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12 *Attorneys for Plaintiffs*
13 [Additional Counsel Appear on Signature Page]

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF RIVERSIDE**

17 RENOVATE AMERICA FINANCE CASES) Case No. RICJCCP4940
18)
19) **NOTICE OF MODIFICATION TO**
THIS DOCUMENT RELATES TO:) **PARAGRAPH 2.01 OF FIRST AMENDED**
20) **CLASS ACTION SETTLEMENT**
21) **AGREEMENT**
22)
ALL ACTIONS)
23)
24)
25)
26)
27)
28)

Judge: Hon. Sunshine Sykes
Lead Compl. Filed: November 1, 2016

1 TO ALL PARTIES, THEIR ATTORNEYS OF RECORD, AND MEMBERS OF THE
2 SETTLEMENT CLASS, PLEASE TAKE NOTICE THAT:

3 Pursuant to Paragraph 7.11 of the First Amended Settlement Agreement (“Agreement”),
4 dated February 5, 2020, as incorporated by the Preliminary Approval Order, filed on February 24,
5 2020, Plaintiffs George Loya, Judith Loya, Richard Ramos, Michael Richardson and Shirley Petetan
6 (collectively, “Plaintiffs”) and Defendant Renovate America, Inc. (“Renovate”) (collectively, the
7 “Parties”) hereby agree to modify the Agreement as follows:

- 8 1. Paragraph 2.01 of the Agreement as written provides:

9 2.01 Renovate will pay the sum of two million, five hundred
10 fifty thousand dollars (\$2,550,000.00) (“Settlement Fund”) to the
11 Settlement Administrator, minus any Settlement Administration
12 Costs already advanced to the Settlement Administrator, within
13 thirty (30) days after the Preliminary Approval Date, which,
together with any interest that shall accrue thereafter, shall be used
to pay all moneys to be paid in connection with the Settlement.
The Settlement Fund will be the maximum monetary exposure to
Renovate under the Settlement.

- 14 2. Paragraph 2.01 of the Agreement shall be modified to provide:

15 2.01 Renovate will pay the sum of two million, five hundred
16 fifty thousand dollars (\$2,550,000.00) (“Settlement Fund”) to the
17 Settlement Administrator, minus any Settlement Administration
18 Costs already advanced to the Settlement Administrator. Renovate
19 will make an initial payment of one million, seven hundred
20 thousand dollars (\$1,700,000), within thirty (30) days after the
21 Preliminary Approval Date; and a second payment of eight
hundred and fifty thousand dollars (\$850,000) within fifteen (15)
days of the Final Approval Date; which, together with any interest
that shall accrue thereafter, shall be used to pay all moneys to be
paid in connection with the Settlement. The Settlement Fund will
be the maximum monetary exposure to Renovate under the
Settlement.

22 (“Modified Terms”)

23 All other terms of the Agreement remain unchanged and as set forth in the Agreement itself.
24

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1 ///

2 The Parties' agreement to these Modified Terms is reflected by the signatures of their
3 attorneys below.

4
5 Respectfully submitted,

6
7 **CLASS COUNSEL**

8
9
10 Dated: March 26, 2020

11 By: 
12 RACHELE R. BYRD

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COUNSEL FOR DEFENDANT

Dated: March 26, 2020

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RENOVATE AMERICA, INC.

1 **PROOF OF SERVICE**

2 *Renovate America Finance Cases*
3 Riverside Superior Court Case No. RICJCCP4940

4 At the time of service I was over 18 years of age and not a party to this action. My
5 business address is: 601 South Figueroa Street, 41st Floor, Los Angeles, California 90017.

6 On **March 26, 2020**, I served the following document on the person(s) below:

7 **NOTICE OF MODIFICATION TO PARAGRAPH 2.01 OF FIRST AMENDED**
8 **CLASS ACTION SETTLEMENT AGREEMENT**

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(E-MAIL or ELECTRONIC TRANSMISSION) By electronic service on **March 26, 2020**. Based upon a court order or an agreement of the parties to accept electronic service, I caused the documents to be served via electronic transfer to CASE ANYWHERE.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **March 26, 2020**, at Los Angeles, California.

Angie Zuñiga-García

(Type or print name)

(Signature)