

## **NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

*Amy Kunce v. SPM of Alabama, LLC (Case No. 2025-CA-001302-O, Orange County, Florida)*

This notice is merely to inform you about rights you have regarding a proposed Class Action Settlement related to your Apartment Lease with or managed by SPM of Alabama, LLC (“Defendant”).

The Defendant in this lawsuit, owned and/or managed rental homes during the time that you lived there and paid a security deposit, according to its records. You are receiving this Notice because you have been identified through the business records of Defendants (your former property manager and/or landlord) as a member of the proposed Settlement Class in a lawsuit filed against your former property manager and/or landlord in regards to their security deposit return practices. The Settlement Class includes the following people:

All persons in Florida who signed a lease with Defendants and paid a security deposit from February 15, 2021 through December 2025 (the “Class”).

**LITIGATION SUMMARY:** Plaintiff filed a putative class action lawsuit in Orange County Circuit Court asserting that her landlord and property manager (Defendant) failed to comply with the Florida Residential Landlord Tenant Act, Florida Consumer Collection Practices Act, Florida Deceptive in connection with returning security deposits. Defendant has denied all liability and presented defenses to the claim prior to entering in to this Class Settlement.

Plaintiff and Defendant have agreed to settle these claims in a Class Action Settlement in exchange for the monetary and non-monetary benefits set forth in the Settlement. All Settlement Class members will release Defendant from all liability arising from the claims in the lawsuit involving their Security Deposits.

**MONETARY BENEFITS:** Defendant will pay each Class Member, who does not opt-out of the settlement and Class Action, and who files a valid claim form, 80% of the amount that was withheld from their security deposit. For example, if \$1,000 was withheld from your deposit, you would receive \$800. The total value of the Monetary Benefits for all class members is \$139,153.60.

**DEBT RELIEF BENEFITS:** In addition to the Monetary Benefits, Defendant will reduce the outstanding account balance of every Class Member to \$0, including any balances that were referred or sent to debt collection agencies. For example, if you paid a \$1,000 security deposit, and after you moved out Defendant kept the \$1,000 deposit and claimed that you still owed additional money, but you have not paid that amount, any remaining balance on your account will be reduced to \$0 as part of the Settlement, including if the balance was sent to a debt collector.

**PARTICIPATING IN CLASS AND SETTLEMENT:** In order to receive the Monetary Benefits and Debt Relief benefits of this Settlement, Class members need to fill out an Online Claim form on the settlement website [www.SPMsettlement.com](http://www.SPMsettlement.com) no later than **July 10, 2026**. If and when the Settlement is approved, a Settlement Payment of 80% of the amount that was withheld from their security deposit will distributed to you in the payment manner you select on the Online Claim Form. Additionally, your outstanding balance owed will be brought to \$0, including any accounts with a debt collector.

All Settlement Class members who do not exercise their right to exclude themselves from the Settlement Class in the manner set forth below will release Defendant from any and all claims arising out of the causes of action advanced in the class action complaint.

**ATTORNEYS' FEES:** Defendant has agreed to pay Class Counsel's attorneys fees and litigation costs. The attorneys' fees and costs are not coming out of any payments to Settlement Class members and is being paid separate from the class benefits. The amount of litigation costs and attorneys fees are \$75,000. The Settlement Class members do not need to pay Class Counsel. If you wish to hire your own attorney to object for you in this matter, or to represent you personally, you may do so at your own expense.

**OPTING OUT OF CLASS AND SETTLEMENT:** If you wish to be excluded from the Settlement Class, and receive **no settlement benefits**, you must send a written Request for Exclusion to Kuncce v SPM c/o Settlement Administrator, PO Box 23680, Jacksonville, FL 32241 no later than **July 10, 2026**, stating your name, address, and the following statement: "Requests exclusion from the Settlement Class in *Amy Kuncce v. SPM of Alabama, LLC*. Requests for Exclusion must be signed and postmarked by **July 10, 2026**. Requesting exclusion from the class removes your ability to receive the benefits of the settlement set forth above, but doing so preserves any claims you may have against Defendant.

**OBJECTING TO THE SETTLEMENT:** As a Settlement Class Member, you may appear at the Final Fairness Hearing to be heard in opposition to the fairness of the settlement, provided that you send a written Notice of Objection to the Settlement to Kuncce v SPM c/o Settlement Administrator, PO Box 23680, Jacksonville, FL 32241 Class Counsel, Matthew T. Peterson of Consumer Law Advocate, PLLC, 1000 Brickell Ave, Suite 715, Miami, FL 33131, and, Defense Counsel, Dante Rohr, Marshall Dennehey P.C., 315 E. Robinson Street, Suite 550, Orlando, FL 32801. Your written objection must include: (a) a notice of intent to appear; (b) a detailed statement of each objection asserted; (c) the grounds for each objection; (d) any documents and writings which you want the Court to consider; and (e) a list of witnesses you intend to call, if any. **OBJECTIONS MUST BE RECEIVED NO LATER THAN JULY 6, 2026.**

**FINAL FAIRNESS HEARING:** The Court will hold a Final Fairness Hearing on **July 20, 2026** at 9:00 am before the Honorable Patricia Strowbridge, to determine whether the proposed settlement is fair, reasonable and adequate. **YOU ARE NOT REQUIRED TO ATTEND BUT YOU MAY DO SO IF YOU WISH.**

**ADDITIONAL INFORMATION:** This is a summary Notice of the terms of the settlement. You may view the Settlement Agreement and Complaint at the Orange County Courthouse, 425 N. Orange Ave., Suite 350, Orlando, FL 32801. Additionally, you can contact the Settlement Administrator via email at [info@SPMsettlement.com](mailto:info@SPMsettlement.com) or via mail at Kuncce v SPM c/o Settlement Administrator, PO Box 23680, Jacksonville, FL 32241.

This Notice has been Approved and Ordered by:  
Honorable Patricia Strowbridge, Circuit Court Judge