

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>IN RE: REALPAGE, INC., RENTAL</b>	)	<b>NO. 3:23-md-03071</b>
<b>SOFTWARE ANTITRUST</b>	)	<b>MDL No. 3071</b>
<b>LITIGATION (NO. II)</b>	)	
	)	<b>Judge Waverly D. Crenshaw, Jr.</b>
	)	
	)	<b>This Document Relates to:</b>
	)	<b>ALL CASES</b>
	)	

**PLAINTIFFS’ AND SETTLING DEFENDANTS’ JOINT QUARTERLY  
SETTLEMENT REPORT**

Pursuant to the Court’s February 25, 2025 Order (Dkt. 1079), Plaintiffs<sup>1</sup> and Settling Defendants,<sup>2</sup> collectively the “Parties,” hereby submit their first quarterly settlement report (the “Report”).

The Parties are pleased to report that settlements in principle have been reached with nineteen (19) Settling Defendants, including on all material monetary terms relating to each settlement. Appendix A attached to this Report details whether (1) the Parties have reached

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<sup>1</sup> Jason Goldman, Jeffrey Weaver; Billie Jo White; Nancy Alexander; Brandon Watters; Priscilla Parker and Patrick Parker; Barry Amar-Hoover; Joshua Kabisch; Meghan Cherry; Selena Vincin; and Maya Haynes, collectively “Plaintiffs.”

<sup>2</sup> Apartment Income REIT, Corp., d/b/a AIR Communities (“AIR”); Allied Orion Group LLC (“Allied Orion”); Avenue5 Residential, LLC (“Avenue5”); Bozzuto Management Company (“Bozzuto”); Brookfield Properties Multifamily LLC (“Brookfield”); CH Real Estate Services, LLC (“CH”); ConAm Management Corporation (“ConAm”); CWS Apartment Homes LLC (“CWS”); First Communities Management, Inc. (“FCM”); FPI Management, Inc. (“FPI”); Lantower Luxury Living, LLC (“Lantower”); Mission Rock Residential, LLC (“Mission Rock”); Pinnacle Property Management Services (“Pinnacle”); Prometheus Real Estate Group, Inc. (“Prometheus”); Security Properties Residential, LLC (“Security Properties”); Sherman Associates, Inc. (“Sherman”); Simpson Property Group, LLC (“Simpson”); Thrive Communities Management LLC (“Thrive”); and WinnCompanies LLC and WinnResidential Manager Corp. (“Winn”), collectively “Settling Defendants.”

agreement on all other material terms to their respective settlements, including as they relate to non-monetary terms; and (2) where agreement has not yet been reached on all material terms to any settlement, the Parties propose a date by when they expect to have all terms finalized and their respective long-form Settlement Agreements executed.

Finally, with respect to the timing for preliminary approval of the settlements, the Parties respectfully propose October 1, 2025, as the date by when they will jointly submit notice for approval of the above nineteen (19) settlements, pursuant to the Court's February 25, 2025 Order (Dkt. No. 1079).

Dated: March 31, 2025

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/Dkt. system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

*/s/ Tricia R. Herzfeld*

Tricia R. Herzfeld

**Appendix A to Settlement Report Dated March 31, 2025**

<b>Defendant</b>	<b>Material Monetary Terms Agreed (Y/N)</b>	<b>Material Non-Monetary Terms Agreed (Y/N)</b>	<b>Term Sheet Signed<sup>1</sup> (Y/N)</b>	<b>Target Date to Finalize Long-Form Settlement Agreement</b>
Apartment Income REIT LLC	Yes	Yes	Yes	Executed
FPI Management	Yes	Yes	Yes	Executed
Lantower	Yes	Yes	Yes	Executed
Pinnacle	Yes	Yes	Yes	Executed
Prometheus	Yes	Yes	Yes	4/14/2025
Bozzuto	Yes	Yes	Yes	4/17/2025
Allied Orion	Yes	Yes	Yes	4/21/2025
Winn	Yes	Yes	Yes	4/23/2025
Thrive	Yes	Yes	Yes	4/28/2025
Brookfield	Yes	Yes	Yes	4/29/2025
Mission Rock	Yes	Yes	Yes	4/30/2025
Avenue5	Yes	Yes	No	6/30/2025
ConAm	Yes	Yes	No	6/30/2025
Sherman	Yes	Yes	No	6/30/2025
CH	Yes	Yes	No	6/30/2025
CWS	Yes	No	No	6/30/2025
FCM	Yes	No	No	6/30/2025
Security Properties	Yes	No	No	6/30/2025
Simpson	Yes	No	No	6/30/2025

<sup>1</sup> The Parties have generally engaged in a two-step settlement negotiation process whereby they first agree on all material terms in a short-form agreement, the “Term Sheet,” and refine those terms in the long-form “Settlement Agreement.”