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J. M. W. F. ZGERALD
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR SPOKANE COUNTY

ULISES LOPEZ, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

HOBAN & ASSOCIATES, LLC, a
Washington limited liability company d/b/a
COAST PROPERTY MANAGEMENT,
COAST SCREENING SERVICES, COAST
COLLECTION SERVICES, COAST
MANAGEMENT COMPANY, INC. (CMC);
and CANYON BLUFFS INVESTORS VII-1,
LLC, a Washington limited liability company,

Defendants.

NO. 20-2-01929-32

**DECLARATION OF RYAN ALDRIDGE
REGARDING NOTICE AND
SETTLEMENT ADMINISTRATION**

I, Ryan Aldridge, hereby declare and verify as follows:

I. INTRODUCTION

1. ***Personal Information.*** I am a Partner at EisnerAmper ("EAG").¹ EAG was retained as the Settlement Administrator in this Litigation, and, as the project manager over this Settlement, I am personally familiar with the facts set forth in this Declaration.

2. ***The Capacity and Basis of this Declaration.*** I am over the age of 21. Except as otherwise noted, the matters set forth in this Declaration are based upon my personal knowledge, information received from the Parties in this Litigation, and information provided by my colleagues at EAG and our Partners.

II. BACKGROUND

¹Unless otherwise indicated, all capitalized terms have the same meaning assigned to them in the Settlement Agreement.

1 3. **Preliminary Approval.** On February 6, 2026, the Court entered its Order Granting Preliminary
2 Approval of Amended Class Definition and Class Settlement, preliminarily approving the Settlement
3 Agreement and appointing EAG as Class Administrator. After the Court's preliminary approval of the
4 Settlement, EAG began to implement and coordinate the notice program.

5 4. **The Purpose of this Declaration and Verification.** I submit this Declaration to evidence
6 EAG's compliance with the terms of the Preliminary Approval Order, to detail EAG's execution of its role
7 as the Class Administrator, and to verify compliance with the notice requirements contained in the Settlement
8 Agreement and the Court's Preliminary Approval Order.

9
10 **III. NOTICE PROGRAM EXECUTION**

11 5. **Notice Database.** EAG maintains a database of 28,850 Class Members (the "Notice List"),
12 which was used to effectuate the notice program as outlined within the Settlement Agreement. On February
13 13, 2026, EAG received one Excel file from Defendant containing 30,962 records, all of which included a
14 mailing address and 26,759 of which included an email address. After processing and de-duplicating the data,
15 EAG determined the operative Notice List consists of 28,850 unique Class Members, of which 23,720 had
16 an email address sufficient to attempt notice. The reduction from the originally provided list reflects the
17 removal of identified duplicate records following EAG's standard data-processing and de-duplication
18 procedures.

19 6. **Email Notice.** Beginning on March 16, 2026, in accordance with the Preliminary Approval
20 Order, EAG commenced sending the Email Notice to the 23,720 Class Members on the Notice List with an
21 email address. The Email Notice directed Class Members to the website established for the Settlement
22 ("Settlement Website") for access to additional information and summarized the Class Member's rights and
23 options under the Settlement, including the right to opt out of or object to the Settlement, and the deadlines
24 by which to act on those options, and the date of the Fairness Hearing. EAG followed standard email best
25 practices, including utilizing "unsubscribe" links and providing Class Administrator contact information in
26 the Email Notice. Ultimately, the Email Notice was successfully delivered to 21,606 Class Members. A copy
27 of the Email Notice is attached hereto as **Exhibit A**.
28

1 7. **Mail Notice.** EAG also coordinated and caused the Postcard Notice to be mailed via First-
2 Class Mail to Class Members for whom no valid email address was available, as well as to Class Members
3 whose Email Notice was returned as undeliverable. The Postcard Notice included (a) the web address to the
4 Settlement Website for access to additional information, and (b) the Class Member's rights and options under
5 the Settlement, including the ability to opt out or object and the dates by which to act on those options, (c)
6 the date of the Fairness Hearing. A true and correct copy of the Postcard Notice is attached hereto as **Exhibit**
7 **B.**

8 8. **Mailing Address Validation.** Prior to the mailing, all mailing addresses were checked against
9 the National Change of Address ("NCOA") database maintained by the United States Postal Service
10 ("USPS"). In addition, the addresses were certified via the Coding Accuracy Support System ("CASS") to
11 ensure the quality of the zip code and verified through Delivery Point Validation ("DPV") to verify the
12 accuracy of the addresses.

13 9. **Mail Notice Delivery.** In the initial mailing, EAG executed Postcard notice mailings to 5,680
14 Class Members, including 1,850 Class Members whose Email Notice was returned as undeliverable. EAG
15 also executed supplemental mailings for Class Members whose initial Postcard Notice was returned as
16 undeliverable but for whom EAG was able to obtain an alternative mailing address through (1) forwarding
17 addresses provided by the USPS, (2) skip trace searches using a third-party vendor database, or (3) requests
18 received directly from Class Members. Notice delivery statistics are detailed in Section IV below.

19 10. **Settlement Website.** On March 16, 2026, EAG published the Settlement Website, available at
20 www.hobancoastsettlement.com. Visitors to the Settlement Website can download the Long Form Notice
21 and other Court documents, such as the Class Action Complaint, the Settlement Agreement, the Unopposed
22 Motion for Preliminary Approval, Orders of the Court, and other relevant documents. Visitors are also able
23 to identify important dates and deadlines and access contact information for the Class Administrator. As of
24 June 9, the Settlement Website received 1,956 unique visits.

25 11. **Settlement Post Office Box.** EAG maintains the following Post Office Box for the Notice
26 Program:
27
28

1 Hoban Coast Settlement Administrator

2 P.O. Box 1749

3 Baton Rouge, LA 70821

4 This P.O. Box serves as a location for the USPS to return undeliverable program mail to EAG and for Class
5 Members to submit exclusion requests, objections, and other settlement-related correspondence. The P.O.
6 Box address appears in the notices and on the Settlement Website. EAG monitors the P.O. Box and uses a
7 dedicated mail intake team to process each item received.

8 12. ***Dedicated Toll-Free Number.*** On March 16, 2026, EAG established a dedicated toll-free
9 telephone number, 1-844-699-4460, which is available twenty-four hours per day. Settlement Class Members
10 can call and interact with an interactive voice response (“TVR”) system that provides important Settlement
11 information and offers the ability to leave a voicemail message to address specific requests or issues. EAG
12 also provided copies of the Class Notice and the Settlement Agreement to Class Members, upon request,
13 through the toll-free number. The toll-free number appeared in the notices and in multiple locations on the
14 Settlement Website and will remain active through the close of this notice program.

15 13. ***Email Support.*** EAG established an email address, Info@HobanCoastSettlement.com, to
16 provide an additional option for Class Members to address specific questions and requests to the Class
17 Administrator for support.

18 IV. **NOTICE PROGRAM REACH**

19 14. ***Notice Reach Results.*** Through the Notice procedures outlined above, EAG disseminated
20 direct Notice to Class Members via Email Notice and Postcard Notice. As of June 9, 2026, Notice reached a
21 total of 26,658 (92.40%)² of the 28,850 Class Members.³ Table 1 below provides an overview of the
22 dissemination and reach statistics for Notice.

23
24
25
26 ²The linchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together
will reach a high percentage of the class. It is reasonable to reach between 70-95%. *See* 2010 Judges’ Class Action Notice and
Claims Process Checklist and Plain Language Guide. Here, the notice effort reached 92.40% of the Settlement Class Members.

27 ³A Settlement Class Member is considered “reached” by direct Notice if the Email Notice sent to the Settlement Class Member
28 was not returned as undeliverable, or a Postcard Notice mailed to the Settlement Class Member was not returned by the USPS as
undeliverable.

Table 1: Direct Notice Program Dissemination & Reach		
Description	Volume	Percentage
Class Members	28,850	100.00%
Email Notice		
(+) Total Notices E-Mailed	23,720	82.22%
(-) Total Undeliverable Emails	2,114	8.91%
Postcard Notice Mailing		
(+) Total Initial Notices Mailed	5,680	19.69%
(-) Total Dropped/Returned	996	17.54%
Supplemental Notice Mailings		
(+) Total Notices Re-Mailed	581	2.01%
(-) Total Dropped/Returned of Re-Mailed	213	36.66%
Direct Notice Program Reach		
Received Email Notice	21,606	91.09%
Received Postcard Notice	5,052	88.94%
(=) Received Direct Notice	26,658	92.40%

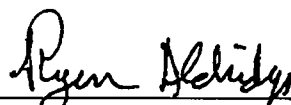
V. EXCLUSIONS AND OBJECTIONS

15. **Exclusions (Opt-Outs) Received.** The deadline to submit a request for exclusion from the Settlement was May 15, 2026. As of that deadline, EAG received zero (0) requests for exclusion from Class Members.

16. **Settlement Objections.** The deadline to object to the Settlement was May 15, 2026. As of that deadline, EAG received zero (0) objections from Class Members.

VI. CERTIFICATION

I, Ryan Aldridge, declare under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. Executed on this 10th day of June, 2026 at Baton Rouge, Louisiana.


 Ryan Aldridge

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served upon counsel of record at the address and in the manner described below a copy of the document to which this certificate is attached for delivery to the following:

Eliot M. Harris, WSBA #36590
WILLIAMS, KASTNER & GIBBS PLLC
601 Union Street, Suite 4000
Seattle, WA 98101-2380
Email: eharris@williamskastner.com

*Attorneys for Defendants
Hoban & Associates, LLC d/b/a Coast
Property Management, Coast Screening
Services, Coast Collection Services, Coast
Management Company, Inc. (CMC), and
Canyon Bluffs Investors VII-1, LLC*

- ☐ Via E-Service
- ☐ Via Hand Delivery/Legal Messenger
- ☐ Via Facsimile
- ☒ Via Electronic Mail
- ☐ Via U.S. Mail
- ☐ Via Overnight Courier

Dalton J. Reynolds, WSBA #54055
WINSTON & CASHATT LAWYERS, PS
601 West Riverside Ave., Suite 1900
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Tel: (509) 838-6131
Fax: (509) 838-1416
Email: djr@winstoncashatt.com

*Co-Counsel for Defendant Canyon Bluffs
Investors VII-1, LLC*

- ☐ Via E-Service
- ☐ Via Hand Delivery/Legal Messenger
- ☐ Via Facsimile
- ☒ Via Electronic Mail
- ☐ Via U.S. Mail
- ☐ Via Overnight Courier

DATED this 12th day of June 2026.

s/ Shayne J. Sutherland
Shayne J. Sutherland, WSBA #44593

Cameron Sutherland, PLLC
827 W. First Ave., Ste. 301
Spokane, WA 99201
Tel: (509) 315-4507

EXHIBIT A

Date: Tuesday, March 10th 2026, 04:12:39 PM -04:00 EDT
Subject: [External] Notice of Settlement: Ulises Lopez v Hoban & Associates, LLC
From: Hoban Coast Settlement Administrator <notice@pnclassaction.com>
To: [REDACTED]



Settlement Class Member: [REDACTED]
Claim ID: [REDACTED]

**If You Paid a Tenant Screening Fee to Coast Property Management
Between April 28, 2017 and February 10, 2023,
You May Be Entitled to Benefits Under a Class Action Settlement.**

*The Spokane County Superior Court of Washington authorized this Notice.
This is not a solicitation from a lawyer.*

A proposed settlement of a class action lawsuit relates to allegations that Hoban & Associates, LLC, a Washington limited liability company d/b/a Coast Property Management, Coast Screening Services, Coast Collection Services, Coast Management Company, Inc. (CMC), and/or Canyon Bluffs Investors VII-1, LLC, (hereafter collectively referred to as "Defendant") failed to provide certain required disclosures prior to obtaining screening reports in violation of state law. The case is known as Ulises Lopez v. Hoban & Associates, LLC, dba Coast Property Management, No. 20-2-01929-32 (Superior Court of the State of Washington for the County of Spokane) ("Action").

What is the lawsuit about? In the Action, the Plaintiff Ulises Lopez ("Plaintiff") claimed, among other things, that Defendant obtained information on prospective tenants without first providing certain required disclosures to those prospective tenants, in violation of Washington State law. The Court did not determine that Defendant violated RCW 59.18.257 and did not determine an award of damages (if any) that would be due to each Class Member. Instead, this settlement was reached between the parties, anticipating a payment to each participating Class Member of \$27.56. The Defendant claims it has abided by all state and federal laws. As part of the proposed settlement, Defendant does not admit to any wrongdoing, maintains its compliance with the law, and continues to deny the allegations against it.

Who is included? You are a Class Member if:

- (1) from April 28, 2017, to February 10, 2023, you applied to rent at any property in the State of Washington, where the rental property on the date of application was owned or managed by Defendant, or where Defendant was a "landlord" of the property, as defined by RCW 59.18.030(16);
- (2) you paid a tenant screening fee to Defendant or its affiliates;
- (3) were screened by RealPage, Inc, d/b/a On-Site ("On-Site"); and

(4) you did not receive all of the prospective tenant screening disclosures required by RCW 59.18.257.

What does the settlement provide? The Defendant has agreed to pay a total settlement amount of \$1,400,000 which will be used to create a Settlement Fund to pay cash awards to Settlement Class Members who do not timely exclude themselves from the Settlement, pay Class Counsel's attorneys' fees and costs, pay an incentive award to the Representative Plaintiff, and pay costs and expenses of settlement administration.

What are your options?

Do Nothing: If you do nothing, you will be eligible to receive the benefits allocated to Class Members and will be bound by the terms of the Settlement Agreement and Final Judgement.

Opt-Out or Object: If you opt out, you will retain your right to sue the Defendant separately, however, you will not be eligible to receive any benefits. You must submit a request for exclusion. To exclude yourself from the settlement, you must send a signed letter by mail stating that you "want to opt out of the *Ulises Lopez v. Coast Property Management Settlement*." Please be sure to include your name, address, telephone number, and your signature. Requests for exclusion must be **postmarked on or before May 15, 2026**. Detailed instructions are available on the Settlement Website.

You may also object to any part of this Settlement. Details about how to object are available on the Settlement Website. Objections must be filed with or mailed to the Court **on or before May 15, 2026**.

Has the Court approved the Settlement? No. The Court will hold a Fairness Hearing on **June 26, 2026 at 1:30pm**, at the Superior Court of the State of Washington for the County of Spokane, 1116 W Broadway Ave., Room 408 Spokane, WA 99260. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Judge will listen to people who have asked to speak at the hearing. The Court will also consider whether to approve the requested attorneys' fees, costs, and Service Award. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

How Do You Get More Information?

This notice is only a summary. To obtain a detailed Notice of Class Action Settlement and find answers to common questions about the settlement plus other information, including a copy of the Settlement Agreement, visit www.HobanCoastSettlement.com.

[Unsubscribe - Unsubscribe Preferences](#)

EXHIBIT B

What is the lawsuit about? In the Action, the Plaintiff Ulises Lopez (“Plaintiff”) claimed, among other things, that Defendant obtained information on prospective tenants without first providing certain required disclosures to those prospective tenants, in violation of Washington State law. The Court did not determine that Defendant violated RCW 59.18.257 and did not determine an award of damages (if any) that would be due to each Class Member. Instead, this settlement was reached between the parties, anticipating a payment to each participating Class Member of \$27.56. The Defendant claims it has abided by all state and federal laws. As part of the proposed settlement, Defendant does not admit to any wrongdoing, maintains its compliance with the law, and continues to deny the allegations against it.

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Court-Approved Legal Notice

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For more information, visit www.HobanCoastSettlement.com or call 1-844-699-4460.

Coast Property Management Settlement Administrator

P.O. Box 1749

Baton Rouge, LA 70821

PRESORTED
FIRST CLASS
U.S. POSTAGE
PAID
FPI

ELECTRONIC SERVICE REQUESTED

SETTLEMENT CLAIM ID [ID]
[FIRST NAME] [LAST NAME]
[ADDRESS]
[ADDRESS]
[CITY] [STATE] [ZIP]



Postal Service: Do Not Mark or Cover Barcode

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