

<p>DISTRICT COURT, ARAPAHOE COUNTY, COLORADO</p> <p>7325 S. Potomac St., Centennial CO 80112</p> <hr/> <p>PLAINTIFF/COUNTERCLAIM DEFENDANT: ECHELON PROPERTY GROUP, LLC, a Colorado limited liability company</p> <p>v.</p> <p>DEFENDANT/COUNTERCLAIM PLAINTIFF: BOBBY SALANDY, on behalf of himself and all those similarly situated.</p> <hr/> <p>Attorneys for the Class:</p> <p>Steven L. Woodrow #43140 WOODROW & PELUSO, LLC 3900 East Mexico, Ave. Suite 300 Denver, CO 80210 Telephone: (720) 213-0675 Facsimile: (303) 927-0809</p> <p>Jason Legg #42946 CADIZ LAW, LLC 501 S. Cherry St., Ste. 1100 Denver, CO 80246 720.330.2800 jason@cadizlawfirm.com</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p> <hr/> <p>Case Number: 2019CV112</p> <p>Ctrm.: A2</p>
<p style="text-align: center;">DECLARATION OF ATTORNEY STEVEN WOODROW IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT</p>	

I, Steven Woodrow, on oath, and in support of the Motion for Preliminary Approval of Class Action Settlement, hereby declare as follows:

1. I am over the age of 18 and can competently testify as to the matters set forth herein if called to do so.

2. I am one of the attorneys who the Court appointed as Class Counsel in this lawsuit and have been appointed as Settlement Class Counsel.

Case Background

3. This case challenges certain fees that Echelon charged its tenants in Colorado.

4. That is, Echelon used a form lease agreement that applied to Defendant/Counterclaim Plaintiff/Class Representative Bobby Salandy ("Salandy") and all of its other tenants. This form lease specified that tenants were to pay Late Fees, Notice Posting Fees, and Eviction Legal Fees.

5. Discovery revealed Echelon's standard procedure: tenants who failed to pay the rent by the fourth day of the month would incur a \$75 Late Fee plus \$10 for each following day the rent was late. When rent remained unpaid as of the fourth day, Echelon would also assess a \$20 Notice Posting Fee for posting a legal notice on the tenant's door demanding the payment of rent or possession of the rental within three days.

6. If rent remained unpaid three days after the notice was posted, Echelon would refer the case to its eviction lawyers who would initiate forcible entry and detainer actions. Echelon would charge tenants an additional \$295 in Eviction Legal Fees.

7. Salandy claimed that these charges were assessed in the event of a default under the form lease and that they were penalties.

8. Echelon admitted in discovery that the Parties never intended to liquidate damages and that calculating the amount of damages Echelon would suffer in the event a tenant did not pay on time, as measured from the time the leases were entered, wouldn't have been difficult.

9. On April 16, 2019, Echelon filed its fourth eviction case against Salandy, a Forcible Entry and Detainer Action against styled, *Echelon Property Group, LLC v. Bobby Salandy*, Case No. 2019C37058 in the County Court for Arapahoe County. By the time of this filing, Salandy had paid Echelon thousands of dollars in Late Fees, Notice Posting Fees, and Eviction Legal Fees.

10. On April 25, 2019, Salandy filed an Answer, Class Action Counterclaims, and a Jury Demand challenging the fees stated in paragraph 9 of Echelon's form lease. On April 30, 2019, Salandy filed an Amended Answer and Class Action Counterclaims, together with a motion to transfer the case to the District Court for Arapahoe County. Salandy brought his counterclaims as a class action seeking relief on behalf of himself and all other similarly situated.

11. On April 30, 2019, the case was removed to the District Court for Arapahoe County and was assigned Case No. 2019CV112.

12. The Parties vigorously litigated the case following transfer to the District Court. This including a motion by Echelon to proceed with an expedited, bifurcated hearing on possession (eviction) only. The Court issued an order granting that motion but later revised it after Salandy filed a motion to reconsider. The Court's revised ruling included a determination adverse to Echelon concerning Salandy's usury claim, and Echelon moved for reconsideration. Ultimately

Echelon obtained dismissal of Salandy's claim that the fees represented unlawfully high interest under Colorado law.

13. Salandy was allowed to proceed on his claims that the challenged fees are unlawful penalties, are unconscionable, and are void as against public policy.

14. The Parties engaged in written and oral discovery. In addition to interrogatories and requests to produce, Salandy's counsel deposed two of Echelon's Rule 30(b)(6) designees and Mr. Salandy himself sat for a full day deposition. Class Counsel also served third party subpoenas to Echelon's eviction counsel and RD Fuller, Echelon's collection agency. These third-party subpoenas were of particular benefit to the Class, establishing that Echelon's practices were indeed widespread and that impacted persons could be identified and have their claims decided in a manageable way.

15. The Parties also litigated discovery disputes, which on two occasions resulted in conferences with the Court.

16. On July 28, 2020, Echelon moved for summary judgment on Salandy's claims arguing that the voluntary payment doctrine applied. Salandy filed his opposition on August 18, 2020, and on October 27, 2020, the Court denied Echelon's Motion for Summary Judgment.

17. On February 25, 2021, Salandy filed his Motion for Class Certification.

The Parties' First Mediation Session

18. While Salandy's Motion for Class Certification was pending, the Parties engaged in their first full day mediation session with Mr. Epstein. Despite good faith negotiations, the Parties were unable to reach an agreement on a class-wide basis, and both sides agreed to return to the litigation.

19. Upon returning to Court, the Parties proceeded to complete briefing on Salandy's motion for class certification.

20. On July 21, 2021, the Court granted class Salandy's motion and certified the following class: all Echelon tenants "who, from April 2016 to the date of the order for possession against Salandy - August 5, 2019 - were charged the Fees and, like Salandy, had actions filed against them by Echelon for forcible entry and detainer."

21. Echelon initially indicated that the Settlement Class consisted of 3,575 current and former tenants. Following further de-duplication work, however, the actual number of Settlement Class Members was established as 2,899.

22. Following certification, the Parties proceeded to negotiate the form and content of a class notice in addition to discussing the potential to revisit settlement discussions through a second mediation session.

23. The Parties eventually agreed to return to mediation with Messrs. Epstein and Atkins, and the Court granted a stay of the case to afford the Parties time to complete their negotiations.

The Second Mediation

24. On September 29, 2021, the Parties engaged in a second full-day mediation session. After numerous rounds of good faith negotiations, the Parties were essentially able to reach an agreement regarding the Settlement's prospective relief.

25. Despite their best efforts and subsequent follow up talks, however, the Parties were unable to achieve a resolution of the Settlement's remaining terms. The Parties again agreed to return to litigating with an understanding that settlement talks could continue simultaneously.

26. Following the second mediation session, the Parties filed cross-motions for summary judgment and began preparing for trial set on Salandy's first counterclaim for January 19, 2022. This required work on motions in limine and other pre-trial and trial materials.

27. While preparing for trial and working to consummate the notice plan put on hold by the second mediation, the Parties continued to discuss a settlement framework and terms. These talks lead to an agreement in principle with respect to the relief to be made available to the certified class.

28. Only after the Parties had negotiated the relief to be made available to the class did the Parties discuss and come to an agreement regarding reasonable attorneys' fees and an incentive award for Mr. Salandy.

Class Counsel's Work Identifying the Claims and Relevant Experience

29. To be sure, Class counsel identified and investigated the claims in this case, including Colorado and other state law regarding liquidated damages and unlawful penalties and assessing the merits and risks of proceeding as a class action. Class Counsel have also devoted hundreds of hours of attorney time and have advanced thousands of dollars in out of pocket expenses.

30. Further, Class Counsel have extensive experience in prosecuting class actions and other complex litigation more generally and landlord tenant cases specifically. (*See Firm Resumes*, attached hereto as Ex. 1.)

31. Class Counsel vigorously prosecuted this action, defeating multiple motions attacking the pleadings, defeating summary judgment, achieving adversarial certification, and successfully negotiating the Settlement. We also engaged in substantial written discovery, Rule 30(b)(6) depositions, and two successful discovery dispute conferences with the Court.

32. With respect to settlement negotiations, we also engaged in two full-day mediation sessions and several follow up negotiations and were in the midst of preparing for trial

when an agreement was reached. Class Counsel also undertook the effort and calculations to prepare a proposed debt forgiveness distribution to Echelon for the hundreds of Class Members entitled to such relief as a component of the Settlement Agreement on February 3, 2022. Echelon had no objections to Class Counsel's proposal.

Class Counsel's Opinion of the Settlement

33. This is an excellent Settlement. The Settlement provides \$3,450,000 in cash and debt forgiveness plus meaningful prospective relief. It is unclear whether the Settlement Class Members could have recovered additional relief through trial.

34. Settlement Class Counsel was contacted by over 20 Class Members with questions and comments about the Settlement. These inquiries typically included questions about the nature of the Settlement benefits, whether they were included in the Settlement, and to ask what action they need take to benefit from the Settlement. Class Counsel was able to inform these Class Members that no further action was necessary to participate. No one expressed any objection or disappointment about the details of the Settlement.

Further affiant sayeth not.

Dated this 4th day of May, 2022.

/s/ Steven L. Woodrow
Steven L. Woodrow

WOODROW & PELUSO, LLC FIRM RESUME

WOODROW & PELUSO, LLC (“Woodrow & Peluso” or the “firm”) is a plaintiff’s class action and commercial litigation firm based in Denver, Colorado. The firm files cases across the Country.

Our attorneys have over a decade of experience successfully representing consumers and small businesses in matters nationwide. From litigation under the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.*, to cases enforcing the rights of job applicants and employees under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.*, to appeals of first impression, our lawyers have litigated and favorably resolved numerous legal disputes to the satisfaction of our clients. At Woodrow & Peluso, LLC, we take special pride in the quality of our work product and strive tirelessly to achieve the best results for every client. Descriptions of our three primary practice areas—(1) Consumer Class Actions, (2) Commercial Litigation, and (3) Appeals—and key personnel follow.

OUR PRACTICE AREAS

1. CONSUMER CLASS ACTIONS

The majority of the firm’s caseload focuses on consumer class actions. These cases include class actions alleging violations of statutes, such as the Fair Credit Reporting Act, the Telephone Consumer Protection Act, and the Truth-in-Lending Act, as well as class actions challenging systematic breaches of contract and advancing other common law theories.

TCPA Class Actions

Woodrow & Peluso attorneys have successfully litigated and settled numerous class actions challenging violations of the Telephone Consumer Protection Act. To date we have filed, prosecuted, and resolved using various settlement models TCPA cases against major corporations and entities including Rita's Italian Ice, Global Marketing Research Services, LKQ Corporation, Art Van, Telenav, Price Self Storage, and the NRA, among others. Our firm’s attorneys have substantial experience prosecuting such claims, including class actions challenging the unlawful transmission of text messages, the sending of unlawful facsimiles, the placement of “robocalls” featuring a pre-recorded voice, and the use of automatic telephone dialing systems, including predictive dialers, to call consumer cell phones.

Notable TCPA cases and settlements include:

- *Tech Instruments, Inc. v. Eurton Electric Inc.* 1:16-cv-02981-MSK-KMT (Krieger, C.J.) (adversarial class certification granted under for transmission of junk faxes)
- *Bowman v. Art Van Furniture, Inc.* 2:17-cv-11630-NGE-RSW (Edmunds, J.) (granting final approval to all in, non-reversionary settlement fund of \$5,875,000 in pre-recorded message case) (final approval granted December 10, 2018);

- *Wendell H. Stone & Co. v. LKQ Corporation*, 16-cv-07648 (N.D. Ill.) (Kennelly, J.) (granting final approval to all-in, non-reversionary, settlement fund of \$3,266,500) (final approval granted May 16, 2017);
- *Martin et al. v. Global Marketing Research Services, Inc.*, 6:14-cv-1290-ORL-31-KRS (M.D. FL) (Woodrow & Peluso appointed co-lead Settlement Class Counsel in settlement creating \$10,000,000 common fund for class of 688,500 cellphone users) (final approval granted November 4, 2016);
- *Mendez v. Price Self Storage Management, Inc.*, 3:15-cv-02077-AJB-JLB (S.D. CA) (Woodrow & Peluso appointed co-lead Settlement Class Counsel in TCPA settlement providing option of \$750 cash or \$1,100 in storage certificates) (final approval granted August 23, 2016);
- *Sherry Brown and Ericka Newby v. Rita's Water Ice Franchise Company, LLC*, 2:15-cv-03509-TJS (E.D. PA) ("all in" non-reversionary \$3,000,000 settlement fund for text messages) (final approval granted March 20, 2017);
- *Morris et al v. SolarCity, Inc.* 3:15-cv-05107 (N.D. CA) (JPA with counsel on \$15 million common fund TCPA settlement, final approval granted February 1, 2018).
- *Gergetz v. Telenav, Inc.* 3:16-cv-04261 (N.D. CA) ("all-in" non-reversionary \$3.5 million fund for text messages) (final approval granted on September 6, 2018).

Further, while a Partner with his prior law firm, Woodrow & Peluso attorney Steven Woodrow was appointed interim co-lead class counsel in a TCPA class action against Nationstar Mortgage, LLC (*see Jordan et al v. Nationstar Mortgage LLC*, 3:14-cv-00787-WHO) and led TCPA litigation that resolved favorably against Bankrate Inc., and Carfax.com. Mr. Woodrow was also involved in the TCPA settlement reached in *Weinstein v. The Timberland Co. et al.* (N.D. Ill.), a text messaging class action featuring 40,000 unauthorized messages, and was part of the appellate strategy team that secured the landmark decision in *Satterfield v. Simon & Schuster, Inc.*, 569 F.3d 946 (9th Cir. 2009), the first federal appellate decision to affirm that text messages are covered as "calls" under the TCPA.

FCRA Class Actions

The second sub-focus within the firm's class action practice consists of cases under the Fair Credit Reporting Act ("FCRA"), which regulates the procurement and use of consumer reports by employers when they make hiring/firing/pay decisions. To date, the firm has successfully represented clients in putative class actions against Terminix, ServiceMaster, TrueBlue Inc./Labor-Ready Mid-Atlantic, FedEx, Tyler Staffing Services, Inc., Great Lakes Wine & Spirits, Freeman Webb, Inc., and others. This includes attaining adversarial class certification in the case of *Munoz v. 7-Eleven, Inc.*, 2:18-cv-03893-RGK-AGR (C.D. Cal., October 28, 2018) and a subsequent class settlement of \$1,972,500. This also includes *Woodford v. World Emblem*, 1:15-cv-02983-ELR, an FCRA settlement providing between \$315 and \$400 to claimants (final approval granted January 23, 2017).

Banking and Financial Institutions Class Actions

Our attorneys have substantial experience representing consumers in class action litigation involving national banking associations and other financial institutions. Meaningful representations include:

- *Schulken v. Washington Mut. Bank*, No. 09-CV-02708-LHK, 2012 WL 28099, at *15 (N.D. Cal. Jan. 5, 2012). Attorney Steven Woodrow secured prior firm's appointment as Class Counsel from Judge Lucy Koh in class action challenging JPMorgan Chase Bank, N.A.'s suspension of former WaMu home equity line of credit accounts. Case settled with Mr. Woodrow's appointment as co-lead settlement class counsel.
- *In re JPMorgan Chase Bank, N.A. Home Equity Line of Credit Litigation*, MDL No. 2167. Attorney Steven Woodrow helped secure transfer by the Judicial Panel on Multidistrict Litigation to the Northern District of Illinois and appointment of prior firm as interim class counsel. Attorney Woodrow also negotiated and was also appointed co-lead settlement class counsel in settlement projected to restore between \$3 billion - \$5 billion in credit to affected borrowers in addition to cash payments.
- *Hamilton v. Wells Fargo Bank, N.A.*, 4:09-cv-04152-CW (N.D. Cal.). Attorney Steven Woodrow served as co-lead settlement counsel in class action challenging Wells Fargo's suspensions of home equity lines of credit. Nationwide settlement restored access to over \$1 billion in credit and provided industry leading service enhancements and injunctive relief.
- *In re Citibank HELOC Reduction Litigation*, 09-CV-0350-MMC (N.D. Cal.). Attorney Steven Woodrow was appointed interim co-lead counsel and settlement class counsel in class actions challenging Citibank's suspensions of home equity lines of credit. The settlement was estimated to have restored over \$650,000,000 worth of credit to affected borrowers.
- *Vess v. Bank of America, N.A.* 10cv920-AJB(WVG) (S.D. Cal.). Attorney Steven Woodrow negotiated class action settlement with Bank of America challenging suspension and reduction of home equity lines of credit.
- *Wigod v. Wells Fargo*, No. 10-cv-2348 (N.D. Ill.). Steven Woodrow secured the first appellate decision in the country recognizing the right of homeowners to sue under state law to enforce HAMP trial plan agreements. Attorney Steven Woodrow was appointed co-lead settlement counsel providing loan modifications and cash payments to affected borrowers.

General Consumer Protection Class Actions

Woodrow & Peluso attorneys have additionally successfully prosecuted and resolved countless class action suits against other companies for a range of consumer protection issues. For example, Woodrow & Peluso filed the first class action in the Country to challenge the marijuana

industry's use of certain allegedly dangerous fungicides and pesticides and were the first lawyers to bring class actions (against the Colorado Rockies Baseball Club and Kroenke Sports & Entertainment, LLC) seeking to enforce the Colorado Consumer Protection Act, § 6-1- 718 *et seq.*, which prohibits owners of entertainment venues from imposing restrictions on the resale of tickets.

The firm has also brought and litigated class actions against hospitals for their use of “chargemaster” billing rates. This includes attaining adversarial class certification in the case of *Joseph v. North Broward Hospital District*, Case No. 15-013213 (04) (17th Circuit Court, Florida).

Woodrow & Peluso LLC has also brought claims against major food manufacturers and distributors for falsely advertising certain products as “All Natural” and “Made in U.S.A.” Our attorneys also have experience litigating class claims regarding missing or misappropriated “bitcoins.”

2. COMMERCIAL LITIGATION

As small business owners, we understand and appreciate the challenges that new companies face as they strive to make headway in the market. Our attorneys regularly counsel small to medium-sized businesses and have represented such companies in a wide range of general commercial litigation matters including partnership and business disputes, breaches of contracts and term sheets, and claims charging company managers and members of breach of fiduciary duty, breach of contract, fraud, and fraudulent/preferential transfers. We regularly advise clients on matters and contracts involving millions of dollars, and our attorneys have successfully represented businesses and other entities in mediations, arbitrations, and trial.

3. APPEALS

Our attorneys have substantial experience handling appeals at both the state and federal level. Representative appeals worked on predominately by our attorneys include:

- *Mitchell v. Winco Foods, LLC*, No. 1:16-cv-00076-BLW, Appeal No. 17-35998 (9th Cir. Nov. 29, 2018). Firm attained reversal of district court's dismissal of putative FCRA class action on Article III standing grounds;
- *Walker v. Fred Meyer, Inc.*, Appeal No. 18-35592 (9th Cir. Mar. 20, 2019). Firm attained reversal of district court's dismissal of putative FCRA class action, the Ninth Circuit found that the disclosure at issue violated the FCRA;
- *Brown v. Centura Health Corporation*, No. 15CV31140 (Douglas Cnty. Colo.), Appeal No. 17CA430. Firm achieved reversal of dismissal of putative class action lawsuit challenging hospital's use of chargemaster billing system);
- *Wigod v. Wells Fargo Bank, N.A.*, 673 F.3d 547 (7th Cir. 2012). Attorney Steven Woodrow briefed and argued this appeal resulting in the first federal appellate decision holding that banks may be sued under state law

for violations of the federal government's Home Affordable Modification Program. The opinion has been cited over 1,300 times by courts, litigants, and commentators throughout the Country and is widely regarded as the leading authority on the rights and obligations of HAMP servicers and borrowers.

- *Robins v. Spokeo*, 742 F.3d 409 (9th Cir. 2014). Attorney Steven Woodrow argued a federal appeal reversing dismissal and upholding consumer rights under the Fair Credit Reporting Act against one of the nation's largest online data aggregators regarding whether a plaintiff who does not suffer tangible pecuniary loss may still show legal harm to satisfy Article III standing. The case was reversed on writ of certiorari to the United States Supreme Court (argued by different attorneys).
- *Equity Residential Properties Mgmt. Corp. v. Nasolo*, 364 Ill. App. 3d 26, 28, 847 N.E.2d 126, 128 (2006). Attorney Steven Woodrow helped author the winning brief in this landmark landlord/tenant appeal defining the requirements for constructive service and due process for Illinois evictions under the Illinois Forcible Entry and Detainer Act. 735 ILCS 5/9–107 *et seq.*
- *Fuentes v. Kroenke Sports & Entertainment, LLC*, Case No. 2014CV32619. Woodrow & Peluso appealed grant of summary judgment in favor of defendant finding that the Colorado Consumer Protection Act, 6-1-701 *et seq.* does not allow for class actions. Case settled prior to the resolution of the appeal.

OUR ATTORNEYS

At present, our firm consists of 4 attorneys whose relevant experience is set forth below.

STEVEN LEZELL WOODROW has over a decade of experience advising consumers and small businesses in high stakes litigation.

Steven briefed and delivered the winning argument in the landmark federal appellate court decision *Wigod v. Wells Fargo Bank, N.A.*, 673 F.3d 547 (7th Cir. 2012) holding banks accountable for violations of the federal Home Affordable Modification Program. The opinion is widely regarded as the leading authority on the rights and obligations of HAMP servicers and borrowers. Steven also delivered the winning oral argument in *Robins v. Spokeo*, 742 F.3d 409 (9th Cir. 2014), a federal appeal upholding consumer rights under the Fair Credit Reporting Act against one of the nation's largest online data aggregators. The case and the Supreme Court decision that ultimately reversed it (and now the Ninth Circuit's decision to re-affirm its prior finding of Article III standing) present some of the most widely-litigated issues in class action practice today.

Mr. Woodrow was appointed lead class counsel in litigation against JPMorgan Chase Bank, N.A. challenging the bank's 4506-T HELOC suspension program and was appointed lead settlement class counsel in other HELOC suspension litigation against Wells Fargo Bank, N.A., Citibank, N.A., Chase, Bank of America, N.A. and PNC Bank.

Mr. Woodrow also led the legal team that secured a preliminary injunction freezing the U.S. assets of Mark Karpeles, the former head of the failed Bitcoin exchange known as Mt. Gox, as well as an order compelling Mr. Karpeles to personally appear in the United States for a deposition in connection with Mt. Gox's Chapter 15 bankruptcy case in Dallas Texas.

Steven has also litigated putative class actions under the Telephone Consumer Protection Act, and courts have appointed him to serve as class counsel in nationwide settlements against cellphone companies, aggregators, and mobile content providers related to unfair billing practices, including *Paluzzi v. Cellco Partnership*, *Williams v. Motricity, Inc.*, and *Walker v. OpenMarket Inc.*

Steven has also served as an Adjunct Professor of Law at the Illinois Institute of Technology Chicago-Kent College of Law, where he co-taught a seminar on class actions. Prior to founding Woodrow & Peluso, Steven was a partner at prominent class action technology firm in Chicago.

Before that, he worked as a litigator at a Chicago boutique where he tried and arbitrated a range of consumer protection, landlord tenant, and real estate matters.

EDUCATION

Chicago-Kent College of Law, J.D., High Honors, 2005

The University of Michigan-Ann Arbor, B.A, Political Science, with Distinction, 2002

ADMISSIONS

State of Illinois (2005)

State of Colorado (2011)

United States Court of Appeals for the Seventh Circuit

United States Court of Appeals for the Ninth Circuit

United States District Court, Northern District of Illinois

United States District Court, District of Colorado

United States District Court, Eastern District of Michigan

United States District Court, Western District of Michigan

United States District Court, District of New Mexico

PATRICK H. PELUSO specializes in plaintiff-side consumer class actions.

With a true passion for protecting consumers and their rights, Patrick aggressively pursues class action lawsuits against companies who violate those rights.

Through these lawsuits, he is able to force law-breaking companies to compensate the people they have harmed and correct their future practices. Patrick possesses the skills, strategic vision, and

moxie to achieve excellent results for the people he represents. He has experience working with a broad range of consumer protection laws including the Fair Credit Reporting Act, the Telephone Consumer Protection Act, and various state consumer protection and consumer fraud statutes.

Patrick has been appointed Class Counsel and Settlement Class Counsel in numerous consumer cases throughout the country. Patrick has also successfully argued appeals before the Ninth Circuit Court of Appeals and the Colorado Court of Appeals.

Patrick was named to the Super Lawyers “Rising Star” list in 2017, 2018, 2019, and 2020.

Patrick received his law degree from the University of Denver, Sturm College of Law where he was Editor-in-Chief of an academic journal. During law school, Patrick worked with a leading consumer class action law firm and held legal internships with a federal administrative judge and the legal department of a publicly traded corporation. Before law school, Patrick attended New York University, where he graduated with a B.S. and played on the school’s club baseball team.

Patrick grew up in Baltimore, Maryland and now resides in Denver, Colorado.

EDUCATION

University of Denver, J.D.

New York University, B.S.

ADMISSIONS

State of Colorado

United States Court of Appeals for the Ninth Circuit

United States Court of Appeals for the Eleventh Circuit

United States District Court, District of Colorado

United States District Court, District of New Mexico

United States District Court, Eastern District of Michigan

United States District Court, Northern District of Illinois

United States District Court, Southern District of Illinois

United States District Court, Western District of Wisconsin

TAYLOR TRUE SMITH focuses his practice on consumer class actions.

Throughout his life and career, Taylor has developed a passion for consumer advocacy. By pursuing class actions on behalf of consumers, Taylor can give consumers not just a voice but also a seat at the bargaining table.

Taylor received his law degree from the Creighton University School of Law. During law school, he interned with the South Dakota Supreme Court. Prior to beginning law school, Taylor attended South Dakota State University where he earned a B.S. in Economics.

Taylor was raised in Fort Pierre, South Dakota and currently resides in Denver, Colorado.

Education

Creighton University School of Law, J.D. *Cum Laude* 2017
South Dakota State University, B.S. *Magna Cum Laude* 2013

Admissions

State of Colorado (2017)
United States District Court, District of Colorado
United States District Court, Eastern District of Michigan
United States District Court, Northern District of Illinois

STEPHEN KLEIN devotes his practice to consumer class actions and commercial litigation.

In a word, Stephen prides himself on the pursuit of results. Whether championing consumers in class actions to curb injurious commercial practices or helping businesses to secure their resources and protect their rights, Stephen is dedicated to achieving client goals.

Stephen earned his law degree at the University of Denver, Sturm College of Law, where he earned a certificate in intellectual property law. While in law school, Stephen worked as a student attorney in the Environmental Law Clinic and as a legal fellow in DU's Office of Technology Transfer. He also served as Managing Editor of the University of Denver Water Law Review. Prior to law school, Stephen earned a B.A. in Environmental and Sustainability Studies from the University of Northern Colorado.

Originally from Chicago, Illinois, Stephen spent time in Minnesota, Ohio, and Texas before settling in the Denver metro area.

EDUCATION

University of Denver, Sturm College of Law, J.D., Order of the Coif, 2018
University of Northern Colorado, B.A., *summa cum laude*, 2014

ADMISSIONS

State of Colorado (2018)
United States District Court, District of Colorado

CADIZ LAW, LLC FIRM RESUME

Cadiz Law, LLC (“Cadiz Law” or the “Firm”) is based in Denver, Colorado, and its practice focuses on tenants rights, eviction defense, personal injury, and criminal defense. Our attorneys have years of experience focusing on defending residential tenants from eviction, asserting affirmative claims on their behalf, providing training sessions to tenant communities, associations, and organizers, and representing tenant organizers and associations throughout the state of Colorado.

This representation has included successfully defending dozens of evictions, asserting cases of first impression under Colorado’s statutory protections for renters (including its Warranty of Habitability and Statute, Rental Application Fairness Act, Consumer Credit Code, and the Mobile Home Park Act), filing numerous class action claims and counterclaims on behalf of Colorado tenants, and helping tenant associations and organizers assert their rights in contexts ranging from maintenance issues and billing practices to exercising the statutory opportunity for mobile home park residents to purchase their community. The Firm’s work has also led to it being invited by Colorado lawmakers into the stakeholder process on repeated occasion to provide feedback regarding tenant rights legislation in the state. As a result, the Firm has helped with the drafting of an array of legislation benefiting renters at the state and local level in Colorado.

OUR ATTORNEYS

At present, our firm consists of 2 attorneys whose relevant experience is set forth below.

JASON LEGG became an attorney to gain a skillset that he could use to help pursue positive change advocating for those at a structural disadvantage in our society. He’s found contentment in that pursuit over the past four years by developing a practice focused on representing residential tenants in Colorado and advising tenant communities, organizers, and associations.

Jason’s practice in this arena has been furthered substantially by his work with 9to5 Colorado’s Housing Justice Program. That relationship started when Jason became involved with 9to5 Colorado organizers working in the Denver Meadows Mobile Home Park community, a community whose residents were facing mass displacement in the face of the Park’s closure. Jason’s advocacy led to the remaining residents obtaining significantly more time in their homes and community prior to its closure, and significant funds to assist with their relocation by both the Park’s ownership and the City of Aurora.

Thereafter, Jason became 9to5 Colorado’s Housing Justice Program’s main contract attorney to provide eviction defense services pursuant to various grant awards, including Colorado’s Eviction Legal Defense Fund. Through that partnership, Jason has represented hundreds of tenants faced with eviction and housing insecurity in Colorado and provided hundreds of hours of know-your-rights trainings to tenants, tenant-organizers, and tenant associations. Jason has also accompanied 9to5 Colorado in providing feedback to lawmakers throughout the state concerning legislation impacting renters.

During this time, Jason has also filed numerous affirmative claims and counterclaims on behalf of Colorado renters - including class action claims - concerning their rights under Colorado law. Those tenant rights claims are based on numerous theories challenging fee assessments under Colorado law concerning unlawful penalties and the duty of good faith and fair dealing, as well as, Colorado’s Consumer Credit Code, Rental Application Fairness Act, Warranty of Habitability statute, and the Mobile Home Park Act. These claims push back on practices that detrimentally impact the housing security of tens if not hundreds of thousands of Colorado renters.

EDUCATION

University of Wyoming College of Law, J.D., with Honor, 2010

University of Wyoming, B.A, Sociology & International Studies, with Distinction, College of Arts & Sciences Distinguished Graduate, Phi Beta Kappa, 2007

ADMISSIONS

State of Colorado (2010)

State of Wyoming (2011)

SCOTT CADIZ began his legal career as a prosecutor in the criminal division of the City of Aurora City Attorney's Office where he was in the courtroom daily and handled a countless number of jury and bench trials. When he left for private practice Scott went to work as an associate at a personal injury firm where he began working on behalf of victims who had been injured at no fault of their own. Scott founded the Firm in 2016 to focus his practice on representing marginalized clients in criminal defense and eviction defense cases, as well as personal injury cases. Scott has used his wealth of experience in the courtroom to successfully defend numerous criminal and eviction cases.

EDUCATION

University of Wyoming College of Law, J.D.

University of Colorado Leed's School of Business, B.S. Business Administration with an emphasis in Finance

ADMISSIONS

State of Colorado (2010)