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11 Attorneys for Plaintiffs

12 **DISTRICT COURT, ARAPAHOE COUNTY, COLORADO**

13 PLAINTIFF/COUNTERCLAIM
14 DEFENDANT: ECHELON PROPERTY
15 GRUP, LLC, a Colorado limited liability
16 company

17 v.

18 DEFENDANT/COUNTERCLAIM
19 PLAINTIFF: BOBBY SALANDY, on behalf
20 of himself and all those similarly situated.

Case Number: 2019CV112

**DECLARATION OF DANA BOUB
ON BEHALF OF RG2 CLAIMS
ADMINISTRATION LLC
REGARDING NOTICE TO THE
CLASS**

21 I, Dana Boub, hereby declare and state as follows:

22 1. I am a project manager for RG/2 Claims Administration LLC (“RG/2 Claims”),
23 whose address is 30 South 17th Street, Philadelphia, PA 19103. I am over the age of 18, have
24 personal knowledge of the matters set forth herein, and if called upon to do so, could testify
25 competently to them.

26 2. RG/2 Claims is a full-service class action settlement administrator offering
27 notice, claims processing, allocation, distribution, tax reporting, and class action settlement
28 consulting services. RG/2 Claims’ experience includes the provision of notice and
administration services for settlements arising from antitrust, consumer fraud, civil rights,
employment, negligent disclosure, and securities fraud allegations. Since 2000, RG/2 Claims

1 has administered and distributed in excess of \$1.2 billion in class action settlement proceeds.

2 3. RG/2 Claims was retained to, among other tasks, a) prepare, print and mail
3 notices to all Settlement Class Members identified by Defendants; b) track the requests for
4 exclusions and objections; c) prepare weekly activity reports for Counsel; d) handle inquiries
5 from Settlement Class Members; e) re-mail notices; f) skip-trace undeliverable addresses; g)
6 calculate and issue distribution checks to Settlement Class Members; h) prepare, print and
7 mail notices to all Settlement Class Members; and i) conduct such other tasks as the parties
8 mutually agree or the Court orders RG/2 Claims to perform. RG/2 Claims has and will
9 continue to perform these duties in effectuating the Settlement Agreement.

10 4. On January 27, 2022, RG/2 Claims received an excel file from Defendant's
11 counsel Lewis Brisbois, containing a list individuals who were considered Class Members.

12 5. After deduplication of the class list and prior to the notice mailing and in order to
13 locate the most recent addresses for the 2,899 Class Members, RG/2 Claims ran the mailing file
14 through the United States Postal Service's National Change of Address database.

15 6. The Settlement website, www.rg2claims.com/SalandySettlement.html, was
16 created by RG/2 Claims and the website (*i.e.*, Homepage, Court Documents, etc.) went live on
17 February 18, 2022. This website allowed potential Class Members to obtain information
18 regarding the Settlement. The Settlement website consists of a Homepage, a Notice page, a
19 Court Documents page, and a Contact Information page.
20 The Settlement website allowed Class members to file a claim electronically using the unique
21 login and password that were included in the mailed Claim Form.

22 7. On February 18, 2022, RG/2 Claims arranged for the printing and mailing, by
23 First Class U.S. Mail, of the Postcard Notice to each of the 2,899 Class Members. A non-
24 personalized copy of the mailed Notice is attached hereto as **Exhibit A**.

25 8. A total of 1,813 mailed Notices have been returned by the United States Postal
26 Service as undeliverable. RG/2 then performed a standard skip-trace procedure and was able to
27 re-mail an additional 1,562 Notices for whom an updated address was located. A total of 251
28 Notice packets remain undeliverable.

9. The Notice informed Class Members of their right to request exclusion from the settlement, provided the request is received or postmarked on or before April 21, 2022. To date, RG/2 Claims has received zero Requests for Exclusion from the Settlement.

10. The Notice also informed Class Members of their right to object to the Settlement, provided the objection is received or postmarked on or before April 21, 2022. To date, RG/2 Claims has not received or been advised of any objections to the settlement.

11. RG/2 Claims received and responded to 5 emails and 5 phones calls requesting information and/or confirmation of class member status.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on May 4, 2022 at Philadelphia, Pennsylvania.

Dana Boub
Dana Boub

EXHIBIT A

Legal Notice

**If You Paid Late Fees, Notice Posting
Fees, or Eviction Legal Fees While a
Tenant of Echelon Property Group You
Could Get a Payment or Other Relief
from a Class Action Settlement**

**You May Be Part of a
Class Action Settlement
Learn More At:**

www.rg2claims.com/SalandySettlement.html

*Echelon Property Group, LLC v. Bobby
Salandy*, Case No. 2019-cv-112
RG2 Claims Administration
P.O. Box 59479
Philadelphia, PA 19102

First
Class
Postage
Permit



Postal Service: Please do not mark barcode

ABC-1234567-8

First Last
Address1
Address2
City, State, Zip Code

Summary Notice

You are receiving this notice because you have been identified as a potential Settlement Class Member in *Echelon Property Group, LLC v. Bobby Salandy*, Case No. 2019-cv-112, pending in the District Court for Arapahoe County, Colorado. The Court has preliminarily approved a settlement that could impact your legal rights, whether you act or not. This is only a summary of the Full Notice. Visit www.rg2claims.com/SalandySettlement.html to read the Settlement Agreement, the Full Notice, and view important court dates and documents.

Nature of the Action. This lawsuit alleges that Echelon unlawfully charged Class Members Late Fees, Notice Posting Fees, and Eviction Legal Fees when it acted as their property manager. Echelon denies that it charged any unlawful sums and maintains that it has several defenses. The Court has not determined who is right. Rather, you are receiving this legal notice because your rights may be impacted by the Settlement.

How Do I Know if I am a Class Member? You fall into the definition of the Settlement Class if you were a tenant from April 25, 2016 to August 5, 2019 and were charged any Late Fees, Notice Posting Fees, and Eviction Legal Fees and had an action filed against you by Echelon for forcible entry and detainer (an eviction action).

What are My Options? Echelon has agreed to pay a Settlement Fund of \$3,450,000 comprised of \$1,200,000 in cash ("Cash Component") and \$2,250,000 in debt forgiveness. Settlement Class Members who have a balance with Echelon's debt collection firm, RD Fuller, and who do not exclude themselves, may receive debt forgiveness. Settlement Class Members who do not carry a balance with RD Fuller may receive a cash payment. Settlement Administration Expenses any Incentive Award and the Fee Award to Class Counsel will be paid from the Cash Component of the Settlement Fund. You can discuss the case with Class Counsel. You may also enter an appearance through an attorney if you so desire. You may also request to be excluded, and the Court will exclude any member who timely requests exclusion. To request exclusion, you must mail a signed statement that says "I wish to be excluded from *Echelon Property Group, LLC v. Bobby Salandy*, Case No. 2019-cv-112" to the Settlement Administrator, postmarked by April 21, 2022. Specific information is available at www.rg2claims.com/SalandySettlement.html. If you do nothing you will remain in the Class and you will be bound by all orders and judgments of the Court. If you request exclusion, you will not be able to participate in the Settlement.

Who Represents Me? The Court has appointed Steven L. Woodrow of Woodrow & Peluso, LLC and Jason Legg of Cadiz Law, LLC to be the attorneys for the Class. These attorneys are referred to as Class Counsel. You may hire your own lawyer at your own expense.

How Do I Get More Information? For more information about the proposed settlement and a copy of the full Notice go to www.rg2claims.com/SalandySettlement.html, contact the Administrator at 1-866-742-4955 or Salandy Settlement, RG/2 Claims, P.O. Box 59479, Philadelphia, PA 19102 or call Class Counsel at 720-213-0676.

TO VIEW MORE INFORMATION, VISIT:
www.rg2claims.com/SalandySettlement.html

To request exclusion, submit your signed statement that says "I wish to be excluded from *Echelon Property Group, LLC v. Bobby Salandy*, Case No. 2019-cv-112 to:

RG2 Claims Administration
Echelon Property Group, LLC v. Bobby Salandy,
Case No. 2019-cv-112
P.O. Box 59479
Philadelphia, PA 19102
1-866-742-4955

Echelon Property Group, LLC v. Bobby Salandy,
Case No. 2019-cv-112
Class Counsel
Woodrow & Peluso, LLC
3900 East Mexico Ave., Ste. 300
Denver, CO 80210
(720) 213-0676
swoodrow@woodrowpeluso.com

www.rg2claims.com/SalandySettlement.html