

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST
LITIGATION (NO. II)**

**NO. 3:23-cv-03071
MDL No. 3071**

THIS DOCUMENT RELATES TO:

ALL CASES

REMAINING DEFENDANTS' JOINDER AND RESPONSE

On August 21, 2026, the Attorneys General for the District of Columbia, the Commonwealth of Kentucky, and the States of Maryland, New Jersey, and Washington (the “Five AGs”) filed a Motion to Intervene for the Limited Purpose of Participating in Final Approval Proceedings regarding the settlements with certain Defendants (the “Overlap Defendants”). Dkt. 1497. On September 25, 2026, the Overlap Defendants filed a response explaining—correctly—that the Five AGs’ request to participate in final approval proceedings “fail[s] on the merits because the Court has already rejected [it],” and asking the Court to “reaffirm its conclusion that the Overlap Defendants’ settlements permissibly release parens patriae claims for damages, restitution, and disgorgement,” and “enjoin the Five AGs from seeking recovery for those released claims.” Dkt. 1550 at 1, 16 (the “Response”).

The undersigned Remaining Defendants¹ join in the Overlap Defendants’ Response and further respond to emphasize the unique impact of the Five AGs’ arguments on Remaining Defendants’ consideration of potential settlements with the Class Plaintiffs. Like the Overlap

¹ The undersigned Remaining Defendants are RealPage, Inc.; Morgan Properties Management Company, LLC; Independence Realty Trust, Inc.; UDR, Inc.; Thoma Bravo L.P.; Thoma Bravo Fund XIII, L.P.; and Thoma Bravo Fund XIV, L.P.

Defendants, the Remaining Defendants do not oppose the Five AGs' limited request to intervene. However, as the Overlap Defendants acknowledge, the Five AGs reargue virtually all of the same points they have already briefed multiple times. As this Court has already recognized, crediting these arguments "would lead to confusion and chaos" and "imped[e] settlements because Defendants could not obtain certainty and closure on class members' damages claims." Dkt. 1463. Accordingly, the Court should deny the Five AGs' Motion and reaffirm that the Overlap Defendants' settlements permissibly release parens patriae claims—for damages, restitution, and disgorgement—and enjoin the Five AGs from seeking recovery for those released claims. Accordingly, the undersigned Remaining Defendants hereby join the Response.²

² Remaining Defendants' joinder of the Response is limited to the context of settlement. For the avoidance of doubt, Remaining Defendants dispute Plaintiffs' claims and dispute that any litigation class can or should be certified in this case.

DATED: September 25, 2026

Respectfully submitted,

/s/ Jay Srinivasan

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CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2026, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Jay P. Srinivasan

Jay P. Srinivasan