

## LEGAL NOTICE OF CLASS ACTION

**If you are or were a tenant at the Versailles Apartments located at 8811 Burton Way, West Hollywood, CA 90048 between February 15, 2013 and the date of this notice, this class action lawsuit may affect your rights.**

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES  
Case No. BC650407

CAMILLA CLEESE, an individual, and MATTHEW BILINSKY, an individual, on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

MLT, LLC, a California limited liability company, MAY LING YU, an individual, THOMAS YU, an individual, JAY ROSHAN, an individual, PEMCO, LLC, a California limited liability company, and DOES 1 through 400, inclusive,

Defendants.

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### YOU ARE NOT BEING SUED

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

- Tenants and former tenants of the Versailles Apartments (8811 Burton Way) have filed a lawsuit that alleges, among other things, that its owners and managers, MLT, LLC, MAY LING YU, and THOMAS YU, failed to provide and interfered with the use of amenities bargained for at the Versailles Apartments between February 15, 2013 and the date of this notice.
- The lawsuit also alleges that, beginning in November 1, 2016, and continuing through the date of this notice, a massive building renovation project further interfered with the use of amenities at the Versailles Apartments
- The Superior Court of Los Angeles County (referred to as the “Court”) has allowed the lawsuit to proceed as a class action on behalf of all tenants of the Versailles Apartment building during the aforementioned time periods.
- The Court has not determined who is right or wrong in this lawsuit. However, your legal rights may be affected, and **you have a choice to make now.**
- Approved class counsel, who you may contact at any time with questions, are:

McNICHOLAS & McNICHOLAS  
www.McNicholas Law.com  
Contact person: Jeff Lamb  
310.474.1582  
10866 Wilshire Blvd., 1400  
Los Angeles, CA 90024

ROME & ASSOCIATES  
www.romeandassociates.com  
Contact person: Sridavi Ganesan  
2029 Century Park E #450  
Los Angeles, CA 90067

## **What is this Lawsuit About?**

**This is a CLASS ACTION** lawsuit and it is called:

CAMILLA CLEESE, an individual, and MATTHEW BILINSKY, an individual, on behalf of themselves and all others similarly situated,

vs.

MLT, LLC, a California limited liability company, MAY LING YU, an individual, THOMAS YU, an individual, JAY ROSHAN, an individual, PEMCO, LLC, a California limited liability company, and DOES 1 through 400, inclusive,

This CLASS ACTION is proceeding in the Los Angeles County Superior Court, at 312 North Spring Street, Los Angeles, California on behalf of all tenants who have made rental payments for an apartment unit at the Versailles Apartments (8811 Burton Way) between February 15, 2013 and, ongoing through the present date and beyond.

This CLASS ACTION alleges causes of action against the Defendants for (1) Breach of Contract; (2) Breach of the Covenant of Good Faith and Fair Dealing; (3) Breach of the Warranty of Habitability; and (4) Violations of Business & Professions Code section 17200, *et seq.*

The Defendants deny the allegations in Plaintiffs' complaint, and deny that they did anything unlawful or improper. The Court is neutral with respect to Plaintiffs' and Defendants' claims, and the Court has not determined who is right or wrong in this lawsuit.

## **Who is a Member of the Class?**

This case involves a class and a subclass. Members of either the class, subclass, or both the class and the subclass, are joined in this lawsuit, unless specifically opting-out.

The class is defined as all tenants of 8811 Burton Way, Los Angeles, California, ("Versailles Apartments") who have made rental payments for their respective units under their respective lease agreements, from February 15, 2013 through the present.

The subclass is defined as all tenants of Versailles Apartments who have made rental payments for their respective lease agreements and occupied their units from approximately November 1, 2016, to the present, and who have not signed written waivers entitled "Renovation Construction Lease Addendum" addressing ongoing construction at the Versailles Apartments.

## **Who Represents You?**

Plaintiff Matthew Bilinsky, an individual, is a class member like you, and the Court has accepted him as the "Class Representative."

The Court designated **McNICHOLAS & McNICHOLAS, LLP** 10866 Wilshire Blvd, Suite 1400 Los Angeles, CA 90024 and **ROME & ASSOCIATES**, 2029 Century Park E #450, Los Angeles, CA 90067 to represent you as "Class Counsel." You do not have to pay Class Counsel, or anyone else, to participate. Instead, if they get money or benefits for the Class, they will ask the Court for attorneys' fees and costs, which could be paid either by the Defendants or out of any money recovered for the Class, or both. However, ANY fee paid to Class Counsel must be approved by the Court.

You do not have to use Class Counsel. You have the right to hire your own lawyer to appear in Court for you in this lawsuit; however, if you do, you are responsible for paying that lawyer.

### **What is the Benefit of Being a Class Member?**

If the Class Representative is successful at proving the allegations at trial on behalf of the Class, class members could receive partial refunds of rental payments based on the lease benefits (such as amenities, for example) that were unavailable or interfered with during their tenancy at the Versailles Apartments, less any attorneys' fees and other expenses awarded to "Class Counsel" (described above) by the Court. There is no money available now and no guarantee that there ever will be any money for the Class.

### **What is the Risk of Being a Class Member?**

If the Class Representatives lose at trial, you will be bound by that judgment in favor of Defendants. You will not be able to sue Defendants in another lawsuit for the same claims presented in the Class Action.

### **What Are Your Options?**

You have the option to remain in this lawsuit or opt-out. You must decide this now.

To stay in the Class, you do not have to do anything; you are automatically in the Class unless you ask to exclude yourself, as set forth below. If you stay in the Class, you will be legally bound by all orders and judgments of the Court. If money or benefits are obtained, you will be notified about how to obtain your share.

If you decide to exclude yourself from the Class, or "opt out" of the Class, you cannot get money or benefits from this lawsuit if any are awarded. Instead, you will retain your right to sue the Defendants for any claims you may have, now or in the future, and will not be bound by any orders, judgments or settlements in this lawsuit, favorable or not.

Members who choose to opt-out of the Class can do so through the Versailles Apartments Class Action Website at ([www.versaillesclassaction.com](http://www.versaillesclassaction.com)). Alternatively, you can also send a letter or postcard postmarked no later than September 30, 2019 to: Versailles Apartments Action, McNICHOLAS & McNICHOLAS, LLP, 10866 Wilshire Blvd., Suite 1400, Los Angeles, CA 90024, that says you want to opt out from *Cleese v. MLT, LLC, et al* (the Versailles Apartment Class Action). Please include your name, address, and telephone number if you choose this option.

Please keep your address current – If you should change your address, or if this Notice is not mailed to your correct address, you should immediately provide your current address by accessing the Versailles Apartments Class Action Website ([www.versaillesclassaction.com](http://www.versaillesclassaction.com)). Changes of address can also be submitted to McNicholas & McNicholas, LLP (identified below) by phone, letter, fax, or e-mail. This will ensure that you receive future communications about this lawsuit. If McNicholas & McNicholas, LLP does not have your correct contact information, you might not receive notice of important developments in this lawsuit and you might not receive your share of money, if any, recovered by the Class.

### **How Can You Get More Information?**

If you have questions or want other documents about this lawsuit and your rights, visit ([www.versaillesclassaction.com](http://www.versaillesclassaction.com)) or email [jrl@mcnicholaslaw.com](mailto:jrl@mcnicholaslaw.com), or visit [www.mcnicholaslaw.com](http://www.mcnicholaslaw.com), or write to: McNICHOLAS & McNICHOLAS, LLP, 10866 Wilshire Blvd, Suite 1400 Los Angeles, CA 90024 or ROME & ASSOCIATES, 2029 Century Park E #450, Los Angeles, CA 90067.

**DO NOT CONTACT THE COURT REGARDING THIS NOTICE. THE COURT WILL NOT ANSWER QUESTIONS ABOUT THIS NOTICE.**