

This is a notice about a court case affecting park residents. Please call 320-253-0121 to have this read to you in Somali, Spanish, Hmong, Vietnamese, or another language.

Somali / Soomaali: Arintan wa ogeysis quseyso kis maxkamaded sameneyso park residents. Hadi ad rabtid inan kufamsino arintan nasowac adhigo isticmalayo nambarka 320-253-0121.

Spanish / Español: Este documento es un aviso sobre un juicio que afecta a los residentes del parque de casas móviles. Llame al 320-253-0121 para que se lo lea en español.

Hmong / Hmoob: Daim ntawv no yog ceeb toom qhia txog ib rooj plaub ua yuav cuam tshuam cov neeg nyob hauv Park. Thov hu 320-253-0121 yog koj xav kom muab daim ntawv no nyeem lus Hmoob rau koj.

Vietnamese / Tiếng Việt: Đây là thông báo về một vụ kiện có ảnh hưởng đến cư dân sinh sống tại khu dân cư. Xin vui lòng gọi số điện thoại 612-332-1441 để được đọc thông báo này bằng tiếng Việt.

Notice of Proposed Class Action Settlement

Important Legal Notice – PLEASE READ CAREFULLY

To: All current and former residents of Sartell Mobile Home Park who resided in the park between June 14, 2024 and the present.

From: United States District Court, District of Minnesota
Case No.: 0:24-cv-04235-LMP-LIB

About: Settlement of class action lawsuit against Gemstone

1. Summary of the settlement

A proposed settlement has been reached in a class action lawsuit between residents of Sartell Mobile Home Park and its current owners, Gemstone Communities, LLC and Sartell MHC, LLC (Gemstone).

Things to know:

- This settlement provides injunctive relief only. This means that Gemstone agrees to make changes and improvements.
- This settlement will not pay any money to park members who are not named as Plaintiffs.
- Plaintiffs' claims against Impact MHC Management, LLC, Sartell MHP, LLC, and Sartell MHP 2, LLC will remain pending.

Because of this settlement, Gemstone will:

- Make sewer repairs agreed on by Plaintiffs and Gemstone following investigation and recommendations from their respective independent experts
- Test the soil for contamination and remediate if required
- Monitor and ensure that the water billing process is accurate
- Allow residents to either stay on their old lease or sign a new lease

Complete details are available in the Settlement Agreement, which is on file with the Court.

2. Who is included in the settlement class

You are a member of the settlement class if you resided in the park at any time between June 14, 2024, and the present.

3. Your options

- Because this settlement is under Federal Rule of Civil Procedure 23(b)(2), you do not have a right to opt-out.
- However, you do have a right to object to the settlement terms.
- You can attend the Final Approval Hearing, at your own expense, to observe.

4. Important Dates

Event	Date
Objection Deadline	March 7, 2026
Final Approval Hearing	April 30, 2026 at 10:00 am
Settlement Implementation Begins	5 days after the final approval

5. The Final Approval Hearing

The Court will hold a hearing on April 30, 2026, at 10:00 am at 316 North Robert Street, St. Paul, MN 55101 to decide if it should approve the settlement. You may attend this hearing, but you don't have to.

At the hearing, the Court will look at:

- Whether the settlement is fair, reasonable, and adequate.
- Whether to approve attorneys' fees and costs.

6. More information

For more information about this settlement, you may:

Review settlement documents and motion papers by visiting the settlement website:

<https://tinyurl.com/mylegalaid-sartell>

Review all court documents in the matter at 316 North Robert Street, St. Paul, MN 55101 during business hours.

Contact class counsel:

Mid-Minnesota Legal Aid

Sartell Mobile Home Park Litigation

110 Sixth Ave. S. Suite 200, St. Cloud, MN 56301

7. Objecting to the settlement

- You may object to the settlement if you believe it is unfair, unreasonable, or inadequate.
- If you want your concerns to be considered before the Court decides whether to approve the settlement, you must send a written objection to the lawyers for the Class.
- Your objection must include:
 - Your name, current address, and telephone number;
 - A statement confirming that you lived at the Sartell Mobile Home Park between June 14, 2024 and March 7, 2026;
 - A clear explanation of the reasons you object to the settlement;
 - Whether your objection applies only to you, to a specific group of class members, or to the entire class; and
 - Any documents or information you want the lawyers for the class to consider.

Your written objection must be postmarked by March 7, 2026, and sent to:

Mid-Minnesota Legal Aid

Sartell Mobile Home Park Litigation

110 Sixth Ave. S. Suite 200, St. Cloud, MN 56301

Class Counsel will provide all timely objections to the Court before the Final Approval Hearing. The Court may permit objectors to be heard at the hearing.

8. Payment to named plaintiffs and attorneys' fees and costs

- Each named plaintiff will receive a service award of \$5,000 for their role in bringing this case.
 - Class counsel will apply to the Court for an award of attorney fees and costs of up to \$15,000.
 - All payments are subject to Court approval at the Final Approval Hearing.
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9. Legal effect of the settlement

If the Court approves this settlement:

- Gemstone will make all the changes and improvements described above.
- Class members will release their legal claims against Gemstone for the issues in this lawsuit.
- The lawsuit will be dismissed with prejudice against Gemstone.
- Plaintiffs' claims against Impact MHC Management, LLC, Sartell MHP, LLC, and Sartell MHP 2, LLC Defendants will remain pending. Plaintiffs have not yet moved to certify a class as to those entities.

Please do not contact the Court, Gemstone, or the park office or staff directly with questions about the settlement. Please contact the lawyer for the class.

This notice is authorized by the Court. It is not an expression of the Court's opinion about the merits of the claims or the proposed settlement.

**Case No. 0:24-cv-04235-LMP-LIB
United States District Court, District of Minnesota
December 5, 2025**