

Tenae Smith, *et al.*, \* IN THE  
Plaintiffs, \* CIRCUIT COURT  
v. \* FOR  
Westminster Management, LLC, *et al.*, \* BALTIMORE CITY  
Defendants. \* Case No. 24-C-17-004797

\* \* \* \* \* 00000000 \* \* \* \* \*

**PLAINTIFFS' MOTION FOR APPROVAL OF  
NOTICE PLAN FOR CLASS MEMBERS**

Class Representatives Tenae Smith, Howard Smith, Simone Ryer, Dechonne McBride, and Louvinia Sneed (“Tenants”), on their own behalf and on behalf of all others similarly situated, by and through counsel, request the Court’s approval of this Proposed Notice Plan for Class Members, and further state:

1. On March 7, 2025, the above-captioned case was certified as a class action pursuant to Md. Rule 2-231(c)(3).
2. Md. Rule 2-231(f) states that “[i]n a class action maintained under subsection (c)(3), notice shall be given to members of the class in the manner the court directs.” Rule 2-231(f) requires that the notice include the following information: “(1) the court will exclude from the class any member who so requests by a specified date, (2) the judgment, whether favorable or not, will include all members who do not request exclusion, and (3) any member who does not request exclusion and who desires to enter an appearance through counsel may do so.”
3. Tenants propose that the deadline for any Class Members to request to intervene or opt out of the lawsuit be set for 60 days after the Notice is mailed to Class Members.
4. Class Counsel propose to utilize the information provided by Defendants as to the identity and last known addresses of all members of the Class to mail the Notice. Class Counsel

intend to utilize the services of a professional class administrator, RG/2 Claims Administration LLC, to complete the mailings. RG/2 will scrub the class member address information to increase accuracy of information, including through a United States Postal Service national change of address review and a private database service change of address review. For returned mail, RG/2 will use various data, including address history data, and will use a locator service vendor to obtain updated addresses. The updated addresses will be documented, and the Notice will be resent.

5. Class Counsel also intend to work with RG/2 to email the Notice to those class members for whom Defendants have provided an email address.

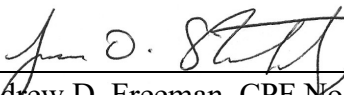
6. As part of its services, RG/2 will provide affidavits to the Court describing its efforts and results in mailing notice to the class, including information on any opt-outs.

7. Tenants propose the attached Notice of Class Action Lawsuit be sent to class members to inform them of their rights in accordance with the Maryland Rules. *See* Exhibit A.

8. Tenants agree to initially bear the costs of notifying the class members, with the understanding that such costs will be sought from the Defendants in any judgment or final resolution to this matter.

WHEREFORE, Tenants respectfully request that the Court approve the attached Notice of Class Action Lawsuit and direct the Notice to be provided as described above.

Respectfully submitted,

  
\_\_\_\_\_  
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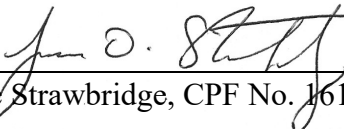
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*Attorneys for the Named Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 13, 2025, a copy of the foregoing Plaintiffs' Motion for Approval of Notice Plan for Class Members was served on all counsel of record via MDEC.

  
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Jamie Strawbridge, CPF No. 1612140265