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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*

**[PROPOSED] FINAL JUDGMENT**

1 WHEREAS, this matter came before the Court on December 28, 2023 in Department 1 of the  
2 Superior Court of California for the County of Los Angeles, the Honorable Stuart M. Rice presiding  
3 (“Final Hearing”), in accordance with the (i) Order Granting Motion for Preliminary Approval of Class  
4 Action Settlement entered by this Court on December 5, 2022, and (ii) Plaintiff’s Motion for Final  
5 Approval of Class Action Settlement seeking final approval of the settlement set forth in the Class  
6 Action Settlement Agreement and Stipulation filed on October 28, 2022 (the “Settlement”);

7 WHEREAS, the Court, having considered all papers filed in this action and oral arguments of  
8 counsel in this action and those persons appearing at the Final Hearing, and otherwise being fully  
9 informed, and good cause appearing thereon;

10 WHEREAS, on December 28, 2023, this Court gave final approval to the class settlement and  
11 entered its Order Granting Final Approval of Class Action Settlement; and

12 WHEREAS, unless otherwise defined herein, all capitalized words and terms contained in this  
13 Final Judgment shall have the same meanings set forth in the Class Action Settlement Agreement and  
14 Stipulation filed on December 1, 2022, including the amendment thereto also filed on December 1, 2022  
15 (collectively, the “Settlement Agreement”) Settlement.

16 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

17 1. This Court has jurisdiction over the subject matter of the Action, this litigation, and all  
18 Parties to the Action, including all Settlement Class Members.

19 2. The Court, pursuant to California Code of Civil Procedure section 382 and Rule 3.769(e)  
20 and (d) of the California Rules of Court, orders that the Settlement Class constitutes:

21 All tenants of Defendants’ properties in the State of California from  
22 December 10, 2014, to May 16, 2022 who were signatories to a lease at  
23 the time one or more Late Fees were paid as the result of untimely rent  
24 payments for their unit.

25 3. No objections to the Settlement or to the application by Class Counsel for attorneys’ fees  
26 and reimbursement of expenses have been received.

27 4. No requests for exclusion have been received from Settlement Class Members.

28 5. This Court hereby enters judgment in accordance with, and subject to, the terms set forth  
in the Order Granting Final Approval of Class Action Settlement, and the Representative Plaintiff and

1 the Class Members shall take nothing except as provided in the Settlement Agreement and the Order  
2 Granting Final Approval of Class Action Settlement.

3 6. Plaintiff and Settlement Class Representative Heath Seltzer fairly and adequately  
4 represented the Class Members.

5 7. Class Counsel (Caleb Marker of Zimmerman Reed LLP and Theodore Maya of Ahdoot  
6 & Wolfson, PC) fairly and adequately represented the Settlement Class Members.

7 8. The Parties shall take all steps necessary and appropriate to provide Class Members with  
8 the benefits to which they are entitled under the terms of the Settlement and pursuant to the Orders of  
9 the court.

10 9. Plaintiff and Settlement Class Representative Heath Seltzer shall be awarded \$5,000.00  
11 as a service award in his capacity as a representative Plaintiff in the Action. Such funds shall be paid  
12 from the Settlement Fund.

13 10. Class Counsel shall be awarded \$583,333.33 in attorneys' fees and expenses, which  
14 amounts are approved as fair and reasonable, in accordance with the terms of the Settlement. Such sums  
15 shall be paid from the Settlement Fund.

16 11. The Court hereby approves the Settlement and finds that it is, in all respects, fair,  
17 reasonable, and adequate to the Settlement Class.

18 12. Upon the Effective Date of this Final Judgment, Plaintiff and each Settlement Class  
19 Member, on behalf of themselves and any other legal or natural persons who may claim by, through or  
20 under them, agree to fully, finally and forever release, relinquish, acquit, discharge and hold harmless  
21 the Released Parties from any claims that were asserted, or that could reasonably have been asserted in  
22 the Action (based upon and/or arising out of the facts alleged in the Complaint), against the Release  
23 Parties, and that arise out of, or relate in any way to any or all of the acts, omissions, facts, matters,  
24 transactions, or occurrences that were alleged in the Action (based upon and/or arising out of the facts  
25 alleged in the Complaint).

26 13. The Class Notice disseminated pursuant to the Notice Plan and by Order of this Court  
27 was the best notice practicable under the circumstances. The Class Notice provided due and adequate  
28 notice of those proceedings and of the matters set forth therein, including the proposed Settlement, to

1 all Persons entitled to such notice, and the Class Notice fully satisfied the requirements of California  
2 law and the requirements of due process.

3 14. Pursuant to the Settlement Agreement, California Code of Civil Procedure section 664.6,  
4 and Rule 3.769(h) of the California Rules of Court, this Court retains jurisdiction over the parties to  
5 enforce the terms of the Settlement Agreement, the Order Granting Final Approval of Class Action  
6 Settlement, and this Final Judgment.

7 15. This document shall constitute a judgment for purposes of California Rule of Court  
8 3.769(h). The Clerk is directed to enter this Final Judgment forthwith.

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10 **IT IS SO ORDERED.**

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12 Date: \_\_\_\_\_

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13 Honorable Stuart M. Rice  
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