

FILED

2026 JUN 12 P 3:52

SHAYNE J. SUTHERLAND
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 SHAYNE J.
SUTHERLAND IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Shayne J. Sutherland, upon penalty of perjury under the laws of the state of Washington,
declares as follows:

1. I am the lead attorney representing the Plaintiff and the Class in this matter.
2. This Declaration is based on my personal knowledge.
3. The parties, through counsel, and experienced ADR specialist Louis Peterson,
engaged in extensive settlement discussions which ultimately resulted in the Settlement

Agreement previously filed as Exhibit 1 to my prior declaration for preliminary approval of the
class action settlement (SN 206, ¶ 5).

DECLARATION OF SHAYNE J. SUTHERLAND IN SUPPORT
OF PLAINTIFF'S UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT - 1

Cameron Sutherland, PLLC
827 W. First Ave., Ste. 301
Spokane, WA 99201
Tel: (509) 315.4507

1 4. Since this case was commenced Plaintiff and Class Counsel have investigated
2 Defendant Hoban and Associates, LLC dba Coast Property Management's ("Coast") business
3 practices, conducted extensive discovery, and litigated several motions including but not limited
4 to motions for class certification and to deny class certification. Plaintiff and Class Counsel also
5 reviewed and analyzed thousands of documents and data to ascertain appropriate class members
6 and a reasonable range of damages and engaged in extensive settlement negotiations with
7 Defendant Coast.
8

9 5. Class Counsel have a significant amount of experience in consumer individual
10 and class actions, including class actions that concern tenant-sided landlord-tenant matters. They
11 know from experience that any case involving a class of consumers can, and often does, lead to
12 costly litigation that may (and often does) go on for years.
13

14 6. Class Counsel have thoroughly analyzed the factual and legal issues involved in
15 this case.
16

17 7. In addition to the monetary relief achieved for the Settlement Class Members,
18 Defendant Coast also changed its tenant screening processes to conform with Washington law
19 and provide prospective tenants with all the information deemed essential by the Washington
20 legislature in RCW 59.18.257 for prospective tenants to make informed renting decisions.
21

22 8. Out of the 26,658 Settlement Class Members who received class notice, not a
23 single Class Member objected to the Parties' Settlement, Class Counsel's requested attorneys'
24 fees and costs, or the requested incentive award to Mr. Lopez. Furthermore, not one Class
25 Member requested to be excluded from the Settlement. Accordingly, 26,658 Settlement Class
Members will be issued payments in the amount of approximately \$32.00 each assuming final
approval by the Court.

9. The proposed *cy pres* recipients of the unclaimed class member funds are the non-profit entities Legal Foundation of Washington and Southeast Effective Development, which provides an array of housing services for disadvantaged and lower income tenants and families in Washington State.

10. No government entity has objected to this Settlement.

11. Class Counsel believes the Settlement is fair, reasonable, adequate, and in the best interest of the Settlement Class as a whole.

SIGNED and DATED this 12th day of June, 2026, at SPOKANE, WA.

s/ Shayne J. Sutherland

SHAYNE J. SUTHERLAND, WSBA #44593
Attorney for Plaintiff and the Class

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 <i>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</i>	☐ 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 Spokane, WA 99201 Tel: (509) 838-6131 Fax: (509) 838-1416 Email: djr@winstoncashatt.com <i>Co-Counsel for Defendant Canyon Bluffs Investors VII-1, LLC</i>	☐ 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