered to the incorrect address, the Administrator shall have a further, 14-day  
8 extension to re-mail any notices. If any Short Form Notices are returned as  
9 undeliverable or without a forwarding address, the Administrator shall use a search  
10 tool like LexisNexis to attempt to locate any class members' updated address for  
11 re-mailing.
- 12 • As soon as practicable, and within 21 days after Court approval of the Notice Plan,  
13 the Administrator shall make available a public website with information contained  
14 in the Long Form Notice.
- 15 • Class members may opt out of the class after receiving the Short Form Notice. Any  
16 opt-out requests must be registered with the Administrator no later than 30 calendar  
17 days after the Administrator completes the process of mailing out each class  
18 members' respective Short Form Notices. For class members whose notices were  
19 re-mailed, this 30-day opt-out deadline shall not begin until after the Administrator  
20 completes the process of re-mailing out their respective Short-Form Notices.

21 **II. The Parties' Notice Plan Appropriately Protects the Interests of Class Members.**

22 Notice to class members must fulfill the requirements set forth in the Rules of Court and  
23 protect class members' due process rights. Under Rule of Court 3.766, courts reviewing the  
24 adequacy of notice must consider (1) Whether notice is necessary; (2) Whether class members  
25 may exclude themselves from the action; (3) The time and manner in which notice should be  
26 given; (4) A proposal for which parties should bear the costs of notice; and, (5) If cost shifting or  
27 sharing is proposed under subdivision (4), an estimate of the cost involved in giving notice. In  
28 addition, sufficient notice must be provided to class members to protect their due process rights.

1 Due process is a “pragmatic” standard that requires “meaningful notice” and “a reasonable chance  
2 of reaching a substantial percentage of the class members.” *Noel v. Thrifty Payless, Inc.*, 7 Cal. 5th  
3 955, 983 (2019) (citation omitted).

4 Here, the Notice Plan fulfills each of Rule 3.766’s requirements, and also provides notice  
5 in a manner to protect the class’s due process rights.

6 **A. Whether notice is necessary**

7 The Parties do not dispute that individual notice to the class member is required in this  
8 action.

9 **B. Whether class members may exclude themselves**

10 The Parties agree that class members must be given the opportunity to exclude themselves  
11 from the class.

12 **C. Time and manner in which notice should be given**

13 The Notice Plan’s proposal for the time and manner of providing notice is sufficient to  
14 inform as many class members as practicable about their rights in this action. In determining the  
15 manner of the notice, a court must consider: (1) The interests of the class; (2) The type of relief  
16 requested; (3) The stake of the individual class members; (4) The cost of notifying class members;  
17 (5) The resources of the parties; (6) The possible prejudice to class members who do not receive  
18 notice; and (7) The res judicata effect on class members. *See* Rule of Court 3.766(e). In approving  
19 a notice plan, a trial court “has virtually complete discretion as to the manner of giving notice to  
20 class members.” *Chavez v. Netflix, Inc.*, 162 Cal. App. 4th 43, 57 (2008).

21 Here, the Notice Plan relies on a form of notice—direct mail notice with a link to a longer-  
22 form notice page—that is commonly adopted in class cases. *See Sansone v. Charter Commc’ns,*  
23 *Inc.*, No. 17-CV-1880-WQH-JLB, 2023 WL 9051463, at \*2 (S.D. Cal. Aug. 21, 2023) (“District  
24 courts in this Circuit regularly permit the use of postcard notices that provide information about  
25 the action and that direct class members to a website containing a long-form notice as consistent  
26 with the requirements of due process.”); *Utne v. Home Depot U.S.A., Inc.*, No. 16-CV-01854-RS,  
27 2018 WL 11373654, at \*2 (N.D. Cal. Aug. 21, 2018) (ordering post-card notice with a link to a  
28 class website). Indeed, the Notice Plan takes into account—and meets—each of Rule of Court

1 3.766(e)'s requirements for providing class notice.

2 **(1) The interests of the class; (2) The type of relief requested; (3) The stake of the**  
3 **individual class members; and (7) The res judicata effect on class members:** The process  
4 articulated in the Notice Plan is sufficient to notify as many class members as practicable of this  
5 litigation and their rights. Under Measure MM, unit holders are required to register their  
6 identities—including their addresses—with the Board and cannot pay the charges at issue without  
7 registering. The Board has agreed to provide this information to the Administrator and Plaintiff to  
8 distribute notices.

9 Further, both the Short and Long-Form Notices provide sufficient information to the class  
10 members to inform them of their rights in this action. Both the Short and Long Form Notices  
11 describe the class definition in detail. Both the Short Form and Long Form Notices inform the  
12 class members of their ability to opt out of the class, and the potential res judicata effects if they  
13 choose to remain in the class. The Long Form Notice also provides instructions for how class  
14 members may inform the Administrator should they choose to opt out. Further, in addition to the  
15 text of the notices, the Administrator will also maintain and monitor an email address and a toll-  
16 free telephone number to receive calls, faxes, and emails from Class Members.

17 **(6) The possible prejudice to class members who do not receive notice:** Notice can also  
18 likely be achieved while minimizing the number of class members who do not receive notice. The  
19 Parties estimate that approximately 3, 315 class members are currently registered in the Board's  
20 database and are unaware of any class member who paid a fee but is not registered in the Board's  
21 database. The Parties are currently unaware of any other centralized database that would contain  
22 class members' addresses or otherwise be used to provide notice to unit holders. Further, SSI will  
23 also be prepared to verify the addresses of the class members in the Board's database, and conduct  
24 a diligent search for any class members whose addresses are unknown.

25 **(4) The cost of notifying class members; (5) The resources of the parties:** SSI estimates  
26 that the Notice Plan will cost approximately \$22,350. Plaintiff is willing to pay for the cost of  
27 providing notice without prejudice to seeking recovery of those costs in the future. SSI's bid was  
28 selected among the multiple RFPs because its proposal was cost competitive.

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**D. Division of costs**

Plaintiff has agreed to pay for the cost of providing notice to class members.

**E. Due Process**

For the reasons articulated above, the Parties believed that their Notice Plan is the most pragmatic way to provide notice to class members and to minimize the number of class members—if any—who do not receive notice.

**III. Proposed notice**

Under Rule of Court 3.766, notice to class members must include the following: (1) A brief explanation of the case, including the basic contentions or denials of the parties; (2) A statement that the court will exclude the member from the class if the member so requests by a specified date; (3) A procedure for the member to follow in requesting exclusion from the class; (4) A statement that the judgment, whether favorable or not, will bind all members who do not request exclusion; and (5) A statement that any member who does not request exclusion may, if the member so desires, enter an appearance through counsel. Here, the Parties’ proposed Short Form (Exhibit A) and Long Form (Exhibit B) Notices include all of the required information in Rule of Court 3.766.


DATED: November 22, 2024

COBLENTZ PATCH DUFFY & BASS LLP

By:   
FRANK BUSCH  
Attorneys for Plaintiff  
ALAN WOFSY & ASSOCIATES  
dba Hearst Commons

DATED: November 22, 2024

GOLDFARB & LIPMAN LLP

By:   
JAMES DIAMOND  
Attorneys for Defendant  
BERKELEY RENT STABILIZATION BOARD

# **EXHIBIT A**

COURT AUTHORIZED NOTICE OF PENDING  
CLASS ACTION

The Court has certified a class of all persons who currently own or have owned residential units in the City of Berkeley at any time from January 1, 2021, and are covered by Measure MM, subject to certain exceptions. Individuals who only owned units that were not covered by Measure MM, or only owned certain affordable-housing units that were subject to a lowered, Measure MM fee are not part of the Court's class definition.

**VISIT:** WWW.BERKELEYREGISTRATIONFEES.COM

Berkeley Registration Fees Notice Administrator  
c/o Settlement Services, an Epiq Company  
P.O. Box 2715  
Portland, OR 97208-2715

«fname» «lname» MailID: «MailID»  
«address» «address\_2»  
«City», «State» «Zip»  
«Country»

By Order of the Court Dated: [Insert date]



SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF ALAMEDA

**ALAN WOFSY & ASSOCIATES, DBA HEARST COMMONS v. BERKELEY RENT STABILIZATION**

**BOARD**

Case No. 23CV043503

**NOTICE OF CLASS ACTION LITIGATION**

This notice is being provided in connection with a class action lawsuit pending in the Superior Court for the State of California in the County of Alameda called Alan Wofsy & Associates, dba Hearst Commons v. Berkeley Rent Stabilization Board, Case No. 23CV043503. This lawsuit challenges fee imposed by the City of Berkeley's Rent Stabilization Board onto owners of Berkeley rentals units under a law called Measure MM. Plaintiffs allege that these fees are unconstitutional. The Court has certified a class of units owners, and appointed the law offices of Coblenz, Patch, Duffy & Bass LLP as class counsel.

The Berkeley Rent Stabilization Board disputes these allegations and maintains that the Measure MM fees it charges are constitutional and otherwise appropriate under the law.

You are being provided this notice because you may be a member of a certified class of unit owners affected by the Board's Measure MM fees. If you are member, your legal rights and options are affected and you have a choice to make now. No money or benefits are available now because the lawsuit is not resolved. There is no guarantee that money or benefits ever will be available. If they are, you will be notified about how to ask for a share of any recovery. Unless you exclude yourself or your business from the lawsuit, you may be bound by the outcome of the case and you will not be able to file a lawsuit or be part of any lawsuit against the Board concerning or relating to the claims and allegations that were or could have been raised in this lawsuit.

**LITIGATION CLASS DEFINITION:** The Court has certified a class of all persons who currently own or have owned residential units in the City of Berkeley at any time from January 1, 2021, and are covered by Measure MM, subject to certain exceptions. Individuals who *only* owned units that were not covered by

Measure MM, or only owned certain affordable-housing units that were subject to a lowered, Measure MM fee are not part of the Court's class definition.

**YOUR LEGAL RIGHTS AND OPTIONS:**

If you are a member of the class, you may take one of two options in connection with this action:

(1) **Exclude Yourself:** You may write to the Administrator, Berkeley Registration Fees Notice Administrator by [insert date] to exclude yourself. If you ask to be excluded from this lawsuit and money is later rewarded, you will not be allowed to request a payment. But you will keep your right to file your own lawsuit against the Board for damages concerning or relating to the claims and factual allegations that were or could have been raised in this action.

(2) **Do Nothing:** If you do nothing, you will be bound by the outcome of the case, whether a judgment is rendered for or against the Board. Unless you exclude yourself, you will not be able to file a lawsuit or be part of any other lawsuit asserting claims against the Board concerning or relating to the claims and factual allegations that were or could have been raised in this lawsuit.

**Further Information:** Important information about this litigation is available in the Long Form Notice at [www.berkeleyregistrationfees.com](http://www.berkeleyregistrationfees.com) or by request from the Notice Administrator. You can contact the Administrator by mail at: Berkeley Registration Fees Notice Administrator, c/o Settlement Services, an Epiq Company, P.O. Box 2715, Portland, OR 97208-2715, email at [claims@ssicclaims.com](mailto:claims@ssicclaims.com), or phone at 888-868-8642. The deadlines contained in this notice may be amended by the Court, so please check the website for any updates.

You should review the Long Form Notice at [WWW.BERKELEYREGISTRATIONFEES.COM](http://WWW.BERKELEYREGISTRATIONFEES.COM) to inform yourself of your rights in this Action. Please do not call the Court or the Clerk of the Court for information about the lawsuit.

1 FRANK BUSCH (State Bar No. 258288)  
VICTOR H. YU (State Bar No. 325411)  
2 COBLENTZ PATCH DUFFY & BASS LLP  
3 One Montgomery Street, Suite 3000  
San Francisco, California 94104-5500  
4 Telephone: 415.391.4800  
Facsimile: 415.989.1663  
5 Email: ef-fhb@cpdb.com  
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6

7 Attorneys for Plaintiff  
ALAN WOFSY & ASSOCIATES  
8 dba Hearst Commons  
9

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **COUNTY OF ALAMEDA**

12  
13 ALAN WOFSY & ASSOCIATES, a  
California corporation (dba Hearst Commons)  
14 on behalf of itself and all others similarly  
situated,

15 Plaintiff,

16 v.  
17

18 CITY OF BERKELEY and BERKELEY  
RENT STABILIZATION BOARD,

19 Defendants.  
20

Case No. 23CV043503

ASSIGNED FOR ALL PURPOSES TO:  
JUDGE BRAD SELIGMAN  
DEPARTMENT 22

**EXHIBIT B TO JOINT CLASS NOTICE –  
LONG FORM NOTICE**

Action Filed: September 11, 2023  
Trial Date: April 7, 2025

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**SUPERIOR COURT FOR THE STATE OF CALIFORNIA IN THE COUNTY OF ALAMEDA**

**NOTICE OF PENDING CLASS ACTION**

If you are an owner or have owned rental units in the City of Berkeley, a class action lawsuit may affect your rights. This Notice is being provided by order of the Superior Court for the State of California, in the County of Alameda. It is not a solicitation from a lawyer. You are not being sued.

A class action lawsuit is pending in the Superior Court for the State of California in the County of Alameda. This lawsuit challenges registration fee imposed by the City of Berkeley’s Rent Stabilization Board onto owners of rentals units in the City of Berkeley under a law called Measure MM. The name of the case is *Alan Wofsy & Associates, dba Hearst Commons v. Berkeley Rent Stabilization Board*, Case No. 23CV043503. Under Measure MM, owners of units have been charged a fee of up to \$150 per unit. Plaintiffs allege that these fees are unconstitutional under Article XII C of the California Constitution. Plaintiffs challenge Measure MM because it not passed with a super majority of voters, and it does not meet any of the constitutional exceptions that would permit the Board to impose these fees without a super majority of votes.

Plaintiffs seek, among other things, (1) compensation for class members for any unlawful Measure MM fees that they were required to pay and (2) a Court order prohibiting the Board from furthering imposing Measure MM fees onto class members.

The Berkeley Rent Stabilization Board disputes these allegations and maintains that the Measure MM fees it charges are constitutional and otherwise appropriate under the law.

The Court has not, however, rendered any opinion as to whether Plaintiffs or the Berkeley Rent Stabilization Board are correct about the legal claims in the case. By establishing the Class and issuing this Notice, the Court is not suggesting that the Plaintiff or the Berkeley Rent Stabilization Board will win or lose this case. Plaintiff must prove the Class's claims at a trial, which has not yet occurred. The trial date has been scheduled for April 7, 2025.

The Court has appointed the law offices of Coblentz, Patch, Duffy & Bass LLP as class counsel. No money or benefits are available now because the lawsuit is not resolved. There is no guarantee that money or benefits ever will be available. If they are, you will be notified about how

1 to ask for a share of any recovery. Unless you exclude yourself or your business from the lawsuit,  
2 you or your business will be bound by the outcome of the case and you will not be able to file a  
3 lawsuit or be part of any lawsuit against the Board concerning or relating to the claims and  
4 allegations that were or could have been raised in this lawsuit.

5 On October 21, 2024, the Court determined that Plaintiff’s claims against the Board could  
6 proceed as a class action. There is no money available now and no guarantee there ever will be.  
7 However, if you are a member of the certified classes as described in this Notice, your legal rights  
8 and options are affected, and you have a choice to make now.

9 **LITIGATION CLASS DEFINITION:** The Court has certified a class of all persons who  
10 currently own or have owned residential units in the City of Berkeley at any time from January 1,  
11 2021, and are covered by Measure MM, subject to certain exceptions. Individuals who *only* owned  
12 units that were not covered by Measure MM, or only owned certain affordable-housing units that  
13 were subject to a lowered, Measure MM fee are not part of the Court’s class definition. Specifically,  
14 the following categories of individuals are excluded from the class:

- 15 • Individuals who only owned units in affordable-housing projects, including those  
16 managed through regulatory agreements under the City of Berkeley’s Affordable  
17 Housing Trust Fund Program;
- 18 • Individuals who only owned single-family homes or condominiums that are rented  
19 for up to two years and: (1) owned no more than one residential unit in Berkeley; (2)  
20 lived in the unit as your primary residence for at least 365 consecutive days  
21 immediately prior to rental; (3) will reoccupy the unit as your primary residence  
22 when the rental ends; and (4) specified the rental term, not to exceed 24 months, in  
23 the lease;
- 24 • Individuals who only owned Section 8 or Shelter Plus tenancies; or
- 25 • Individuals who only owned units that they occupied, maintained for their own use,  
26 or occupied rent free.

27 **YOUR LEGAL RIGHTS AND OPTIONS:** If you are a member of the class, you may take  
28 one of two options in connection with this action:

1           (1) Exclude Yourself: You may write to the Administrator at Berkeley Registration Fees  
2 Notice Administrator, c/o Settlement Services, an Epiq Company, P.O. Box 2715, Portland, OR  
3 97208-2715 by [INSERT DATE] to exclude yourself. If you ask to be excluded from this lawsuit  
4 and money is later rewarded, you will not be allowed to request a payment. But you or your business  
5 will keep your right to file your own lawsuit against the Board for damages concerning or relating to  
6 the claims and factual allegations that were or could have been raised in this action.

7           (2) Do Nothing: If you do nothing, you (or your business) will be bound by the outcome of  
8 the case, whether a judgment is rendered for or against the Board. Unless you exclude yourself (or  
9 your business), you will not be able to file a lawsuit or be part of any other lawsuit asserting claims  
10 against the Board concerning or relating to the claims and factual allegations that were or could have  
11 been raised in this lawsuit.

12           **FURTHER INFORMATION REGARDING YOUR RIGHTS AND OPTIONS AND THE**  
13           **DEADLINES TO EXERCISE THEM ARE EXPLAINED IN THIS NOTICE.**

14           **A.       What is a class action and who is involved?**

15           In a class action lawsuit, one or more individuals or entities called “Class Representatives”  
16 sue on behalf of other individuals or entities who have similar claims. That group of individuals or  
17 entities is a “class” made up of class members. The Class Representatives that sued here—and all  
18 the class members like them—are called the Plaintiffs. The individual or entity they sued are called  
19 the Defendant. Class members may choose to exclude themselves from the class.

20           **B.       What is the certified class, and how do I know if I am a class member?**

21           On October 21, 2024 the Court certified a class that includes “All persons who currently own  
22 or have owned units to which Measure MM applies at any time from January 1, 2021, through the  
23 present, excluding all persons exempt from Measure MM and all affordable housing projects  
24 managed by a nonprofit with an operative regulatory agreement with the City of Berkeley through  
25 its Affordable Housing Trust Fund program.”

26           Under this definition, you may be a class member if you are an owner of non-affordable-  
27 housing rental units in the City of Berkeley and paid Measure MM fees from January 1, 2021 to the  
28 present. As set forth in detail in the home page, owners who only owned affordable-housing units

1 or who owned units that are exempt from Measure MM are excluded from the class.

2 **C. What is the current status of the lawsuit?**

3 The lawsuit is pending in the Superior Court for the State of California in Alameda County  
4 before Judge Brad Seligman. A trial in this action is currently scheduled for April 7, 2025.

5 **D. Is there any money available now?**

6 No money or benefits are available now because there has not been a trial and there is no  
7 settlement. There is no guarantee that money or benefits will ever be available to class members. If  
8 they do become available, a separate notice will be issued about how to submit a claim for potential  
9 money or benefits.

10 **E. What happens if I do nothing at all?**

11 If you do nothing, you will be bound by the outcome of the lawsuit regardless of who wins.  
12 You will keep the possibility of getting money or benefits that may come from a trial or settlement.  
13 Unless you exclude yourself from the class, you will not be able to file a lawsuit or be part of any  
14 other lawsuit asserting claims against the Board related to the allegations or claims in this case.  
15 Once you are in the class, you will not be able to remove yourself from it.

16 **F. What does it mean to request to be excluded or to opt-out from the class?**

17 If you exclude yourself from the Class by “opting out,” you will not be eligible to receive a  
18 payment from future settlements or judgments in this lawsuit. You will keep your right to sue the  
19 Board relating to the claims in this lawsuit. If you excluded yourself or opted out, you did not do so  
20 with respect to any injunction that the Court may enter in the lawsuit.

21 **G. How do I exclude myself?**

22 To exclude yourself or your business , you must send a letter by mail or email saying that  
23 you wish to be excluded. You must include your name, business name (if applicable), address,  
24 telephone number, email and signature, and a statement that you want to exclude yourself or your  
25 business from the class in this litigation. You cannot exclude yourself or your business by telephone.  
26 You must mail or email your request for exclusion, postmarked no later than [Insert date] to:

27 Berkeley Registration Fees Notice Administrator  
28 c/o Settlement Services, an Epiq Company  
P.O. Box 2715

1 Portland, OR 97208-2715  
2 Phone: 888-868-8642  
3 Fax: 850-385-6008  
4 Email: [claims@ssiclaims.com](mailto:claims@ssiclaims.com)  
5 Website: [www.berkeleyregistrationfees.com](http://www.berkeleyregistrationfees.com)

6 Unless you exclude yourself or your business, you or your business will be bound by the  
7 outcome of the case. You will not be able to file a lawsuit or be part of any other lawsuit asserting  
8 claims against the Berkeley Rent Stabilization Board concerning or relating to the claims and factual  
9 allegations that were or could have been raised in this lawsuit.

10 **H. Who are the lawyers representing the class?**

11 The Court has appointed lawyers to represent you and the other class members. These  
12 lawyers are called “Class Counsel”. The following lawyers represent the class:

13 Frank Busch  
14 Victor H. Yu  
15 Coblenz Patch Duffy & Bass LLP  
16 One Montgomery Street, Suite 3000  
17 San Francisco, CA 94104-5500  
18 Telephone: 415.391.4800  
19 Email: [ef-fhb@cpdb.com](mailto:ef-fhb@cpdb.com)  
20 [ef-vhy@cpdb.com](mailto:ef-vhy@cpdb.com)

21 **I. How will the lawyers representing the class be compensated?**

22 If Plaintiffs prevail in the lawsuit, Class Counsel may ask the Court to approve attorney’s  
23 fees, which may be up to one-third of any recovery that may be obtained in this lawsuit, plus costs  
24 and expenses. They may ask the Court to approve incentive payments to the named Plaintiff from  
25 any recovery that may be obtained in this lawsuit. Those fees, costs and awards must be approved  
26 by the Court.

27 **J. Should I get my own lawyer?**

28 You do not need to hire your own lawyer because Class Counsel are working on behalf of  
the class. If you choose to hire your own lawyer to represent you, you will have to pay for that  
lawyer on your own.

**K. How can I keep up with developments?**

Class Counsel has hired Settlement Services, an Epiq Company, to assist with the class



1 notice process and to maintain this website for all class members. Updates regarding the case and  
2 the class notice process will be provided on this website and not by additional mailings to potential  
3 class members. This includes major developments in the case, supplemental information to be  
4 distributed to the class, and changes to dates the Court sets. Please check this website on a regular  
5 basis to see whether there are updates or new information.

6 **L. Where can I get more information about this lawsuit?**

7 The Notice contains a summary of the lawsuit and the proceedings. You may access  
8 additional information on this website. Complete copies of the pleadings, orders and other publicly  
9 filed documents in the lawsuit may be accessed for a fee through the Court’s eCourt Public Portal at  
10 <https://eportal.alameda.courts.ca.gov/?q=Home>.

11 The Court and the Berkeley Rent Stabilization Board will not respond to any questions  
12 regarding this Notice or the lawsuit. Please do not contact Judge Seligman, Department 22, the  
13 Clerk of the Court, or the Berkeley Rent Stabilization Board.

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# **EXHIBIT C**

## About Epiq Class Action

We are the preeminent leader in class action settlement administration delivering best-in-class people, technology, and service for class action administration matters anywhere in the world – regardless of size or complexity.

The Epiq logo is located in the bottom right corner of the page. It consists of the word "epiq" in a white, lowercase, sans-serif font. The letter "i" has a dot, and the letter "q" has a tail that curves to the right. The logo is set against a background of a dense grid of blue spheres that recede into the distance, creating a strong sense of perspective.

epiq

# About Epiq

Class action, mass tort, remediation, and restructuring provider

Epiq clients receive comprehensive solutions for every settlement administration and matter and are supported by industry-leading experts using cutting-edge technology.

Our end-to-end solution approach includes Epiq-managed contact centers, large capacity print facilities, website and custom application development, and treasury services with controlled digital and check disbursements.

Class action  
claims  
administration

Mass tort  
administration  
and lien  
resolution

Remediation:  
voluntary and  
regulatory

Bankruptcy  
analytics and  
trustee  
platforms

Data breach  
notification

Corporate  
restructuring



# About Epiq

## Case administration services

Since 1993, Epiq has administered thousands of settlements, including some of the largest and most complex cases ever settled.

We work with the settling parties, the court, and the class members in a neutral facilitation role to implement administration services based on the negotiated terms of a settlement. Our class action case administration services include:

- 1 **Coordination of all notice requirements**
- 2 **Design of direct-mail notices**
- 3 **Establishment and implementation of notice fulfillment services**
- 4 **Coordination with the U.S. Postal Service**
- 5 **Electronic noticing**
- 6 **Notice website development and maintenance**
- 7 **Dedicated phone lines with recorded info. and/or live operators**
- 8 **Receipt and processing of opt-outs**
- 9 **Claims database management**
- 10 **Claim adjudication**
- 11 **Funds management**
- 12 **Award calculations and distribution services**

# About Epiq

Global provider of expert legal noticing services

We provide superior notice plan design, implementation, and targeted communications for class action, mass tort, and bankruptcy proceedings through our global provider of legal noticing services, Hilsoft Notifications.

No other expert firm matches our experience with direct oversight of the entire notice process.



**CAMERON AZARI**  
Epiq Senior VP and  
Director, Hilsoft Notifications

- A recognized expert in both the U.S. and Canada in the creation of legal notice programs.
- Experience in the design and implementation of more than 625 legal notice programs, including more than 75 MDLs since 2000.
- Provided testimony on numerous occasions regarding the method of notice and providing the best notice practicable under the circumstances.



**STEPHANIE FIERICK**  
Director, Notice Expert Services

- Consults with clients and drafts or reviews legal notice documents to provide plain language notice to class members in class actions cases.
- Drafted more than 1,000 expert legal notice declarations, which have been approved by federal and state courts nationwide and in Canada.



**KYLE BINGHAM**  
Director of Legal Noticing

- A pivotal resource for researching, planning, and executing media plans for legal notice programs for class actions, bankruptcy cases, and government matters, as well as the handling of CAFA notice mailings.
- Prepared notices that have appeared in 53 languages and have been distributed in almost every country, territory, and dependency in the world.

All of our  
notice  
programs  
have  
been  
accepted  
and  
approved  
by courts.



# About Epiq

A trusted partner



## Deep resources and relationships

We employ lawyers, paralegals, insurance claims adjusters, certified project and risk managers, adjudicators, and call center staff.

This means we have the right people and resources in the right place at the right time to handle matters of any size with speed, precision, and accountability.



## Vast experience and expertise

Consulting and expert administration means you get a comprehensive plan and execution from start to finish.



## Advanced technology

State-of-the-art applications deliver the efficiencies and metrics you care about with complete process transparency and confidence.



## World-class security

Your data and business are safe with us in highly secure data centers that exceed Tier IV standards and are monitored 24/7/365.



# About Epiq

Distributing excellence



## 2023 Activity Metrics

**558.4M**

printed  
images

**108.4M**

pieces  
mailed

**\$24.5B**

paid  
out

**17.2M**

payments  
made

**66.1M**

emails sent to  
class members

**13.1M**

call center  
minutes

**1,811**

call centers  
launched

**11.9M**

documents  
processed

**1.5M**

calls  
received







Epiq Class Action and Claims Solutions CV  
2022

10300 SW Allen Blvd, Beaverton, OR 97005  
[www.epiqglobal.com](http://www.epiqglobal.com)



**Epiq is a leading class action settlement administrator delivering best-in-class people, technology and service for class action administration matters anywhere in the world—regardless of size or complexity.**

**History:**

Epiq has been administering settlements since 1993, including settlements of class actions, mass tort litigations, Securities and Exchange Commission enforcement actions, Federal Trade Commission disgorgement actions, insurance disputes, bankruptcies, and other major litigation. Epiq has administered thousands of settlements, including some of the largest and most complex cases ever settled.

Epiq’s class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment and implementation of notice fulfillment services, coordination with the United States Postal Service (“USPS”), electronic noticing, notice website development and maintenance, dedicated phone lines with recorded information and/or live operators, receipt and processing of opt-outs, claims database management, claim adjudication (paper and electronic), funds management, and award calculations and distribution services (both traditional checks and electronic payments). Epiq works with the settling parties, the Court, and the Class Members in a neutral facilitation role to implement administration services based on the negotiated terms of a settlement.

Through Hilsoft Notifications, our global provider of legal noticing services, we provide superior notice plan design, implementation, oversight, and communications for class action, mass tort, and bankruptcy proceedings. Hilsoft Notifications has been retained by defendants and/or plaintiffs on more than 300 cases, including more than 30 MDL cases, with notices appearing in more than 53 languages and in almost every country, territory and dependency in the world.

Epiq also has a Mass Tort division, which offers claimant communication support, medical record retrieval and review, plaintiff fact sheet fulfillment, settlement document fulfillment, lien resolution and fund administration and payments.

**Strategically located:**

- 11 dedicated offices providing project management and operational support including, New York City, New York; Beaverton, Oregon; Dublin, Ohio; Seattle, Washington; Tampa, Florida; Phoenix, Arizona; Tallahassee, Florida, London UK, Memphis TN and Ottawa and Waterloo, Ontario.
- 3 state-of-the-art full-service mail, print, and contact centers in Beaverton, Oregon, Memphis, TN and Dublin, Ohio.
- 2,670 contact center seats across all locations.

**Epiq has been retained on some of the highest profile cases in history:**

*In re: Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* This \$6B+ settlement is one of the largest antitrust class action settlements of all time. Epiq received roughly 80 billion rows of data with 163 types of data columns in 180 distinct files. The aggregated data set is over 110 terabytes and is hosted in a PCI-compliant environment. Over a five-month period this data was used to generate 21 million settlement notice mailings. This settlement is currently on appeal and therefore the claims process has not yet begun. However, in order to efficiently handle the anticipated claim volume, we implemented a pre-registration process that allows merchants to provide information to expedite the claims process prior to claim filing.

*In re: Oil Spill by the Rig "Deepwater Horizon"* Prior to settlement, Epiq acted as a shared database manager for the litigation, collecting data from plaintiffs' counsel, defense counsel, the Gulf Coast Claims Facility, and the court to create an aggregated system of record to manage all plaintiff data. Responsibilities included data intake and processing of all new forms filed on PACER and LexisNexis File & ServeXpress, loading partially complete data lists, identifying exceptions and mismatches and resolving missing data, duplicates and incorrect information for the parties. Epiq's legal noticing division, Hilsoft Notifications, was then appointed as the notice administrator for both the \$7.8 billion economic damages and medical benefits settlements. Across a condensed six week period, Hilsoft ran notices nationally and locally in more than 2,000 print publications. Approximately 10,000 television and radio spots aired across 26 media markets stretching from Houston to Miami. In addition to English, notices appeared in Spanish and Vietnamese. It is estimated that more than 95% of all adults living in the Gulf Area and more than 83% of all adults in the United States had an opportunity to see the notice. In total, the notice effort was one of the largest ever undertaken in a class action settlement.

*In re: Takata Airbag Products Liability Litigation* Massive individual notice mailing to over 59 million class members with Toyota, Mazda, Subaru, BMW, Honda, Nissan and Ford vehicles, as part of \$1.49 billion in multiple settlements regarding Takata airbags. Comprehensive nationwide media accompanied each phase, comprised of radio ads, consumer magazine ads and extensive online notice.

*In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Product Liability Litigation (Bosch Settlement)* Comprehensive notice program within the Volkswagen Emissions Litigation that provided individual notice to more than 946,000 vehicle owners via first class mail and to more than 855,000 via email. A targeted internet campaign further enhanced the notice effort.

*Hale v. State Farm Mutual Automobile Insurance Company* For a \$250 million settlement with approximately 4.7 million class members, Epiq designed and implemented a Notice Program with individual notice via postcard or email to approximately 1.43 million class members and a robust publication program, which combined, reached approximately 80% of all U.S. Adults Aged 35+ approximately 2.4 times each.

*Oppenheimer Rochester Group Funds Securities Litigation* In these securities cases, which combine six separate settlements, Epiq reviewed and processed over 10 million trade transactions, consolidated data and mailed more than 450,000 pre-populated records of claimant transactions ("ROFTS") to alleviate the burden on the majority of class members to research and file claims, and mailed over 180,000 additional Claim Forms

and notices. We created complex software code to calculate the recognized losses across 19 different types of securities.

*In re Merck & Co., Inc. Securities, Derivative & "ERISA" Litigation ('Vioxx')* Epiq is currently administering this \$1.062 billion settlement involving damages from securities trades going as far back as 1999. Epiq mailed almost 2 million notices, received more than 400,000 claims and processed millions of lines of securities transaction data, determined losses using complex algorithms relating to multiple securities for injured investors.

*Hooker v SiriusXM Radio Inc.* This \$35 million settlement for alleged TCPA violations involves approximately 12 million class members. Class members could register for three months of free service or file a claim for cash payment. Epiq's class member outreach included both mailing approximately 8 million postcards and a total of 50 million emails to class members for noticing and reminder purposes. The claims administration process involved working with the defendant to validate claims data using the defendant's internal database.

*The Shane Group, Inc. v Blue Cross Blue Shield of Michigan* Epiq is the claims administrator for this 3 million class member insurance anti-trust settlement. Epiq utilized its proprietary Third-Party Payor (TPP) database to notice insurance companies and other third party payors in addition to the individual class members provided by the defendant. The claims process was complex and involved sensitive HIPAA protected data that had to be housed in a custom secure environment. The settlement was appealed and as a result the parties are currently finalizing alterations to the settlement to address the concerns of the appellant.

*In re Checking Account Overdraft Litigation* Epiq has implemented more In re: Checking Account Overdraft MDL NO. 2036 overdraft class action settlements than any other administrator and is currently providing settlement services to five of the six largest U.S. banks. Our ability to securely intake and normalize complex data from a multitude of sources proves a natural fit for banks and other financial services firms.

*Mortgage Servicing Regulatory Settlement Summary* Epiq is currently handling a number of remediation and distribution programs involving various financial institutions pursuant to private settlements and consent orders with the OCC, DOJ, FRB and CFPB. Examples of these engagements include:

- A borrower identification and distribution program to support a \$35 million Department of Justice (DOJ) and Consumer Financial Protection Bureau (CFPB) settlement with a financial institution related to mortgage loans made to African-American and Hispanic borrowers.
- A payment distribution program to support an expedited payment agreement between the Office of the Comptroller of the Currency (OCC) and a financial institution, which resolves an Independent Foreclosure Review of the financial institution's foreclosure practices.
- A notification, claims and distribution program to support a Federal Reserve settlement with a financial institution related to mortgage loans originated at more than 800 branch offices.
- A notification, claims and distribution program to support a \$320 million Home Affordable Modification Program (HAMP) settlement between the DOJ and a financial institution.

## Experience in major projects by dollar value (values have been rounded)

<b>\$44.5B</b>	Lehman Brothers Holding Inc	<b>\$1.9B</b>	1983 Marine Barrack's Bombings	<b>\$480M</b>	Wells Fargo Securities Litigation
<b>\$11B</b>	Deepwater Horizon Economic Settlement	<b>\$1.3B</b>	Hispanic Women and Farmers	<b>\$473M</b>	Schering Securities Litigation
<b>\$8.5B</b>	BNY Mellon Countrywide RMBS	<b>\$1B</b>	In re Merck & Co Inc. Securities Derivative & ERISA Litigation	<b>\$389M</b>	Royal Dutch Shell
<b>\$6.15B</b>	WorldCom Securities	<b>\$860M</b>	Johnson & Johnson Acuvue	<b>\$384M</b>	Wells Fargo CPI
<b>\$5.5B</b>	In Re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation	<b>\$853M</b>	Air Cargo Antitrust	<b>\$328M</b>	In re Volkswagen "Clean Diesel" (Bosch Settlement)
<b>\$4.6B</b>	Indian Residential Schools Settlement	<b>\$850M</b>	Marsh & McLennan	<b>\$325M</b>	Precision v. PWT ("Freight Forwarders")
<b>\$4.5B</b>	Bank of America Auction Rate Securities	<b>\$845M</b>	In re Urethane Antitrust	<b>\$320M</b>	SunTrust HAMP
<b>\$4.5B</b>	JP Morgan Chase RMBS	<b>\$834M</b>	Tremont Securities	<b>\$299M</b>	Takata Ford
<b>\$3.4B</b>	Indian Trust	<b>\$800M</b>	Engle Trust Fund	<b>\$231M</b>	US Embassy Bombings
<b>\$3.2B</b>	Tyco Securities	<b>\$758M</b>	In re Hyundai and Kia Engine Litigation	<b>\$228M</b>	Hall v Bank of America
<b>\$3.05B</b>	VisaCheck/Mastermoney Antitrust	<b>\$750M</b>	Washington Public Power Supply Systems	<b>\$219M</b>	Genworth Securities Litigation
<b>\$3B</b>	Petrobras Securities Litigation	<b>\$750M</b>	Bristol Myers Securities	<b>\$215M</b>	Merck Securities Litigation
<b>\$2.6B</b>	Morgan Stanley RMBS	<b>\$730M</b>	United States v. Pokerstars	<b>\$212M</b>	Wells Fargo Financial Consent Order
<b>\$2.43B</b>	Bank of America Corp. Securities Derivative & ERISA	<b>\$590M</b>	Klein, et al. v. Bain Capital Partners LLC, et al.	<b>\$210M</b>	In re Wilmington Trust Securities Litigation
<b>\$2.1B</b>	The Hepatitis C Tainted Blood Transfusion Settlements	<b>\$520M</b>	Jessica S. Cook v. Santee Cooper et al	<b>\$210M</b>	Salix Securities Litigation
<b>\$2B</b>	In re Foreign Exchange Benchmark Rates Antitrust Litigation	<b>\$504M</b>	ISDAfix Antitrust Settlement	<b>\$200M</b>	In re Fresenius Granuflo/Naturalyte Dialysate Products Liability Litigation
<b>\$1.2B</b>	Black Farmers Discrimination Litigation	<b>\$504M</b>	Bank of NY Mellon Forex	<b>\$200M</b>	In re New England Compounding Pharmacy Inc. Products Liability Litigation
<b>\$1.10B</b>	Royal Ahold Securities	<b>\$480M</b>	Gary Hefler, et al. v. Wells Fargo & Co. et al.	<b>\$200M</b>	NECC Victims Compensation Program

## By notices disseminated (values have been rounded)

<b>116,000,000</b>	Ticketmaster.com	<b>11,000,000</b>	Premera Data Breach Settlement	<b>4,600,000</b>	1-800-Flowers Retail
<b>57,000,000</b>	Classmates.com	<b>9,000,000</b>	Pelayo v. Mexico Money Transfer	<b>4,500,000</b>	Progressive Group Auto Insurance
<b>55,000,000</b>	Hooker v Sirius XM Radio	<b>9,000,000</b>	Farrell v Bank of America	<b>4,300,000</b>	Chimeno-Buzzi v Hollister
<b>53,000,000</b>	Takata Settlement	<b>9,000,000</b>	Precision v PWT	<b>4,100,000</b>	Amex Merchant Settlement
<b>32,000,000</b>	Justice Stores-McGladrey	<b>8,400,000</b>	Air Passenger Settlement	<b>4,000,000</b>	WorldCom Securities
<b>26,000,000</b>	VisaCheck/MasterMoney Antitrust	<b>8,300,000</b>	Takata Ford	<b>3,900,000</b>	Scharfstein v BP WCP
<b>25,000,000</b>	IPO Securities	<b>8,300,000</b>	Marolda v Symantec	<b>3,800,000</b>	Clark v TransUnion
<b>22,000,000</b>	McKnight v Uber	<b>8,300,000</b>	Bank of America TCPA	<b>3,700,000</b>	Fifth Third Overdraft Settlement
<b>21,000,000</b>	Interchange	<b>8,000,000</b>	Meckstroth v Toyota Motor	<b>3,700,000</b>	Tennille v Western Union
<b>20,500,000</b>	Nwabueza v. AT&T	<b>7,600,000</b>	Vergara v. Uber TCPA Settlement	<b>3,600,000</b>	Bodnar v BofA
<b>20,000,000</b>	Webloyalty.com, Inc.	<b>7,600,000</b>	MFS Sub-Track Mutual Fund	<b>3,500,000</b>	Pfizer Securities Litigation
<b>19,000,000</b>	Interchange	<b>7,100,000</b>	TD Bank Debit Card Overdraft	<b>3,500,000</b>	IDE - UCLA Health
<b>18,000,000</b>	Western Union Money Transfer	<b>7,000,000</b>	Community Hlth Sys DB	<b>3,500,000</b>	Bosch Settlement
<b>16,000,000</b>	Khoday v. Symantec	<b>7,000,000</b>	Time Warner Entertainment Company	<b>3,500,000</b>	Wells Fargo CPI Class Action
<b>15,140,000</b>	Experian Information Solutions, Inc.	<b>7,000,000</b>	AT&T Wireless	<b>3,500,000</b>	Michael Kors Administration
<b>15,000,000</b>	Farag v Kiip	<b>7,000,000</b>	Equifax Consumer Services, Inc.	<b>3,400,000</b>	Lucero v SolarCity TCPA Settlement
<b>15,000,000</b>	Browning v. Yahoo!	<b>6,400,000</b>	UCLA Health Data Breach Settlement	<b>3,300,000</b>	Snyder v Ocwen Loan Servicing
<b>15,000,000</b>	JP Morgan TCPA	<b>6,400,000</b>	Angies List	<b>3,200,000</b>	Hale v. State Farm
<b>14,000,000</b>	Living Social	<b>5,700,000</b>	Moore v Verizon	<b>3,000,000</b>	McKinney-Drobnis v Massage Envy
<b>14,000,000</b>	Sallie Mae	<b>5,000,000</b>	Mohan v. Dell	<b>3,000,000</b>	Amgen Securities Litigation
<b>13,000,000</b>	Expedia Hotel Taxes and Fees	<b>5,000,000</b>	Moneygram – Mexico Money Transfer		

## By claims processed (values have been rounded)

<b>4,300,000</b>	Lease Oil Antitrust	<b>670,000</b>	Citigroup Inc. Securities	<b>298,000</b>	Snyder v Ocwen Loan Servicing
<b>2,100,000</b>	Strong Sub-Track Mutual Fund	<b>618,000</b>	TransUnion	<b>275,000</b>	TD Bank Debit Card Overdraft
<b>1,960,000</b>	Wolf v. Red Bull	<b>607,000</b>	Justice Stores-McGladrey	<b>268,000</b>	Merck Securities Litigation
<b>1,200,000</b>	Baby Products Antitrust	<b>601,000</b>	Dell Fair Fund	<b>264,000</b>	Carnegie v HR Block
<b>1,051,000</b>	Takata Settlement	<b>600,000</b>	Global Crossing Securities	<b>256,000</b>	Mohan v. Dell
<b>1,000,000</b>	AMEX Financial Advisors Securities	<b>521,000</b>	Expedia Hotel Taxes and Fees	<b>250,000</b>	Hill v State Street
<b>995,000</b>	Daniels v. Allstate	<b>520,000</b>	SEC v AIG	<b>240,000</b>	Toronto-Dominion Securities Litigation Settlement
<b>980,000</b>	WorldCom Securities	<b>500,000</b>	Nortel Networks (I & II) Securities	<b>236,000</b>	Bank of America TCPA
<b>950,000</b>	Gulf Coast Claims Facility	<b>438,000</b>	General Motors Securities Litigation	<b>231,000</b>	Apple Securities Litigation
<b>880,000</b>	Premera Data Breach Settlement	<b>425,000</b>	Amgen Securities Litigation	<b>227,000</b>	Purex Settlement
<b>815,000</b>	Progressive Fair Credit Reporting Act	<b>414,000</b>	Merck Vioxx Securities Litigation	<b>206,000</b>	Trombley v National City
<b>815,000</b>	VisaCheck/MasterMoney Antitrust	<b>396,000</b>	Zepeda v. PayPal	<b>196,000</b>	Marchese v Cablevision
<b>760,000</b>	Oppenheimer Funds Securities	<b>394,000</b>	Moore v Verizon	<b>195,000</b>	Toyota Securities Litigation
<b>724,000</b>	Wells Fargo Securities	<b>389,000</b>	Reynolds v Hartford	<b>194,000</b>	SEC v Raytheon
<b>719,000</b>	Bank of America Corp. Securities Derivative & ERISA	<b>357,000</b>	BNYM Forex Securities Litigation	<b>182,000</b>	Ridgely v FEMA
<b>700,000</b>	Lucent Technologies, Inc. Securities	<b>325,000</b>	Hooker v Sirius XM Radio	<b>179,000</b>	Royal Dutch Shell
<b>698,000</b>	Classmates.com	<b>324,000</b>	Air Passenger Settlement	<b>178,000</b>	Angies List
<b>685,000</b>	Deloris Kline v. Progressive Corporation	<b>313,000</b>	Cerbo v Ford of Englewood, Inc.	<b>148,000</b>	UCLA Health Data Breach Settlement
<b>672,000</b>	Oppenheimer Rochester Fund Securities Litigation	<b>303,000</b>	Wright et al v Nationstar Mort	<b>144,000</b>	Tennille v Western Union