

LEGAL NOTICE | CLASS ACTION LAWSUIT

Hills v. PAC Housing Group, LLC, et al.

Civil Action 2:23-cv-05740-BWA-KWR

United States District Court for the Eastern District of Louisiana

WHAT IS THIS NOTICE ABOUT?

A federal court authorized your notice. It is not a solicitation from a lawyer.

The Court has certified this case to proceed as a class action. That means that the lawsuit will be conducted on behalf of a group of people who have similar claims.

The lawsuit has been filed against Dr. Richard Hamlet; MOF-Preservation of Affordability Corp.; Ministry Outreach Foundation; MOF Parc-Fontaine LLC, and/or PAC Housing Group, LLC (collectively, the “Defendants”).

If you leased and resided in an apartment at the Parc Fontaine Apartment Complex at any time during the period from December 1, 2018 to the present, you may be part of this class action case (a “Class Member”).

If you are a Class Member, your legal rights are affected whether you act or don’t act. Read your notice carefully.

WHAT IS THE LAWSUIT ABOUT?

The lawsuit alleges that Defendants, operating together, failed to perform their lease and legal obligations. Specifically, the lawsuit alleges that Defendants failed to provide habitable common areas, common facilities, and common appurtenances at the Parc Fontaine Apartment Complex, located in and around 3101 Rue Parc Fontaine, New Orleans, Louisiana 70131. The lawsuit alleges that all or some of the rent money received by Defendants was paid in exchange for these common benefits that were not actually provided.

The lawsuit seeks specific damages. One category of damages seeks the return of all or part of rent money paid. The other category seeks an order declaring that Defendants’ duties regarding common areas, maintenance, legal compliance, and repairs under the Class Members’ leases and governing law. The lawsuit does not seek categories of damages that are unique to you, including, but not limited to, damages for personal injuries or property damages arising from the common areas, common facilities, and/or common appurtenances.

Dr. Richard Hamlet; MOF-Preservation of Affordability Corp.; Ministry Outreach Foundation; MOF Parc-Fontaine LLC, and/or PAC Housing Group, LLC deny all allegations and any wrongdoing. No court has decided who is right.

ARE YOU A CLASS MEMBER?	
If this description fits you, then you <u>ARE</u> a Class Member, subject to limited exclusions.	All natural persons who both leased and resided at a Parc Fontaine apartment unit owned by any of the Defendants at any time during the period from December 1, 2018 to the present on whose behalf any Defendant was paid rent and who was thus subject to uninhabitable conditions in the common areas, common facilities, and common appurtenances based on Defendants' failure to maintain and provide such common areas, facilities, and appurtenances.
If any of these exclusions apply to you, you are <u>NOT</u> a Class Member:	<p>If you are Dr. Richard Hamlet; MOF-Preservation of Affordability Corp.; Ministry Outreach Foundation; MOF Parc-Fontaine LLC, and/or PAC Housing Group, LLC, you are not a Class Member.</p> <p>If you are an affiliate, employee, officer, or director of any of the Defendants, you are not a Class Member.</p> <p>If you are the judge assigned to this case, you are not a Class Member.</p>
YOUR LEGAL RIGHTS AND OPTIONS IN THIS CASE	
<i>These apply to you if you <u>ARE</u> a Class Member based on the previous section.</i>	
<p>Automatic Member. If you do nothing, you will remain a Class Member.</p> <p>To ensure that you receive up-to-date news on your case, you can review the website link included below.</p>	<p>If you do nothing, you will automatically remain a Class Member. This means:</p> <ul style="list-style-type: none"> You will be represented by the lawyers listed below (called "Class Counsel"). You will be bound by any judgment or settlement, whether favorable or not. If the Class wins the lawsuit or reaches a settlement, you may be entitled to benefits. If the Class loses, you will not be able to pursue other claims against the Defendants. You cannot sue Defendants separately for the same claims covered by this lawsuit or even other claims that are

	<p>individual to you, such as for personal injury arising from uninhabitable conditions in the common areas, common facilities, and common appurtenances based on Defendants' alleged failure to maintain and provide such common areas, facilities, and appurtenances</p>
<p>Opt Out through a timely notice.</p> <p><u>Deadline:</u> <u>Postmarked by</u> <u>October 10, 2025</u></p>	<p>If you opt out, then you will be excluded from the Class. If you exclude yourself:</p> <ul style="list-style-type: none"> • You will not be represented by the lawyers listed below (called "Class Counsel"). • You will not be bound by any judgment or settlement, whether favorable or not. • If the Class wins the lawsuit or reaches a settlement, you will not get any settlement money or other benefits. • If the Class loses, you could still be able to pursue other timely claims against the Defendants. • You keep your right to timely sue the Defendants individually for the same claims covered by this lawsuit or even other claims that are individual to you, such as personal injury or property damage claims arising from the allegations in this lawsuit. <p>If you do not opt out by the deadline, you will automatically be included in the Class.</p>
<p>How to exclude yourself. (<i>The method for opting out</i>).</p>	<p>To exclude yourself, you <u>MUST</u> send an Opt-Out form for exclusion, postmarked no later than <u>October 10, 2025</u> by submitting a request to:</p> <p>RG2 Claims Administration LLC P.O. Box 59479 Philadelphia, PA 19102-9479</p> <p>This request must be on the attached Opt-Out form and be postmarked by no later than October 10, 2025. <u>You cannot exclude yourself by telephone or email.</u></p>
<p>What information do you need to provide to opt-out?</p>	<p>The request for exclusion must include:</p>

(The required contents of a valid opt out).	<ul style="list-style-type: none"> • Case Name and Case Number (<i>Hills v. PAC Housing Group, LLC, et al.</i>, 2:23-cv-05740-BWA-KWR; United States District Court for the Eastern District of Louisiana); • Full Name; • Address; • Telephone Number; • Statement that you want to be excluded from the Class; and • Your Signature.
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WHO REPRESENTS THE CLASS?

The Court has appointed the following attorneys to represent the class:

Class Counsel:

(1) DeVonn Jarrett
 JARRETT LAW GROUP, LLC
 643 Magazine St., Suite 301A
 New Orleans, Louisiana 70130
 Telephone: (833) 554-6653
 Email: djarrett@jarrettlawgroup.com

and

(2) Casey C. DeReus
 BRAGAR EAGEL & SQUIRE, P.C
 810 Seventh Avenue, Suite 620
 New York, New York 10019
 Telephone: (212) 308-5858
 Facsimile: (212) 486-0462
 Email: dereus@bespc.com

If you a Class Member and do not opt-out, then you do not need to hire your own lawyer. Class Counsel will represent your interests along with those of all other Class Members.

WHAT HAPPENS NEXT?

This lawsuit is still in progress. The Court has not decided whether Defendants did anything wrong or whether Class Members are entitled to money or other relief.

The case will proceed through discovery, motion practice, and potentially trial unless it is settled. This process may take months or years to complete. **You will be notified of any proposed settlement or any judgment.**

You can track other significant developments, including motion practice and key deadlines, by:

- Visiting the designated case webpage at:

<https://www.bespc.com/cases/ParcFontaine>

- Writing Class Counsel at the addresses above, or
- Examining the court docket, including documents, through the Court's PACER system at:

<https://www.laed.uscourts.gov/case-information/pacer>.

DO NOT CONTACT THE COURT, THE JUDGE, OR THE DEFENDANTS DIRECTLY ABOUT THIS CASE.

OPT-OUT FORM

*Alvin Hills, et al. v. Parc Housing Group,
LLC et al.*

Court: Eastern District of Louisiana

Case No. 2:23-cv-05740-BWA-KWR

**This is NOT a Claim Form. It EXCLUDES you from this Class Action.
DO NOT use this Form if you wish to remain IN this Class Action.**

Full Name of Class Member:

Address:

Street

City

State

Postal Code

Telephone: _____

Area Code/Phone No. (Ext. if applicable)

I understand that by opting out of this Class Action, I will not be eligible to receive any money that may result from any trial or settlement of this lawsuit, if there is one. I do not wish to receive compensation under the terms of any judgment or settlement or to otherwise participate in this Class Action. I further understand that by opting out, all personal representatives, spouses, and relatives who on account of a personal relationship to me might assert a derivative claim for money will be deemed to have opted out as well.

If you wish to opt out of this Class Action, please check the box below.

☐ By checking this box, I affirm that I wish to be excluded from this Class Action.

Date Signed

Signature of Class Member or Executor, Administrator or
Personal Representative

**This form must be postmarked to Plaintiffs' and Defendant's counsel NO LATER THAN
October 10, 2025, at the addresses below, or else you will lose your right to opt out.**

RG2 Claims Administration LLC
P.O. Box 59479
Philadelphia, PA 19102-9479

Hills v. PAC Housing Group, LLC, et al.
 c/o RG/2 Claims Administration LLC
 P.O. Box 59479
 Philadelphia, PA 19102-9479

[Postage Prepaid]

COURT-ORDERED LEGAL NOTICE

Important Notice about a Pending Class Action.

**This Notice may affect your legal rights.
 Please read it carefully.**

Hills v. PAC Housing Group, LLC, et al.,
 Civil Action No. 2:23-cv-05740 (BWA-KWR)

Name
 Address
 City, State
 Zip

***THIS CARD PROVIDES ONLY LIMITED INFORMATION ABOUT THE CLASS ACTION.
 PLEASE VISIT WWW.BESPC.COM/CASES/PARCFONTAINE FOR MORE INFORMATION.***

A class action has been certified against Dr. Richard Hamlet; MOF-Preservation of Affordability Corp.; Ministry Outreach Foundation; MOF Parc-Fontaine LLC, and/or PAC Housing Group, LLC (collectively, the “Defendants”). The class action involves a lawsuit in which Plaintiffs allege that Defendants failed to perform their lease and legal obligations. Specifically, the lawsuit alleges that Defendants failed to provide habitable common areas, common facilities, and common appurtenances at the Parc Fontaine Apartment Complex, located in and around 3101 Rue Parc Fontaine, New Orleans, Louisiana 70131. The lawsuit alleges that all or some of the rent money received by Defendants was paid in exchange for these common benefits that were not actually provided. Defendants deny any wrongdoing.

You received this notice because you may have leased and resided at a Parc Fontaine apartment unit owned by any of the Defendants at any time during the period starting from December 1, 2018 onward and you may have been damaged by the alleged breaches described above relative to the common areas, common facilities, and common appurtenances at the Parc Fontaine Apartment Complex. **For all details of the Class Action, read the full Notice, available at www.bespc.com/cases/parcfontaine.** You may also request a copy of the full Notice by contacting the Claims Administrator in either of the following ways: (1) mail: P.O. Box 59479, Philadelphia, PA 19102-9479; or (2) call: toll-free, 1-866-742-4955.

If you leased or resided in a Parc Fontaine apartment unit owned by any Defendant from December 1, 2018 to present, you are automatically a part of the class action, or a “Class Member”, with certain, limited exceptions. If you choose to remain a Class Member, then you will be bound by the outcome of the class action, whether successful or unsuccessful. However, as a Class Member, you also have the right to opt-out and pursue your claims individually. **To opt out, you must submit a valid Opt-Out Form to the Claims Administrator.** The Opt-Out Form can be found on the website. **Opt-Out Forms must be postmarked by October 10, 2025.** If you do not want to be legally bound by the Class Action, you must exclude yourself, or you will not be able to sue the Defendants about the legal claims in this case. If you exclude yourself, you cannot get money from this class action if it settles or if a favorable judgment is reached in court.