

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

LASHANDA VASSERS, Individually and as parent	)	
of ADREYONNA BANKS and COURTNEY	)	
HARPER and as a representative of a class of	)	
similarly situated and aggrieved persons,	)	
	)	Case No.: 12 CH 9997
Plaintiff,	)	
	)	
v.	)	
	)	
	)	
	)	
EAST LAKE MANAGEMENT GROUP, INC., an	)	
Illinois corporation and KING PRESERVATION	)	
OF ILLINOIS LLC.	)	
	)	
Defendants.	)	
	)	

**NOTICE OF LIABILITY JUDGMENT  
IN FAVOR OF PLAINTIFF CLASS AND AGAINST DEFENDANTS**

**IMMEDIATE ACTION REQUIRED**

**1. *What is this Notice About?***

Any person who was a resident in an apartment complex known as 51<sup>st</sup> & King Drive Apartments (“Complex”) during the period 20 March 2010 – 1 June 2018, you are a member of a class of plaintiffs **who may be entitled to recover money damages** caused by defendants’ failure to exterminate bedbugs in that Complex.

The Court has found the owner, King Preservation of Illinois, Inc., and manager, East Lake Management Group, Inc., of the Complex liable for violating the rights of residents of the Complex during the period 18 March 2010 - 1 June 2018 by failing to exterminate bed bugs in the Complex.

**2. *What specific addresses are included within the Complex?***

The Complex includes any of the apartment units in any of the following addresses:

- 5036-5054 South Washington Park Ct., Chicago, Illinois 60615**
- 5035-5053 South King Drive, Chicago, Illinois 60615**
- 404-406 East 51<sup>st</sup> Place, Chicago, Illinois 60615**
- 405-407 East 50<sup>th</sup> Place, Chicago, Illinois 60615**

If you were a resident of these addresses during the period 20 March 2010 – 1 June 2018, then you **may be entitled to recover money damages** caused by defendants' failure to exterminate bedbugs.

3. *For what damages may you be entitled to claim money damages?*

Damages for which you may be entitled to compensation include:

- a. Bedbug bites that caused you physical and/or emotional pain and suffering, regardless of whether they required medical care;
- b. Medical expenses or costs of over-the-counter remedies resulting from bedbug bites;
- c. Lost time/wages due to bedbug bites or activity in your apartment;
- d. Loss of or interference with your life's normal activities due to bed bug activity in your apartment
- e. Loss or damage to property (furniture, clothing, linens, etc.) caused by exposure to bedbug infestation;
- f. Other out-of-pocket costs incurred to address bedbug infestation and/or bites (*i.e.*, repellants, preventive products, over-the-counter medication); and
- g. Rent abatement.

4. *What must you and/or members of our family/household do to recover money damages?*

- a. **BY 10 JULY 2021**, Contact plaintiff's Class Counsel:

Law Offices of Hall Adams LLC  
ATTN: Taja Reynolds  
33 North Dearborn; Suite 2350  
Chicago, IL 60602  
[treynolds@adamslegal.net](mailto:treynolds@adamslegal.net)  
Direct dial telephone no. 312/445-4907

- b. Compile any/all of the following in your possession:
  - i) Medical records, reports, bills and/or Medicare/Medicaid/Insurance Explanation of Benefits forms for bedbug related care during the period 20 March 2010 – 1 June 2018

- ii) Invoices/receipts/estimates for any out-of-pocket expenses you incurred due to exposure to bedbugs during the period 20 March 2010 – 1 June 2018
  - iii) Invoices/receipts/inventories/photos for any property of which you had to dispose, replace and/or treat/repair due to exposure to bedbugs during the period 20 March 2010 – 1 June 2018
  - iv) Receipts for rents paid to defendants during the period 20 March 2010 – 1 June 2018
  - v) An itemization of any/all dates/times you lost from compensable employment during the period 20 March 2010 – 1 June 2018 due to exposure to bedbugs and documentation of your rate-of-pay during that period.
  - vi) Pictures of bedbug bites (or other skin disorders of unknown origin), bedbugs and/or bedbug fecal staining in your apartment during the period 20 March 2010 – 1 June 2018
  - vii) Contact information for any professionals – doctors, counselors, psychologists, etc. – from whom you received care that you believe was necessitated by your exposure to bedbugs during the period 20 March 2010 – 1 June 2018
  - viii) Narrative descriptions of your experiences with bedbugs while a resident of the Complex
- c. Inform family, friends and neighbors who resided in the Complex during the period 20 March 2010 – 1 June 2018 to take these same steps.

***DO NOT CONTACT THE COURT, THE ASSIGNED JUDGE, THE COURT CLERK OR DEFENSE COUNSEL. CONTACT ONLY CLASS COUNSEL AS INSTRUCTED, ABOVE.***

---

One of the Attorneys for Plaintiff

Hall Adams  
Law Offices of Hall Adams  
33 North Dearborn Street, Suite 2350  
Chicago, Illinois 60602  
T: (312) 445-4900  
Attorney No. 40587