

LEGAL NOTICE BY ORDER OF
THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

**IF YOU WERE A TENANT AT STONEGATE MEADOWS
APARTMENT COMPLEX FROM NOVEMBER 27, 2019
THROUGH AUGUST 31, 2020, A SETTLEMENT IN A CLASS
ACTION LAWSUIT MAY AFFECT YOUR RIGHTS.**

READ THIS NOTICE CAREFULLY

A state court authorized this notice. This is not a solicitation from a lawyer.

- **There is a proposed settlement (“Settlement”) with Young Management Corporation in a class action lawsuit titled *Johnson v. Young Management Corporation***
- All tenants that leased and/or lived at Stonegate Meadows Apartment Complex from November 27, 2019 through August 31, 2020, may be entitled to a partial rent refund. The case is a proceeding titled *Johnson v. Young Management Corporation.*, Case No. 2316-cv09588 (the “Action”), which is before the Circuit Court of Jackson County, Missouri (the “Court”).
- The Plaintiffs in *Johnson v. Young Management Corporation* have entered into a Settlement with a company called Young Management Corporation, along with their predecessor names and/or entities, (collectively, “Young”).
- Young denies all of Plaintiffs’ claims, but has agreed to the Settlement to resolve any and all claims alleged in the Action.
- Your rights and options—and the deadlines to exercise them—are explained in this notice. **Read this notice carefully.**
- If you have questions, go to www.stonegatesettlements.com or email info@rg2claims.com. You can also write to Stonegate Settlements (Young Management) Notice Administrator, c/o RG/2 Claims Administration, PO Box 59479, Philadelphia, PA 19102-9479.

QUESTIONS? VISIT WWW.STONEGATESSETTLEMENTS.COM
PARA UNA NOTIFICACIÓN EN ESPAÑOL, LLAMAR O VISITAR NUESTRO WEBSITE

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS FOR THE SETTLEMENT	
REMAIN A MEMBER OF THE SETTLEMENT CLASS	To remain a class member of the Settlement, you do not need to do anything. You automatically will be included in the Settlement Class. If you choose to remain in the Settlement Class, you will give up your right to sue Young on the claims relating to the subject matter of the lawsuit.
EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS	You may request exclusion from the Settlement Class (also known as “opting out”) by submitting a letter to the Parties at the addresses below. The request(s) for exclusion must be postmarked no later than OCTOBER 30, 2025. If you exclude yourself from the Settlement, you will not lose your claims against Young, and you will not be bound by any judgments or orders of the Court as to the Settlement.
OBJECT TO THE SETTLEMENT	Write to the Court about why you don’t like the Settlement. To object to or comment on the Settlement, you must send a copy of the your objection via mail to the Court, Class Counsel, and counsel for Young. Their addresses are listed below. Your written objection must be postmarked no later than OCTOBER 30, 2025.
GO TO A HEARING	Ask to speak in Court about the fairness of the Settlement. The Court will hold a Fairness Hearing on November 21, 2025 at 1:30 p.m to consider whether the Settlement is fair, reasonable, and adequate, and may also consider the motion for Plaintiffs’ attorneys’ fees, costs and expenses, as well as the request for a class representative service award for the named plaintiffs.

QUESTIONS? VISIT WWW.STONEGATESSETTLEMENTS.COM
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BASIC INFORMATION

1. WHAT IS THIS LAWSUIT ABOUT?

This lawsuit is about whether Young failed to properly maintain the Stonegate Meadows Apartment Complex (“the Property”) in a livable condition while it was the manager of the Property from November 27, 2019 through August 31, 2020, and whether residents lived in conditions that were unsafe, unsanitary, and unhealthy. The lawsuit alleges that Young breached class members’ rights to have habitable property during the course of its management of the Property. The Plaintiffs alleged that Young treated everyone situated like the Plaintiffs in the same manner, thus making this action susceptible to class treatment.

Young denies Plaintiffs’ claims and allegations, and contends it acted properly at all times. Young denies the conditions at the property were unsafe or uninhabitable. Young contends that it was not ultimately responsible for the conditions of the Property and that the actual authority and means to rehabilitate the Property were outside of its control. However, to avoid the uncertainties of litigation, the Plaintiffs and Young have entered into the Settlement.

There are other defendants sued by Plaintiffs in the case, other than Young, and this settlement does not affect your claims, if any, that you have against those co-defendants.

2. WHAT IS A CLASS ACTION AND WHO IS INVOLVED?

In a class action lawsuit, one or more people called “class representatives” sue on behalf of themselves and other people who have similar claims. Together, they are called a “class” or “class members.” The class representatives for the Settlement are individuals that were tenants at the Property during a certain time period (the “Class Period”). Charlesetta Lockett, Roosevelt Devoe Price III, Aaliyah Ross, Malik Weeks, Michele Williams, Jill Harris, Anga Crosby, and Ratasha Williams are the Class Representatives in this case.

The Class Period is November 27, 2019 through August 31, 2020.

WHO IS IN THE SETTLEMENT

3. WHO IS A CLASS MEMBER?

Members of the Settlement Class are all Missouri tenants who leased and/or lived at Stonegate Meadows Apartment Complex from November 27, 2019 through August 31, 2020.

Excluded from the class are officers, directors or employees of Young, any trial judge who may preside over this action, court personnel and their family members and any juror assigned to this action.

If you are still not sure whether you are a member of the class, you can email or write to the lawyers in this case at the addresses listed in Question 10.

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4. DID THE COURT DECIDE WHO IS RIGHT?

No, the parties entered into the Settlement before the lawsuit reached a trial or court decision, so if the Court approves the Settlement there will not be a trial or decision about which side was right.

Plaintiffs' claims against the other co-defendants are scheduled for trial on June 22, 2026.

WHAT THE SETTLEMENT PROVIDES

5. WHAT DOES THE SETTLEMENT DO?

The Settlement provides for partial rent refunds to Class Members based upon the length of time they resided at the Property during the Class Period. Young has agreed to pay the sum of \$700,000.00 into a fund that will be used to make payments to Class Members. Class Members that do not opt out/exclude themselves from the Settlement will receive a check mailed to their address, without the need for a claim form. Class members that do not opt out/exclude themselves from the Settlement may also receive a secondary supplemental cash payment, contingent on whether Class Member funds are unclaimed.

IF YOU DO NOTHING

6. WHAT HAPPENS IF I DO NOTHING?

If you do nothing, you will be included in the Settlement Class. You will be bound by the Settlement if it is finally approved by the Court. If you do nothing, you will not be able to sue Young on your own for the legal claims that are resolved by the Settlement.

If you want to pursue any claim related to the issues in the Action on your own and at your own expense against Young, you need to exclude yourself ("opt out") from the Settlement.

EXCLUDING YOURSELF FROM THE SETTLEMENT

7. WHY WOULD I ASK TO BE EXCLUDED (OPT OUT)?

You would ask to be excluded if you want to keep your right to pursue your own individual lawsuit against Young relating to the issues in the Action. If you choose to opt out, you will be able to sue Young on your own and you will not be bound by the Settlement.

8. HOW DO I OPT OUT FROM THE CLASS?

If you want to exclude yourself from the Settlement (known as "opting out"), you must provide an opt out request. Any request to opt-out must be in writing and must include the name, address,

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telephone number and a statement that the Settlement Class Member is seeking exclusion, and be signed by that person. Any opt-out request must include a reference to “*Johnson v. Young Management Corporation*, Case No. 2316-cv09588” and be mailed to:

Stonegate Class Counsel
HORN AYLWARD & BANDY, LLC
2600 Grand Boulevard, Suite 1100
Kansas City, Missouri 64108
816-421-0700

To be considered timely and effective, any opt-out request must be postmarked on or before **OCTOBER 30, 2025**.

No person may opt out of the Settlement by having an actual or purported agent or attorney submit an opt-out request on said person’s behalf, nor may an opt-out request be submitted or made on behalf of a group of persons.

If you do not exclude yourself from the Settlement by filing an opt-out request, you will be included in the Settlement Class and deemed a Settlement Class Member.

**REQUESTS FOR EXCLUSION THAT ARE NOT POSTMARKED ON OR BEFORE
OCTOBER 30, 2025 WILL NOT BE HONORED.**

**9. IF I DON’T EXCLUDE MYSELF, CAN I SUE FOR THE SAME THING
LATER?**

No. Unless you exclude yourself, if the Court approves the Settlement you will lose your right to sue Young for relief arising from the claims that are resolved by the Settlement.

OBJECTING TO THE SETTLEMENT

10. HOW DO I OBJECT TO THE SETTLEMENT?

You can object to the Settlement. Submitting an objection gives you the chance to tell the Court why you think the Court should not approve the Settlement, but will not exclude you from the Settlement. If you wish to object to any aspect of the Settlement, you must file a written notice of objection with the Court as provided below (the “Notice of Objection”). Your Notice of Objection must be postmarked on or before **OCTOBER 30, 2025**. For purposes of determining whether your Notice of Objection is timely, it shall be deemed submitted to the Court when it is actually filed by the Clerk of the Court. Notices of Objection can be mailed to the Clerk of the Court at:

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Clerk of the Court

Jackson County Courthouse
415 E 12th Street
Kansas City, Mo 64106

Copies of your Notice of Objection must also be postmarked and mailed, or delivered, to the following at the same time or before the date for filing a Notice of Objection:

Class Counsel	Defense Counsel
Joseph A. Kronawitter Horn Aylward & Bandy, LLC 2600 Grand Blvd., Suite 1100 Kansas City, MO 64108	Ian M. Bartalos Kevin D. Looby McCausland Barrett & Bartalos, P.C. 9233 Ward Parkway, STE 270 Kansas City, MO 64114

Your Notice of Objection must be in writing, and must specifically include:

- a. The name, address, and telephone number of the class member filing the objection;
- b. A statement of each objection asserted;
- c. A detailed description of the facts underlying each objection;
- d. Any documents in the possession or control of the objector and relied upon by the objector as a basis for the objection;
- e. If the objector is represented by counsel, a detailed description of the legal authorities supporting each objection;
- f. If the objector plans to utilize expert opinion and/or testimony as part of the objection(s), a written expert report from all proposed experts;
- g. If the objector plans to call a witness or present other evidence at the hearing, the objector must state the identity of the witness and identify any documents by attaching them to the objection and provide any other evidence that the objector intends to present;
- h. A statement of whether the objector intends to appear at the hearing;
- i. A copy of any exhibits which the objector may offer during the hearing; and

Any person who does not object in the manner set forth above shall be deemed to have waived such objection and shall forever be foreclosed and barred from making any objection to the fairness, adequacy, or reasonableness of the Settlement.

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OBJECTIONS THAT ARE NOT RECEIVED BY THE COURT ON OR BEFORE OCTOBER 30, 2025, WILL NOT BE HONORED.

THE LAWYERS REPRESENTING YOU

11. DO I HAVE A LAWYER IN THE CASE?

Yes, unless you exclude yourself from the Settlement Class. The Court decided that Joe Kronawitter and Taylor Foye (from the law firm Horn Aylward & Bandy, LLC) and Gina Chiala, Amy Sweeny Davis and Nathan Cho (from the Heartland Center for Jobs and Freedom), all from Kansas City, Missouri, are qualified to represent the members of the class. Together, these lawyers are called “Class Counsel.” You will not be charged by these lawyers for their work on the case. If you want to be represented by your own lawyer, you may hire one at your own expense.

12. HOW WILL THE LAWYERS AND CLASS REPRESENTATIVE BE PAID?

Class Counsel will ask the Court to approve payment of attorneys’ fees and litigation costs. Class Counsel may apply for payment of attorneys’ fees and litigation costs up to 33% of the settlement fund being paid by Young. Class Counsel’s motion for payment of attorney fees and expenses and will be filed prior to your deadline to object to the settlement, and will be available for viewing at the website noted below.

In addition, Class Counsel may apply to the Court for a “service award” of up to \$7,000 for each of the class representative who brought the lawsuit, in recognition of their service and commitment to the case and the Settlement Class Members. Any service award payment must be approved by the Court and will be in addition to the amount of attorneys’ fees and costs approved by the Court. Any service award approved by the Court will be paid from the settlement fund being paid by Young noted above.

13. SHOULD I GET MY OWN LAWYER?

If you don’t exclude yourself, you do not need to hire your own lawyer because Class Counsel is working on your behalf. If you want your own lawyer, you will have to pay that lawyer. You can ask that lawyer to appear in Court for you and speak on your behalf instead of Class Counsel.

14. HOW IS THE COST OF PROVIDING NOTICE TO CLASS MEMBERS PAID FOR?

The Settlement provides that Notice will be paid for from the settlement fund being paid by Young.

THE FAIRNESS HEARING

15. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

QUESTIONS? VISIT WWW.STONEGATESETTLEMENTS.COM
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The Court will hold a Fairness Hearing on **November 21, 2025 at 1:30 p.m.**, at the Jackson County, Missouri Courthouse, Division 13, 415 E. 12th St., Kansas City, MO 64108. 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 in the case, the Honorable Charles H. McKenzie, will listen to people who have asked to speak at the hearing. The Court may also decide how much in attorney fees and expenses to pay to Class Counsel, as well as the amount of any service award payable to the named plaintiffs. After the hearing, the Court will decide whether to approve the Settlement. It is not known how long that decision will take.

16. DO I HAVE TO COME TO THE HEARING?

No. Class Counsel will answer questions the Court may have at the Fairness Hearing, but you are welcome to attend at your own expense. If you send a written objection to the Settlement as described above, you don't have to come to Court to talk about it at the Fairness Hearing. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend the Fairness Hearing, but it is not necessary.

17. MAY I SPEAK AT THE HEARING?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intention to Appear in ***Johnson v. Young Management Corporation, Case No. 2316-cv09588.***" Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be postmarked no later than **OCTOBER 30, 2025**, and must be sent to the Clerk of the Court, Class Counsel, and Defense Counsel, at the addresses set forth in Question 10 above. You cannot speak at the hearing if you opted out of the Settlement.

GETTING MORE INFORMATION

18. ARE THERE MORE DETAILS ABOUT THIS LAWSUIT?

Some relevant case filings, pleadings and documents are available at the settlement website: **www.stonegatesettlements.com**. Additional information may be found at the Court's website by visiting **<https://www.courts.mo.gov/cnet/welcome.do>**, and reviewing the docket related to ***Johnson v. Young Management Corporation, Case No. 2316-cv09588.***

19. HOW CAN I LEARN MORE?

If you have additional questions about the Settlement and the case, you can go to go to **www.stonegatesettlements.com** or email **info@rg2claims.com**. You can also write to Stonegate Notice Administrator (Young Management), c/o RG/2 Claims Administration, P.O. Box 59479 Philadelphia, PA 19102-9479.

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