

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RACHELLE BAKER and JASON DITTMANN,
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

C.A. No. 18-11175-PBS

EQUITY RESIDENTIAL MANAGEMENT, L.L.C. and
EQR-WALDEN PARK, LLC,

Defendants.

**AMENDED ASSENTED TO MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED SETTLEMENT**

Plaintiffs Rachelle Baker and Jason Dittmann (“Plaintiffs”) hereby move for an order: (1) granting preliminary approval of a Proposed Settlement (the “Settlement”) with Defendants Equity Residential Management, L.L.C. and EQR-Walden Park, LLC (“Equity” or “Defendants”); (2) preliminarily certifying the Settlement Class; (3) approving the proposed form and manner of giving notice to the Class of the Settlement; (4) directing that notice be given to the Class Members as approved by the Court; (5) naming Plaintiffs and their counsel as Class Representatives and Class Counsel; and (6) naming JND Legal Administration as Claims Administrator. A proposed order is submitted with this Motion.¹ The terms of the Settlement are set forth in a Settlement Agreement dated August 14, 2019 and executed by the Parties.²

¹ [Proposed] Order for Preliminary Approval of Proposed Settlement (“Preliminary Approval Order”), annexed hereto as **Exhibit 1**.

² The Amended Settlement Agreement is submitted herewith as Exhibit 1 to the Supplemental Declaration of David Pastor in Support of Preliminary Approval of Proposed Settlement (“Supplemental Pastor Declaration”).

8/16/19
Allowed
Patti B Sars