

**IN THE CIRCUIT COURT OF
THE NINETEENTH JUDICIAL CIRCUIT,
IN AND FOR INDIAN-RIVER COUNTY, FLORIDA**

**BEVERLY DESHAY, individually and on
behalf of all those similarly situated,**

Plaintiff,

Case No.: 2022CA000457

v.

KELLER WILLIAMS REALTY, INC.,

Defendant.

/

STIPULATION REGARDING OBJECTION

Plaintiff Beverly Deshay, Defendant Keller Williams Realty, Inc., and Objector Steven Helfand (the “Parties”) have, subject to Court approval, reached an agreement to resolve Mr. Helfand’s Objections to the Class Action Settlement Agreement and Plaintiff’s Motion to Strike Mr. Helfand’s Objections.

Specifically, the Parties have agreed that any person (1) who has submitted a timely Claim but is not on the Direct Mail List and (2) who provides (a) proof of receiving a call from or on behalf of Defendant or any Defendant-affiliated franchisees, market centers, realtors, agents or vendors and (b) proof of ownership of the telephone number at which the call was received, shall have their Claim validated by the Settlement Administrator absent evidence of fraud.

The Settlement Administrator shall be responsible to undertake a diligent and impartial review of all submitted Claims for purposes of validation and fraud prevention.

Plaintiff shall withdraw her Motion to Strike Mr. Helfand’s Objection.

Mr. Helfand shall withdraw his Objections to the Class Action Settlement Agreement, and agrees to not seek any additional fees, awards, or payments beyond his Claim amount.

This Stipulation and any Order approving this stipulation shall be posted to the Settlement Website.

Accordingly, the Parties request that the Court enter an Order approving their Stipulation.

Dated: March 22, 2023

Respectfully submitted,

By: /s/ Avi R. Kaufman
Avi R. Kaufman, Esq. (Florida Bar No. 84382)
KAUFMAN P.A
237 South Dixie Highway, Floor 4
Coral Gables, Florida 33133
kaufman@kaufmanpa.com
(305) 469-5881

Stefan Coleman (FL Bar no. 30188)
law@stefancoleman.com
COLEMAN PLLC
66 West Flagler Street, Suite 900
Miami, FL 33130
Telephone: (877) 333-9427
Facsimile: (888) 498-8946

Counsel for Plaintiff and all others similarly situated

HINSHAW & CULBERTSON LLP

s/ Todd P. Stelter
John P. Ryan (pro hac vice)
jryan@hinshawlaw.com
Todd P. Stelter (pro hac vice)
tstelter@hinshawlaw.com
151 N. Franklin Street, Suite 2500
Chicago, IL 60606
Telephone: (312) 704-3000
Facsimile: (313) 704-3001

Ruel W. Smith
Florida Bar No. 36548
rsmith@hinshawlaw.com
100 South Ashley Drive
Suite 500
Tampa, FL 33602
Telephone: 813-276-1662
Facsimile: 813-276-1956

Attorneys for Defendant Keller Williams Realty, Inc.

By: Steven Helfand
Steven Helfand (Mar 22, 2023 17:53 EDT)
STEVEN HELFAND

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 22, 2023 a copy of the foregoing has been served on all counsel of record through Florida's E-Filing Portal.

/s/ Avi R. Kaufman _____
Avi R. Kaufman







KW stipulation re objection

Final Audit Report

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