

Date of Notice: April 17, 2023

**BY ORDER OF THE CIRCUIT COURT FOR
ANNE ARUNDEL COUNTY, MARYLAND**

Notice of Proposed Class Action Settlement and Final Hearing for Settlement Class

If eWrit Filings, LLC sued you for Failure To Pay Rent in Maryland state courts at any time from August 26, 2017 to April 3, 2018, a class action lawsuit may affect your rights.

A court authorized this notice. This is not a solicitation from a lawyer.

- Leslie Williams (“Named Plaintiff”) sued Defendant eWrit Filings, LLC. (“eWrit”) alleging that eWrit acted as a collection agency without a license when it sued you and other Maryland consumers.
- Leslie Williams filed this action on her own behalf and on behalf of all others against whom eWrit Filings, LLC filed a Failure To Pay Rent petition in Maryland state courts at any time from August 26, 2017 to April 3, 2018.
- The Court has not made any determination whether eWrit violated the law by filing the petitions without being a licensed collection agency. eWrit denies that it did anything wrong.
- To resolve this matter now without the need for further litigation, the Parties have reached settlement terms that affect a “Settlement Class”. The Settlement Class is comprised of the following persons:

All individuals against whom eWrit filed a Failure To Pay Rent petition in Maryland state courts at any time from August 26, 2017 to April 3, 2018.

The Settlement affects the rights of any member of the Settlement Class. There are at least 30,000 (thirty thousand) members of the class.

Under the settlement, eWrit has agreed to make a payment in the amount of \$415,000 (four hundred fifteen thousand dollars) to a common fund. The common fund will be used to pay the costs of administration, an incentive fee to the Plaintiff Leslie Williams and her counsel’s attorneys fees and costs. The balance of the payment shall be paid to Arundel Community Development Services, Inc. The reason the funds will be paid to Arundel Community Development Service, Inc. is because the costs of mailing notices to each class member, and the cost of distributing the funds that are available will reduce any direct payment to class members to such a small amount to each class member, that the costs to do so is not warranted.

- On March 16, 2023, the Court preliminarily certified this case to proceed as a “Settlement Class” and authorized the posting of this notice in the District Courts for the State of Maryland. This notice informs Settlement Class members about the

proposed settlement. This affects the rights of Settlement Class Members and provides any Settlement Class member different choices. These choices are explained below.

YOUR LEGAL RIGHTS ARE AFFECTED, AND YOU HAVE A CHOICE TO MAKE NOW:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

DO NOTHING: If you do nothing, you will be a member of the Settlement Class and any right to pursue claims against eWrit will be released. You will not receive any payment for the reason set out above.

ASK TO BE EXCLUDED: Settlement Class Members may ask to be excluded from this settlement. To validly request exclusion from the Settlement Classes, a person must personally sign, date, and send a written request to opt out stating, “I have reviewed the Class Settlement Notice and wish to exclude myself from the Settlement Class in Williams v. eWrit, Case No. C-02-CV-20-001655” (or substantially similar clear and unambiguous language) to:

Plaintiff/Class Counsel:

Peter Holland,
THE HOLLAND LAW FIRM, P.C.
914 Bay Ridge Rd. Ste 230
Annapolis, MD 21403

The written request for exclusion must be mailed no later than 30 (thirty) days before the Fairness Hearing (i.e. by May 15, 2023), and must include the person’s name, address, telephone number and a “wet” signature not affixed via electronic means. If a question is raised about the authenticity of an exclusion request, the Parties will have the right to demand additional proof of the individual’s identity and intent. The Parties retain discretion to determine whether any exclusion request substantially complies with the requirements above.

Sending a written request to be excluded from the Settlement Class does not guarantee that you will be excluded. Requests to be excluded will be reviewed for their validity.

If you do not exclude yourself from the Settlement Class, the settlement (if approved) will release all of your legal claims and will affect your right to start or continue any other lawsuit or proceeding against eWrit, its officers, employees, agents or insurers.

OBJECT: If you are a member of the Settlement Class, you have the right to object to the terms of the settlement. If you request to be excluded, you do not have the right to object. A Settlement Class Member who wishes to object to any aspect of the settlement must do so no more than 30 (thirty) days before the Fairness Hearing (i.e. by May 15, 2023), and must file with the Court a written statement of the objection(s) and serve the objection(s) on Class Counsel (name and address above) and eWrit’s counsel. The written statement of objection(s) must include: (1) a statement as to whether it applies only to the objector or to the entirety of the Settlement Class, and also state with specificity the grounds for the objection(s), including any evidence and legal

authority the Settlement Class Member wishes to bring to the Court's attention; (2) the Settlement Class Member's printed name, address, and telephone number; (3) the date eWrit filed a petition against the Settlement Class Member; (4) a statement that the Settlement Class Member has reviewed the relevant Settlement Class definition and has not opted out of the Settlement Class; (5) any supporting papers, materials, or briefs the Settlement Class Member wishes the Court to consider when reviewing the objection; (6) a statement of whether the Settlement Class Member intends to appear at the final approval hearing; and (7) a dated "wet" signature not affixed by electronic means.

Objections must also be filed with the Civil Clerk's Office of the Circuit Court for Anne Arundel County, Maryland located at 8 Church Circle, Annapolis, MD 21401 by the deadline.

Objections must also be sent to Class Counsel and eWrit's Counsel at the following addresses:

Class Counsel: Peter Holland, THE HOLLAND LAW FIRM, P.C., 914 Bay Ridge Rd. Ste 230 Annapolis, MD 21403

eWrit's Counsel: Michael Blumenfeld, 100 S Charles St Suite 1600, Baltimore, MD 21201.

You may submit a written statement of objection(s) on your own behalf or through a lawyer hired at your expense.

If you file an objection, you will also need to attend the final approval hearing, or the Court may not consider your objections. The final hearing is set for June 14, 2023, at 9:00 a.m. Eastern time, at the Circuit Court for Anne Arundel County:

Circuit Court for Anne Arundel County
8 Church Circle
Annapolis, Maryland 21401

You only have the right to object to the settlement if you do not request to be excluded. If you request to be excluded, you do not have the right to object.

For more information, you may contact Class Counsel, Peter Holland in writing at his above address or by phone at (410) 280-6133 or by mail: peter@hollandlawfirm.com. Please reference the Williams v. eWrit Case when contacting class counsel. Class counsel is being paid from the Settlement Funds.

IN THE CIRCUIT COURT FOR
ANNE ARUNDEL COUNTY, MARYLAND

LESLIE WILLIAMS

Plaintiff,

v.

EWBIT FILINGS, LLC

Defendant.

Case No.: C-02-CV-20-001655

~~PROPOSED~~ ORDER GRANTING PRELIMINARY APPROVAL
TO PROPOSED CLASS SETTLEMENT

The parties to the above-captioned action have submitted a Consent Motion for entry of an Order determining certain matters in connection with the proposed Settlement of this class action, pursuant to the terms of the Settlement Agreement reached by the parties and presented to the Court for approval (hereinafter, the "Stipulation"). After consideration of the Stipulation and the exhibits annexed thereto, and after due deliberation and consideration of the totality of the circumstances and the record, and for good cause shown, it is hereby

ORDERED, ADJUDGED, and DECREED as follows:

1. **Defined Terms:** This Court adopts the defined terms set forth in Paragraph 7 of the Stipulation for purposes of this Order, unless otherwise specified herein.

2. **Preliminary Approval of Settlement:** The terms of the Stipulation are **preliminarily approved**, subject to further consideration at the Fairness Hearing provided for below. The Court concludes that the proposed Settlement is sufficiently within the range of reasonableness to warrant the conditional certification

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of the Settlement Class, the scheduling of the Fairness Hearing, and the circulation of the Notice to the Settlement Class, each as provided for in this Order.

3. **Conditional Certification for Settlement Purposes:** For purposes of Settlement only, pursuant to Rule 2-231, the Settlement Class is conditionally certified as follows:

All individuals against whom eWrit filed a Failure To Pay Rent petition in Maryland state courts at any time from August 26, 2017 to April 3, 2018

Leslie Williams, is conditionally certified as representative of the Settlement Class defined above, and Peter A. Holland, Emanwel J. Turnbull and Scott C. Borison are appointed as Class Counsel. This conditional certification of the Settlement Class and Class Representative, and appointment of Class Counsel, are solely for purposes of effectuating the proposed Settlement. If the Stipulation is terminated or is not consummated for any reason, the foregoing conditional certification of the Settlement Class and appointment of the Class Representative shall be void and of no further effect, and the parties to the proposed Settlement shall be returned to the status each occupied before entry of this Order, without prejudice to any legal argument that any of the parties to the Stipulation might have asserted but for the Stipulation.

Based on the Court's review of the Joint Motion and supporting materials, the Court conditionally finds that the proposed Settlement Class satisfies Rule 2-231 in that:

a. The Settlement Class, which consists of thousands of individuals, is so numerous that joinder of all persons who fall within the Settlement Class definition is impracticable;

b. The commonality requirement is satisfied where members of the Settlement Class share at least one common legal or factual issue. Here, there are questions of law and fact common to the Settlement Class, including allegations related to the alleged violations of the Maryland Consumer Debt Collection and Maryland Consumer Protection Acts;

c. The claims of the Class Representative are typical of the claims of the Settlement Class; and

d. The Class Representative will fairly and adequately protect the interests of the Settlement Class and is represented by qualified counsel who are competent to represent the Settlement Class.

The Court further conditionally finds that the proposed Settlement Class satisfies Rule 2-231(b) and (c), which requires that common issues predominate and that a class action is superior to other available methods for the fair and efficient resolution of this controversy. The Court notes that because the litigation is being settled, rather than litigated, it need not consider the manageability issues that would be presented by this litigation.

4. **Fairness Hearing:** A Fairness Hearing shall take place at 9:00 a.m. on June 14 2023 to determine:

a. whether the Court should finally certify the Settlement Class and whether the Class Representative and Class Counsel have adequately represented the Settlement Class;

b. whether the proposed Settlement, on the terms and conditions provided for in the Stipulation, should be finally approved by the Court as fair, reasonable, and adequate;

c. whether the Released Claims of the Settlement Class Members in this Lawsuit should be dismissed on the merits and with prejudice;

d. whether the application for attorneys' fees, costs, expenses, and class representative incentive award submitted by Class Counsel should be approved; and

e. such other matters as the Court may deem necessary or appropriate.

5. **Approval with Modifications:** The Court may finally approve the proposed Stipulation at or after the Fairness Hearing with any modifications agreed to by eWrit and the Class Representative and without further notice to the Settlement Class.

6. **Right to Appear and Object:** Settlement Class Members shall have the right to appear and show cause, if they have any, why the terms of this Stipulation should not be given Final Approval by the Court.

a. Any objection must be submitted in writing, must be filed with the Court, and must be served by mail to Class Counsel and Defense Counsel at the addresses set forth in the Settlement Notice, no later than thirty (30) days before the Fairness Hearing.

b. Settlement Class Members may object either on their own or through an attorney hired at their own expense. If a Settlement Class Member hires an attorney to represent him or her at the Fairness Hearing, he or she must do so at his or her own expense.

c. Any objection regarding or related to the Stipulation or Settlement: (1) shall contain a caption or title that identifies it as "Objection to Class

Settlement in *Williams v. eWrit Filings, LLC*, Case No: C-02-CV-20-001655”; (2) shall contain information sufficient to identify the objecting Settlement Class Member, including the objecting Settlement Class Member’s name, address, telephone number, email address, and the contact information for any attorney retained by the Settlement Class Member in connection with the objection; (3) shall contain a clear, concise, and detailed statement of each objection the Settlement Class Member is making, the facts supporting each objection, the legal basis on which each objection is based, and the relief the objecting Settlement Class Member is requesting; (4) shall contain a statement of whether the objecting Settlement Class Member intends to appear, either in person or through counsel, at the Final Approval Hearing; (5) shall contain, if the objecting Settlement Class Member objects through or intends to appear through counsel, the counsel’s name, address, phone number, email address, and any Points and Authorities in support of the objecting Settlement Class Member’s objections upon which the objecting Settlement Class Member will rely; and (6) shall contain a list of and copies of all exhibits that the objecting Settlement Class Member may seek to use at the Final Approval Hearing. If the objecting Settlement Class Member intends to request the Court allow the Settlement Class Member to call witnesses at the Final Approval Hearing, the objecting Settlement Class Member must provide a list of any such witnesses together with a brief summary of each witness’ expected testimony at least thirty (30) days prior to the Final Approval Hearing.

d. Any Settlement Class Member who fails to comply with the Procedures for Presenting Objections described herein shall waive and forfeit any and all rights he or she may have to appear separately and/or to object, and shall be bound by all the terms of this Settlement upon Final Approval and by all proceedings, orders

and judgments, including, but not limited to, the Release in the Lawsuit.

7. **Notice.** Notice shall be provided by posting in the District Courts for the State of Maryland as permitted by the Chief Judge of the Maryland District Court. The costs of providing notice shall be paid as set forth in the Settlement Agreement, and the Notice shall be sent no later than 30 days after the entry of this Order. The Court finds that the form and method of providing notice is the best practicable under the circumstances and, if carried out, shall constitute due and sufficient notice of Rule 2-231 and the Due Process Clause of the United States Constitution.

8. **Ability of Class Members to Opt Out.** All putative Settlement Class Members who wish to opt out of the Settlement Class must do so by sending a written request for exclusion to Class Counsel and Defense Counsel by first-class mail as outlined in the Notice, signed by the putative Settlement Class Member, and providing all required information. To be considered timely, and thereby effectively exclude a person from the Settlement Class, the envelope delivering a completed opt out request must be received no later than 30 days before the Fairness Hearing (the "Opt Out Deadline"). At the Fairness Hearing, Class Counsel and Defense Counsel shall file an Affidavit or Declaration attaching a final list of all opt out requests filed by the Opt Out Deadline.

Any putative Settlement Class Member who does not properly and timely request exclusion from the Settlement Class shall be included in such Settlement Class and, if the proposed Settlement is approved and becomes effective, shall be bound by all the terms and provisions of the Stipulation, including but not limited to the releases, waivers, and covenants not to sue described therein, whether or not such person shall have objected to the Settlement.

9. **Appearance by Settlement Class Member.** Any Settlement Class Member may enter an appearance in this litigation, at his, her, or its own expense, individually or through counsel of his, her, or its own choice. Any Settlement Class Member who does not enter an appearance will be represented by Class Counsel.

10. **No discovery of settlement materials.** No discovery with regard to the proposed Settlement or the Stipulation shall be permitted as to any of the settling parties other than as may be directed by the Court upon a proper showing by the party seeking such discovery.

11. **No Admission.** Neither the Settlement nor the Stipulation shall constitute an admission, concession, or indication of the validity of any claims or defenses in the Lawsuit, or of any wrongdoing, liability or violation by eWrit, which vigorously denies all of the claims and allegations raised in the Lawsuit.

It is so ORDERED.

Date: 3/16/23


CIRCUIT JUDGE, Steven I. Platt (Ret.)