## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

DON GIBSON, LAUREN CRISS,	)
JOHN MEINERS, and DANIEL	)
UMPA, individually and	
on behalf of all others similarly situated,	
Plaintiffs,	) )
V.	) Case No. 4:23-cv-00788-SRB
	)
THE NATIONAL ASSOCIATION OF	)
REALTORS, et al.,	)
	)
Defendants.	

## PLAINTIFF CLASS COUNSELS' NOTICE OF CHANGE IN ESCROW AGENT

Plaintiffs' Class Counsel, responsible for administering the settlement funds in this and all related matters before the Court, hereby provide notice that the settlement escrow account previously held at Huntington Bank will be transferred to an institutional money market fund offered through Morgan Stanley. This notice is submitted in the interest of full transparency to the Court and all parties.

- Plaintiffs' Class Counsel have determined that the settlement funds currently held at Huntington Bank will be transferred to Morgan Stanley. The funds will remain in Morgan Stanley's Institutional Money Market Fund.
- 2. This decision was based on an evaluation of factors including rate of return, account costs, and the product being offered by Morgan Stanley. Morgan Stanley has disclosed the net rate of return, currently 4%, and there are no additional charges or fees to the class.

3. The determination followed consultation among all Class Counsel and a review of a

market analysis comparing reasonable and secure options for holding settlement funds.

4. Morgan Stanley operates under the regulatory oversight of the Securities and Exchange

Commission and maintains high standards of compliance and institutional strength.

5. The transfer decision was also informed by the ease of use, transparency, and efficiency

of Morgan Stanley's platform.

6. This decision does not reflect any concern or criticism of Huntington Bank.

7. Plaintiffs' Counsel have complied with the Court's disclosure requirements regarding all

vendors and financial institutions and will continue to do so.

8. Plaintiffs' Counsel have each prepared and are filing the necessary disclosures regarding

Morgan Stanley to ensure there is no conflict of interest related to the transfer.

9. Plaintiffs' Counsel will supplement these disclosures promptly should any change in

circumstances alter the representations made in any sworn declarations previously filed

with the Court.

Respectfully Submitted,

KETCHMARK AND MCCREIGHT P.C.

/s/ Michael S. Ketchmark

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>th</sup> day of October 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to counsel of record for this case.

/s/ Michael S. Ketchmark

Attorney for Plaintiffs