

OLMSTED COUNTY DISTRICT COURT
THIRD JUDICIAL DISTRICT OF MINNESOTA

If you are a current or former resident of Southern Hills/Northridge Place Community and were charged excessive late fees, pet fees, and/or delinquency fees, you may be entitled to a payment from a class action settlement.

A state court authorized this Notice. This is not a solicitation from a lawyer.

- A settlement has been proposed in a class action lawsuit against Sun Communities, Inc. d/b/a Southern Hills/Northridge Place Community (“Defendant”) claiming it charged residents excessive late fees, pet fees, and delinquency fees in violation of Minnesota laws.
- The members of the settlement class include all current and former Southern Hills/Northridge Place Community residents who were charged excessive late fees, pet fees, and/or delinquency fees for the period beginning December 21, 2017 (six years prior to the commencement of the Litigation) and ending on February 24, 2025 (“Class Members”).
- If the settlement is approved and becomes final, Class Members will be sent a check for their share of the settlement amount.
- Your legal rights are affected regardless of whether you act or don’t act. Read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING	You will be sent a check when the settlement is approved and becomes final. You will also give up certain legal rights.
EXCLUDE YOURSELF FROM THE SETTLEMENT	Do not get a settlement payment. This is the only option that allows you to be part of any other lawsuit against the Defendant for the legal claims made in this case and released by the settlement.
OBJECT TO THE SETTLEMENT	Write to the Court with reasons why you do not agree with the settlement.
GO TO THE FINAL APPROVAL HEARING	You may ask the Court for permission for you or your attorney to speak about your objection at the Final Approval Hearing.

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the settlement. If the Court denies final approval, the settlement will be null and void and the litigation will continue with the Defendant.

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BASIC INFORMATION

1. Why is Notice being provided?

The Court directed that Notice be provided because you have a right to know about a proposed settlement that has been reached in a class action lawsuit and about all of your options before the Court decides whether to grant final approval to the settlement. If the Court approves the settlement, and after objections or appeals, if any, are resolved, the Settlement Administrator appointed by the Court will distribute the benefits that the settlement allows. This Notice explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

Judge Christa Daily of the Third Judicial District Court, Olmsted County is overseeing this class action. The case is known as *Jacquelen Pegram, Camile Smisek and Linda Medes v. Sun Communities, Inc. d/b/a Southern Hills/Northridge Place Community*, Court File No. 55-CV-23-8624, and is referred to as the “Litigation.” The people who filed the lawsuit are called Plaintiffs and the company they sued, Sun Communities, Inc. d/b/a Southern Hills/Northridge Place Community, is called Defendant.

2. What is this lawsuit about?

Plaintiffs allege that Defendant charged: (i) late fees in excess of eight percent of overdue rent payments in violation of Minn. Stat. § 504B.177(a); (ii) pet fees in excess of \$4 per pet per month in violation of Minn. Stat. § 327C.03, subd. 3; and (iii) delinquency fees in an amount in excess of those permitted by Minn. Stat. § 327C.11, subd. 1. Based on these allegations, Lead Plaintiffs asserted claims against Defendant for: (i) violation of Minnesota’s Uniform Deceptive Trade Practices Act (Minn. Stat. §§ 325D.43-48); (ii) violation of Minnesota’s Consumer Fraud Statute (Minn. Stat. § 325.69); and (iii) unjust enrichment.

The Defendant denies all claims asserted in the Litigation and all allegations of wrongdoing.

3. What is a class action?

In a class action, one or more people called named class representatives or lead plaintiffs (in this Action, Jacquelen Pegram, Camile Smisek, and Linda Medes) sue on behalf of people who have similar claims. Together, all these people are called a class or class members. One court resolves the issues for all class members, except for those who exclude themselves from the class.

4. Why is there a settlement?

The Court did not decide in favor of the Plaintiffs or the Defendant. Instead, the Plaintiffs negotiated a settlement with the Defendant that allows them to avoid the risks and costs of lengthy and uncertain litigation and the uncertainty of a trial and appeals. It also allows Class Members to be compensated without further delay. The Lead Plaintiffs and their attorneys think the settlement is best for all Class Members.

WHO IS INCLUDED IN THE SETTLEMENT?

5. How do I know if I am part of the settlement?

The settlement includes all current and former Southern Hills/Northridge Place Community residents who were charged excessive late fees, pet fees, and/or delinquency fees for the period beginning December 21, 2017 (six years prior to the commencement of the Litigation) and ending on February 24, 2025 (“Class Members”). The two sub-classes are Pet Fee Subclass and Late Fee Subclass.

6. Are there exceptions to being included in the settlement?

Yes, the settlement does not include: Defendant, the officer and directors of Defendant at all relevant times, members of the immediate families, and their legal representatives, heirs, agents, affiliates, successors or assigns, Defendant’s counsel, Defendant’s liability insurance carriers, and any affiliates or subsidiaries thereof, and any entity in which Defendant has or had a controlling interest, as well as any governmental entity, court personnel and any person who would otherwise be a Member of the Class but who validly and timely requested exclusion.

7. I am still not sure if I am included.

If you are still not sure whether you are included, visit www.suncommunitiesclassaction.com for more information.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

8. What does the settlement provide?

The Defendant has agreed to pay a total of \$170,000 to settle the Litigation. After deducting Court-approved attorneys’ fees and costs, and Lead Plaintiffs’ awards, the balance will be used to make payments to Class Members.

9. What can I get from the settlement?

Exact payment is \$49.53 per Class Member for each sub-class.

HOW TO GET A PAYMENT

10. How do I get a payment?

You do not have to do anything to get a payment. If the settlement is approved and becomes final, a settlement payment will be mailed to you.

11. When will I get my payment?

The Court will hold a Final Approval Hearing at 9 a.m. on February 9, 2026, to decide whether to approve the settlement. If the Court approves the settlement, there may be appeals. It is always uncertain whether any appeals can be resolved favorably, and resolving them can take time, perhaps more than a year.

12. What am I giving up to get a payment or stay in the settlement?

Unless you exclude yourself from the settlement, you will give up your right to sue, continue to sue, or be part of any other lawsuit against Defendant and certain “Released Parties” for any claim related to the Litigation or released by the Settlement Agreement. You will be legally bound by all of the Court’s orders, as well as the release of the “Released Claims” as defined below.

“Released Parties” means: the Defendant; any and all former or present direct and indirect parents, subsidiaries, divisions and affiliates of the Defendant; each former or present officer, director, principal, agent, representative, attorney, employer, employee, owner, or partner of Defendant; any successor to or predecessor of Defendant; Defendant’s current and former insurance carriers, indemnifiers, reinsurers, advisors, bankers, consultants, experts, accountants, auditors, and attorneys; and any personal representative, estate, heir, beneficiary, administrator, or executor of any of the entities and persons described herein.

13. What are the Released Claims?

“Released Claims” include any and all actions, causes of action, rights, or liabilities, known or unknown, contingent or noncontingent arising out of, relating to, or that were or could have been asserted in the Action, existing as of the Effective Date. More information about the Released Claims can be found in the Settlement Agreement, available at www.suncommunitiesclassaction.com.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I get out of the settlement?

To exclude yourself from the settlement, you must send a letter to the Settlement Administrator containing:

- 1) your full name, current address, email address, and telephone number;
- 2) a clear statement indicating your request to be excluded from the settlement, such as “I request to be excluded from the class action settlement in *Pegram v. Sun Communities, Inc. d/b/a Southern Hills/Northridge Place Community*, Court File No. 55-CV-23-8624”; and
- 3) your signature.

You must send your request or by mail postmarked no later than **December 1, 2025**, to:

Pegram v. Sun Communities, Inc. Settlement Administrator
P.O. Box 301130
Los Angeles, CA 90030-1130

15. If I exclude myself, can I still get a payment from the settlement?

No. If you exclude yourself from the settlement, you will not receive a payment because you will no longer be eligible for one.

16. If I do not exclude myself, can I sue the Defendant for the same thing later?

No. If you stay in the settlement (*i.e.*, do nothing or do not exclude yourself from the settlement), you give up any right to separately sue the Defendant for the claims released by the Settlement Agreement.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

Yes. The Court appointed Thomas J. Lyons, Jr., Esq., and Carter B. Lyons of Consumer Justice Center, PA. to represent you and other Class Members. These lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

18. How will Class Counsel be paid?

If the settlement is approved and becomes final, Class Counsel will ask the Court to award attorneys' fees and litigation expenses, as well as class representative awards for the Lead Plaintiffs. If approved, these amounts will be deducted from the settlement amount before making payments to Class Members.

OBJECTING TO THE SETTLEMENT

19. How do I tell the Court that I do not like the settlement?

If you are a Class Member, you can object to the settlement if you do not like it or a portion of it. You can give reasons why you think the Court should not approve the settlement. The Court will consider your views before making a decision. To object, you must send a written objection to the Settlement Administrator by mail to *Pegram v. Sun Communities, Inc.*, Settlement Administrator, P.O. Box 301130, Los Angeles, CA 90030-1130, postmarked by **December 1, 2025**.

Your objection must include:

- 1) the case name and number (*Pegram v. Sun Communities, Inc. d/b/a Southern Hills/Northridge Place Community*, No. 55-CV-23-8624);
- 2) your full name, current address, telephone number, and email address;
- 3) the reasons why you object to the settlement, including any documents supporting your objection;
- 4) the name, address, and telephone number of your attorney (if any) representing you in your objection;
- 5) a statement indicating whether you or your attorney intend to appear at the Final Approval Hearing;
- 6) if you have retained an attorney and your attorney will appear at the Final Approval Hearing,
 - a. the name, address, telephone number, and email address of your attorney;
 - b. a list of all persons who will be called to testify in support of the objection;
 - c. copies of any papers, briefs, or other documents upon which the objection is based;
 - d. a list of all other class actions you or your attorney has been involved in over the last five years (whether or not you or your attorney appeared in the matter);
 - e. your attorney's signature; and
- 7) your signature.

20. What is the difference between objecting to and excluding myself from the settlement?

Objecting is telling the Court that you do not like something about the settlement. Excluding yourself is telling the Court that you do not want to be part of the Class in this settlement. If you exclude yourself from the settlement, you have no basis to object because the settlement no longer applies to you.

THE COURT'S FINAL APPROVAL HEARING

21. When and where will the Court decide whether to approve the settlement?

The Court will hold a Final Approval Hearing at 9 a.m. on February 9, 2026, at the Olmsted County District Court, Olmsted County Government Center, 151 Fourth Street SE, Rochester, Minnesota 55904. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. The Court will take into consideration any properly-filed written objections and may also listen to people who have asked to speak at the hearing (*see* Question 23). The Court will also decide whether to approve payments of attorneys' fees, costs, and service awards.

22. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. But, you are welcome to come at your own expense. If you file an objection, you do not have to come to Court to talk about it. You may also hire your own lawyer to attend, at your own expense, but you are not required to do so.

23. May I speak at the Final Approval Hearing?

Yes, you may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must follow the instructions provided in Question 19 above. You cannot speak at the hearing if you exclude yourself from the settlement.

IF YOU DO NOTHING

24. What happens if I do nothing?

If you do nothing, you will automatically receive a payment from this settlement and you will be bound by the terms of the Settlement Agreement if it is approved and becomes final. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendant or the Released Parties about the issues resolved by this settlement and released by the Settlement Agreement.

GETTING MORE INFORMATION

25. How do I get more information?

More details are available in the Settlement Agreement, which is available at www.suncommunitiesclassaction.com. You may also write to the *Pegram v. Sun Communities, Inc.*, Settlement Administrator, P.O. Box 301130, Los Angeles, CA 90030-1130.

Please do not call the Court or the Clerk of the Court for additional information.

They cannot answer any questions regarding the settlement or the Litigation.