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TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR SPOKANE COUNTY

THOMAS SILVER, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

RUDEEN MANAGEMENT COMPANY,
INC., a Washington corporation,

Defendant.

NO. 17-2-03103-2

DECLARATION OF RYAN ALDRIDGE
REGARDING NOTICE AND
SETTLEMENT ADMINISTRATION

I, Ryan Aldridge, hereby declare and verify as follows:

I. INTRODUCTION

1. *Personal Information.* I am a Partner at Eisner Advisory Group, LLC ("EAG").¹ EAG was retained as the Settlement Administrator in this Litigation, and, as the project manager over this Settlement, I am personally familiar with the facts set forth in this Declaration.

2. *The Capacity and Basis of this Declaration.* I am over the age of 21. Except as otherwise noted, the matters set forth in this Declaration are based upon my personal knowledge, information received from the Parties in this Litigation, and information provided by my colleagues at EAG and our Partners.

II. BACKGROUND

3. *Preliminary Approval.* On March 3, 2026, the Court entered its Order Granting Preliminary Approval of Class Settlement, preliminarily approving the Settlement Agreement and appointing EAG as Settlement Class Administrator. After the Court's preliminary approval of the Settlement, EAG began to implement and coordinate the notice program.

¹Unless otherwise indicated, all capitalized terms have the same meaning assigned to them in the Settlement Agreement.

1 4. ***The Purpose of this Declaration and Verification.*** I submit this Declaration to evidence
2 EAG's compliance with the terms of the Preliminary Approval Order, to detail EAG's execution of its role
3 as the Class Administrator, and to verify compliance with the notice requirements contained in the Settlement
4 Agreement and the Court's Preliminary Approval Order.

5 III. **NOTICE PROGRAM EXECUTION**

6 5. ***Notice Database.*** EAG maintains a database of 7,813 Class Members (the "Notice List"),
7 which was used to effectuate the notice program as outlined within the Settlement Agreement. On November
8 11, 2025, EAG received the Class Member data file from Defendant in the form of two excel files, containing
9 a combined total of 7,825 individual contact records. After processing and de-duplicating the data, EAG
10 determined the operative Notice List consisted of 7,813 unique Class Members, of which 6,248 had an email
11 address sufficient to attempt notice. The reduction from the originally provided list reflects the removal of
12 identified duplicate records following EAG's standard data-processing and de-duplication procedures.

13 6. ***Email Notice.*** Beginning on April 1, 2026, in accordance with the Preliminary Approval
14 Order, EAG commenced sending the Email Notice to the 6,248 Class Members on the Notice List with an
15 email address. The Email Notice directed Class Members to the website established for the Settlement
16 ("Settlement Website") for access to additional information and summarized the Class Member's rights and
17 options under the Settlement, including the right to opt out of or object to the Settlement, and the deadlines
18 by which to act on those options, and the date of the Fairness Hearing. EAG followed standard email best
19 practices, including utilizing "unsubscribe" links and providing Class Administrator contact information in
20 the Email Notice. Ultimately, the Email Notice was successfully delivered to 5,298 Class Members. A copy
21 of the Email Notice is attached hereto as **Exhibit A**.

22 7. ***Mail Notice.*** EAG also coordinated and caused the Postcard Notice to be mailed via First-
23 Class Mail to Class Members for whom no valid email address was available, as well as to Class Members
24 whose Email Notice was returned as undeliverable. The Postcard Notice included (a) the web address to the
25 Settlement Website for access to additional information, and (b) the Class Member's rights and options under
26 the Settlement, including the ability to opt out or object and the dates by which to act on those options, (c)
27
28

1 the date of the Fairness Hearing. A true and correct copy of the Postcard Notice is attached hereto as **Exhibit**
2 **B.**

3 8. ***Mailing Address Validation.*** Prior to the mailing, all mailing addresses were checked against
4 the National Change of Address ("NCOA") database maintained by the United States Postal Service
5 ("USPS"). In addition, the addresses were certified via the Coding Accuracy Support System ("CASS") to
6 ensure the quality of the zip code and verified through Delivery Point Validation ("DPV") to verify the
7 accuracy of the addresses.

8 9. ***Mail Notice Delivery.*** In the initial mailing, EAG mailed the Postcard Notice to the 1,565
9 Class Members for whom no valid email address was available. EAG subsequently mailed the Postcard
10 Notice to Class Members whose Email Notice was returned as undeliverable, and executed supplemental
11 mailings for Class Members whose Postcard Notice was returned as undeliverable but for whom EAG was
12 able to obtain an alternative mailing address through (1) forwarding addresses provided by the USPS, (2)
13 skip trace searches using a third-party vendor database, or (3) requests received directly from Class Members.
14 In total, EAG mailed 2,692 Postcard Notices. Notice delivery statistics are detailed in Section IV below.

15 10. ***Settlement Website.*** On March 24, 2026, EAG published the Settlement Website, available at
16 www.RudeenDepositRefund.com. Visitors to the Settlement Website can download the Long Form Notice
17 and other Court documents, such as the Class Action Complaint, the Settlement Agreement, the Unopposed
18 Motion for Preliminary Approval, Orders of the Court, and other relevant documents. Visitors are also able
19 to identify important dates and deadlines and access contact information for the Class Administrator. As of
20 July 15, 2026, the Settlement Website received 1,177 unique visits.

21 11. ***Settlement Post Office Box.*** EAG maintains the following Post Office Box for the Notice
22 Program:

23 Rudeen Settlement Administrator

24 P.O. Box 3637

25 Baton Rouge, LA 70821
26
27
28

1 This P.O. Box serves as a location for the USPS to return undeliverable program mail to EAG and for Class
2 Members to submit exclusion requests, objections, and other settlement-related correspondence. The P.O.
3 Box address appears in the notices and on the Settlement Website. EAG monitors the P.O. Box and uses a
4 dedicated mail intake team to process each item received.

5 12. **Dedicated Toll-Free Number.** In connection with the launch of the Notice Program, EAG
6 established a dedicated toll-free telephone number, 1-844-536-0555, which is available twenty-four hours
7 per day. Settlement Class Members can call and interact with an interactive voice response (“IVR”) system
8 that provides important Settlement information and offers the ability to leave a voicemail message to address
9 specific requests or issues. EAG also provided copies of the Class Notice and the Settlement Agreement to
10 Class Members, upon request, through the toll-free number. The toll-free number appeared in the notices and
11 in multiple locations on the Settlement Website and will remain active through the close of this notice
12 program.

13 13. **Email Support.** EAG established an email address, Info@RudeenDepositRefund.com, to
14 provide an additional option for Class Members to address specific questions and requests to the Class
15 Administrator for support.

16 IV. **NOTICE PROGRAM REACH**

17 14. **Notice Reach Results.** Through the Notice procedures outlined above, EAG disseminated
18 direct Notice to Class Members via Email Notice and Postcard Notice. As of July 15, 2026, Notice reached
19 a total of 7,624 (97.58%)² of the 7,813 Class Members.³ Table 1 below provides an overview of the
20 dissemination and reach statistics for Notice.

21
22
23
24
25
26 ²The linchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together
will reach a high percentage of the class. It is reasonable to reach between 70-95%. See 2010 Judges’ Class Action Notice and
Claims Process Checklist and Plain Language Guide. Here, the notice effort reached 97.58% of the Settlement Class Members.

27 ³A Settlement Class Member is considered “reached” by direct Notice if the Email Notice sent to the Settlement Class Member
28 was not returned as undeliverable, or a Postcard Notice mailed to the Settlement Class Member was not returned by the USPS as
undeliverable.

Table 1: Direct Notice Program Dissemination & Reach		
Description	Volume of Settlement Class Member Records	Percentage of Settlement Class Member Records (%)
Settlement Class Members	7,813	100.00%
Email Notice		
(+) Total Email Notices Sent	6,248	79.97%
(+) Total Email Notices Delivered	5,298	67.81%
(-) Total Email Notices Bounced/Undelivered	950	12.16%
Initial Notice Mailing		
(+) Postcard Notices Mailed (Initial Campaign)	1,565	20.03%
(+) Postcard Notices Mailed (Undeliverable Email)	950	12.16%
(-) Total Postcard Notices Returned as Undeliverable	333	4.26%
Supplemental Notice Mailing		
(+) Total Unique Postcards Re-mailed	177	2.27%
(-) Total Undeliverable (Re-mailed) Postcards	33	0.42%
Direct Notice Program Reach		
(+) Received Email Notice	5,298	67.81%
(+) Received Postcard Notice	2,326	29.77%
(=) Received Direct Notice	7,624	97.58%

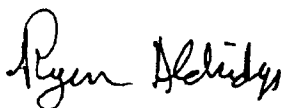
V. EXCLUSIONS AND OBJECTIONS

15. **Exclusions (Opt-Outs) Received.** The deadline to submit a request for exclusion from the Settlement was May 29, 2026. As of that deadline, EAG received zero (0) requests for exclusion from Class Members.

16. **Settlement Objections.** The deadline to object to the Settlement was May 29, 2026. As of that deadline, EAG received zero (0) objections from Class Members.

VI. CERTIFICATION

I, Ryan Aldridge, declare under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. Executed on this 15th day of July, 2026 at Baton Rouge, Louisiana.



Ryan Aldridge

Exhibit A

If you were a tenant at a Washington State residential property between August 10, 2014, and May 19, 2023, that was owned or managed by Rudeen Management Company, Inc., or where it was a landlord, and you did not receive a full and specific deposit statement and/or your entire deposit refund, please read this notice carefully.

You May Be Entitled to Benefits Under a Class Action Settlement.

*The Spokane County Superior Court of Washington authorized this Notice.
This is not a solicitation from a lawyer.*

A proposed settlement of a class action lawsuit relates to allegations that Rudeen Management Company, Inc. (the “Defendant”) failed to provide a full and specific deposit statement and/or deposit refund due within the legal timelines as required by Washington law. The case is known as *Thomas Silver v. Rudeen Management Company, Inc.*, No. 17-2-03103-2 in the Spokane County Superior Court (the “Lawsuit”).

What is the Lawsuit about? In the Lawsuit, Plaintiff Thomas Silver (the “Plaintiff”) claimed that the Defendant failed to provide its tenants with full and final deposit disposition statements and/or refunds due within legally required timelines under RCW 59.18.280 at Washington State residential rental properties owned or managed by the Defendant, or where the Defendant acted as a landlord for that property. In the Lawsuit, the Court entered an Order finding that the Defendant violated RCW 59.18.280 and was liable to pay each Class Member two (2) times the Class Member’s respective security deposit. However, to avoid the cost, uncertainty, and delay of going forward with continuing litigation and appeals concerning this Order, the parties agreed to a settlement.

With the settlement, the parties anticipate that each tenancy where a deposit was paid will receive approximately eighty percent (80%) of the deposit returned as a settlement payment. Where there was more than one tenant in a tenancy where a deposit was paid, this settlement payment amount will be divided amongst the tenants of that tenancy in equal shares. The Defendant claims it has abided by all state and federal laws. As part of the proposed settlement, Defendant does not admit to any wrongdoing, maintains its compliance with the law, and continues to deny the allegations against it.

Who is included? In sum, you are a Class Member if:

- (1) from August 10, 2014, to May 19, 2023, you rented a rental property then-managed or owned by the Defendant in the State of Washington where a damage and/or security deposit was paid at, or any time after, the commencement of the tenancy;
- (2) at the time you moved out of or abandoned the rental property, the Defendant was a landlord; and
- (3) where, within the statutory timeframes under RCW 59.18.280 at the time of your move-out or abandonment of the rental property, the Defendant did not send you a full and specific statement of the basis for retaining the deposit, or a portion thereof, or where the Defendant withheld all, or any portion, of the deposit.

What does the settlement provide? The Defendant has agreed to pay a total settlement amount of \$2,900,000 which will be used to create a Settlement Fund to pay cash awards to Settlement Class Members who do not timely exclude themselves from the Settlement, pay Class Counsel's attorneys' fees and costs, pay a service award to the Representative Plaintiff, and pay costs and expenses of settlement administration. Any funds that go unclaimed by Settlement Class Members will be distributed to the Legal Foundation of Washington and Inland Empire Legal Aid in equal shares as a *cy pres* distribution.

What are your options?

Do Nothing: If you do nothing, you will be eligible to receive the benefits allocated to Settlement Class Members and will be bound by the terms of the Settlement Agreement and Final Judgment.

Opt-Out or Object: If you exclude yourself (i.e., opt-out) from the settlement, you may potentially retain your right to sue the Defendant separately; however, you will not be eligible to receive any benefits. You must submit a request for exclusion. To exclude yourself from the settlement, you must send a signed letter by mail or an e-mail to the Rudeen Settlement Administrator stating that you wish to exclude yourself from the *Thomas Silver v. Rudeen Management Company, Inc.* Settlement. You must also include your name, address, telephone number, and your signature. Requests for exclusion by letter must be **postmarked no later than May 29, 2026**. Requests for exclusion by e-mail must be **received by no later than May 29, 2026**. Detailed instructions are available on the Settlement Website.

You may also object to any part of this Settlement. Details about how to object are available on the Settlement Website. Objections must be filed with the Court and mailed to both Class Counsel and the Defendant's Counsel **no later than May 29, 2026**. Detailed instructions are available on the Settlement Website.

Has the Court approved the Settlement? No. The Court will hold a Fairness Hearing on **July 31, 2026 at 11:00 a.m. PST**, at the Superior Court of the State of Washington for the County of Spokane, 1116 W. Broadway Ave., Room 408, Spokane, WA 99260, before Honorable Jacquelyn High-Edward. 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 will listen to people who have validly asked to speak at the hearing. The Court will also consider whether to approve the requested attorneys' fees, costs, and Service Award. At or after the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

How Do You Get More Information?

This Notice is only a summary. To obtain a detailed Notice of Class Action Settlement and find answers to common questions about the settlement plus other information, including a copy of the Settlement Agreement, visit www.RudeenDepositRefund.com.

Exhibit B

A settlement has been reached in a class action lawsuit alleging that Rudeen Management Company, Inc. ("Rudeen" or "Defendant") failed to provide its tenants upon move-out with a full and specific deposit disposition statement and/or deposit refund due within the legally required timelines under Washington's Residential Landlord-Tenant Act, RCW 59.18.280. The lawsuit is known as *Thomas Silver v. Rudeen Management Company, Inc.*, Case No. 17-2-03103-2, in the Spokane County Superior Court. In the lawsuit, the Court entered an Order finding that the Defendant violated RCW 59.18.280 and was liable to pay each Class Member two (2) times the Class Member's respective security deposit. To avoid the cost, uncertainty, and delay of continuing litigation and appeals, the parties agreed to a settlement. The Defendant denies any wrongdoing, maintains compliance with the law, and continues to deny the allegations against it.

Settlement Class: All persons who (1) rented properties owned or managed by Rudeen in the State of Washington; (2) who paid a damage and/or security deposit at, or any time after, the commencement of their tenancy; (3) who, within the three (3) years prior to the filing of this lawsuit (August 10, 2014), vacated or abandoned the property through May 19, 2023; (4) where, at the time of move-out or abandonment, Rudeen was a landlord pursuant to RCW 59.18.030(16) of the subject property; and (5) where, within the applicable statutory timeframes under RCW 59.18.280, Rudeen withheld all or any portion of the deposit and/or did not send a full and specific statement of the basis for retaining the deposit or a portion thereof.

The Defendant's records indicate that you are a member of the Settlement Class.

The Defendant has agreed to pay a total of \$2,900,000 to create a Settlement Fund. The Settlement Fund will be distributed on a tenancy-by-tenancy basis to Settlement Class Members (after first deducting any attorneys' fees, costs, Service Award to the Plaintiff, and administration costs) Each tenancy is anticipated to receive approximately eighty percent (80%) of the deposit paid. For tenancies with more than one tenant, this amount will be divided equally amongst the tenants. Any unclaimed funds will be distributed to the Legal Foundation of Washington and Inland Empire Legal Aid in equal shares. You do not need to take any action to share in the settlement relief. So long as you do not exclude yourself, you will be mailed a check or may elect to receive payment electronically by visiting the Settlement Website at www.RudeenDepositRefund.com. If you do not exclude yourself from the Settlement, you will be deemed to have agreed to **release any claims that you may have against Rudeen that relate to violations of RCW 59.18.280 during the applicable class period.**

If you do not want to be bound by the Settlement or receive your share of the relief, you must exclude yourself by **May 29, 2026**. To exclude yourself, you must send a signed letter by mail or an e-mail to the Rudeen Settlement Administrator stating that you wish to be excluded, and including your name, address, telephone number, and signature. The full class notice on the Settlement Website explains the complete exclusion procedures. You alternatively may object to the Settlement by **May 29, 2026**. The full class notice on the Settlement Website explains how to object. You cannot exclude yourself and also object. The Court will hold a hearing on Friday, **July 31, 2026, beginning at 11:00 a.m. PST** to consider whether to finally approve the Settlement, as well as any request for attorneys' fees and expenses made by Class Counsel. For more information, please visit www.RudeenDepositRefund.com, at which you may download a complete copy of the Settlement Agreement and the full class notice. Please read this notice and the full notice carefully because your legal rights may be affected whether you act or don't act.

www.RudeenDepositRefund.com

1-844-536-0555

Rudeen Settlement Administrator
P.O. Box 3637
Baton Rouge, LA 70821

**NOTICE OF PROPOSED
CLASS ACTION SETTLEMENT**

*The Spokane County Superior Court of Washington authorized
this Notice. This is not a solicitation from a lawyer.*

If you were a tenant at a Washington State
residential property between August 10, 2014,
and May 19, 2023, that was owned or managed
by Rudeen Management Company, Inc., or
where it was a landlord, and you did not
receive a full and specific deposit statement
and/or your entire deposit refund, please read
this notice carefully. You may be entitled
benefits under a class action settlement.

For more information on the proposed settlement,
including to learn how to object or to exclude yourself,
please visit www.RudeenDepositRefund.com or
contact the Settlement Administrator at
1-844-536-0555.



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FIRST CLASS
U.S. POSTAGE
PAID
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ELECTRONIC SERVICE REQUESTED

[SETTLEMENT CLAIMID#]
[FIRST NAME] [LAST NAME]
[ADDRESS]
[ADDRESS]
[CITY] [STATE] [ZIP]

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