

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Andrew Blizzard, et al.

Plaintiffs,

v.

Hunter Warfield, Inc., et al.

Defendants.

Case No: 1:23-cv-03374-ABA

**NAMED PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT, APPOINTMENT OF CLASS COUNSEL AND CLASS
REPRESENTATIVES, CERTIFICATION OF CLASS FOR SETTLEMENT, SETTING OF
FINAL APPROVAL HEARING AND NOTICE**

Named Plaintiffs Andrew Blizzard and Nora Rowland, on behalf of themselves and all others similarly situated, move this Honorable Court to preliminarily approve the class action settlement, appoint Named Plaintiffs as class representatives and their counsel as class counsel, certify a settlement class, set a final approval hearing and notice, and in support thereof offer the following:

1. Named Plaintiffs and Defendant Hunter Warfield have agreed to resolve this matter by a Settlement Agreement. A copy of the Settlement Agreement is attached as **Exhibit A** to the memorandum submitted in support of this motion.

Hunter Warfield, Inc. does not oppose this motion.

2. The Settlement Agreement proposes a class consisting of:

All tenants of any Unlicensed Property who were sued in a failure-to-pay rent case or otherwise had collection efforts directed towards them with respect to Unlicensed Rent by Defendant Hunter Warfield, Inc. within one year of the filing of this lawsuit.

3. The claims to be addressed by the class are:

All causes of action, suits, claims and demands, in law or in equity, for damages, statutory damages, expenses, costs, and counsel fees arising out of the practices alleged in the Complaint (including MCDCA claims, MCPA claims, and FDCPA claims)

4. The Plaintiffs' counsel move to be appointed as class counsel.
5. Named Plaintiffs believes that the settlement is fair and adequate and that a settlement class should be certified. All of the requirements for a class under Rule 23(a) and (b)(3) are met.
6. A proposed Notice of Class Action (the "Notice") is Exhibit D to the memorandum filed in support of this motion and Named Plaintiffs move that the Notice be approved.
7. A memorandum in support of this Motion is filed herewith.

Wherefore, Named Plaintiffs ask that the Court to preliminarily approve the Settlement Agreement, certify a settlement class, appoint Named Plaintiffs as class representatives and their counsel as class counsel, certify a class for settlement only, authorize notice and set a final approval hearing in this action and such other relief that may be necessary or appropriate.

Respectfully submitted,

Dated: February 20, 2026

By: /s/ Ingmar Goldson
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing when filed through the Court's CM/ECF System to defendant's counsel of record, on February 20, 2026.

/s/ Ingmar Goldson
Ingmar Goldson, Esq.