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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

HEATH SELTZER, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

GEOFFREY H. PALMER; GEOFFREY H.
PALMER dba G.H. PALMER ASSOCIATES;
GHP MANAGEMENT CORPORATION, a
California corporation; and DOES 1-50,
inclusive

Defendants.

CASE NO.: 18STCV07828 (Lead)
Consolidated with No.: 20STCV22701

*Assigned for all purposes to the
Honorable Stuart M. Rice*

**PLAINTIFF'S SUPPLEMENTAL BRIEF IN
SUPPORT OF FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

[Filed concurrently herewith:
1. Declaration of Rebecca Taylor]

Date: December 28, 2023
Time: 10:30 A.M.
Department: 1

Date Action Filed: December 10, 2018
Trial Date: TBD

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I. INTRODUCTION

The second round of notice ordered by the Court now has been implemented. No objections to the Class Settlement have been received and, accordingly, Plaintiff Heath Seltzer (“Plaintiff”) respectfully submits that Settlement Class Members should be paid, Class Counsel should be awarded their requested fees and expenses in the amount of \$583,333.33, and Plaintiff should receive a service award of \$5,000.00. For all the reasons set forth here and in Plaintiff’s prior filings on the pending motions for final approval and for attorneys’ fees and costs, Plaintiff asks that the Court:

- A. Enter the concurrently filed proposed Final Approval Order, which is a modified version of the proposed Final Approval Order previously submitted as Exhibit A to the Settlement Agreement, revised to reflect events that have taken place since the settlement originally was filed, including the second round of notice ordered by the Court; and
- B. Enter the concurrently filed proposed Final Judgment, which is a similarly modified version of the proposed judgment previously submitted as Exhibit B to the Settlement Agreement, with blanks filled in.

On December 5, 2022, the Court granted preliminary approval to the class settlement in this action. On June 21, 2023, the Court ordered a second round of notice, directed to the additional roommates that Defendant identified as possible Settlement Class Members. As explained in the Third Supplemental Declaration of Jason Haas and the Declaration of Sam Volsted, both filed August 3, 2023, there were some 2,111 such roommates.

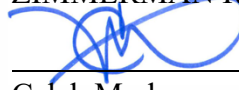
In the concurrently filed declaration of Rebecca Taylor of Angeion, the Court-appointed Settlement Administrator, that second round of notice has been completed. No objections or requests for exclusion have been received.

Angeion’s costs associated with the supplemental notice program are estimated at \$29,400. In addition to the \$106,117.48 in estimated expenses reported by Angeion in Ms. Taylor’s prior declaration of June 16, 2023, total estimated administration expenses amount to \$135,511.48. Defendants have agreed to pay Angeion’s monthly charges from June 21, 2023, through December 28, 2023 (*i.e.*, the delay between the final approval hearing held in June and the currently scheduled continued hearing on December 28, 2023, necessitated by the supplemental notice program).

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Respectfully submitted,

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By: _____

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