



Superior Court of California in and for Santa Clara County
Kachadoorian v. Equity Residential Management, L.L.C., et al.
Case No. 25CV460326

Class Action Notice

Authorized by the Superior Court of Santa Clara

Did you sign a lease at the Mill Creek Apartments, located at 440 Dixon Landing Rd, Milpitas, California, and either receive or respond to a rent renewal notice between March 4, 2021 and June 22, 2026, and/or experience a rent increase between March 4, 2021 and May 2, 2023?

There is a \$1,000,000.00 settlement of a lawsuit.

You may be entitled to money.

If you want to be part of the settlement, you do not need to do anything.

If not, you need to opt out by December 14, 2026. You can also object by December 14, 2026.

Important things to know:

- If you take no action, you will be bound by the settlement, and your rights will be affected.
- You can learn more at: www.MillCreekApartmentSettlement.com.

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About This Notice

Why did I get this notice?

This notice is to tell you about the settlement of a class action lawsuit, *Sharon Kachadoorian v. Equity Residential Management, L.L.C., et al.*, brought on behalf of individuals who signed a lease with Defendants at the Mill Creek Apartments, located at 440 Dixon Landing Rd, Milpitas, California, and who either (a) received and/or responded to a rent renewal notice between March 4, 2021 and June 22, 2026, and/or (b) experienced a rent increase that went into effect between March 4, 2021 and May 2, 2023.

This **notice gives you information about the case and tells you how to opt out if you don't want to be part of it.**

It is an important legal document, and we recommend that you read all of it. If you have questions or need assistance, please go to www.MillCreekApartmentSettlement.com or call (415) 484-0980, which is the number of the lawyers representing the Class.

What do I do next?

Read this notice to understand the settlement and to determine if you are a class member. Then, decide which of these actions you want to take:

Options	What each option means:
Do Nothing	You will receive a payment of approximately <<\$estAmount>> that will be paid to the PayPal account associated with your email address.
Elect Form of Payment	Instead of having the approximately <<\$estAmount>> sent to your PayPal account, you can elect to have payment made by either Venmo or by paper check by filling out information here: www.MillCreekApartmentSettlement.com
Opt Out	Get no payment. Allows you to bring another lawsuit against Defendants about the same issues.
Object	Tell the Court why you don't like the settlement.

Read on to understand the specifics of the settlement and what each choice would mean for you.

What are the most important dates?

- Your deadline to object or opt out: **December 14, 2026.**
- Your deadline to elect a different form of payment: **December 14, 2026.**

Learning About the Lawsuit

What is this lawsuit about?

The lawsuit was brought by Sharon Kachadoorian against Equity Residential Management, L.L.C., Equity Residential, EQR-Fresca 2009 Limited Partnership (collectively, "Equity"), and an on-site landlord (collectively, "Defendants"). The lawsuit claims Defendants did not follow the Milpitas Rent Ordinance when proposing and increasing rent at the Mill Creek Apartments. It alleges tenants were not given required notices about their rights or explanations for rent increases over five percent (5%). Equity denies that they did anything wrong.

Where can I learn more?

You can get a complete copy of the proposed settlement and other key documents in this lawsuit at:

www.MillCreekApartmentSettlement.com

Why is there a settlement in this lawsuit?

In April 2026, the parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the cost and risk of continuing the case in court.

The settlement is for the tenant who brought the case and all members of the settlement class. The Court has not decided this case in favor of either side.

What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members and changes to the practices that caused the harm.

What happens next in this lawsuit?

The Court will hold a Fairness Hearing to decide whether to approve the proposed settlement. The hearing will be held at:

Where: Old County Courthouse, Department 19, 161 North First Street, San Jose, CA 95113

When: 1:30 p.m. on June 30, 2027.

Class members may appear at the final approval hearing in person or remotely using the link for Department 19, and should review the remote appearance instructions beforehand:

<https://santaclara.courts.ca.gov/online-services/remote-hearings>

Class members who wish to appear remotely are encouraged to contact class counsel at least three days before the hearing, if possible, so that potential technology or audibility issues can be avoided or minimized.

The Court has directed the parties to send you this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You don't have to attend the hearing, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement or the parties decide to end it, it will not take effect and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to www.MillCreekApartmentSettlement.com.

Learning About the Settlement

What does the settlement provide?

Equity has agreed to pay \$1,000,000.00 into a settlement fund. This money will be used to provide payments to Settlement Class Members and to pay for Court-approved attorneys' fees and costs, the Class Representative Service Award, and the costs of administering the settlement. If the Settlement is approved, Settlement Class Members will "release" their claims, meaning they will no longer be able to sue Defendants for the same issues and legal violations raised in this lawsuit. The full terms of the release can be found www.MillCreekApartmentSettlement.com.

The Settlement also requires Equity to make changes to its business practices, including ensuring that rent increase notices issued under the Milpitas Rent Review Ordinance include the reason or reasons for the rent increase, and to provide the explanation in the same language(s) as the rest of the notice.

The settlement also provides \$15,000.00 to the tenant who brought this lawsuit, Plaintiff Sharon Kachadoorian, to compensate her for her efforts and work on the case. This is called a "service award."

If there is money left over after the claims and expenses are paid, it will be donated to the California State Bar's Greg E. Knoll Justice Gap Fund.

How do I know if I am part of this settlement?

You are part of this settlement if you signed a lease with Defendants at the Mill Creek Apartments, located at 440 Dixon Landing Rd, Milpitas, California, and either (a) received or responded to a rent renewal notice between March 4, 2021 and June 22, 2026, or (b) experienced a rent increase that went into effect between March 4, 2021 and May 2, 2023.

If you are unsure of whether you are part of this settlement, contact the Settlement Administrator at 1-888-261-0511.

How much will my payment be?

Your payment amount will depend on the amount of the lawyer fees, costs, and service payments approved by the Court. Your payment is expected to be approximately <<\$estAmount>>.

Your payment depends on what happened during your tenancy at the Mill Creek Apartments and on whether you qualify for one or more of the following payment groups. If you qualify for more than one group, you will receive the amounts assigned to each applicable group:

Ordinance Group: this group consists of those class members with a qualifying renewal-related event between March 4, 2023 and May 2, 2023. A qualifying event includes receiving or executing a rent renewal notice or executing a renewal agreement during that period. Equity's records show you <<OrdinanceGroup (are/are not)>> a member of this group.

Notice Group: this group consists of those class members who may not have received all notices required by the Milpitas Rent Review Ordinance between March 4, 2021 and May 2, 2023, including Class Members whose rent increased by more than five percent without a written explanation for the increase. Class Members in this group are expected to receive about \$100. Equity's records show you <<NoticeGroup (are/are not)>> a member of this group.

Restitution Group: this group consists of those class members who received a rent renewal notice and/or responded to a rent renewal notice between March 4, 2021 and May 2, 2023 **and** who had a corresponding rent increase between March 4, 2021 and June 22, 2026. Equity's records show you <<RestitutionGroup (are/are not)>> a member of this group.

How will payment be made?

If you do nothing, a payment will be issued to the PayPal account associated with your email address. If you do not have a PayPal account already created with your email address, PayPal will send an email asking you to create an account. If you do not have a PayPal account and do not create an account within 60 days, the money will be returned and sent to you via Venmo. If you do not claim the payment with Venmo within 60 days, the funds will be donated to the California State Bar's Greg E. Knoll Justice Gap Fund, as approved by the Court.

Alternatively, you can elect at the outset to have payment made directly to Venmo or to have a check mailed to you by clicking www.MillCreekApartmentSettlement.com and providing your information.

Deciding What to Do

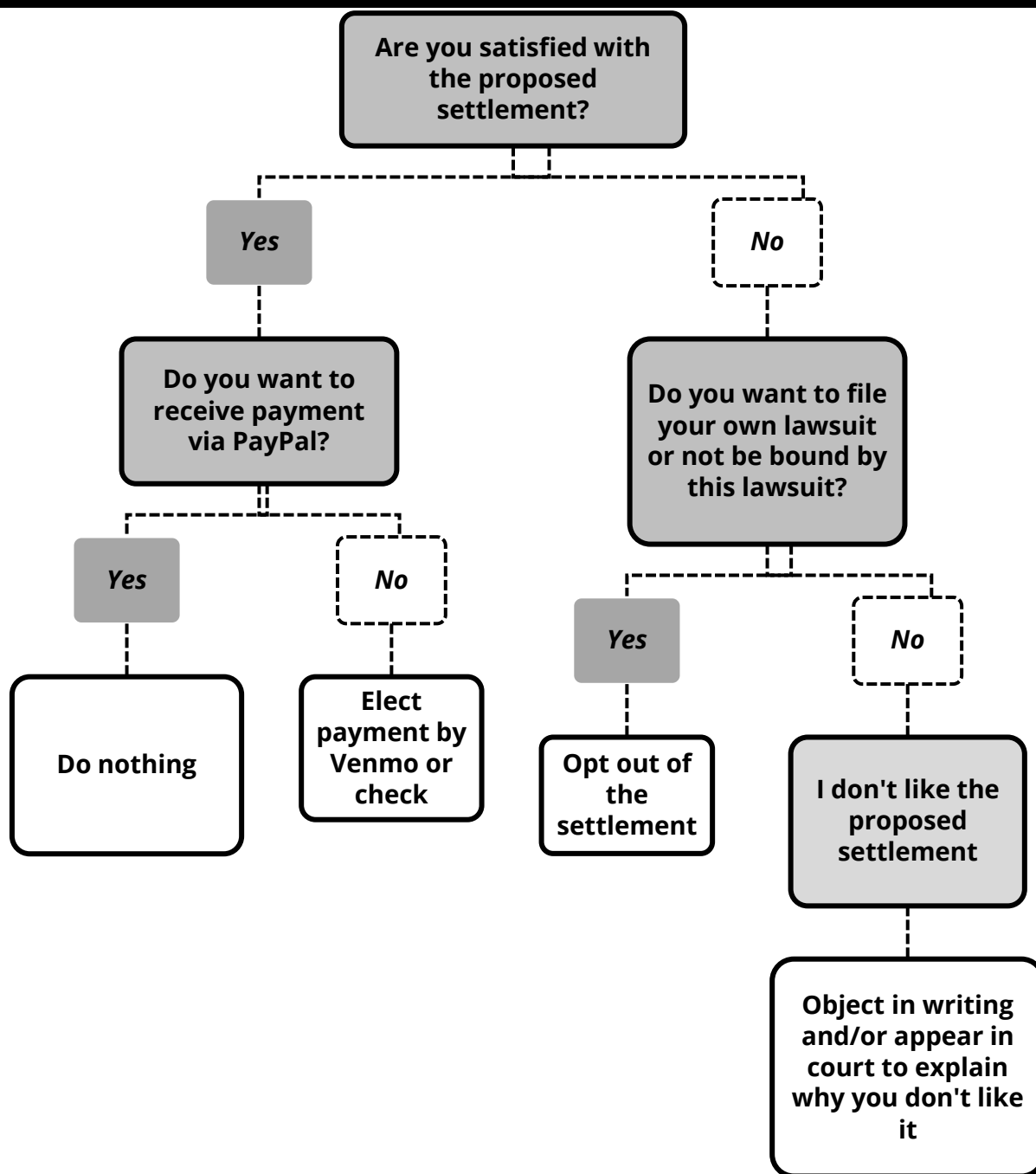
How do I weigh my options?

You have four options. You can stay in the settlement and receive payment by PayPal, you can elect to have payment made by Venmo or check, you can opt out of the settlement, you can object to the settlement, or you can do nothing. This chart shows how your rights are affected by each option:

	Do Nothing	Opt out	Object	Elect Form of Payment
Can I receive settlement money if I . . .	YES	NO	YES	YES
Am I bound by the terms of this lawsuit if I . . .	YES	NO	YES	YES
Can I pursue my own case if I . . .	NO	YES	NO	NO

Will the class lawyers represent me if I ...	YES	NO	NO	YES
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What is the best path for me?



Do I have a lawyer in this lawsuit?

In a class action, the court appoints lawyers to work on the case and represent the interests of all the class members. For this settlement, the Court has appointed the following lawyers.

Your lawyers: Christian Schreiber and Estefania Palacios of Olivier & Schreiber PC, and Daniel

"Sparky" Abraham of Jubilee Legal. These are the lawyers who negotiated this settlement on your behalf.

If you want to be represented by your own lawyer, you may hire one at your own expense.

Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be paid from the Settlement Fund. **You will not have to pay the lawyers directly.**

To date, your lawyers have not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request, as part of the final approval of this Settlement, that the Court approve a payment of up to \$333,333.00 total in attorneys' fees plus the reimbursement of out-of-pocket expenses of up to \$30,000.00.

The Court will also be asked to approve the Settlement Administrator's fees and expenses for administering the settlement. These expenses will not exceed \$25,000.00 unless the Court approves a higher amount for good cause.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

Your lawyers will also ask the Court to approve a payment of \$15,000.00 to the Class Representative for the time and effort she has contributed to the case. If approved by the Court, the Service Awards will be paid from the Settlement Fund.

Opting Out

What if I don't want to be part of this settlement?

You can opt out. If you do, you will not receive payment and cannot object to the settlement. However, you will not be bound or affected by anything that happens in this lawsuit and may be able to file your own case.

How do I opt out?

To opt out of the settlement, you must send the Settlement Administrator, by email or mail, a signed written Request for Exclusion not later than December 14, 2026, at:

Kachadoorian v. Equity Residential Management, L.L.C.
c/o CPT Group, Inc.
PO Box 19504
Irvine, CA 92623
1-888-261-0511
MillCreekApartmentSettlement@cptgroup.com

Be sure to include your name, address, and email address or telephone number.

Objecting

What if I disagree with the settlement?

If you disagree with any part of the settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve the settlement and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement — it cannot change the terms of the settlement. You may, but don't have to, hire your own lawyer to help you.

To object, you must send your written objections, by email or mail to the Settlement Administrator not later than December 14, 2026, at:

Kachadoorian v. Equity Residential Management, L.L.C.
c/o CPT Group, Inc.
PO Box 19504
Irvine, CA 92623
1-888-261-0511
MillCreekApartmentSettlement@cptgroup.com

If you fail to object by December 14, 2026, the Court will still hear from you if you attend the Final Approval Hearing and ask to speak regarding your objection.

Key Resources

How do I get more information?

This notice is a summary of the proposed settlement. The complete settlement with all its terms can be found www.MillCreekApartmentSettlement.com. To get a copy of the settlement agreement or get answers to your questions:

- contact your lawyer (information below)
- visit the case website at www.MillCreekApartmentSettlement.com
- access the Court's <https://portal.scscourt.org/search> or by visiting the clerk's office of the Court (address below)

Resource	Contact Information
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Case website	www.MillCreekApartmentSettlement.com
Settlement Administrator	Kachadoorian v. Equity Residential Management, L.L.C. c/o CPT Group, Inc. PO Box 19504 Irvine, CA 92623 Tel: 1-888-261-0511 MillCreekApartmentSettlement@cptgroup.com
Your Lawyers	Olivier & Schreiber PC 475 14th Street, Suite 250 Oakland, CA 94612 Tel: (415) 484-0980 Jubilee Legal 300 E. Esplanade Dr., Suite 900 Oxnard, CA 93036 Tel: (805) 946-0386
Court (DO NOT CONTACT)	Old County Courthouse 161 North First Street San Jose, CA 95113