

DOCKET NO.: X10-UWY-CV-22-6068623-S : **SUPERIOR COURT**
LATASHA HARRIS, ET AL. : **COMPLEX LITIGATION**
V. : **DOCKET**
: **AT WATERBURY**
THE RELATED COMPANIES, INC., ET AL. : **April 18, 2024**

MOTION ON CONSENT TO MODIFY SCHEDULE

The Plaintiffs move to modify the schedule outlined in the Court’s preliminary approval of the Settlement. All parties consent to the granting of this motion. In support of this Motion, the Plaintiffs show the Court as follows:

1. On February 27, 2024, the Plaintiffs filed their Consent Motion for Preliminary Approval of Class Action Settlement (doc no. 130.00). The Court granted the motion on the same date.
2. Since then, the Defendants have provided the Settlement Administrator with contact information for known class members. Counsel and the settlement administrator have now concluded the organization of the data and diligently searched for and located each class member’s address to ensure proper delivery. The process involved removing duplicates on the rent rolls, determining if individuals were enrolled at multiple apartments simultaneously, and determining majority status during the class period for certain class members.
3. In the interim, the time frame for sending the notices has passed, and therefore, the schedule needs to be modified.

WHEREFORE, the Plaintiffs respectfully request that the Court grant the foregoing Motion to Modify the schedule and impose the following deadlines:

Event	Date
Defendants to provide contact information for known class members to Settlement Administrator	Completed
Settlement Administrator Sends Notice (“Notice Date”)	No later than 14 days after entry of this Motion to Modify
Opt-Out or Objection Deadline	June 10, 2024
Defendants’ Opt-Out Termination Rights Deadline	Within 10 days of an event described in Paragraph 26 of the Settlement Agreement
Motion for Final Settlement Approval Due	June 12, 2024
Final Approval Hearing	July 2, 2024
Effective Date	Seven days after expiration of all rights of appeal or review
Settlement Funding Date	Ten days after Effective Date
Base Payment Claim Form Deadline	Seven days after Settlement Funding Date
Base Payments Sent to Class Members Who Submit Forms	Seven days after Base Payment Claim Form Deadline
Payment of Class Counsel Fees	Settlement Funding Date
Special Masters Begins Determining Enhanced Awards	As soon as practicable after the Claim Form Deadline

**THE PLAINTIFFS,
LATISHA HARRIS, et. al.**

By: /s/Amity L. Arscott
Amity L. Arscott, Esq.
Embry Neusner Arscott & Shafner, LLC
118 Poquonock Road
P.O. Drawer 1409
Groton, CT 06340
alarscott@embryneusner.com

By: /s/

David N. Rosen
Kalind Parish
David Rosen & Associates, P.C.
400 Orange Street
New Haven, CT 06511
drosen@davidrosenlaw.com
kparish@davidrosenlaw.com

CERTIFICATION

I certify that a copy of the above was delivered electronically on this 18th day of April 2024 to all counsel of record as follows:

Marc J. Kurzman
Fatima Lahnin
Carmody Torrance Sandak & Hennessey LLP
1055 Washington Boulevard
4th Floor
Stamford, CT06901
Email Address: mkurzman@carmodylaw.com; flahnin@carmodylaw.com

/s/ Amity L. Arscott
Amity L. Arscott