

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:13-cv-03258-PAB-KMT

KATHY WORNICKI; and  
EDWARD LAINE, on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

BROKERPRICEOPINION.COM, INC.;  
WALTER COATS;  
FIRST VALUATION, LLC;  
FIRST VALUATION SERVICES, LLC;  
FIRST VALUATION TECHNOLOGY, LLC;  
VALUTECH, INC.; and  
CARTEL ASSET MANAGEMENT, LLC.

Defendants.

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**NOTICE OF SETTLEMENT AGREEMENT DEFAULT**

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TO: THE CLERK OF THE COURT; AND  
TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Defendants have failed to make payments due under the  
Class Action Settlement Agreement and Release (Docket No. 149-3) to which this Court granted

final approval and entered a final judgment (Docket Nos. 170-172). Plaintiffs notified Defendants of the default and Defendants failed to cure.

Plaintiffs commenced an action in the District Court, Adams County, Colorado, entitled *Wornicki et al. v. Coats et al.*, No. 2019-CV-31826 to execute on the Promissory Note that Defendants provided to Plaintiffs in connection with the class action settlement. See Exhibit 1. In connection with that action, Defendants notified Plaintiffs that Defendant Walter Coats filed for Chapter 7 Bankruptcy in the District of Colorado Bankruptcy Court on December 30, 2019. See Exhibit 2. The initial meeting of creditors is on February 4, 2020. Class Counsel have retained bankruptcy counsel who plans to attend that meeting.

RESPECTFULLY SUBMITTED AND DATED this 16th day of January, 2020.

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*Attorneys for Plaintiffs*

CERTIFICATE OF SERVICE

I, Jennifer Rust Murray, hereby certify that on January 16, 2020, I caused the foregoing document to be electronically filed with the Clerk of the Court via the CM/ECF system, which will send notification of such filing to the following e-mail addresses denoted on the Court's

Electronic Mail Notice List:

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*Attorneys for Defendants*

DATED at Seattle, Washington, this 16th day of January, 2020.

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