

By Order of the U.S. District Court for the District of Maryland

If you were assessed a collection agency fee by Greenbrook Village HOA a class action lawsuit may affect your rights.

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

- STEWART ALLEN sued Majerle Management, Inc and Cameron Mericle, P.C. alleging that they violated state and federal law by collecting late fees that were not expressly allowed by Greenbrook's governing documents.
- Defendants denied liability and assert that the "late fees" were intended to cover those MMI collection costs that were passed back to owners.
- The Court has allowed the lawsuit to proceed as a class action for the purposes of settlement on behalf of:

All members of Greenbrook HOA from whom Defendants attempted to collect an alleged late fee from June 1, 2017 to the present. The class and settlement excludes individuals who previously entered into a release that released such claims. The class and settlement individuals who filed bankruptcy and was discharged after their last fee.

- The Court has not made a determination in the suit but the Plaintiffs and the Defendants have agreed to a settlement that provides that the Defendants will pay \$50,000.00 into a common fund. That money will go to pay for the following things, in this order:
 - Attorneys' fees (subject to court approval): \$16,500.00
 - Class Representative's Award (subject to court approval): \$3,000.00
 - The costs of class administration (estimated): \$6,500
 - A refund of all late fees assessed to class members: \$3,797.47
 - An equal payment to each class member (estimated): \$150 per member

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 receive the benefit of the settlement described above upon final approval of the Court.

ASK TO BE EXCLUDED: You can ask to be excluded from the lawsuit by giving a written notice stating that you want to be excluded and delivering a copy to that notice to Allen v MMI, c/o Settlement Administrator, PO Box 23698, Jacksonville, FL 32241-3698, no later than May 23, 2023, stating that you want to be excluded. You will need to include your name, address and telephone number. You may be asked to provide documentation that you are a member of the class.

OBJECT: You can object to the Class Settlement if you do not ask to be excluded from the Class. Any objection must be filed no later than May 28, 2023.

- Your options are explained in this notice.
- **Any questions? Read on.**

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BASIC INFORMATION

1. Why did I get this notice?

Records show that you were assessed a “late fee” in the form of a “collection agency Fee” by Majerle Management, Inc. on behalf of Greenbrook. This notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you. You have legal rights and options that you may exercise before the Court enters a final judgment. The lawsuit is known as *Allen v. Majerle Management, Inc.*, Case No. 8:21-cv-00650, which is publicly available through the Court or through the PACER system.

2. What is this lawsuit about?

This lawsuit is about whether the Defendants violated consumer protection laws by trying to

collect a late fee. The Defendants deny that they violated any laws.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives” (in this case Stewart Allen) sue on behalf of other people who have similar claims. The people together are a “Class” or “Class Members.” Stewart Allen, who sued, and all the Class Members like him, are called the Plaintiffs. The persons they sued (in this case Majerle Management, Inc. and Cameron Mericle, P.C.) are called Defendants. The court resolves the issues for everyone in the Class, except for those people who choose to exclude themselves from the Class. In this case there has been no determination but the parties have agreed to settle the claims.

4. Why is this lawsuit a class action?

The Court permitted this case to proceed as a class action for settlement purposes. The court found that the case met the requirements of the Federal Rules of Civil Procedure, which governs class actions before Federal Courts. Specifically, the Court found that:

- There are a sufficient number of people who fell within the definition of the Class;
- There are legal questions and facts that are common to each of them;
- Stewart Allen’s claims are typical of the claims of the rest of the Class;
- Stewart Allen and his lawyers, Peter A. Holland and Emanwel Turnbull of the Holland Law Firm, P.C., and Scott C. Borison of the Borison Firm, LLC, representing the Class, will fairly and adequately represent the Class’s interests;
- The common legal questions and facts are more important than questions that affect only individuals; and
- This class action will be more efficient than having many individual lawsuits.

THE CLAIMS IN THE LAWSUIT

5. What does the lawsuit complain about?

In the lawsuit, the Plaintiff says that the Defendants violated consumer protection laws when it filed documents in debt collection lawsuits that were misleading.

6. How do the Defendants answer?

The Defendants deny that they did anything wrong.

7. Has the Court decided who is right?

The Court hasn’t decided whether the Plaintiff or the Defendants are correct. The Court has certified a class for settlement purposes and has made no determination as to the merits of the claims.

8. What is the Settlement?

The Defendants have agreed to pay \$50,000.00 to be distributed as set out at the beginning of this notice. The exact amount you may receive from the settlement depends on whether the court awards the amounts approved and whether other members of the class choose not to be part of the settlement.

WHO IS IN THE CLASS

You need to decide whether you are affected by this lawsuit.

9. Am I part of this Class?

The class consists of all persons in the State of Maryland, who, were members of Greenbrook Village HOA and were assessed a late fee on or after June 1, 2017. People who have already given

up their claims against Defendants before this settlement are not included. People who filed for and received a bankruptcy discharge after the fee was assessed and before this settlement are not included.

10. I'm still not sure if I'm included.

If you are still not sure whether you are included, you can get free help by calling or writing to the lawyers in this case at:

Peter A. Holland
Emanwel J. Turnbull
The Holland Law Firm, P.C.
914 Bay Ridge Rd, Ste. 230
Annapolis, MD 21403
Telephone: 410-280-6133

YOUR OPTIONS

You have to decide whether you want to join in the class or not join the class, and you have to decide this now.

11. What do I do to be included?

To be included as a class member you do not have to do anything.

12. What happens if I do nothing at all?

You will be included in the class and receive the benefits of the settlement.

13. What if I do not want to be included?

If you do not want to be included, then you must provide a written notice setting forth your name, address and a statement that "I do not want to be included." The notice must be sent no later than May 23, 2023 and sent to Allen v MMI, c/o Settlement Administrator, PO Box 23698, Jacksonville, FL 32241-3698. If you timely elect not to participate, then you may pursue your own claims at your own expense.

14. How do I object?

If you timely elect to be included in the class and want to object to the settlement, you will need to file written objections to the settlement signed by you (or your attorney) with the Court no later than May 28, 2023. Your written objection should reference the case of *Allen v. Majerle Management, Inc., et al*, Case No. 8:21-cv-00950, and be filed in the U.S. District Court for the District of Maryland, by this deadline. Documents submitted that do not comply with applicable rules, including local rules of the Court, may be rejected by the Clerk of the Court. You must also mail a copy of any written objections to each of the following counsel:

Peter A. Holland
Emanwel J. Turnbull
The Holland Law Firm, P.C.
914 Bay Ridge Rd, Ste. 230
Annapolis, MD 21403

Counsel for Plaintiffs

Matthew Berkowitz
Carr Maloney, P.C.
2000 Pennsylvania Ave NW,
Ste. 8001
Washington, DC 20006

Counsel for Defendant

Anne Howard
Budow & Noble, P.C.
Twinbrook Metro Plaza
12300 Twinbrook Pkwy.,
Ste. 540
Rockville, MD 20852

Counsel for Defendant

If you file an objection, you will also need to attend the final hearing or the Court may not consider your objections. The final fairness hearing is set for June 27, 2023 at 11 AM at the Federal Courthouse at 6500 Cherrywood Ln, Greenbelt, MD 20770

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

The Court decided that Peter A. Holland and Emanwel J. Turnbull of the Holland Law Firm, P.C. and Scott C. Borison of the Borison Firm, LLC, are qualified to represent the Class Members. They are called "Class Counsel." They can be reached at The Holland Law Firm, P.C., 914 Bay Ridge Rd, Ste 230, Annapolis, MD 21403, Phone Number 410-280-6133. Please reference the Allen v. MMI settlement. The court found that they are experienced in handling similar cases on behalf of consumers.

16. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you may hire one who it will be your responsibility to pay. For example, you can ask him or her to appear in Court for you, if you want someone other than Class Counsel to speak for you.

17. How will the lawyers be paid?

Class Counsel will ask the court to award attorneys fees out of the common fund.

GETTING MORE INFORMATION

18. Are more details available?

You can contact one of the class counsel. Their contact information is set forth in Question No. 15 above.