

District Court Arapahoe County, Colorado 7325 South Potomac Street Centennial, CO 80112	
<p>Plaintiffs: CHARLENE TILTON, OLLIS KNAULS, PATRICE HUNTER, ALFRED HUNTER, ESTATE OF DESHAWN HUNTER, TANYA SAMUEL, KEVIN GOLDSBY, BRYAN HULL, ASHLEY REED, JACQUELINE BOWEN, ESTATE OF NORMA SAMUELS, CHRISTY WHETSTONE, DAVID DAVIDSON, LOUIS SANTIAGO, TIERRA ALLRED, KEENA HILL, MARKIA RHODES, and MICHAEL LUNSFORD, on their own behalf and on behalf of those similarly situated,</p> <p>v.</p> <p>Defendants: AMEN CORNER, LLC d/b/a THE VARECO, 11800 E COLFAX OZB, LLC d/b/a SUMMIT VIEW INN, and 11800 E COLFAX OZB LLC MANAGER LLC</p>	<p>DATE FILED March 6, 2026 6:16 PM FILING ID: BE515893FDCD3 CASE NUMBER: 2022CV32318</p> <p>▲ COURT USE ONLY ▲</p> <p>Case Number: 22CV32318</p> <p>Div: 204</p>
<p>DECLARATION OF BRIANNE POWER IN SUPPORT OF PLAINTIFFS’ MOTION FOR PRELIMINARY APPROVAL OF THE SETTLEMENT</p>	

I, Brianne Power, declare that the following is true and correct based upon my personal knowledge:

1. I am an attorney at Towards Justice and am one of the attorneys representing the Plaintiffs in the above-captioned case.¹
2. Along with attorneys from the other law firms representing those Plaintiffs, I have submitted a prior declaration in this Action. Those declarations, which detail the qualifications and experience of putative Class Counsel, are attached as Exhibits 6-8 to Plaintiffs’ Motion for Class Certification.

¹ On January 29, 2026, the Court granted Plaintiffs’ Counsel’s request to withdraw from representing Plaintiff Markia Rhodes.

3. I submit this declaration to explain the steps I took to review and process the data produced by Defendants in connection with the Settlement of this Action, and to explain the proposed allocation formula and notice process.
4. Pursuant to the Settlement, Defendants' counsel has provided putative Class Counsel with additional records reflecting reservations made by and fees charged to occupants of the Summit View Inn within the class period, in order to facilitate Class Counsel's creation of a notice plan based on the available contact information for Class Members as well as a proposed formula for the allocation of settlement payments.
5. Based on my analysis of the records, I observed that the data includes phone numbers and/or mailing addresses for some but not all class members.
6. Based on the length of time passed since the occurrence of the events underlying this Action, putative Class Counsel's familiarity with the putative Settlement Class, past experience with outreach to class members in similar cases, and my review of the available data, proposed Class Counsel believes that notice sent by text message will likely be both more successful and cost effective than notice by mail.
7. Based on my analysis of the records, I determined that, while the records include thorough data regarding the individuals named on each so-called "reservation" made at the Summit View Inn during the class period, including their length of occupancy and number of late fees charged, most of the "reservation" records only reflect one occupant name (the individual that made the reservation). As a result, there may be additional class members whose names are not listed in the existing data, but whose claims can be verified through the collection of information about each claimant through the proposed claims process (such as the name of other individuals that occupied a unit with them, the approximate

dates of their occupancy, their room number, and/or any other details they may remember).

The proposed Claim Form (Ex. 2) is designed to capture that data as part of the proposed claims process.

8. The proposed Claim Form (Ex. 2) is also designed to capture the additional information necessary to distribute settlement payments as part of the proposed claims process.
9. Based on my analysis of the records, I have estimated the size of the proposed Settlement Class and Subclasses and made initial estimates of class members' pro rata share pursuant to the proposed allocation formula.
10. Based on the data regarding known class members, I estimate that the putative Settlement Class includes approximately 1150 class members. The putative Occupant Late Fee and Tenant Subclasses include over 200 class members. The putative Tenant Lockout Subclass includes approximately 100 class members. The putative Tenant Closure Subclass includes at least 16 class members.
11. The proposed allocation formula bases each class member's pro rata share on each their membership in the Subclasses (accounting for their claims in this Action, as well as Class Counsel's assessment of the potential damages and risks of recovery), as well as their length of occupancy and number of late fees charged.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on March 6, 2026

/s/ Brianne Power
Brianne Power