Laura L. Ho (SBN 173179)
lho@gbdhlegal.com
Anne Bellows (SBN 293722)
abellows@gbdhlegal.com
Beth Holtzman (SBN 316400)
bholtzman@gbdhlegal.com
GOLDSTEIN, BORGEN, DARDARIAN & HO
300 Lakeside Drive, Suite 1000
Oakland, CA 94612
(510) 763-9800; (510) 835-1417 (Fax)

Attorneys for Plaintiffs and Relators
(*Additional Counsel listed on the following page*)

Joseph A. Salazar Jr. (SBN 169551)
Joe.Salazar@lewisbrisbois.com
LEWIS BRISBOIS BISGAARD & SMITH LLP
2020 West El Camino Avenue, Suite 700
Sacramento, CA 95833
(916) 564-5400; (916) 564-5444 (Fax)

Attorney for Defendants

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

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

Plaintiffs/Relators,

vs.

WASATCH ADVANTAGE GROUP, LLC, WASATCH PROPERTY MANAGEMENT, INC., WASATCH POOL HOLDINGS, LLC, CHESAPEAKE COMMONS HOLDINGS, LLC, LOGAN PARK APARTMENTS, LLC, LOGAN PARK APARTMENTS, LP, and DOES 1-30,

Defendants.

Case No.: 2:15-CV-0799 KJM-DB

CLASS ACTION

JOINT STIPULATION AND ORDER FOR APPOINTMENT OF CLASS COUNSEL

Before: Hon. Kimberly Mueller

Trial Date: None Set

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO 732951.9

Andrew Wolff (SBN 195092)
andrew@awolffflaw.com
Tony Ruch (SBN 242717)
LAW OFFICES OF ANDREW WOLFF, PC
1615 Broadway, 4th Floor
Oakland, CA 94612
(510) 834-3300; (510) 834-3377 (Fax)

Jesse Newmark (SBN 247488)
jessenewmark@centrolegal.org
Micaela Alvarez (SBN 319908)
malvarez@centrolegal.org
CENTRO LEGAL DE LA RAZA
3022 International Blvd., Suite 410
Oakland, CA 94601
(510) 437-1863; (510) 437-9164

Attorneys for Plaintiffs and Relators

Plaintiffs Denika Terry, Roy Huskey III, and Tamara Livingston ("Plaintiffs") and Defendants Wasatch Advantage Group, LLC, Wasatch Property Management, Inc., Wasatch Pool Holdings, LLC, Chesapeake Commons Holdings, LLC, Logan Park Apartments, LLC, and Logan Park Apartments, LLP ("Defendants") (collectively, the "Parties"), by and through their respective counsel, hereby stipulate, pursuant to Local Rule 143, to appoint the law firm, Goldstein, Borgen, Dardarian & Ho ("GBDH") as class counsel in this matter and jointly request that the Court approve this stipulation:

WHEREAS, on July 30, 2018, this Court granted Plaintiffs' motion for class certification as to the Rule 23(b)(3) class and granted Plaintiffs' motion for class certification as to the Rule 23(b)(2) class.

WHEREAS, this Court previously appointed Centro Legal de la Raza and the Law Offices of Andrew Wolff, PC as class counsel on July 30, 2018.

WHEREAS, Plaintiffs wish to have the law firm of Goldstein, Borgen, Dardarian & Ho ("GBDH") appointed as class counsel in order to bring additional resources and expertise to the litigation of their class action.

WHEREAS, the Declaration of Laura L. Ho, filed herewith, sets forth her experience and expertise in class action litigation, as well as GBDH's history of prosecuting class actions.

WHEREAS, Defendants consent to the appointment of GBDH as class counsel.

WHEREAS, under Rule 23(c)(1)(B) and Rule 23(g), a court appoints class counsel based on a variety of factors, including the work counsel has done in identifying or investigating potential claims in the action; counsel's experience in handling class actions, other complex litigation, and the types of claims asserted in the action; counsel's knowledge of the applicable law; and the resources that counsel will commit to representing the class. Fed. R. Civ. P. 23(g)(1)(A). The Declaration of Laura L. Ho filed in support of this stipulation provides further evidence demonstrating that Plaintiffs' new counsel have considerable experience in class actions, are qualified to represent the proposed class, and can be expected to perform their responsibilities adequately in light of that experience, the record to date in this case, and related considerations.

WHEREAS, since being retained, GBDH has been working closely with Centro Legal de la Raza and the Law Offices of Andrew Wolff, PC to litigate this case in an effective manner. *See* Ho Decl. ¶ 5.

WHEREAS, proposed class counsel are experienced in handling class actions and other complex litigation, including with regard to housing. *See* Ho Decl. ¶¶ 2-4.

WHEREAS, proposed class are knowledgeable of the applicable law. The declaration submitted in support of this stipulation demonstrates that Plaintiffs' counsel have expertise in class actions, housing, and consumer law, and are capable of adequately representing Plaintiffs in the prosecution of this class action. *See* Ho Decl. ¶¶ 2-4.

WHEREAS, GBDH will commit sufficient resources to represent the class. GBDH, along with co- counsel, are advancing costs for this class action. Such a mechanism for funding litigation is appropriate in a case such as this. *See, e.g., Irwin v. Mascott*, 96 F. Supp. 2d 968 (N.D. Cal. 1999). *See* Ho Decl. ¶ 6.

WHEREAS, GBDH meets the standard for adequacy because plaintiffs and their new counsel have no interest which is antagonistic to the interests of the class, but rather share a common interest in challenging Defendants' unlawful actions. *See* Ho Decl. ¶ 7.

WHEREAS, GBDH has been found adequate to represent classes of individuals in numerous cases. *See* Ho Decl. ¶¶ 3, 6 & Ex. A.

WHEREAS, the appointment of additional class counsel is appropriate given the magnitude and scope of the litigation. The appointment of GBDH is reasonably necessary and appropriate to effectively represent the class. The use of multiple law firms in large scale class action is routine. *See Ellis v. Costco Wholesale Corp.*, -- F. Supp. 2d --, 2012 WL 4371817, *55 (N.D. Cal. Sept. 25, 2012) (appointing five law firms as class counsel in gender discrimination case).

THEREFORE, the Parties stipulate that the Court enter the following order:

The law firm of Goldstein, Borgen, Dardarian & Ho is adequate to serve as class counsel and are hereby appointed as Class Counsel for the Classes previously certified by this Court on July 30, 2018.

Dated: May 15, 2019

Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO

/s/Laura L. Ho
Laura L. Ho

Attorneys for Plaintiff and Relators

Dated: May 15, 2019

Respectfully submitted,

LAW OFFICES OF ANDREW WOLFF, PC

/s/Andrew Wolff (as authorized on May 15, 2019)
Andrew Wolff

Attorneys for Plaintiff and Relators

Dated: May 15, 2019

Respectfully submitted,

CENTRO LEGAL DE LA RAZA

/s/Jesse Newmark (as authorized on May 15, 2019)
Jesse Newmark

Attorneys for Plaintiff and Relators

Dated: May __, 2019

Respectfully submitted,

LEWIS BRISBOIS BISGAARD & SMITH LLP

Joseph A. Salazar Jr.

Attorneys for Defendants

IT IS SO ORDERED.

DATED: May 21, 2019.

UNITED STATES DISTRICT JUDGE