

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

RHONDA HENDERSON; ROBERTA FAULKES;
RACHEL CHURCH; TEAHA JACKSON; and
CHELSEA POBUR, on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

VISION PROPERTY MANAGEMENT, LLC; FTE
NETWORKS, INC.; US HOME RENTALS, LLC;
KAJA HOLDINGS, LLC; KAJA HOLDINGS 2,
LLC; MI SEVEN, LLC; IN SEVEN, LLC; RVFM 4
SERIES, LLC; ACM VISION V, LLC; DSV SPV 1,
LLC; DSV SPV 2, LLC; DSV SPV 3, LLC; BOOM
SC; ALAN INVESTMENTS III, LLC; ARNOSA
GROUP LLC; MOM HAVEN 13, LP; ATALAYA
CAPITAL MANAGEMENT LP; INMOST
PARTNERS, LLC; DS AGENT, LLC, KOOKMIN
BANK, AS TRUSTEE OF THE DISCOVERY US
RESIDENTIAL SENIOR NOTE FUND NO. 8; and
SAMSUNG SECURITIES CO., LTD., AS
TRUSTEE OF THE KCLAVIS US RESIDENTIAL
SENIOR NOTE FUND NO. 1, STATEBRIDGE
COMPANY, LLC, HOMI HOLDINGS, LLC et al.,

Defendants.

Case No. 20-cv-12649

Hon. Shalina D. Kumar

Mag. J. David R. Grand

PLAINTIFFS' CORRECTED¹ MOTION FOR RECONSIDERATION

¹ Plaintiffs' Brief in Support of Plaintiffs' Motion for Reconsideration remains unchanged. Plaintiffs' corrected filing is solely to include and update the motion.

Plaintiffs Rhonda Henderson, Roberta Faulks, and Rachel Church respectfully move pursuant to L.R. 7.1(h) to request reconsideration of the Court's summary judgment opinion and order, ECF No. 229. A brief in support of this motion is attached. Counsel for Plaintiffs communicated in writing with opposing counsel on October 31, 2023 in accordance with Local Rule 7.1(a), explaining the nature of the relief to be sought by way of this motion and seeking concurrence in the relief. Plaintiffs' counsel received responses from counsel for Atalaya, ACMV, the Noteholder Agent Defendants, Kookmin Bank, and Samsung Securities, and concurrence was not obtained. Plaintiffs' counsel did not receive a response from counsel for the FTE Defendants. Through an oversight, Plaintiffs' counsel did not initially seek concurrence from counsel for the DSVs but obtained their position on November 2, 2023. Counsel for the DSVs did not concur.

Respectfully submitted,

/s/ Shennan Kavanagh

**NATIONAL CONSUMER LAW
CENTER**

Shennan Kavanagh (B.B.O. #655174)

Sarah B. Mancini (G.B. # 319930)

Stuart T. Rossman (B.B.O. #430640)

7 Winthrop Square

Boston, MA 02110

Tel: (617) 542-8010

skavanagh@nclc.org

smancini@nclc.org

/s/ Jennifer A. Holmes

**NAACP LEGAL DEFENSE
AND EDUCATIONAL FUND, INC.**

Jennifer A. Holmes (D.C. Bar ID
1018798)

Pilar C. Whitaker (D.C. Bar ID
90009046)

700 14th Street NW, Suite 600

Washington, DC 20005

Tel.: (202) 682-1300

pwhatiaker@naacpldf.org

jholmes@naacpldf.org

sgrossman@nclc.org

/s/ Lorry S.C. Brown

**MICHIGAN POVERTY LAW
PROGRAM**

Lorry S. C. Brown (P60753)
15 South Washington Street, Suite 202
Ypsilanti, Michigan 48197
Tel.: (734) 998-6100 ext. 613
Fax.: (734) 998-9125

lorryb@mplp.org

Alexandra Sloane Thompson (N.Y.
5241989)

Tiffani Burgess (N.Y. 5849344)
40 Rector St, 5th Floor
New York, NY 10006
212-965-2200

athompson@naacpldf.org

tburgess@naacpldf.org

/s/ Bonsitu A. Kitaba-Gaviglio

**AMERICAN CIVIL LIBERTIES
UNION FUND OF MICHIGAN**

Bonsitu Kitaba-Gaviglio (P78822)
Daniel S. Korobkin (P72842)
2966 Woodward Avenue
Detroit, Michigan 48201
(313) 578-6800

bkitaba@aclumich.org

dkorobkin@aclumich.org

*Attorneys for Plaintiffs and the
Putative Classes*

Dated: November 2, 2023