

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

DAVID BIRKS, <i>et al.</i>	:	
	:	
<i>Individually and on behalf of similarly</i>	:	
<i>situated persons</i>	:	
	:	
Plaintiffs	:	
	:	
v.	:	Case No.: 8:23-cv-00837-BAH
	:	
SMALL COMMUNITY SPECIALISTS,	:	
L.L.C., <i>et al.</i>	:	
	:	
Defendants	:	

**MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND
FOR CERTIFICATION OF SETTLEMENT CLASS**

COMES NOW, Plaintiffs, David Birks and Michael Federman (hereinafter “Plaintiffs”), by and through undersigned counsel, and pursuant to Fed. R. Civ. P. 23, move this Court for preliminary approval of the proposed class action settlement in this matter, and for preliminary approval of a settlement class. The proposed settlement class is defined as follows:

All Maryland consumers who paid a fee to Defendants for making a homeowner’s association or condominium association dues or assessment payment using the TownSq app between February 14, 2020 and July 3, 2024.

In support of this motion, Plaintiffs refer the Court to the accompanying memorandum of law and attached declarations. Defendants Small Community Specialists, L.L.C., Associations, Inc., and HOAM Ventures, Inc. do not oppose this motion.

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of July, 2024, a copy of the foregoing was filed and served by CM/ECF filing to the following:

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