

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MARY LOUIS AND MONICA DOUGLAS,
on behalf of themselves and all others
similarly situated, and COMMUNITY
ACTION AGENCY OF SOMERVILLE,
INC.,

Plaintiffs,

v.

SAFERENT SOLUTIONS, LLC, and
METROPOLITAN MANAGEMENT
GROUP, LLC,

Defendants.

Civil Case No. 1:22-cv-10800-AK

JOINT STATUS REPORT

In connection with this Court's Order of February 21, 2024 (Doc. No. 108) and the Parties' Joint Status Report of March 1, 2024 (Doc. No. 111), Plaintiff Mary Louis and Defendant Metropolitan Management Group, LLC submit this report regarding the status of settlement.

1. All parties in this case engaged in a mediation session on November 6, 2023, and with the aid of the Hon. Judge Welsh (Ret.), made progress toward reaching a settlement of this case.

2. Plaintiffs and Defendant SafeRent Solutions have reached a settlement to resolve the claims by Plaintiffs against Defendant SafeRent Solutions. On March 28, 2024, Plaintiffs filed their Unopposed Motion to Certify the Classes for Settlement Purposes and Direct Notice of Settlement to the Classes ("Preliminary Approval Motion"), and corresponding filings. Doc Nos. 113, 114. The final, signed Class Action Settlement Agreement and Release is attached as Exhibit 1 to the Preliminary Approval Motion.

3. Plaintiff Community Action Agency of Somerville (“CAAS”) has also reached a separate settlement agreement to resolve the individual claims of CAAS against Defendant SafeRent Solutions. CAAS filed a Notice of Settlement on March 28, 2024. Doc. No. 117.

4. Plaintiff Mary Louis and Defendant Metropolitan are continuing to engage in settlement discussions regarding the individual claims of Plaintiff Louis against Defendant Metropolitan. As stated in their March 1 report, the Parties initially agreed to submit this updated report to the Court by March 15, 2024. Following the March 1 report, the Parties met and conferred about settlement on March 6, when Plaintiffs’ counsel offered an updated proposal. Plaintiffs’ counsel attempted to follow up with counsel for Metropolitan thereafter through email, but received no response until March 28. The Parties apologize to the Court for failing to provide a further update by the March 15 deadline and intend to continue settlement discussions and provide prompt updates to the Court in the future.

5. Plaintiff Louis and Defendant Metropolitan have agreed to submit a further status report by April 12, 2024, that either updates the Court on the status of these parties’ settlement discussions or that proposes a schedule consistent with the dates provided at the Court’s September 13, 2023 status conference.

If the Court believes a further order is necessary at this time, the Parties respectfully request that the Court enter an order directing Plaintiff Mary Louis and Defendant Metropolitan to submit a further status report by April 12, 2024, that either updates the Court on the status of the these parties’ settlement discussions or that proposes a schedule consistent with the dates provided at the Court’s September 13, 2023 status conference.

Respectfully submitted March 28, 2024, by:

/s/ Christine E. Webber

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies shall be served by first class mail postage prepaid on all counsel who are not served through the CM/ECF system on March 28, 2024.

Dated: March 28, 2024

/s/ Christine E. Webber