

EXHIBIT 13

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

_____	X	
EDWIN BARTOK, <i>et al.</i> ,	X	
	X	
Plaintiffs,	X	CASE NO: 21-CV-10790-LTS
	X	
vs.	X	
	X	
HOMETOWN AMERICA, LLC, <i>et al.</i> ,	X	
	X	
Defendants.	X	
_____	X	

SUPPLEMENTAL DECLARATION OF ETHAN R. HOROWITZ

I, Ethan R. Horowitz, state that the following facts are true and accurate, based on my personal knowledge, and that I am competent to testify to the truth and accuracy of the same:

1. I have been a member in good standing of the Bar of the Commonwealth since 2009, membership which I obtained following my studies at Harvard Law School – where I earned my *juris doctor* degree in 2008 – and following a federal judicial clerkship with the Hon. Roslyn O. Silver of the U.S. District Court for the District of Arizona.

2. At present, I am Managing Director of the Northeast Justice Center, a civil legal aid organization, and have held that position since 2015, prior to which time I worked in other public interest or private practice settings.

3. During my tenure as the Justice Center’s Managing Director, I have consistently advised clients and litigated matters concerning resident-tenant rights under the Massachusetts Manufactured Housing Act.

4. During my tenure as the Justice Center’s Managing Director, I represented three *amici curiae* in the matter captioned as *Blake, et al. v. Hometown America Communities, Inc., et al.* before the Massachusetts Supreme Judicial Court and submitted a brief respecting the proper

interpretation of Section 32L(2) of the Massachusetts Manufactured Housing Act, an interpretation which the Supreme Judicial Court largely adopted in its decision on the matter.

5. During both my time in private practice and my tenure as the Justice Center's Managing Director, I have represented clients in class-action litigation, including six other manufactured housing class actions which I prosecuted or am prosecuting on behalf of the plaintiff class:

- a. *Reid, et al. v. Neighborhood Assistance Corp. of Am.*, as defense counsel, 2011-CH-37979 (Circuit Court of Cook County) 16-0296 (App. Ct. of Ill. 1st Dist.);
- b. *Lannan, et al. v. Levy & White, et al.*, as class counsel, 14-CV-13866-IT (D. Mass.);
- c. *Layes, et al. v. RHP Properties, Inc., et al.*, as class counsel, 15-CV-2722 (Middlesex Super. Ct.) 18-P-218 (Mass. App. Ct.) 20-CV-10721 (D. Mass.);
- d. *Currie, et al. v. RHP Properties, Inc., et al.*, as class counsel, 17-CV-1055 (Middlesex Super. Ct.);
- e. *Baldwin, et al. v. RHP Properties, Inc., et al.*, as class counsel, 18-CV-849 (Middlesex Super. Ct.);
- f. *Craw, et al. v. Hometown America, LLC, et al.*, as class counsel, 18-CV-12149-LTS (D. Mass.) ;
- g. *Smith, et al. v. Chelmsford Group, LLC, et al.*, as class counsel, 21-CV-10654-DJC (D. Mass.); and
- h. *Moynihan, et al. v. Rocky Knoll MHC, LLC, et al.*, as class counsel, 23-CV-214 (Bristol Super. Ct.).

6. Based on my experience and judgment, I can discern no conflict among Barbara Lee and the members of the Rule 23(b)(3) damages class whom she seeks to represent.

7. Based on my experience and judgment, Barbara Lee is fit to serve as a representative of the members of the Rule 23(b)(3) damages class whom she seeks to represent.

8. Based on my experience and judgment, I can discern no conflict among Alan Dernalowicz and the members of the Rule 23(b)(3) damages class whom he seeks to represent.

9. Based on my experience and judgment, Alan Dernalowicz is fit to serve as a representative of the members of the Rule 23(b)(3) damages class whom he seeks to represent.

10. On or about March 5, 2025, Defendants in the above-captioned action produced rent roll documents respecting the Miller's Woods and River Bend Manufactured Housing Community which demonstrated that all rent-payers in that community had been paying a uniform rent since January 1, 2025.

I affirm that the foregoing is true and accurate, to the best of my personal knowledge, and do so under the pains and penalties of perjury. Executed this 7th day of April, 2025, by:

/s/ Ethan R. Horowitz

Ethan R. Horowitz