



**United States District Court for the Eastern District  
of Louisiana**

**Calogero v. Shows, Cali & Walsh, LLP et al  
Case No. 2:18-cv-06709-BWA-EJD**

# Class Action Notice

*Authorized by the U.S. District Court*

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**Did you get a letter from Shows, Cali and Walsh saying they might take you to court if you didn't pay back money you got from the Road Home Program?**

**There is a \$2.8 million settlement of a lawsuit: \$300 - \$1200 per share, plus partial reimbursement of any money you repaid. You may be entitled to money.**

**To be included in this settlement, you should:**

**Read through this notice.**

**Reply by March 3, 2025.**

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If you don't do anything, the settlement will still apply to you and might change your rights. For more information, visit <https://www.splcenter.org/settlement-louisiana-road-home-program>.

- This settlement ends a lawsuit about whether Shows, Cali & Walsh misled recipients of the Road Home homeowners' grants and violated the Fair Debt Collection Practices Act.
- It stops added costs and risks from going on with the lawsuit, gives money to homeowners, and frees Shows, Cali & Walsh from legal responsibility.
- The two sides disagree on how much money could have been won at trial.
- The lawyers for the homeowners will ask the Court for \$950,000 as payment for their work on this case and reimbursement for case costs.

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## About This Notice

### Why did I get this notice?

This notice is to tell you about the settlement of a class action lawsuit, *Calogero v. Shows, Cali & Walsh, LLP et al*, Case No. 2:18-cv-06709-BWA-EJD, brought on behalf of people who received a debt collections letter that threatened legal action if portions of the Road Home homeowners grants were not paid back. **You received this notice because you may be a member of the group of people affected, called the “class.”** This notice gives you a summary of the terms of the proposed settlement agreement, explains what rights class members have, and helps class members make informed decisions about what action to take.

### What do I do next?

Read this notice to understand the settlement and to determine if you are a class member. Then, decide if you want to:

Options	More information about each option
<b>Submit your information</b>	Receive payment. You will be bound by the settlement.
<b>Opt Out</b>	Get no payment. Allows you to bring another lawsuit against Shows, Cali and Walsh about the same issues.
<b>Object</b>	Tell the Court why you don't like the settlement.

Before this settlement, the Department of Housing and Urban Development (“HUD”) ended the Road Home Program including any attempts to collect repayment of Road Home grants. If Shows, Cali and Walsh collected a promissory note from you or took out a lien against your property, the note and/or the lien should have been cancelled at that time. **This settlement will not affect the cancellation of your alleged debt, whichever option you choose.** This settlement only affects 1) whether you receive refunds of payments you may have made to repay Road Home homeowners grants before the debt was cancelled and 2) whether you receive additional payment for your damages.

Read on to understand the specifics of the settlement and what each choice would mean for you.

## What are the most important dates?

Your deadline to object or opt out: **March 3, 2025**

Settlement approval hearing: **April 3, 2025**

Your deadline to submit a claim form: **March 3, 2025**

## Learning About the Lawsuit

### What are the reasons for this lawsuit?

The lawsuit said that Shows, Cali, Walsh, and others deceived homeowners. They threatened to bring legal actions on debts that were too old. The lawsuit also said that Shows, Cali, and Walsh sent letters that gave incorrect and confusing info about homeowners having to pay lawyer fees.

Shows, Cali and Walsh deny that they did anything wrong, and they had many defenses.

### How to learn more?

You can get a complete copy of the proposed settlement and other key documents at:

<https://www.splcenter.org/settlement-louisiana-road-home-program>

### Why is there a settlement in this lawsuit?

In 2024, the parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation. The Defendants only had \$2.8 million left in their insurance, which would be reduced by lawyers' fees and other costs if the court case went on, and Defendants say they do not have much net worth to add to what was left in their insurance policy.

The settlement includes two major compromises: First, the parties agreed to include everyone who

### What is a class action settlement?

A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members and changes to the practices that caused the harm.

received a collection letter, but to reduce their damages to take into account that not all of the letter recipients might be entitled to damages. Second, the parties compromised on how much money each person should receive for emotional damages, because the costs of proving individual damages would substantially reduce the money available to pay those damages.

The settlement is on behalf of the homeowners who brought the case and all members of the settlement class. The Court has not decided this case in favor of either side.

## What happens next in this lawsuit?

The Court will hold a Fairness hearing to decide whether to approve the settlement. The hearing will be held at:

**Where:**

U.S. District Court  
Eastern District of Louisiana  
500 Poydras St., Room C351  
New Orleans, LA 70130

**When:** 10:00am on Thursday, April 3, 2025.

The Court has directed the parties to send you this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You don't have to attend, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement or the parties decide to end it, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To confirm the hearing date, go to <https://www.splcenter.org/settlement-louisiana-road-home-program>.

# Learning About the Settlement

## What does the settlement provide?

Shows, Cali and Walsh has agreed to create a \$2.8 million fund. This money will be divided among the class members and will also be used to pay for costs and lawyer fees approved by the Court, and for the cost of administering this settlement. Members of the settlement class will “release” their claims as part of the settlement, which means they cannot sue Shows, Cali and Walsh for the same issues and legal violations raised in this lawsuit. All parties also agree not to discuss the settlement in the press or social media. You can read the complete terms of the 'release' <https://www.splcenter.org/settlement-louisiana-road-home-program>.

If there is money left over after the claims process is completed, it will be donated to Southeast Louisiana Legal Services.

## How much will my payment be?

**If you received a collections letter, you could be a class member and entitled to money.**

If you received a collection letter after July 16, 2017 which stated you may be sued or may be responsible for attorneys’ fees if you did not repay some of the Road Home Homeowners grant, **but you did not make any payments to the Defendants or receive a promissory note to begin repayment**, you may receive a damages check of approximately \$300.

If you received a collection letter after July 16, 2017 which stated you may be responsible for attorneys’ fees if you did not repay some of the Road Home Homeowners grant, **and you did make payments to the Defendants or receive a promissory note to begin repayment**, you may receive a damages check of approximately \$1000 plus a partial refund of your payments.

**There are exceptions. You are not a class member if:**

- **You received the collection letter before July 16, 2017;**

- **Your claims against Defendant come from other Road Home benefit such as elevation grants.**
- Some letters were addressed to more than one person. Each person to whom the letter was addressed is a class member and has a separate claim for damages.
- If you signed a promissory note and/or you made any payment on a debt Defendants said you owed, you are a class member entitled to a refund of 90% of the amounts you paid, in addition to the money for damages. While damages will be paid to each recipient of a collection letter, the refund will only be paid to one.

## Deciding What to Do

### How do I weigh my options?

You have three options. You can stay in the settlement and give needed tax information, you can opt out of the settlement, or you can object to the settlement. This chart shows the effects of each option:

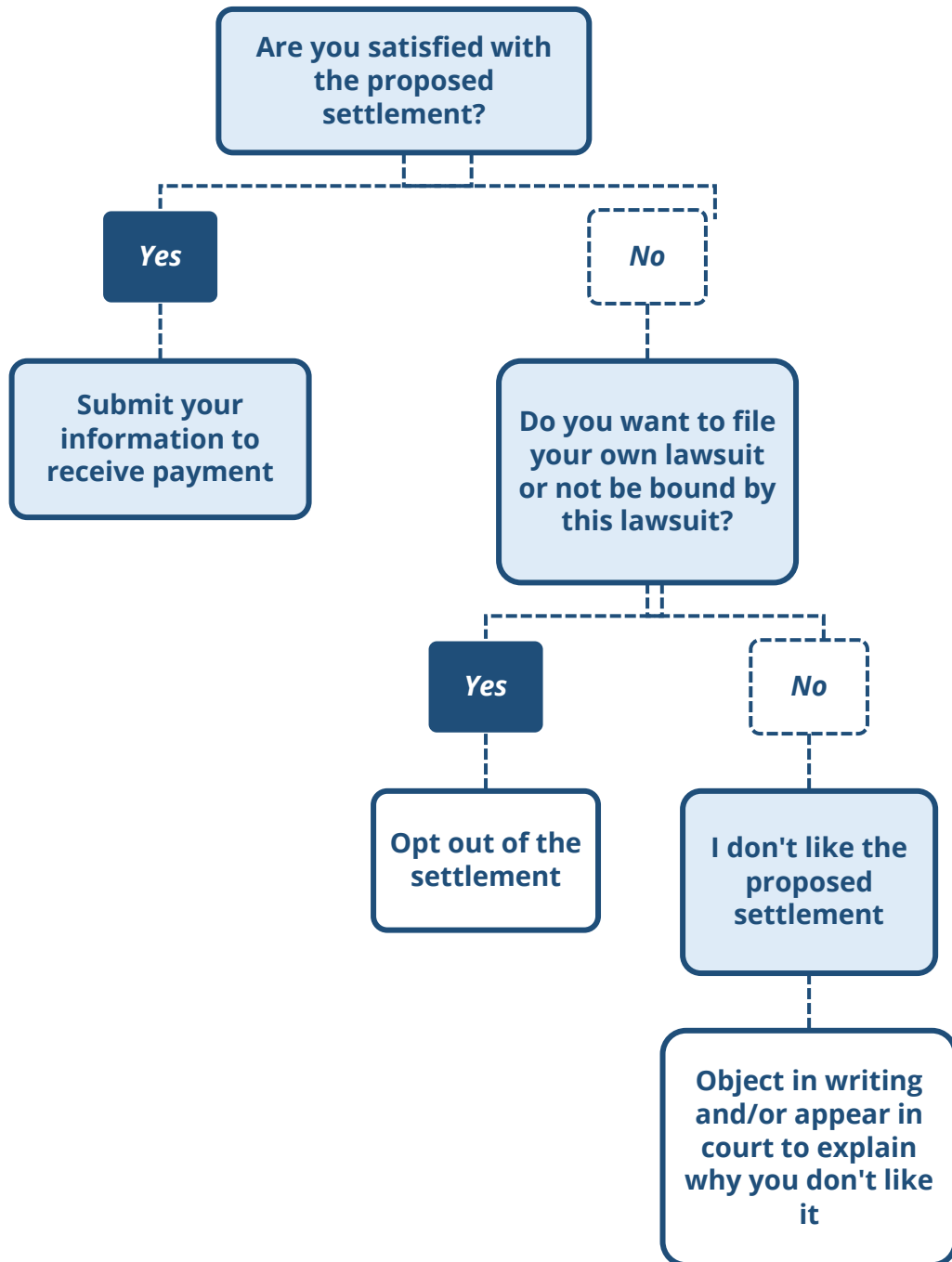
	<b>Submit my information</b>	<b>Opt out</b>	<b>Object</b>
<b>Can I receive settlement money if I . . .</b>	YES	NO	YES
<b>Am I bound by the terms of this lawsuit if I . . .</b>	YES	NO	YES
<b>Can I pursue my own case if I . . .</b>	NO	YES	NO
<b>Will the class lawyers represent me if I . . .</b>	YES	NO	NO

If a letter had more than one addressee, you must return a claim form stating how any refund is to be divided among the addressees. If you do not return a claim form or if there is a dispute about the allocation of the refund, the claims administrator will divide the refund equally among the addressees.

The claim form will also ask for tax information, like a SSN, so the claims administrator can send you the necessary tax forms

(i.e. a 1099 for damages over \$600). You should still consult with your own tax professional about whether you will owe taxes. If you do not provide a SSN, the claims administrator will automatically send 24% of your damages to the IRS.

## What is the best path for me?





# Submitting a Claim

## How do I get a payment if I am a class member?

If you want a settlement payment, you must submit a completed claim form to the Settlement Administrator online or download a claim form at <https://www.splcenter.org/settlement-louisiana-road-home-program> and mail to the Settlement Administrator (at the web and mailing addresses below), transmitted or postmarked no later than March 3, 2025. If you are filing on behalf of a deceased claimant, you must include a Next of Kin form.

## Do I have a lawyer in this lawsuit?

In a class action, the court approves class representatives and lawyers to work on the case and look after what's best for everyone in the class. For this settlement, the Court has appointed the following individuals and lawyers.

### **Your lawyers:**

Keren E. Gesund  
GESUND AND PAILET, LLC  
3421 N. Causeway Blvd., Suite 805  
Metairie, LA 70002

Margaret E. Woodward  
ATTORNEY AT LAW  
1229 N. Tonti Street  
New Orleans, Louisiana 70119

Jennifer C. Deasy  
JENNIFER C. DEASY, LLC  
Energy Centre  
1100 Poydras Street, Suite 1500  
New Orleans, Louisiana 70163

Kirsten Anderson  
Crystal McElrath  
Jamie Rush  
SOUTHERN POVERTY LAW CENTER  
201 Saint Charles Avenue  
New Orleans, Louisiana 70170

O. Randolph Bragg  
300 N. State Street, Suite 5320  
Chicago, Illinois 60654

These are the lawyers who worked out this agreement for you.

If you'd prefer to have your own lawyer, you can hire one at your cost.

## Do I have to pay the attorneys in this case?

Lawyers' fees and costs will be paid from the Settlement Fund. **You will not have to pay the lawyers directly.**

To date, your lawyers have not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request, as part of the final approval of this Settlement, that the Court approve a payment of up to \$950,000 total in attorneys' fees plus the reimbursement of case costs. Case costs include expenses like hiring an expert and mailing all settlement checks.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

Your lawyers will also ask the Court to approve a payment of \$10,000 to each of the Class Representatives for the time and effort they contributed to the case. If approved by the Court, the Service Awards will be paid from the Settlement Fund.

## Opting Out

### What if I don't want to be part of this settlement?

You can opt out. If you do, you will not receive payment and cannot object to the settlement. However, you will not be bound or affected by anything that happens in this lawsuit. That means you keep the right to sue Shows, Cali and Walsh or be part of another case against Shows, Cali and Walsh about the issues in this lawsuit. **If you have a pending lawsuit against Shows, Cali and Walsh speak to your lawyer in that case immediately.** You must exclude yourself from this Class to continue your own lawsuit.

### How do I opt out?

To opt out of the settlement, you must mail a written request for exclusion by March 3, 2025, to the Settlement Administrator at:

Calogero v. Shows, Cali & Walsh  
Settlement Administrator  
c/o SSI, an Epiq Company  
P.O. Box 2715  
Portland, OR 97218-2715  
Telephone: (888) 293-2380  
E-mail: [claims@ssiclaims.com](mailto:claims@ssiclaims.com)

Be sure to include your full name, address, telephone number, your signature and a statement that you wish to be excluded from the class action settlement.

# Objecting

## What if I disagree with the settlement?

If there's part of the settlement that you don't like (like the fees you need to pay to lawyers) but you still don't want to opt out, you have the right to object. You must give reasons why you think the Court should not approve it and say whether your objection applies to just you, a part of the class, or the entire class. The Court will listen to your view. But, remember, it can only say 'yes' or 'no' to the settlement - it can't change what's in it. You may, but don't need to, hire your own lawyer to help you.

To object, you must send a letter to the Court that:

- 1) is postmarked by March 3, 2025;
- 2) includes the case name and number (*Calogero v. Shows, Cali & Walsh, LLP et al*, Case No. 2:18-cv-06709-BWA-EJD)
- 3) includes your full name, address and telephone number, and email address (if you have one);
- 4) states the reasons for your objection;
- 5) says whether either you or your lawyer intend to appear at the final approval hearing and your lawyer's name;
- 6) your signature

Mail the letter to:

Calogero v. Shows, Cali & Walsh Settlement Administrator c/o SSI, an Epiq Company P.O. Box 2715 Portland, OR 97218-2715 Telephone: (888) 293-2380 E-mail: <a href="mailto:claims@ssiclaims.com">claims@ssiclaims.com</a>	U.S. District Court, Eastern District of Louisiana, 500 Poydras St., Room C351 New Orleans, LA 70130
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## Doing Nothing

### What are the consequences of doing nothing?

If you do nothing, we will send you a check. You will be responsible for paying your own taxes and you will still be bound by the settlement and its “release” provisions. That means you won’t be able to start, continue, or be part of any other lawsuit against Shows, Cali and Walsh about the issues in this case. For a complete list of the claims involved that will be settled if the agreement is accepted, visit the settlement website.

## Key Resources

### How do I get more information?

This notice is a summary of the proposed settlement.

To get a copy of the settlement agreement or get answers to your questions:

- contact your lawyer (information below)
- visit the case website at <https://www.splcenter.org/settlement-louisiana-road-home-program>
- access the Court’s portal online <https://pacer.uscourts.gov/> or by visiting the Clerk’s office of the Court (address below).

Resource	Contact Information
<b>Case website</b>	<a href="https://www.splcenter.org/settlement-louisiana-road-home-program">https://www.splcenter.org/settlement-louisiana-road-home-program</a>
<b>Settlement Administrator</b>	Calogero v. Shows, Cali & Walsh Settlement Administrator c/o SSI, an Epiq Company P.O. Box 2715 Portland, OR 97218-2715 Telephone: (888) 293-2380

	E-mail: <a href="mailto:claims@ssiclaims.com">claims@ssiclaims.com</a>
<b>The Lawyers Representing You (The Lawyers for the Plaintiffs/Homeowners)</b>	<p>Keren E. Gesund  GESUND AND PAILET, LLC  3421 N. Causeway Blvd., Suite 805  Metairie, LA 70002</p> <p>Margaret E. Woodward  ATTORNEY AT LAW  1229 N. Tonti Street  New Orleans, Louisiana 70119</p> <p>Jennifer C. Deasy  JENNIFER C. DEASY, LLC  Energy Centre  1100 Poydras Street, Suite 1500  New Orleans, Louisiana 70163</p> <p>Kirsten Anderson  Crystal McElrath  Jamie Rush  SOUTHERN POVERTY LAW CENTER  201 Saint Charles Avenue  New Orleans, Louisiana 70170</p> <p>O. Randolph Bragg  300 N. State Street, Suite 5320  Chicago, Illinois 60654</p>
<b>Court (DO NOT CONTACT)</b>	U.S. District Court, Eastern District of Louisiana, 500 Poydras St., New Orleans, LA 70130

