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5 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
6 FOR THE COUNTY OF SONOMA
7 CIVIL UNLIMITED

8 SHARON FELKER; HERMAN GRISHAVER;
9 EDGAR CRUZ SORIANO; and JEANACE
10 ZETINO, individually and on behalf of other
similarly situated individuals,

11 Plaintiffs,

12 vs.

13 JRK RESIDENTIAL GROUP, INC.; JRK
14 PROPERTY HOLDINGS, INC.; and DOES 1-
100,

15 Defendants.

Case No.: SCV-267587

**DECLARATION OF TIFFANY SUGRIM
RE: IMPLEMENTATION OF NOTICE
PLAN AND ADMINISTRATION**

Judge: Hon. Patrick M. Broderick

Date: August 19, 2026

Time: 3:00 p.m.

Dept: 16

Complaint Filed: December 22, 2020

Trial Date: N/A

1 I, Tiffany Sugrim, hereby declare under penalty of perjury as follows:

2 1. I am an Associate Project Manager with the class action notice and administration
3 firm, Angeion Group, LLC (“Angeion”). I am over 21 years of age and am not a party to this
4 action. I have personal knowledge of the facts set forth herein, as well as information that has
5 been provided to me by my colleagues in the ordinary course of business at Angeion.

6 2. Angeion was retained by Class Counsel and approved by this Court to serve as
7 Settlement Administrator and to, among other tasks, provide Notice to the Settlement Class, and
8 perform other duties as specified in the Settlement Agreement and Release (“Settlement
9 Agreement”) and by the directives of the Court, including but not limited to the Order Granting
10 Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement and Class Notice (the
11 “Preliminary Approval Order”).

12 3. Angeion is not related to or affiliated with the Plaintiffs, Class Counsel, Defendants
13 or Defendants’ Counsel.

14 4. The purpose of this Declaration is to provide the Court with a summary of the work
15 performed by Angeion to disseminate notice to the Settlement Class and the responses received
16 from the Settlement Class, as well as other administrative tasks Angeion carried out.

17 **CLASS DATA**

18 **Main Class and Collection Subclass Lists**

19 5. On or about March 24, 2026, Angeion received from Defendants’ Counsel, two (2)
20 Class Member lists. The first list identified 15,112 Settlement Class Members and provided their
21 names, addresses and email addresses, as well as property identification numbers and apartment
22 numbers. The second list identified 795 individuals designated as Collection Class Members, and
23 included property identification numbers and apartment numbers for each Collection Class
24 Member.

25 **Total Damages List**

26 6. On or about April 7, 2026, Class Counsel supplemented the existing class data with
27 a list of total damages for each Settlement Class Member, as calculated by Class Counsel. No new
28 Settlement Class Members were added. As directed by Class Counsel, Angeion calculated the total

1 expected payment for each Settlement Class Member in accordance with the requirements set forth
2 in the Allocation Plan, found in the Motion for Preliminary Approval of Class Action Settlement
3 at page 38.

4 **Fee Class Designation List**

5 7. On or about April 30, 2026, Class Counsel supplemented the existing class data
6 with a list of fee class designations, and no new Settlement Class Members were added. The fee
7 class designations consisted of four categories (1) Late Fee Class, (2) RINCO Class, (3) Section
8 396 Class and (4) Tenant Protection Act Class.

9 8. In total, Angeion received four (4) separate Class Lists from Defendants' Counsel
10 and Class Counsel during the period from March 24, 2026, through April 30, 2026.

11 9. Angeion reviewed the data files and removed 17 duplicative records, resulting in
12 15,095 unique Settlement Class Members ("Class List"). Upon removal of duplicative records,
13 Angeion determined there were 11,877 unique email addresses, and 3,218 records contained names
14 and addresses, but no email addresses.

15 **DIRECT NOTICE**

16 **Email Notice**

17 10. Prior to disseminating notice, Angeion performed an email address update to help
18 ensure the accuracy of the recipient email addresses. This email cleansing process removed extra
19 spaces, and fixed common typographical errors in domain names. After the cleansing process, the
20 email addresses were subjected to an email validation process whereby each email address was
21 compared to known bad email addresses. Additionally, the email addresses were further verified
22 by contacting the Internet Service Provider ("ISP") to determine if the email addresses exist.

23 11. As a result of the email cleansing and validation process, Angeion identified 11,877
24 valid email addresses and 3,218 records with invalid or no email addresses. Of the 11,877 Class
25 Members with valid email addresses, 11,248 were Main Class Members and 629 were Collection
26 Class Members.

27 12. On May 6, 2026, Angeion caused Notice to be disseminated via email ("Email
28 Notice") to the 11,877 Class Members who had a valid email address on the Class List. True and

1 correct copies of the Email Notice sent to the Collections Class and Main Class are attached hereto
2 as **Exhibits A and B**, respectively.

3 13. Of the 11,877 Email Notices sent 10,805 were delivered and 1,072 bounced back
4 as undeliverable. Of the 1,072 Class Members whose Email Notice could not be delivered, 1,069
5 had a corresponding mailing address.

6 **Mailed Notice**

7 14. On May 6, 2026, Angeion caused Notice in the form of a postcard (“Postcard
8 Notice”) to be mailed via the United States Postal Service (“USPS”) first class mail, postage
9 prepaid, to 3,218 Class Members (“Mailing List”). Of the 3,218 with mailing addresses, 3,053
10 were Main Class members and 165 were Collections Class Members.

11 15. The Mailing List was comprised of 3,218 Class Members who either did not have
12 an email address or had an invalid email address. Thirteen (13) Class Member records were unable
13 to be mailed due to having invalid mailing addresses. True and correct copies of the Postcard
14 Notice sent to Collections Class Members and Main Class Members are attached hereto as
15 **Exhibits C and D**, respectively.

16 16. On May 19, 2026, Angeion caused the postcard notice to be mailed via the United
17 States Postal Service (“USPS”) first class mail, postage prepaid to the 1,069 Class members whose
18 Email notice was undeliverable and for whom Angeion had a corresponding mailing address
19 (“Email Follow up Mailing List”).

20 17. Prior to mailing, the Class Member addresses on the Mailing List were processed
21 through the USPS National Change of Address database to identify updated addresses for
22 individuals who have moved within the last four years and who filed a change of address card with
23 the USPS.

24 18. Postcard Notices that were returned by the USPS as undeliverable with a
25 forwarding address were re-mailed to that forwarding address. Postcard Notices that were returned
26 by the USPS without a forwarding address were subjected to an address verification search (“skip
27 trace”) in an attempt to locate an updated address. As a result of the above-described efforts, of
28 the 3,205 Postcard Notices, 1,460 were re-mailed to updated addresses.

1 **Reminder Email Notices**

2 19. On June 5, 2026, and on June 15, 2026, Angeion caused Reminder Notices to be
3 sent via email to Class Members who had not submitted a Payment Election or made a claim for
4 the additional \$50.00 allocated to the Collection Class members. A total of 22,600 Reminder
5 Notices were sent via email. True and correct copies of the Reminder Notices sent to Collections
6 Class Members and Main Class Members are attached hereto as **Exhibits E and F**, respectively.

7 **SETTLEMENT WEBSITE**

8 20. On May 5, 2026, Angeion activated the following case-specific website dedicated
9 to this Settlement: www.JRKClassActionSettlement.com (the “Settlement Website”). Class
10 Members were able to select a Payment Method election for their payment directly on the
11 Settlement Website, and Collection Class Members were able to submit a claim for additional
12 benefits. The Settlement Website also allowed Class Members to easily view general information
13 about this class action Settlement, review relevant Court documents, and view important dates and
14 deadlines pertinent to the Settlement. The Settlement Website also has a “Contact Us” page
15 whereby Class Members can send an email with any additional questions to a dedicated email
16 address, info@JRKClassActionSettlement.com. As of the date of this declaration, the Settlement
17 Website has received 2,607 website visits by 1,544 unique users totaling 9,111 pageviews.

18 **TOLL-FREE HOTLINE**

19 21. On May 5, 2026, Angeion activated the following toll-free number dedicated to this
20 Settlement: 1-844-900-4177. The toll-free hotline utilizes an interactive voice response (“IVR”)
21 system to provide Class Members with responses to frequently asked questions and provide
22 essential information regarding the Settlement. This hotline is accessible 24 hours a day, 7 days a
23 week. As of the date of this declaration, the toll-free hotline has received 121 calls totaling 483
24 minutes.

25 **CLAIM FORMS & PAYMENT METHOD ELECTION FORMS**

26 22. The deadline for Collection Class Members to submit a Claim Form was June 20,
27 2026. As of July 13, 2026, Angeion has received 105 Collections Class Member Claim Form
28 submissions. Angeion has also received a total of 1,403 Payment Method Election submissions.

1 Claim Form and Payment Method Election submissions are still subject to final audits, including
2 the full assessment of each claim's validity and a review for duplicate submissions.

3 **EXCLUSIONS & OBJECTIONS**

4 23. The deadline for Class Members to request exclusion from the Settlement was June
5 20, 2026. As of the date of this declaration, Angeion has received seven (7) timely requests for
6 exclusion from Andrew Mendoza, Na Young Lee, Victoria Rosado, Marianella Rosado, Nellissa
7 Young, Nicole Brisbois, and Griffin Poitevin.

8 24. The deadline for Class Members to object to the Settlement was June 20, 2026. As
9 of the date of this declaration, Angeion has not received and has not been made aware of any
10 written objections.

11
12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct. Executed this 13th day of July, 2026.

14
15 

16 _____
TIFFANY SUGRIM, Declarant

EXHIBIT A

To: [Class Member Email Address]
From: info@JRKClassActionSettlement.com
Subject: JRK Residential Group Class Action Settlement

«First Name» «Last Name»

Notice ID: «Notice ID»

Confirmation Code: «Confirmation Code»

Felker, et al. v. JRK Residential Group, Inc., et al
(Case No. SCV-267587)

**SUPERIOR COURT OF CALIFORNIA,
COUNTY OF SONOMA**

NOTICE OF PENDING CLASS ACTION AND PROPOSED SETTLEMENT

**READ THIS NOTICE FULLY AND CAREFULLY; THE PROPOSED SETTLEMENT
MAY AFFECT YOUR RIGHTS!**

IF YOU RENTED AN APARTMENT UNIT OPERATED BY JRK RESIDENTIAL GROUP, INC. AND/OR JRK PROPERTY HOLDINGS, INC., THEN YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS ACTION SETTLEMENT. RECORDS SHOW THAT YOU ARE ALSO BE ELIGIBLE FOR AN ADDITIONAL PAYMENT, IF YOU SUBMIT A CLAIM BY JUNE 20, 2026.

The Superior Court of The State of California, County of Sonoma authorized this Notice to be sent. This Notice is not an advertisement. This Notice is not a solicitation from a lawyer.

Records indicate that you were a tenant of one of the JRK California Apartments during a relevant time period. This Notice is to inform you of a proposed class action settlement and your legal rights.

In this class action lawsuit, Plaintiffs claim that the Defendants violated California law by: (1) charging tenants improper late fees; (2) charging tenants improper fees for not having renter's liability insurance; (3) raising rent more than allowed under the California Tenant Protection Act; and (4) raising rent more than 10 percent after 2017-2019 wildfire emergency proclamations in Los Angeles, Sonoma and Ventura Counties. JRK denies any wrongdoing and insists its practices were lawful.

There are four groups of "Class Members": (1) Late Fee Class: All tenants whose leases for JRK California Apartments provide for a late rent charge and who were charged that late charge on a net basis, from December 22, 2016 through June 27, 2024; (2) RINCO Class: All tenants whose leases for JRK California Apartments provide for a fee for a missing renter's liability insurance policy and who were charged that fee on a net basis, from December 22, 2016 through June 27,

2024; (3) Section 396 Class: All tenants (subject to exclusions) with initial lease terms of no longer than one year who were charged rental price increases of more than 10 percent for JRK California Apartments in Los Angeles, Sonoma or Ventura Counties during Wildfire Section 396 Protection Periods in those counties; (4) Tenant Protection Act (“TPA”) Class: All tenants (subject to exclusions) who from January 1, 2020, through June 27, 2024, were charged rent increases based on gross rental rates excluding discounts, incentives, concessions or credits for JRK California Apartments that exceeded Rental Rate Caps under the TPA. **Records show that you are a member of one or more Class Member groups.**

IMPORTANT: You have also been identified as a Collection Class Member. Collection Class Members are Class Members who are in collections for unpaid balances related to the JRK California Apartments and were sent to collections from January 1, 2022 to June 27, 2024. You are eligible for an additional \$50.00 payment from the settlement if submit a claim via **www.JRKClassActionSettlement.com** by **June 20, 2026** and do not opt-out of the settlement. This additional \$50.00 payment is in addition to your estimated settlement payment shown below. However, you will only receive this additional \$50.00 payment if you submit a claim by **June 20, 2026**. Please note that the settlement does not affect or reduce the amount of your unpaid balance. Regardless of whether you submit this form, remaining in the settlement means that you will give up certain rights. If you wish to retain all of your rights, you must opt out of the settlement by **June 20, 2026** according to the instructions provided at **www.JRKClassActionSettlement.com**.

The Court has preliminarily approved this settlement. It will hold a Final Approval Hearing in this case on **August 19, 2026 at 3:00 p.m.**, Superior Court of the State of California, County of Sonoma, Department 16, 3035 Cleveland Ave #200, Santa Rosa, CA 95403. At that hearing, the Court will consider whether to grant final approval of the settlement and whether to approve payment from the Settlement Fund of up to \$40,000 (\$10,000.00 each) to the Class Representatives for their services on behalf of the Class, attorneys’ fees (up to \$2,000,000), reimbursement of costs incurred by the attorneys (up to \$100,000), and payment of the settlement administration costs.

The Court appointed Erickson Kramer Osborne LLP, Law Office of Joshua Katz and Law Office of Todd Espinosa to represent all Class Members. You may hire your own lawyer to represent you at your own expense. The Court has also appointed Plaintiffs Sharon Felker, Herman Grishaver, Edgar Cruz Soriano and Jeanace Zetino as Class Representatives.

If the Court grants Final Approval of the settlement and you do not request to be excluded from the settlement, you will release your right to bring any claim covered by the settlement. In exchange, the Settlement Administrator will issue a monetary payment to you. **Your estimated settlement payment amount is \$** **.** You may select a payment method and update your address if necessary by visiting **www.JRKClassActionSettlement.com** or calling 1-844-900-4177.

To obtain a long form class notice, a copy of the full proposed settlement agreement, and other important documents, please visit www.JRKClassActionSettlement.com. Alternatively, you may call 1-844-900-4177.

If you do not want to participate in this settlement—which means you do not want to receive any payment and you do not want to be bound by any judgment entered in this case—you may exclude

*yourself by submitting an opt-out request postmarked by **June 20, 2026**. If you want to object to this settlement, you may object by submitting an objection postmarked no later than **June 20, 2026**. You may learn more about the opt-out and objection procedures by visiting **www.JRKClassActionSettlement.com** or by calling **1-844-900-4177**.*

EXHIBIT B

To: [Class Member Email Address]
From: info@JRKClassActionSettlement.com
Subject: JRK Residential Group Class Action Settlement

«First Name» «Last Name»

Notice ID: «Notice ID»

Confirmation Code: «Confirmation Code»

Felker, et al. v. JRK Residential Group, Inc., et al
(Case No. SCV-267587)

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Apartments in Los Angeles, Sonoma or Ventura Counties during Wildfire Section 396 Protection Periods in those counties; (4) Tenant Protection Act (“TPA”) Class: All tenants (subject to exclusions) who from January 1, 2020, through June 27, 2024, were charged rent increases based on gross rental rates excluding discounts, incentives, concessions or credits for JRK California Apartments that exceeded Rental Rate Caps under the TPA. **Records show that you are a member of one or more Class Member groups.**

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EXHIBIT C

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(Case No. SCV-267587)**

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JRK Class Action Settlement Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

Electronic Service Requested

Postal Service:

Notice ID:
Confirmation Code:

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EXHIBIT D

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Philadelphia, PA 19103

Electronic Service Requested

Postal Service: Please do not mark barcode

Notice ID:
Confirmation Code:

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EXHIBIT E

To: [Class Member Email Address]
From: info@JRKClassActionSettlement.com
Subject: REMINDER: JRK Residential Group Class Action Settlement

THIS IS A REMINDER EMAIL

«First Name» «Last Name»
Notice ID: «Notice ID»
Confirmation Code: «Confirmation Code»

**If you want to participate in the settlement, please log on to
www.jrkclassactionsettlement.com with your Notice ID and Confirmation
Code to choose how you want your settlement payment to be sent to you.**

Felker, et al. v. JRK Residential Group, Inc., et al
(Case No. SCV-267587)

**SUPERIOR COURT OF CALIFORNIA,
COUNTY OF SONOMA**

NOTICE OF PENDING CLASS ACTION AND PROPOSED SETTLEMENT

**READ THIS NOTICE FULLY AND CAREFULLY; THE PROPOSED SETTLEMENT
MAY AFFECT YOUR RIGHTS!**

**IF YOU RENTED AN APARTMENT UNIT OPERATED BY JRK
RESIDENTIAL GROUP, INC. AND/OR JRK PROPERTY HOLDINGS,
INC., THEN YOU MAY BE ENTITLED TO A PAYMENT FROM A CLASS
ACTION SETTLEMENT. RECORDS SHOW THAT YOU ARE ALSO BE
ELIGIBLE FOR AN ADDITIONAL PAYMENT, IF YOU SUBMIT A CLAIM
BY JUNE 20, 2026.**

The Superior Court of The State of California, County of Sonoma authorized this Notice to be sent. This Notice is not an advertisement. This Notice is not a solicitation from a lawyer.

Records indicate that you were a tenant of one of the JRK California Apartments during a relevant time period. This Notice is to inform you of a proposed class action settlement and your legal rights.

In this class action lawsuit, Plaintiffs claim that the Defendants violated California law by: (1) charging tenants improper late fees; (2) charging tenants improper fees for not having renter's liability insurance; (3) raising rent more than allowed under the California Tenant Protection Act; and (4) raising rent more than 10 percent after 2017-2019 wildfire emergency proclamations in

Los Angeles, Sonoma and Ventura Counties. JRK denies any wrongdoing and insists its practices were lawful.

There are four groups of “Class Members”: (1) Late Fee Class: All tenants whose leases for JRK California Apartments provide for a late rent charge and who were charged that late charge on a net basis, from December 22, 2016 through June 27, 2024; (2) RINCO Class: All tenants whose leases for JRK California Apartments provide for a fee for a missing renter’s liability insurance policy and who were charged that fee on a net basis, from December 22, 2016 through June 27, 2024; (3) Section 396 Class: All tenants (subject to exclusions) with initial lease terms of no longer than one year who were charged rental price increases of more than 10 percent for JRK California Apartments in Los Angeles, Sonoma or Ventura Counties during Wildfire Section 396 Protection Periods in those counties; (4) Tenant Protection Act (“TPA”) Class: All tenants (subject to exclusions) who from January 1, 2020, through June 27, 2024, were charged rent increases based on gross rental rates excluding discounts, incentives, concessions or credits for JRK California Apartments that exceeded Rental Rate Caps under the TPA. **Records show that you are a member of one or more Class Member groups.**

IMPORTANT: You have also been identified as a Collection Class Member. Collection Class Members are Class Members who are in collections for unpaid balances related to the JRK California Apartments and were sent to collections from January 1, 2022 to June 27, 2024. You are eligible for an additional \$50.00 payment from the settlement if submit a claim via **www.JRKClassActionSettlement.com** by **June 20, 2026** and do not opt-out of the settlement. This additional \$50.00 payment is in addition to your estimated settlement payment shown below. However, you will only receive this additional \$50.00 payment if you submit a claim by **June 20, 2026**. Please note that the settlement does not affect or reduce the amount of your unpaid balance. Regardless of whether you submit this form, remaining in the settlement means that you will give up certain rights. If you wish to retain all of your rights, you must opt out of the settlement by **June 20, 2026** according to the instructions provided at **www.JRKClassActionSettlement.com**.

The Court has preliminarily approved this settlement. It will hold a Final Approval Hearing in this case on **August 19, 2026 at 3:00 p.m.**, Superior Court of the State of California, County of Sonoma, Department 16, 3035 Cleveland Ave #200, Santa Rosa, CA 95403. At that hearing, the Court will consider whether to grant final approval of the settlement and whether to approve payment from the Settlement Fund of up to \$40,000 (\$10,000.00 each) to the Class Representatives for their services on behalf of the Class, attorneys’ fees (up to \$2,000,000), reimbursement of costs incurred by the attorneys (up to \$100,000), and payment of the settlement administration costs.

The Court appointed Erickson Kramer Osborne LLP, Law Office of Joshua Katz and Law Office of Todd Espinosa to represent all Class Members. You may hire your own lawyer to represent you at your own expense. The Court has also appointed Plaintiffs Sharon Felker, Herman Grishaver, Edgar Cruz Soriano and Jeanace Zetino as Class Representatives.

If the Court grants Final Approval of the settlement and you do not request to be excluded from the settlement, you will release your right to bring any claim covered by the settlement. In exchange, the Settlement Administrator will issue a monetary payment to you. **Your estimated**

settlement payment amount is \$. You may select a payment method and update your address if necessary by visiting www.JRKClassActionSettlement.com or calling 1-844-900-4177.

To obtain a long form class notice, a copy of the full proposed settlement agreement, and other important documents, please visit www.JRKClassActionSettlement.com. Alternatively, you may call 1-844-900-4177.

*If you do not want to participate in this settlement—which means you do not want to receive any payment and you do not want to be bound by any judgment entered in this case—you may exclude yourself by submitting an opt-out request postmarked by **June 20, 2026**. If you want to object to this settlement, you may object by submitting an objection postmarked no later than **June 20, 2026**. You may learn more about the opt-out and objection procedures by visiting www.JRKClassActionSettlement.com or by calling **1-844-900-4177**.*

EXHIBIT F

To: [Class Member Email Address]
From: info@JRKClassActionSettlement.com
Subject: REMINDER: JRK Residential Group Class Action Settlement

THIS IS A REMINDER EMAIL

«First Name» «Last Name»
Notice ID: «Notice ID»
Confirmation Code: «Confirmation Code»

If you want to participate in the settlement, please log on to www.jrkclassactionsettlement.com with your Notice ID and Confirmation Code to choose how you want your settlement payment to be sent to you.

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