

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

ELECTRONICALLY FILED  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN BERNARDINO  
SAN BERNARDINO DISTRICT  
3/12/2025 12:07 PM  
By: Jani Urbano, DEPUTY

ANNE MOULTON, individually and on  
behalf of all other persons similarly situated,

Plaintiff,

v.

UNITED DOMINION REALTY, L.P., UDR,  
INC.; and DOES 1-100, inclusive.

Defendants.

Case No. CIVSB 2123480

**SUPPLEMENTAL DECLARATION OF  
JESSIE MONTAGUE**

1. My name is Jessie Montague, and I am over the age of eighteen (18) years. I make this declaration under the penalty of perjury, free and voluntarily, under no coercion, threat, or intimidation, and without promise of benefit or reward, based on my own personal knowledge. If called to testify, I could and would testify consistent with the matters stated herein.

2. I am the Senior Project Manager for RG/2 Claims Administration LLC (“RG/2 Claims”), whose address is 30 South 17<sup>th</sup> Street, Philadelphia, PA 19103, the independent third-party settlement administrator retained as Claims Administrator to handle various settlement administration activities in the above-referenced matter, including, but not limited to, mailing of settlement notification packages to Class Members, Claim Form collection and review, claimant correspondence, and distribution.

3. RG/2 Claims is a full-service class action settlement administrator offering notice, claims processing, allocation, distribution, tax reporting, and class action settlement consulting services. RG/2 Claims’ experience includes the provision of notice and administration services for settlements arising from antitrust, data security breach, consumer, civil rights, employment, negligent disclosure, and securities fraud allegations. Since 2000, RG/2 Claims has administered and distributed in excess of \$2 billion in class action settlement proceeds.

4. I have been actively involved and responsible for handling the administration of the settlement of the above-referenced matter.

5. The Notice of Settlement informed Settlement Class Members of, among other things, their right to opt-out and not participate in the Settlement, provided the request is postmarked by March 3, 2025. As of March 11, 2025, RG/2 Claims has received one (1) Opt-Out request. A copy of the Opt-Out request is attached hereto as “**Exhibit A**”.

6. The Notice of Settlement also informed Class Members of their right to object to the Settlement provided the request is postmarked by March 3, 2025. To date, RG/2 Claims has not received or been advised of any objections to the Settlement, to the request for fees and expenses identified in the Notice, or to the Class Representatives’ requested incentive award.

7. As of March 11, 2025, RG/2 Claims has received and processed 896 Claim Forms from Settlement Class Members. The deadline to file a claim was March 3, 2025. RG/2 Claims anticipates that additional claim forms may be received after the Claims Deadline that are postmarked on or before the Claims Date.

8. I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of March 2025.

  
\_\_\_\_\_  
Jessie Montague

# **EXHIBIT A**



Jeffrey M. Singletary  
Snell & Wilmer, L.L.P.  
600 Anton Blvd.,  
Suite 1400  
Costa Mesa, CA 92626

Subject: REQUEST FOR EXCLUSION; Moulton v. United  
Dominion Reality - Residential Late Fee Settlement Case

Per Claims Administration's request, based upon my situation  
of not being charged late fees, which disqualifies me from  
being part of this class action settlement case, I am  
requesting exclusion from the above mentioned case.

Thank you for your assistance.



Kathleen Irish

920 Irvine Avenue, #B309  
Newport Beach, California 92663