

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY

**NOTICE OF PROPOSED CLASS ACTION PARTIAL SETTLEMENT, FAIRNESS
HEARING AND RIGHT TO APPEAR**

**If you are a Missouri resident who signed a lease with
KM-T.E.H. Realty 8, LLC or Ruskin Place
Apartments and rented at Ruskin Place Apartments
between July 2015 and the present, you could get a
payment from a class action settlement.**

A partial settlement of a class action lawsuit affects you if you signed a lease with KM-T.E.H. Realty 8, LLC or Ruskin Place Apartments and rented at Ruskin Place Apartments between July 2015 and the present. If you qualify, you may send in a claim form to ask for payment, or you can exclude yourself from the settlement, or object.

The Circuit Court of Jackson County, Missouri at Kansas City authorized this notice. The Court will have a hearing to consider whether to approve the partial settlement, so that the benefits may be paid.

WHO'S AFFECTED?

Missouri residents who signed a lease with KM-T.E.H. Realty 8, LLC or Ruskin Place Apartments and rented at Ruskin Place Apartments between July 2015 and the present are included in this partial settlement. *If you fit the above description, you are a 'Class Member.'*

WHAT'S THIS ABOUT?

A lawsuit in Fuentes, et al. v. KM-T.E.H. Realty 8, LLC, et al., Case No. 2016-CV19826, claims that Liberty Insurance Underwriters Inc. ("Liberty") provided insurance that might satisfy part of a Judgment in Fuentes, et al. v. KM-T.E.H. Realty 8, LLC, et al., Case No. 1916-CV29273. The suit claims the insurance money should be available to satisfy the Judgment. Liberty denies all allegations and has asserted many defenses, including that it never received notice of the claim and therefore, no insurance funds are available. The partial settlement is not an admission of wrongdoing or an indication that any law was violated.

WHAT CAN YOU GET FROM THE PARTIAL SETTLEMENT?

The partial settlement will result in a payment of \$1,300,000.00 to be divided up as the Court may direct.

HOW DO YOU GET A PAYMENT?

In the event the Court approves of this partial settlement, the court will also determine the procedure for class members to receive payment.

WHAT ARE YOUR OPTIONS?

The Court will hold a hearing in this case, Fuentes, et al. v. KM-T.E.H. Realty 8, LLC, et al., Case No. 1916-CV29273 on September 8, 2025 at 1:00 p.m. CST, via Webex (available at this link mocourts.webex.com/meet/joel.fahnestock) and by phone at 1-408-418-9388 and access code: 966278533, to consider whether to approve the partial settlement, which includes payment of attorneys' fees and expenses.

You may appear at the hearing, but you do not have to. You may seek legal representation for the hearing. You may object to or request to exclude yourself from the partial settlement **in writing** to Class Counsel by **August 27, 2025**. You must mail your written objection or exclusion request postmarked no later than **August 27, 2025**, to the following address:

Fuentes Class Action Settlement Administrator
c/o Gregory Leyh, P.C.
1600 Genessee Street, Suite 900
Kansas City, MO 64102

For more details, call toll free at 1-877-283-7767, go to www.leyhlaw.com, or call or write to Gregory Leyh, P.C., 1600 Genessee St., Suite 900, Kansas City, Missouri 64102, (816) 283-3380.