

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

A court authorized this Notice. This is not a solicitation from a lawyer.

**TILTON ET AL. V. AMEN CORNER, LLC ET AL.
CASE NUMBER 2022CV32318, ARAPAHOE COUNTY DISTRICT COURT, DIVISION 31
(THE “SUMMIT VIEW INN” CLASS ACTION LAWSUIT)**

TO: ALL INDIVIDUALS THAT OCCUPIED A UNIT AT THE SUMMIT VIEW INN BETWEEN FEBRUARY 14, 2020 AND OCTOBER 31, 2021 (the “Class”).

RE: SETTLEMENT OF CLASS ACTION LAWSUIT

Why am I getting this Notice?

If you are an individual that occupied a unit at the Summit View Inn between February 14, 2020, and October 31, 2021, you are a member of the Class in the Summit View Inn Class Action Lawsuit.

The Summit View Inn Class Action Lawsuit was brought against 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 (the “Defendants”) by Tanya Samuel, Kevin Goldsby, and Bryan Hull (the “Representative Plaintiffs”) and by other individuals named in the complaint alleging that residents and other occupants of the Summit View Inn were subject to illegal late fees, lockouts, property deprivation, poor conditions, and unlawful evictions.

The Representative Plaintiffs have reached a proposed Settlement with Defendants on behalf of themselves and all members of the Class.

The purpose of this Notice is to inform you of your rights with respect to the Settlement.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

SUBMIT A CLAIM (Receive Money)

If you are part of the Class, you are eligible to receive payment as part of the Settlement. **If you want to receive your share of the Settlement, you must submit a complete and valid Claim Form** to confirm you are a class member and provide information on how and where to send your share of the settlement.

To submit a timely claim, you must submit a complete and valid Claim Form **on or before June 11, 2026**. Individuals that submit a late Claim Form may still be eligible to receive a delayed settlement payment if feasible, but only while funds remain available.

If you submit a complete, valid, and timely Claim Form, payment will be sent to you at the mailing address or electronic payment app that you specify on the Claim Form. **It is possible that you will receive a second payment after the initial payments have cleared.**

You will be bound by the final judgment entered as part of the settlement process.

If you need assistance submitting a claim, contact CED Law at (303) 550-7623 or info@cedproject.org.

<p>ASK TO BE EXCLUDED (Receive No Money)</p>	<p>If you want to exclude yourself from the Settlement, no longer be a member of the Class, <u>receive no money from the settlement</u>, and not be bound by any final judgment entered by the Court, you may “opt-out” by completing and returning the enclosed Exclusion Form <u>on or before June 11, 2026.</u></p> <p>If you opt-out, you may still bring a claim against Defendants for illegal late fees, lockouts, property deprivation, poor conditions, and/or unlawful evictions, to the extent allowable by law and the applicable statute of limitations, by filing your own separate lawsuit.</p>
<p>OBJECT</p>	<p>If you want to remain part of the Class, but object to the terms of the Settlement, you may object to the settlement by filing a written objection with the Court and appearing at the hearing described below. Your written objection must be filed with the Court <u>on or before June 11, 2026.</u></p>
<p>APPEAR IN COURT</p>	<p>A hearing is set where the Court will consider approving the Settlement.</p> <p>The hearing is at 1:00 pm on June 22, 2026 in the Arapahoe County District Court, 7325 South Potomac Street, Centennial, CO 80112, Division 31.</p> <p>Unless you are objecting to the Settlement, you do not have to appear at this hearing. However, you are entitled to appear and address the Court. Note that appearing does not change the requirements for asking to be excluded from the settlement or objecting to the settlement, as described above.</p>

1. What is the Settlement?

Defendants and the Representative Plaintiffs preliminarily reached a settlement, subject to Court approval, for claims by Representative Plaintiffs and the Class against Defendants that residents and other occupants of the Summit View Inn were subject to illegal late fees, lockouts, property deprivation, poor conditions, and unlawful evictions from February 14, 2020 to October 31, 2021.

The total settlement amount is \$750,000.00, inclusive of attorneys’ fees, attorneys’ expenses, settlement administration expenses, and service payments. The settlement amount—after fees, expenses, and service award—will be distributed to members of the Class that submit a complete and valid Claim Form on a pro rata basis based on the extent to which class members were subject to or paid illegal late fees and experienced lockouts, property deprivation, poor conditions, and unlawful evictions, as well as the duration of their time at the property.

Your proportionate share of the settlement will be based on the length of time you resided at the Summit View Inn, whether you resided at the Summit View Inn for 30 consecutive days or more, whether (and how often) you were charged late fees, and whether you occupied a unit of the Summit View Inn after the announced closure (on or after September 12, 2021, through October 31, 2021).

To learn your approximate share of the settlement, you must contact the Settlement Administrator by calling 1-866-742-4955. This amount may increase depending on how many class members the Settlement Administrator is able to locate. It is possible that you will receive a second payment after the initial payments have cleared.

Class Counsel, CED Law, Towards Justice, and DeGolia Law, intend to ask the Court for 20% of the \$750,000.00 settlement amount to reimburse them for fees and expenses. Representative Plaintiffs intend to request Service Payments in amounts ranging from \$2500 to \$5,000 to compensate Representative Plaintiffs and other individuals who were named in the complaint and/or who provided testimony for their services to the Class in securing this settlement.

In exchange for the settlement amount, Representative Plaintiffs and the Class will release all claims they have against Defendants for claims that residents and other occupants of the Summit View Inn were subject to illegal late fees, lockouts, property deprivation, poor conditions, and unlawful evictions. This is merely a summary.

The complete Settlement is available for review on the Court docket or by contacting the Settlement Administrator.

2. What happens if I do nothing at all?

To receive money as part of the settlement, **you must complete the Claim Form** so that the Settlement Administrator can confirm your class membership and send the payment in the format you select. Keep in mind that if you remain a member of the Class, you will not be able to sue, or continue to sue, Defendants as part of any other lawsuit about the same legal claims that are the subject of this lawsuit (*i.e.*, claims that residents and other occupants of the Summit View Inn were subject to illegal late fees, lockouts, property deprivation, poor conditions, and unlawful evictions). You will also be legally bound by all orders the Court issues and judgments the Court makes in this class action.

3. Why would I ask to be excluded and how would I ask to be excluded?

If you exclude yourself from the Class – which also means to remove yourself from the Class and is sometimes called “opting-out” of the Class – you won’t get any money or benefits from the Settlement. If you exclude yourself, you also will not be legally bound by the Court’s judgments in this Case and would be able to hire an attorney, at your expense, to pursue the claims being released by this Settlement against Defendants. To ask to be excluded, you must complete and send the enclosed form to the Settlement Administrator. To be accepted, the form must either be emailed or postmarked **on or before June 11, 2026**. The form can be emailed to info@rg2claims.com or mailed to Summit View Inn Settlement, c/o RG/2 Claims Administration LLC P.O. Box 59479, Philadelphia, PA 19102-9479.

4. Why would I object and how do I object?

If you do not want to exclude yourself from the Class, but do not like the Settlement, you must serve the Class Administrator with your Objection. To object to the Settlement, you must send your written objection, detailing the reasons for your objection, to the Settlement Administrator. To be accepted, the objection must either be emailed or postmarked **on or before June 11, 2026**. The form can be emailed info@rg2claims.com or mailed to Summit View Inn Settlement, c/o RG/2 Claims Administration LLC P.O. Box 59479, Philadelphia, PA 19102-9479. In order for your objection to be considered by the Court, you must also appear at the hearing at 1:00 p.m. on June 22, 2026 in the Arapahoe County District Court, 7325 South Potomac Street, Centennial, CO 80112, Division 31.

5. Will accepting money affect my public benefits?

If you receive public benefits, it is possible that receiving money from the Settlement may impact your benefits. Below is a summary of possible impacts. You are urged to consult an advocate or benefits attorney if you have specific concerns. This is not legal advice.

In general, you have an obligation to report the receipt of a settlement payment to the government agency that provides you a benefit like SSI, SSDI, OAP, AND, SNAP, Medicaid and/or TANF. If you fail to promptly report

that you receive a settlement payment, and the income makes you ineligible for the benefit, you may owe the government agency money, and other more serious consequences could stem from failing to report.

If you are on a public benefit such as SSI, SSDI, OAP, AND, SNAP, Medicaid, and/or TANF the receipt of this money could make you ineligible for the benefit you receive. The amount of time you are ineligible could be just one month, or it could be longer depending on the benefit you receive and other factors.

These programs are complex and the impact of the receipt of this money on your benefit will vary depending on your individual circumstances.

If any government benefit is terminated or you have an overpayment as a result of receiving this money, you can contact Colorado Legal Services.

6. What if I have questions?

You can contact the Class Administrator to be put in touch with someone to get more information about your rights.

RG/2 Claims Administration LLC
P.O. Box 59479
Philadelphia, PA 19102-9479
Toll-Free: 1-866-742-4955
Email: info@rg2claims.com
Fax: (215)-827-5551

If you need assistance submitting a claim, contact CED Law at (303) 550-7623 or info@cedproject.org.

THIS NOTICE HAS BEEN AUTHORIZED BY THE COURT. HOWEVER, THE COURT TAKES NO POSITION REGARDING WHAT YOU SHOULD DO WITH RESPECT TO THE SETTLEMENT. PLEASE DO NOT CONTACT THE COURT ABOUT THIS NOTICE.