

IN THE CIRCUIT COURT FOR BALTIMORE CITY

TENAE SMITH, *et al.*,
Plaintiffs,

v.

WESTMINSTER MANAGEMENT, LLC, *et al.*,
Defendants.

Case No. 24-C-17-004797

NOTICE OF CLASS ACTION LAWSUIT

TO: ALL PERSONS WHO (1) ARE OR WERE TENANTS AT PROPERTIES IN MARYLAND MANAGED BY WESTMINSTER MANAGEMENT, LLC OR JK2 MANAGEMENT, LLC (COLLECTIVELY “WESTMINSTER”) (2) HAVE BEEN CHARGED FEES RELATED TO THE ALLEGED LATE PAYMENT OF RENT SINCE SEPTEMBER 27, 2014, AND (3) HAVE PAID THOSE FEES.

PLEASE READ THIS NOTICE CAREFULLY IN ITS ENTIRETY. YOUR LEGAL RIGHTS MAY BE AFFECTED BY THIS LAWSUIT NOW PENDING IN THIS COURT.

Usted ha recibido esta notificación por un mandato de la Corte Circuito de la Ciudad de Baltimore. Este no es un caso contra usted, pero es posible que esta notificación afectará sus derechos legales con relación a Westminster Management. Para aprender más información sobre esta notificación en español, favor de llamar 410-625-9409.

NOTICE IS HEREBY GIVEN, pursuant to Md. Rule 2-231, and pursuant to Order of the Circuit Court for Baltimore City, to the following Class:

All persons who (1) are or were tenants at Westminster-managed properties in Maryland, (2) have been charged fees related to the alleged late payment of rent since September 27, 2014, and (3) have paid those fees.

Records provided by Westminster indicate that you may be a Class Member as defined in a court order dated March 7, 2025.

THIS IS NOT A LAWSUIT AGAINST YOU. This case is a class action brought on behalf of tenants against Westminster.

THIS LAWSUIT CONCERNS WHETHER WESTMINSTER UNLAWFULLY CHARGED YOU FEES IN CONNECTION WITH THE LATE PAYMENT OF RENT. Please read this notice carefully, as it explains your rights and options.

I. SUMMARY OF THIS LAWSUIT

This lawsuit was filed in the Circuit Court for Baltimore City on September 27, 2017, by Tenae Smith, Howard Smith, Simone Ryer, Dechonne McBride, and Louvinia Sneed as a proposed class action. The Court has named these individuals Class Representatives. The lawsuit is called *Tenae Smith, et al. v. Westminster Management, LLC, et al.* The case number is 24-C-17-004797.

The lawsuit alleges that Westminster violated state law when it charged and/or collected impermissible and illegal fees related to the alleged late payment of rent. The lawsuit seeks compensatory damages, an order that Westminster be required to pay back all impermissible and illegal fees collected by it from Class Representatives and Class Members, a judgment awarding Class Representatives and Class Members damages, interest, attorneys’ fees, and costs, and a Court Order that Westminster cease charging these fees. The Court has not decided whether Class Representatives are correct or whether Westminster is correct. Further information is available at www.WestminsterTenantsClassAction.com.

II. COUNSEL FOR THE CLASS

The Court has appointed the following attorneys as Class Counsel: Andrew D. Freeman, Anisha S. Queen, Jamie Strawbridge, and Lauren Kelleher of Brown, Goldstein & Levy, LLP; C. Matthew Hill of Public Justice Center; and Jane Santoni, Matthew Thomas Vocci, and Chelsea Ortega of Santoni, Vocci & Ortega, LLC. Class Counsel can be contacted by mail at 201 W. Padonia Road, Suite 101, Timonium, MD 21093, by phone at 443-921-8161, or by email at info@svolaw.com.

III. RIGHTS AND OPTIONS OF CLASS MEMBERS

1. You may be a member of the Class unless you request to be excluded (see Paragraph 4 below). **You do not have to file any documents with the Court to remain a member of the Class.** If you are a Class Member, your interests as a Class Member will be represented by Class Representatives and by Class Counsel. **You will not be billed for their services.** Class Counsel will receive a fee only if Class Representatives succeed on their claims. Any fee award requires Court approval. If you are a Class Member, you will be entitled to share in any monetary recovery for the Class and also receive the benefit of any other relief obtained.
2. **If you do not request to be excluded from the Class (see Paragraph 4 below), you will be bound by any judgment or other final disposition of this case, whether favorable or not.**
3. You may retain your own counsel to represent you at your own cost, and seek to appear, individually, or intervene in the case. Any request for intervention must be sent to the Circuit Court for Baltimore City located at 111 N. Calvert St., Baltimore, MD 21202. Copies of the intervention and supporting papers must also be mailed or hand-delivered to: Andrew D. Freeman, Brown, Goldstein & Levy, LLP, 120 E. Baltimore St., Ste. 2500, Baltimore, MD 21202, Counsel for Plaintiffs and the Class, and Michael E. Blumenfeld, Timothy M. Hurley, Nelson Mullins Riley & Scarborough LLP, 100 S. Charles St., Ste. 1600, Baltimore, MD 21201, Counsel for Westminster.

The written request for intervention must be sent by U.S. mail, first class postage prepaid, postmarked on or before October 14, 2025 (60 days after this Notice was sent to you). Any request for intervention must be by motion and must comply with Maryland Rule 2-214. **Any Class Member who does not file a request for intervention in the time and manner described above is prohibited from seeking to intervene in this lawsuit.**

4. You may request exclusion and “opt-out” from the Class. If you elect to be excluded from the Class, you will not be bound by any judgment or settlement of the lawsuit, nor will you receive any of the benefits of this Class Action, including the payment to you of any money. You will retain and be free to pursue any claims that you may have on your own behalf. If you wish to exclude yourself from the Class, you must mail a written request for exclusion to Smith, et al. v. Westminster Management LLC, et al, c/o RG/2 Claims Administration, LLC, P.O. Box 59479, Philadelphia, PA 19102-9479. Requests for exclusion do not need to be in any particular format, except that the request must state that you intend to “opt-out” or request “exclusion” from the Class, and it must be signed in ink and contain the full name, current address, and telephone number of the person requesting exclusion. The written request for exclusion must be sent by U.S. mail, first class postage prepaid, postmarked on or before October 14, 2025. Any Class Member who requests exclusion by October 14, 2025 (60 days after this Notice was sent to you) will be excluded from the Class by the Court.
5. If you have moved and/or changed your mailing address or plan to change it in the future, you must advise Class Counsel of your new address in writing and mail or email it to their office at the address(es) in Section II of this notice.

IV. INFORMATION TO INCLUDE IN ANY DOCUMENT YOU SEND ABOUT THE CASE

When sending documents to the Court, Class Counsel, or Counsel for Westminster, both your envelope and the documents must contain the case name and number: *Tenae Smith, et al. v. Westminster Management, LLC, et al.*, Case No. 24-C-17-004797. Include your full name, address, email, and telephone number on each document.

V. PLEADINGS AND OTHER RECORDS

The pleadings and other records in this case may be examined and copied during regular office hours at the Office of the Clerk of the Court, located at the Circuit Court for Baltimore City, 111 N. Calvert St., Baltimore, MD 21202. **PLEASE DO NOT CALL THE CLERK’S OFFICE OR THE JUDGE’S CHAMBERS.**

DATE: August 15, 2025

Xavier A. Conaway, Clerk of Court
Circuit Court for Baltimore City, Maryland