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17 **UNITED STATES DISTRICT COURT**  
18 **EASTERN DISTRICT OF CALIFORNIA**  
19 **SACRAMENTO DIVISION**

20 UNITED STATES OF AMERICA, *ex rel.*  
DENIKA TERRY, ROY HUSKEY III, and  
21 TAMERA LIVINGSTON, and each of them for  
themselves individually, and for all other persons  
22 similarly situated and on behalf of the UNITED  
STATES OF AMERICA

23 Plaintiffs/Relators,

24 vs.

25 WASATCH ADVANTAGE GROUP, LLC,  
WASATCH PROPERTY MANAGEMENT, INC.,  
26 WASATCH POOL HOLDINGS, LLC,  
CHESAPEAKE APARTMENT HOLDINGS, LLC,  
27 LOGAN PARK APARTMENTS, LLC, LOGAN  
PARK APARTMENTS, LP, ASPEN PARK  
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Case No.: 2:15-CV-00799-KJM-SCR

CLASS ACTION

**PLAINTIFFS' NOTICE OF MOTION &  
MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT**

Date: January 23, 2025

Time: 10:00 a.m.

Dept: Courtroom 3, 15th Floor

Before: Hon. Chief Judge Kimberly J. Mueller

1 HOLDINGS, LLC, BELLWOOD JERRON  
2 HOLDINGS, LLC, BELLWOOD JERRON  
3 APARTMENTS, LP, BENT TREE  
4 APARTMENTS, LLC, CALIFORNIA PLACE  
5 APARTMENTS, LLC, CAMELOT LAKES  
6 HOLDINGS, LLC, CANYON CLUB HOLDINGS,  
7 LLC, COURTYARD AT CENTRAL PARK  
8 APARTMENTS, LLC, CREEKSIDE HOLDINGS,  
9 LTD, HAYWARD SENIOR APARTMENTS, LP,  
10 HERITAGE PARK APARTMENTS, LP, OAK  
11 VALLEY APARTMENTS, LLC, OAK VALLEY  
12 HOLDINGS, LP, PEPPERTREE APARTMENT  
13 HOLDINGS, LP, PIEDMONT APARTMENTS,  
14 LP, POINT NATOMAS APARTMENTS, LLC,  
15 POINT NATOMAS APARTMENTS, LP, RIVER  
16 OAKS HOLDINGS, LLC, SHADOW WAY  
17 APARTMENTS, LP, SPRING VILLA  
18 APARTMENTS, LP, SUN VALLEY HOLDINGS,  
19 LTD, VILLAGE GROVE APARTMENTS, LP,  
20 WASATCH QUAIL RUN GP, LLC, WASATCH  
21 PREMIER PROPERTIES, LLC, WASATCH  
22 POOL HOLDINGS III, LLC,  
23 and DOES 1-4,

24 Defendants.

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28 Attorneys for Relators

1 **NOTICE OF MOTION AND MOTION**

2 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that on January 23, 2025 at 10:00 a.m., Plaintiffs Denika Terry, Roy  
4 Huskey III, and Tamera Livingston, on behalf of themselves and the certified classes, will and hereby  
5 do move the Court pursuant to Federal Rule of Civil Procedure 23 to: (1) grant final approval of the  
6 proposed class action settlement between Plaintiffs and all Defendants in this case; (2) approve a  
7 service payment of \$5,000 each to Class Representatives Denika Terry, Roy Huskey III, and Tamera  
8 Livingston; (3) approve the *cy pres* distribution proposed by the parties; and (4) authorize distribution  
9 of payments to participating class members.

10 This Motion is based on the Memorandum of Points and Authorities filed herewith; the  
11 Declaration of Lori Rifkin in Support of the Motion and Exhibits thereto; the Declaration of Gio  
12 Santiago and Exhibits thereto; any argument heard on this motion; and the pleadings and records in the  
13 above-captioned matter.

14  
15 Dated: December 19, 2024

Respectfully submitted,

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18 Meredith Dixon  
19 IMPACT FUND  
20 Attorneys for Plaintiffs and Relators  
21 and the Certified Classes  
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