

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRISTOPHER MOEHRL, MICHAEL
COLE, STEVE DARNELL, JACK RAMEY,
DANIEL UMPA, and JANE RUH, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

THE NATIONAL ASSOCIATION OF
REALTORS, REALOGY HOLDINGS
CORP., HOMESERVICES OF AMERICA,
INC., BHH AFFILIATES, LLC, HSF
AFFILIATES, LLC, THE LONG & FOSTER
COMPANIES, INC., RE/MAX LLC, and
KELLER WILLIAMS REALTY, INC.,

Defendants.

Case No.: 1:19-cv-01610

Judge Andrea R. Wood

Magistrate Judge M. David Weisman

**NOTICE OF PENDING SETTLEMENT AND
JOINT MOTION TO STAY CASE AS TO REALOGY HOLDINGS CORP.**

Christopher Moehrl, Michael Cole, Steve Darnell, Jack Ramey, Daniel Ump, and Jane Ruh (collectively “Plaintiffs” and Anywhere Real Estate, Inc. (f/k/a Realogy Holdings Corp.) (“Anywhere” and, together with Plaintiffs, the “Parties”)) respectfully write to the Court to provide notice that Plaintiffs have reached an agreement with Anywhere to settle all claims asserted against Anywhere in this action as part of a proposed nationwide class settlement.

This agreement is subject to court approval under Federal Rule of Civil Procedure 23. This settlement was jointly negotiated with the Plaintiffs in *Burnett v. The National Association of Realtors, et al.*, Case No. 19-CV-000332-SRB. The settlement encompasses both classes. Trial is set to commence in the *Burnett* action in less than two months. Therefore, the parties have agreed that Plaintiffs will promptly move for preliminary approval of the proposed settlement in the United States District Court for the Western District of Missouri, where the parallel action of

Burnett v. The National Association of Realtors, et al., Case No. 19-CV-000332-SRB is pending. Plaintiffs and Anywhere will be prepared to further discuss the settlement approval process at the status conference that is currently set for September 12, 2023.

As provided by the agreement, Plaintiffs and Anywhere hereby jointly stipulate and request that this Court stay all deadlines and proceedings solely as to Anywhere in this case to preserve the resources of Plaintiffs, Anywhere, and the Court and to allow the Parties to formalize the settlement agreement and to seek preliminary and final approval of the settlement.

Dated: September 5, 2023

Respectfully submitted,

Co-Lead Counsel for Plaintiffs

Counsel for Realogy Holdings Corp.

/s/ Steve W. Berman

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 5, 2023, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system, which will cause notice and a copy of this filing to be served upon all counsel of record.

/s/ Steve W. Berman
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