

If you were a resident of the California Suites Hotel for at least 14 days between July 7, 2011 and November 1, 2014, a class action may affect your rights.

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

- The settlement resolves a lawsuit over whether California Suites Hotel in San Diego and its owners used illegal means to require guests to check out within 30 days of consecutive occupancy.
- You could receive up to \$500 for each time you were required to check out or move out every 28 days during the specified time frame. See paragraph 7 below.
- Court appointed lawyers will ask the Court to approve a total settlement fund of \$750,000.
- The two sides disagree whether California Suite Hotel’s practices were legal and, if they were not, how much money they should have to pay to former guests.
- Your legal rights will be affected whether you act or not. Read this Notice carefully. You have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS	
Do Nothing	You will: <ul style="list-style-type: none">• Stay in the lawsuit• Receive the monetary compensation• Give up certain rights
Object to the Settlement	You will: <ul style="list-style-type: none">• Stay in the lawsuit.• Be allowed to file court papers and appear before the Judge explaining why you do not like the settlement• Give up certain rights

- Your rights and options are explained in this Notice. To object you must act before **January 9, 2019**.
- The Court must still decide whether to approve this settlement. Please be patient.
- Any questions? A copy of this Notice and additional information can be found at <http://www.lakeshorelaw.org/californiasuiteshotel>.

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BASIC INFORMATION

1. WHY DID I GET THIS NOTICE?

The records of California Suites Hotel, 5415 Clairemont Mesa Blvd., San Diego, CA show that you stayed there between July 7, 2011 and November 1, 2014 for at least 14 consecutive days and then checked out or moved out by 30 consecutive days.

The Court sent you this Notice because you have a right to know about a proposed settlement of the class action lawsuit, and about your options, before the Court decides whether to approve the settlement. If the Court approves it and after objections and appeals are resolved, you will receive certain compensation. You can receive updates about the progress of the settlement from the website listed at the bottom of this Notice.

This packet explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the case is the Superior Court of the County of San Diego, State of California, and the case is known as Hansen v. California Suites Hotel, et. al., Case No. 37-2014-00022185-CU-BT-CTL. The person who sued is the Plaintiff and the various companies and individuals being sued are the Defendants.

2. WHAT IS THIS LAWSUIT ABOUT?

The lawsuit contends that Defendants required you to check out or move out before you could stay longer than 30 consecutive days and that this was done to prevent you from gaining the legal rights of a tenant. Plaintiff argues that a state law, Civil Code § 1940.1, prohibits residential hotels (hotels where most of the guests use it as their primary residence) from using this tactic. This tactic is sometimes called the “28-day shuffle.” Often, guests subject to the 28-day shuffle will be allowed to check back in the following day.

The law imposes a civil fine of \$500 per violation. In addition, if it can be proven the hotel owner used force or coercion, the fine could be much greater.

The Defendants deny they did anything wrong. They deny the law applies to them or that the California Suites Hotel is a residential hotel. However, they chose to settle for economic reasons.

3. WHAT IS A CLASS ACTION AND WHO IS INVOLVED?

In a class action lawsuit, one or more people called “Class Representatives” (in this case the Plaintiff) sues on behalf of other people who have similar claims. The people together are a “Class” or “Class Members.” One court resolves the issues for all Class Members, except those who exclude themselves. San Diego County Superior Court

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Judge Joan M. Lewis is in charge of this case.

4. WHY IS THIS LAWSUIT A CLASS ACTION?

The Court previously ruled that all of the class members have similar claims and Defendants have similar defenses that apply in general to all of the class members. Therefore, the Court ordered that this lawsuit should proceed as a class action. The Court also ruled that attorneys Jeffrey Wilens and Jeffrey Spencer are qualified to represent the class.

WHO IS IN THE SETTLEMENT

5. AM I PART OF THIS CLASS?

Judge Lewis, the judge presiding over this case, decided that anyone who stayed at the California Suites Hotel between July 7, 2011 and November 1, 2014 for at least 14 consecutive days and then checked out or moved out by 30 consecutive days is a class member.

If this Notice is addressed to you, it has been determined you are a class member.

6. DO I NEED PROOF IN ORDER TO GET COMPENSATION?

Proof is not required to be a member of the Class as Defendants' records contain that information. However, if you believe you should be a Class Member, but have not received this Notice, you should contact Class Counsel at the address listed in paragraph 15 below and present proof that you are a Class Member.

THE SETTLEMENT BENEFITS

7. WHAT DOES THE SETTLEMENT PROVIDE?

The settlement provides for a cash fund of \$750,000 that will be used to pay class members, pay their legal fees and court costs, pay an incentive award to the Plaintiff, and pay for the administrative costs of this settlement.

You should assume that for each time you stayed 14-30 days at the Hotel during the specified time frame you will receive \$398, although you possibly could get up to \$500 per violation.

According to Defendant's business records, you stayed at the Hotel _____ time(s) during the relevant time period and will receive approximately \$_____.

Any Class Member may dispute the estimated payout preprinted on the Class Notice by January 9, 2019 by notifying the Settlement Administrator and submitting any proof

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supporting the objection, such as copies of rental receipts. Disputes regarding the correct number of stays that a Class Member had will be resolved based on the documentation supplied by the Class Member and Defendants.

8. HOW DO I GET MY COMPENSATION?

If this Settlement is approved after the Fairness Hearing (see paragraph 17) a check will be mailed to you approximately 30 days later. You do not need to do anything to receive it.

If you change your address after receiving this Class Notice, be sure to call 877-705-5021 and give your change of address to the California Suites Settlement Administrator.

9. WHAT AM I GIVING UP IN ACCEPTING THE SETTLEMENT?

Because you previously did not exclude yourself from this lawsuit, that means you cannot start a lawsuit, continue a lawsuit or join a lawsuit raising similar claims against Defendants. It also means you are “releasing” all of the Defendants (and related companies and persons) from any legal claims you might have relating to your being required to check out by the 30th day of occupancy.

This release does not include any claims relating to your stay at the California Suites Hotel such as any personal injury you might have suffered.

10. WHAT IF I DO NOTHING AT ALL?

You will be automatically included in this settlement, will release claims and be paid as described above.

EXCLUDING YOURSELF FROM THE SETTLEMENT

11. CAN I EXCLUDE MYSELF FROM THE SETTLEMENT?

Because you were previously served Notice of this Class Action and did not act to exclude yourself, or opt out, of the case, you no longer have that option. Instead, you are legally bound by the Court’s judgment. However, you still retain the right to Object to the Settlement as set forth below in paragraph 15.

THE LAWYERS REPRESENTING YOU

12. DO I HAVE A LAWYER IN THIS CASE?

Yes. The Court decided that the law firms of Lakeshore Law Center and The Spencer Law Firm are qualified to represent you and all Class Members. Together, the law firms are called “Class Counsel.” They are experienced in handling similar consumer rights

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cases. More information about these law firms, their practices and their experiences is available at www.lakeshorelaw.org and www.spencerlaw.net.

13. SHOULD I GET MY OWN LAWYER?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer.

14. HOW WILL THE LAWYERS AND PLAINTIFF BE PAID?

Class Counsel will ask the Court for attorneys' fees equal to one-third of the \$750,000 Settlement Fund and court costs. This breaks down to \$250,000 in fees and up to \$10,000 in costs. They have spent approximately four years prosecuting this lawsuit.

In addition, the Plaintiff has requested the Court award an "incentive award." This is additional compensation to her for the hours of extra work and the personal risks she assumed in bringing the lawsuit, which the rest of the class members did not have to do. The total amount sought for incentive awards is \$10,000 which is less than two percent of the total fund.

The Court may award less than these amounts sought for fees, costs and incentive awards. Defendants have agreed not to oppose these fees and expenses, or incentive awards.

OBJECTING TO THE SETTLEMENT

15. HOW DO I TELL THE COURT I DO NOT LIKE THE SETTLEMENT?

If you are a Class Member, you can object to the settlement if you do not like any part of it. This includes if you want to object the estimated payout to you is too low because you stayed at the Hotel more times than listed in this Notice. You can give reasons why you think the Court should not approve it. The Court will consider your views. However, if the Court rejects your objection, you will still be bound by the terms of the Settlement.

To object, you must submit or file the written objection. If you want to speak at the hearing, you should also state "I am giving Notice of Intention to Appear."

To file the objection or notice, you can mail it to Clerk of Court, Superior Court of California, County of San Diego, Hall of Justice, Dept. 65, 330 West Broadway, San Diego, California 92101.

You can also deliver the objection or notice to Hansen v. California Suites, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606.

The Written Objection or Notice of Intention to Appear must be filed by the Court or postmarked by **January 9, 2019** or it will not be valid.

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You must also serve by the above deadline copies of the Objection or Notice by United States Mail to the following:

Plaintiffs' Attorneys and Class Counsel:

Jeffrey Wilens, Esq.
LAKESHORE LAW CENTER
18340 Yorba Linda Blvd. Suite 107-610
Yorba Linda, CA 92886
Telephone: 714-854-7205
Facsimile: 714-854-7206
Email: jeff@lakeshorelaw.org

Defendants' Attorneys:

William M. Slaughter, Esq.
SLAUGHTER, REAGAN & COLE, LLP
625 East Santa Clara Street, Suite 101
Ventura, CA 93001
Telephone: 805-658-7800
Facsimile: 805-644-2131
Email: Marshall@srlplaw.com

Any written objections or notice of intent to appear shall state each specific reason in support of your objection and any legal support for each objection.

16. WHAT IS THE DIFFERENCE BETWEEN OBJECTING AND EXCLUDING MYSELF?

Objecting is simply telling the Court that you do not like something about the settlement. You can object only if you stay in the Settlement Class. Excluding yourself is telling the Court that you do not want to be part of that Class. You were previously given the chance to exclude yourself and did not do so; therefore, that option is no longer available.

THE COURT'S FAIRNESS HEARING

17. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold a Fairness Hearing on **February 8, 2019 at 8:30 a.m.** in Department 65 of the San Diego County Superior Court, 330 West Broadway, San Diego, CA 92101. At this hearing the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. Judge Lewis will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Class Counsel and Plaintiffs. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

18. DO I HAVE TO COME TO THE FAIRNESS HEARING?

No. Class Counsel will answer questions Judge Lewis may have. But, you are welcome to come at your own expense. If you send an Objection, you don't have to come to Court to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

19. MAY I SPEAK AT THE HEARING?

If you have previously filed your Notice of Intention to Appear, or even if you have not, you may be permitted to speak at the Fairness Hearing.

GETTING MORE INFORMATION

20. ARE MORE DETAILS AVAILABLE?

Visit the website <http://www.lakeshorelaw.org/californiasuiteshotel> to find more information and copies of important court documents. You may also write to, email or call the Class Counsel Jeffrey Wilens at the contact information listed under item 15. Your communications with Class Counsel regarding this action will be confidential.

The pleadings and other records in this litigation may be examined online on the San Diego County Superior Court “Case Number Search” at <http://courtindex.sdcourt.ca.gov/CISPublic/casesearch>. Select “Case Type” as “Civil”; select “Case Location” as “San Diego.” Enter case number 37-2014-00022185-CU-BT-CTL.

DO NOT CONTACT THE JUDGE OR THE COURT TO DISCUSS THE LAWSUIT.

BY ORDER OF THE COURT:

Dated: October 26, 2018

by Joan M. Lewis
Judge of the Superior Court