

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street, Denver, CO 80202</p> <hr/> <p>PLAINTIFFS: BRANDON SMITH, KENDRA RAYLENE KEELY, LYNETTE RHODES, AND SHIVANI MOHAN</p> <p>v.</p> <p>DEFENDANTS: CARDINAL GROUP MANAGEMENT & ADVISORY, LLC d/b/a CARDINAL GROUP MANAGEMENT; GLENDALE PROPERTIES I, LLC d/b/a MINT URBAN INFINITY; GLENDALE PROPERTIES II, LLC d/b/a/ MINT URBAN INFINITY</p> <hr/> <p>One of Plaintiffs' Attorneys:</p> <p>Jason Legg (#42946) jason@justiceforthepeoplecenter.org Justice for the People Legal Center 501 S. Cherry St., Ste. 1100 Denver, CO 80219</p> <p><i>Additional Counsel for Plaintiffs Listed Below</i></p>	<p>DATE FILED March 5, 2026 9:46 AM FILING ID: CAF6252AF5D72 CASE NUMBER: 2021CV33357</p> <hr/> <p>▲ COURT USE ONLY ▲</p> <hr/> <p>Case Number: 21CV33357</p> <p>Div: 409</p>
<p align="center">CLASS REPRESENTATIVES UNOPPOSED MOTION FOR MODIFICATION OF CLASS NOTICE PLAN</p>	

Class Representatives Brandon Smith, Kendra Raylene Keely, Lynette Rhodes, and Shivani Mohan (collectively, the “Class Representatives”), by and through their undersigned counsel, hereby submit this Unopposed Motion for Modification of Class Notice Plan and, in support thereof, state as follows:

C.R.C.P. 121 § 1-15(8) CERTIFICATE OF CONFERRAL

Undersigned counsel has conferred with counsel for the Defendants regarding the relief requested. The relief requested herein is unopposed.

MOTION

1. The Court approved the Class Representatives' Class Action Notice Plan on May 29, 2024.

2. On June 5, 2024, the Court approved Defendants Glendale Properties I, LLC and Glendale Properties II, LLC's Unopposed Motion for Modification of Class Action Notice Plan.

3. The approved Class Administrator, RG/2 Claims Administration, LLC, effectuated the Modified Class Notice Plan by disseminating the approved notice to the Class Members and establishing the Class Action Website¹ as described in the Modified Plan.

4. The class claims were tried before a jury from March 3, 2025, to March 13, 2025, after which the jury entered its verdict as reflected in the Court's Order of Judgment dated March 21, 2025.

5. Following the jury trial, the Parties filed various pre-trial motions and, from on January 20, 2026 and January 21, 2026, engaged in a bench trial of certain individual claims.

6. The entry of judgment concerning the individual, bifurcated claims, as well as, certain post-trial motions concerning the class claims, are pending before the Court.

7. Class Counsel continues to receive and respond to inquiries from Class Members regarding the status of the case.

¹ Available at <https://www.muiclassaction.com/>.

8. Given the developments in the case since the entry of the Modified Class Notice Plan and the continued inquiries from Class Members, the Class Representatives move the Court to approve the addition of the following update to the Class Action Website:

Case Status Update – February 18, 2026

Following a jury trial held in March 2025, a verdict was reached in favor of the plaintiff class on certain claims. Specifically, the jury found that the defendants violated Colorado’s Warranty of Habitability law and related lease obligations and awarded damages.

The parties are currently engaged in post-trial proceedings, including motions related to interest, attorneys fees, and other claims. It is anticipated that one or more parties may seek to appeal the verdict. Appeals can add significant time to the case. The deadline for filing any such appeal will be set as the Court decides the pending post-trial motions.

We will continue to provide updates as the case progresses. Please check back periodically on this website or email or call Class Counsel.

9. The Parties have conferred regarding this Motion, and the relief sought is unopposed. Following an Order from the Court approving the relief requested herein, Class Counsel will work with the Class Administrator, RG/2 Claims Administration, LLC, to have the updated language posted on the Class Website.

WHEREFORE, the Class Representatives respectfully request that the Court approve the modification of the Class Notice Plan as described herein and for such additional relief as the Court deems necessary, reasonable, and just.

Dated: March 5, 2026

/s/ Jason Legg

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*Counsel for Plaintiffs Kendra Raylene
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and Shivani Mohan and the Certified
Classes*

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on March 5, 2026, I served the above and foregoing papers by causing a true and accurate copy of such paper to be filed with the Clerk of the Court and transmitted to all counsel of record via the Court's ICCES electronic filing system.

/s/ Jason Legg
Jason Legg