

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Linda Lee Soderstrom, Maria Johnson,
Craig Goodwin, Jurline Bryant, and Julio
Stalin de Tourniel, *on behalf of themselves
and others similarly situated*, and

HOME Line, *a Minnesota nonprofit
corporation*,

Plaintiffs,

v.

MSP Crossroads Apartments LLC, *a
Minnesota corporation*, and Soderberg
Apartment Specialists (SAS), *a Minnesota
corporation*,

Defendants.

Civil No. 0:16-cv-00233 (ADM/KMM)

**MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT, CONDITIONAL CERTIFICATION OF SETTLEMENT CLASS,
APPOINTMENT OF CLASS REPRESENTATIVES AND CLASS COUNSEL,
APPROVAL OF SETTLEMENT NOTICE AND DISTRIBUTION,
APPOINTMENT OF A SETTLEMENT ADMINISTRATOR, AND
SCHEDULING OF A FINAL APPROVAL HEARING**

Plaintiffs respectfully request that this Court enter an Order preliminarily approving the settlement between Plaintiffs Linda Lee Soderstrom, Maria Johnson, Craig Goodwin, Jurline Bryant, Julio Stalin de Tourniel, and HOME Line and Defendants MSP Crossroads Apartments LLC and Soderberg Apartment Specialists (SAS), conditionally certifying the settlement class, appointing Linda Lee Soderstrom, Maria Johnson, Craig Goodwin, Jurline Bryant, and Julio Stalin de Tourniel as class representatives of the Displacement Class,

appointing Linda Lee Soderstrom, Maria Johnson, and Jurline Bryant as class representatives of the Application Class, appointing Lockridge Grindal Nauen P.L.L.P. and the Housing Justice Center as class counsel, approving the settlement notice and distribution thereof, appointing JND Class Action Administration, LLC as the settlement administrator, and scheduling a final approval fairness hearing.

This motion is based on the accompanying memorandum, declarations, and exhibits, and on the records, pleadings, and papers filed in this action, and such argument.

Dated: September 29, 2017

Respectfully submitted,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

s/Kristen G. Marttila

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INTERIM CLASS COUNSEL