

DOCKET NO. X10-UWY-CV-22-6068623-S

LATASHA HARRIS, ET AL	:	SUPERIOR COURT
	:	
v.	:	COMPLEX LITIGATION DOCKET
	:	
	:	AT WATERBURY
THE RELATED COMPANIES, INC.,	:	
ET AL	:	November 14, 2025

CONSENT MOTION TO MODIFY SETTLEMENT TIMETABLE

Plaintiffs move on consent for an order modifying, *nunc pro tunc*, the timetable in the Court's December 4, 2024 order, DE # 160.10, setting deadlines for administration of the settlement, as follows:

Changing the Base Payment Claim Form deadline from February 11, 2025 to December 15, 2025 and adding an Enhanced Payment Claim Form deadline, also of December 15, 2025.¹ The reasons for this request are as follows:

Since this Court's Order, plaintiffs' counsel, together with JND Settlement Administrators, have reached out to the 1379 class members² via direct mail, published notice in the New London Day, the Norwich Bulletin, and the Hartford Courant, and, importantly, class counsel's in-person and telephone contact with class members - contact that has been both direct and by alerting class members, who then in many cases reach out to other class members. These efforts have been very successful indeed: to date, of 1,379 class members - adults, children, and

¹Base Payments are payments made to or on behalf of all authorized residents during the class period from November 23, 2019 to November 22, 2022 and vary based on years of residency and whether the claimant was an adult or a minor. Enhanced claims, discussed further below, are claims of serious injury or property damage from mold during the class period. The amount of the Enhanced Payment paid to or on behalf of each claimant is based on evaluations by the panel of Special Masters of the severity of injury or property damage.

²The class is defined as all authorized residents of the Branford Manor housing project between November 23, 2019 and November 22, 2022.

estates of deceased class members - a total of 1,331 or 96.5%, have filed claims, most before but many not until after the current deadline. It is very much in the interest of class members to file a claim – in fact, of the 48 who have not done so, only four notified class counsel that their failure was by choice. The others have not been heard from, and class counsel's efforts are continuing,

Additional time may lead to some additional class members filing claims that will benefit them and their families. On the other hand, the proposed deadline will mean that class members have had a full year to file a claim, and it is necessary to limit the time to make claims so that class action administration can proceed.

The settlement process will continue as the panel of Special Masters begin their work. The Special Masters have already conferred and planned their approach, including independently reviewing several claims and taking other steps to enhance the consistency of their scoring, and it is appropriate to set a firm time limit for Enhanced Claims as well as Base Claims. Again, time limits were previously set, but both in the interest of fairness and in order to provide benefits to the largest number of class members, a realistic final deadline will best advance the goals of the settlement.

Accordingly, with the consent of the defendants, plaintiffs respectfully request that the Court establish the deadlines noted above, to wit:

All base claims must be filed on or before December 15, 2025; and

All enhanced claims must be filed on or before December 15, 2025.

THE PLAINTIFFS,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was emailed, return receipt requested on November 14, 2025 to:

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