

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

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

**Case No. 3:23-md-3071
MDL No. 3071**

Judge Waverly D. Crenshaw, Jr.

**This Document Relates to:
ALL CASES**

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs Jason Goldman, Jeffrey Weaver, Billie Jo White, Brandon Watters, Priscilla Parker, Patrick Parker, Barry Amar-Hoover, Joshua Kabisch, Meghan Cherry, and Maya Haynes respectfully move the Court to certify this matter as a class action under Rule 23 of the Federal Rules of Civil Procedure. Specifically, Plaintiffs request that the Court certify the class defined in **Appendix A** hereto (the "Class") under Rule 23(b)(3) as to damages and under Rule 23(b)(2) as to injunctive relief. Plaintiffs also request that the Court appoint Plaintiffs as Class Representatives and, under Rule 23(g), appoint Patrick Coughlin of Scott+Scott Attorneys at Law, LLP, Stacey Slaughter of Robins Kaplan LLP, and Swathi Bojedla of Hausfeld LLP as Co-Lead Counsel for the Class.

This Motion is supported by the accompanying Memorandum of Law and the Declaration of Swathi Bojedla with all accompanying exhibits.¹ For the reasons set forth in the Memorandum, the proposed Class meets the requirements of Rule 23(a), 23(b)(3), and 23(b)(2). Plaintiffs

¹ All exhibit references in Plaintiffs' Memorandum of Law refer to the exhibits attached to the Bojedla Declaration.

accordingly request that the Court grant the Motion, certify the Class, appoint Plaintiffs as Class Representatives, and appoint Co-Lead Counsel for the Class.

Dated: October 2, 2026

Respectfully submitted,

/s/ Anthony A. Orlandi

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Plaintiffs' Steering Committee Counsel for Plaintiffs

APPENDIX A

Class Definition

All persons and entities in the U.S. and its territories who paid rent on at least one Multifamily Rental² unit in the Core Based Statistical Areas listed below directly to any owner, manager and/or owner operator (including to any division, subsidiary, predecessor, agent or affiliate of any owner, manager and/or owner-operator) on a property subject to a license for RealPage's RMS—Lease Rent Options, YieldStar and/or AI Revenue Management—during the period of October 18, 2018 through July 31, 2024:

Atlanta-Sandy Springs-Roswell, GA
Austin-Round Rock-San Marcos, TX
Baltimore-Columbia-Towson, MD
Baton Rouge, LA
Birmingham, AL
Boston-Cambridge-Newton, MA-NH
Bridgeport-Stamford-Danbury, CT
Charleston-North Charleston, SC
Charlotte-Concord-Gastonia, NC-SC
Chattanooga, TN-GA
Chicago-Naperville-Elgin, IL-IN
Colorado Springs, CO
Dallas-Fort Worth-Arlington, TX
Denver-Aurora-Centennial, CO
Durham-Chapel Hill, NC
Greensboro-High Point, NC
Greenville-Anderson-Greer, SC
Houston-Pasadena-The Woodlands, TX
Jacksonville, FL
Las Vegas-Henderson-North Las Vegas, NV
Los Angeles-Long Beach-Anaheim, CA
Miami-Fort Lauderdale-West Palm Beach, FL
Mobile, AL
Nashville-Davidson-Murfreesboro-Franklin, TN
North Port-Bradenton-Sarasota, FL
Orlando-Kissimmee-Sanford, FL
Oxnard-Thousand Oaks-Ventura, CA
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
Phoenix-Mesa-Chandler, AZ
Portland-Vancouver-Hillsboro, OR-WA
Raleigh-Cary, NC
Richmond, VA

² Professionally managed conventional multifamily rental properties with 50 or more rental units, excluding other types of multifamily rental housing, such as student housing, military housing, senior living, and 100 percent affordable or Section 8 housing.

Riverside-San Bernardino-Ontario, CA
Sacramento-Roseville-Folsom, CA
Salt Lake City-Murray, UT
San Antonio-New Braunfels, TX
San Diego-Chula Vista-Carlsbad, CA
San Francisco-Oakland-Fremont, CA
San Jose-Sunnyvale-Santa Clara, CA
Santa Rosa-Petaluma, CA
Savannah, GA
Seattle-Tacoma-Bellevue, WA
Shreveport-Bossier City, LA
Tampa-St. Petersburg-Clearwater, FL
Tucson, AZ
Washington-Arlington-Alexandria, DC-VA-MD-WV
Worcester, MA

Specifically excluded from this Class are Opt-Outs; Plaintiffs' and Defendants' attorneys and staff; Plaintiffs' and Defendants' experts and their staff; Defendants; any entity licensing RealPage's RMS, the officers or directors of any entity licensing RealPage's RMS and any entity in which any entity licensing RealPage's RMS has a controlling interest; any affiliate, legal representative, heir or assign of any entity licensing RealPage's RMS; federal, state, or local governments; states and their subdivisions, agencies, and instrumentalities; any judicial officer presiding over this Action and the members of his/her immediate family and judicial staff; and any juror assigned to this Action.

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 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/ Anthony A. Orlandi
Anthony A. Orlandi