

Information Sheet, Continued

C. OTHERS

- | | |
|---|---|
| <input type="checkbox"/> 01 Accounting | <input type="checkbox"/> 17 Merit Personnel Act (OEA) |
| <input type="checkbox"/> 02 Att. Before Judgment | (D.C. Code Title 1, Chapter 6) |
| <input type="checkbox"/> 05 Ejectment | <input type="checkbox"/> 18 Product Liability |
| <input type="checkbox"/> 09 Special Writ/Warrants
(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,
Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication | <input type="checkbox"/> 29 Merit Personnel Act (OHR) |
| <input type="checkbox"/> 11 Writ of Replevin | <input type="checkbox"/> 31 Housing Code Regulations |
| <input type="checkbox"/> 12 Enforce Mechanics Lien | <input type="checkbox"/> 32 Qui Tam |
| <input type="checkbox"/> 16 Declaratory Judgment | <input type="checkbox"/> 33 Whistleblower |

II.

- | | | |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name | <input type="checkbox"/> 15 Libel of Information | <input type="checkbox"/> 21 Petition for Subpoena
[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic | <input type="checkbox"/> 19 Enter Administrative Order as
Judgment [D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien |
| <input type="checkbox"/> 08 Foreign Judgment/International | 2-1802.03 (h) or 32-151 9 (a)] | <input type="checkbox"/> 23 Rule 27(a)(1)
(Perpetuate Testimony) |
| <input type="checkbox"/> 13 Correction of Birth Certificate | <input type="checkbox"/> 20 Master Meter (D.C. Code § | <input type="checkbox"/> 24 Petition for Structured Settlement |
| <input type="checkbox"/> 14 Correction of Marriage
Certificate | 42-3301, et seq.) | <input type="checkbox"/> 25 Petition for Liquidation |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle) | | |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) | | |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other) | | |

D. REAL PROPERTY

- | | |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate | <input type="checkbox"/> 08 Quiet Title |
| <input type="checkbox"/> 12 Specific Performance | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain) | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) | |

/s/ JASON S. RATHOD

Attorney's Signature

10/26/2021

Date



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

Filed
D.C. Superior Court
11/19/2020 16:20PM
Clerk of the Court

KAEDRIANA TURENNE, individually, on behalf of the general public,
and on behalf of all others similarly situated _____
Plaintiff

vs.

Case Number _____

CORVIAS CAMPUS LIVING – HU _____
Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney’s name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Jason S. Rathod _____
Name of Plaintiff’s Attorney

Clerk of the Court

412 H St. NE, Ste. 302 _____
Address
Washington D.C. 20002 _____

By _____
Deputy Clerk

(202) 470-3520 _____
Telephone

Date _____

如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
법역을 원하시면, (202) 879-4828로 전화하십시오. የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation
Vea al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

_____ Demandante
 contra

Número de Caso: _____

_____ Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

SECRETARIO DEL TRIBUNAL

 Nombre del abogado del Demandante

Por: _____
 Subsecretario

 Dirección

Fecha _____

 Teléfono

如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 번역을 원하시면 (202) 879-4828 로 전화하십시오 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés
 See reverse side for English original



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

Filed
D.C. Superior Court
11/19/2020 16:20PM
Clerk of the Court

KAEDRIANA TURENNE, individually, on behalf of the general public,
and on behalf of all others similarly situated _____
Plaintiff

vs.

Case Number _____

CORVIAS CAMPUS MANAGEMENT, LLC _____
Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Jason S. Rathod _____
Name of Plaintiff's Attorney

Clerk of the Court

412 H St. NE, Ste. 302 _____
Address
Washington D.C. 20002 _____

By _____
Deputy Clerk

(202) 470-3520 _____
Telephone

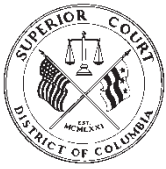
Date _____

如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
법역을 원하시면, (202) 879-4828로 전화하십시오. የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation
Vea al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

_____ Demandante
 contra

Número de Caso: _____

_____ Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

SECRETARIO DEL TRIBUNAL

 Nombre del abogado del Demandante

Por: _____
 Subsecretario

 Dirección

Fecha _____

 Teléfono

如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 번역을 원하시면 (202) 879-4828 로 전화하십시오 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés
 See reverse side for English original



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

Filed
D.C. Superior Court
11/19/2020 16:20PM
Clerk of the Court

KAEDRIANA TURENNE, individually, on behalf of the general public,
and on behalf of all others similarly situated _____
Plaintiff

vs.

Case Number _____

CORVIAS LLC _____
Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Jason S. Rathod _____
Name of Plaintiff's Attorney

Clerk of the Court

412 H St. NE, Ste. 302 _____
Address
Washington D.C. 20002 _____

By _____
Deputy Clerk

(202) 470-3520 _____
Telephone

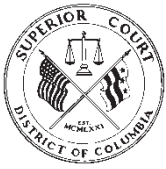
Date _____

如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
법역을 원하시면, (202) 879-4828로 전화하십시오. የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation
Vea al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

_____ Demandante
 contra

Número de Caso: _____

_____ Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

SECRETARIO DEL TRIBUNAL

 Nombre del abogado del Demandante

Por: _____
 Subsecretario

 Dirección

Fecha _____

 Teléfono

如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 번역을 원하시면 (202) 879-4828 로 전화하십시오 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés
 See reverse side for English original



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

Filed
D.C. Superior Court
11/19/2020 16:20PM
Clerk of the Court

KAEDRIANA TURENNE, individually, on behalf of the general public,
and on behalf of all others similarly situated _____
Plaintiff

vs.

Case Number _____

HOWARD UNIVERSITY _____
Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Jason S. Rathod _____
Name of Plaintiff's Attorney

Clerk of the Court

412 H St. NE, Ste. 302 _____
Address
Washington D.C. 20002 _____

By _____
Deputy Clerk

(202) 470-3520 _____
Telephone

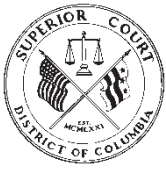
Date _____

如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
법역을 원하시면, (202) 879-4828로 전화하십시오. የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation
Vea al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

_____ Demandante
 contra

Número de Caso: _____

_____ Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

SECRETARIO DEL TRIBUNAL

 Nombre del abogado del Demandante

Por: _____
 Subsecretario

 Dirección

Fecha _____

 Teléfono

如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 번역을 원하시면 (202) 879-4828 로 전화하십시오 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés
 See reverse side for English original

IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION

KAEDRIANA TURENNE, individually, on)
behalf of the general public, and on behalf of)
all others similarly situated,)
c/o Migliaccio & Rathod LLP)
412 H St NE)
Washington D.C. 20002)

) Case No.

) Plaintiff)

) v.)

) CORVIAS CAMPUS LIVING – HU)
) c/o CT CORPORATION SYSTEM)
) 1015 15th St NW, Suite 1000)
) Washington D.C. 20005)

) CORVIAS CAMPUS MANAGEMENT,)
) LLC)
) c/o CT CORPORATION SYSTEM)
) 1015 15th St NW, Suite 1000)
) Washington D.C. 20005)

) CORVIAS, LLC)
) c/o CT CORPORATION SYSTEM)
) 1015 15th St NW, Suite 1000)
) Washington D.C. 20005)

) HOWARD UNIVERSITY)
) 2400 6th St. NW)
) Washington D.C. 20059)

) Defendants)

**PRIVATE ATTORNEY GENERAL
AND CLASS ACTION COMPLAINT**

1. This action seeks monetary damages and injunctive relief for Kaedrianna Turenne (“Plaintiff”), the general public of the District of Columbia, and all those similarly situated for unlawful, unfair and deceptive trade practices committed by Corvias Campus Living – HU, Corvias Campus Management LLC, Corvias LLC,¹ and Howard University (“Howard”) (all Defendants collectively referred to as “Defendants”). The violations arise from Defendants’ involvement in supplying housing to student residents at Howard University, most prominently the fourth floor of Baldwin Hall in the Harriet Tubman Quadrangle (“the Quad”). The fourth floor of Baldwin Hall suffers from a widespread mold problem that Defendants have consistently failed to resolve in violation of District law. Plaintiff’s allegations herein are based upon knowledge as to matters relating to herself and upon information and belief as to all other matters.

PARTIES

2. Plaintiff Turenne is a resident of the District of Columbia and a tenant of the fourth floor of Baldwin Hall in the Quad.

3. The Corvias Defendants all list as their business address 1405 South County Trail, Suite 530, East Greenwich, Rhode Island 02818, designating their registered agent as CT Corporation System, 1015 15th St NW, Suite 1000, Washington DC 20005. Corvias describes itself as a privately-owned company that “partners with higher education and government institutions nationwide to solve their most essential systemic problems and create long-term, sustainable value through our unique approach to partnership.”

¹ The preceding three Defendants are referred to throughout as “Corvias.”

4. Beginning in 2016, Corvias entered into a 40-year agreement with Howard University to finance, renovate, manage, operate, and maintain certain residential facilities. Corvias performs operation and management for Baldwin Hall including with needed repairs. Corvias also trains and oversees Resident Advisers, Building Managers, and Hall Directors, who directly interface with residents, including Plaintiff, about housing issues.

5. On information and belief, rental rates for residents of Baldwin Hall are set by a committee jointly overseen by Corvias and Howard. Corvias receives payment for managing the residential facilities, including Baldwin Hall, which includes – on information and belief – a portion of student tenants’ room and board payments.

6. Howard University is a private university with a principal place of business at 2400 6th St NW, Washington DC, 20059.

JURISDICTION AND VENUE

7. Jurisdiction of this Court arises under D.C. Code §§ 11-921, 28-3905(k) and 13-423.

8. Venue is proper in this Court because the acts and transactions occurred here.

FACTS

The Dangers of Mold in Housing and the Corvias Defendants’ Pattern of Inadequately Responding to Mold Complaints

9. Molds are part of the natural environment, and can be found both indoors and outdoors. Mold can grow on virtually any organic substance such as paper, cloth, wood, plant material, and even soil.

10. Molds reproduce by means of tiny spores, which are invisible to the naked eye and transported through the air. If the spores land on a wet surface indoors, mold can grow.

11. In a dwelling, sinks, bathroom tile and grout, basement walls, and areas around windows

are common sites for mold growth. Roof leaks, condensation due to high humidity or cold spots in a building, leaky plumbing fixtures, and flooding water are common sources of moisture that can promote mold growth.

12. Mold growing near the intake to an HVAC system is indicative of possible problems with ventilation humidity. An HVAC system with a moisture problem is not only a source of mold growth, but can also distribute mold spores throughout a dwelling via the ductwork.

13. Under certain conditions, some molds may produce potentially toxic byproducts called mycotoxins. These molds can be found in dwellings with moisture or water damage.

14. The adverse effects of mold on humans and animals can include: (1) infections; (2) allergic or hypersensitivity reactions; (3) irritant reactions; and (4) toxic reactions. Allergic responses such as sneezing, runny nose, red eyes, and skin rash are common. Mold can trigger episodes in asthmatic individuals.

15. Some molds, known as microbial volatile organic compounds (“mVOCs”), produce compounds having a strong odor and are volatile. Exposure to mVOCs has been linked to symptoms such as headaches, nasal irritation, dizziness, fatigue, and nausea.²

16. Corvias is well-aware of the risks of mold but have engaged in a pattern and practice of concealing mold problems from prospective tenants and failing to resolve mold problems when they arise in the properties they manage.

17. Corvias-related entities manage properties for certain military housing. Class actions have

² The foregoing paragraphs concerning mold are taken verbatim from an Amended Class Action Complaint by servicemembers at Fort Meade against a Corvias-related entity, filed in the federal district court for the District of Maryland on February 14, 2020. Plaintiff has corroborated and incorporated the allegations for her pleading. Corvias has had clear prior notice and knowledge of the risks of mold.

been brought, found by federal judges to be plausible, and remain pending concerning pervasive mold problems at Corvias-managed military housing in Maryland at Fort Meade and in North Carolina at Fort Bragg.

18. News media reports have uncovered similar pervasive mold problems with Corvias-managed properties. By way of example, a 2018 Reuters Investigative report³ detailed the experiences of an Army sergeant and his family. The sergeant's two small children developed breathing problems that a doctor determined to be attributable to mold. Corvias failed to timely act. The sergeant himself developed breathing problems as well that required him to use an inhaler and wear a breathing device when he sleeps. The article noted that he no longer met the Army's fitness requirements and had been recommended for disability because of asthma that he developed. Thousands of military families have signed petitions demanding that housing managed by Corvias be brought to a livable state.

Problems with Mold at the Quad and Plaintiff's Experiences

19. The Quad consists of five residence halls: Baldwin, Crandall, Frazier, Truth, and Wheatley, which collectively house approximately 600 residents.

20. The fourth floor of Baldwin Hall consists of approximately 28 double rooms. The management and operations of housing matters at Baldwin Hall are overseen by Corvias.

21. Plaintiff is a consumer and tenant who is a first-year student at Howard University who is charged full room and board of \$9,330, of which \$4,226 has been paid so far. She moved into the Fourth Floor of Baldwin Hall on August 6, 2021. About two weeks later, she began experiencing symptoms including abnormally swollen tonsils as well as severe headaches, congestion, cough, and

³ <https://www.reuters.com/investigates/special-report/usa-military-developer/> (Dec. 12, 2018) (last accessed Oct. 25, 2021).

sinus pain. Her roommate and others on the floor had similar symptoms. Believing that they may have Covid-19, they got tested, but the results came back negative.

22. Around the same time, Plaintiff decided to briefly visit her family in Florida. Away from her dorm, her symptoms began to subside. Back in her room, though, Plaintiff's roommate continued to feel ill and began investigating other potential sources of the problem. She observed mold growing around the top of the vent of the room's HVAC unit.

23. Plaintiff and her roommate immediately informed Defendants, including their Resident Adviser, Tori Miller, who relayed the information to the building manager, Michelle Mondrey.⁴ Acting on behalf of Defendants, Ms. Miller informed Plaintiff that she must fill out a form so Defendants' "Maintenance" – a contractor – could inspect their dorm. On or around Oct. 6, Plaintiff filled out the form and returned it, describing that the HVAC unit visibly had mold growing in it and demanding that it be remediated.

24. On Oct. 9 or 10, in the hallway of her floor, Plaintiff saw three individuals from Maintenance entering and inspecting rooms. She believed they would be coming to inspect hers as well, but did not. Of the dorm rooms Maintenance did inspect, they simply changed the air filters and wiped down the tops of the vents, but did nothing to treat the root cause of the mold.

25. Ms. Miller notified residents that the rooms Maintenance entered had been treated and were sterilized and were therefore safe for residents to return.

26. In those rooms, however, the mold simply grew back and spread throughout the rooms, including on the belongings of the tenants.

27. Plaintiff complained to Ms. Miller that the mold problem remained unaddressed on their

⁴ Ms. Mondrey is listed on a Howard-maintained website as a "Hall Director" for the Quad and has a Corvias email address. See <https://studentaffairs.howard.edu/housing/harriet-tubman-quadrangle> (last visited: Oct. 25, 2021).

floor, with Maintenance having not even entered their unit to perform a superficial cleaning.

28. To mitigate the problem, Plaintiff chose to very rarely use the air conditioner, even though there were unseasonably hot days, causing discomfort.

29. Despite the mitigation efforts, Plaintiff's symptoms worsened and the mold spread to her closet, in her fridge, and underneath her microwave.

30. Defendants offered her a different room to temporarily stay, but on the same floor. They did not disclose that the room was vacant because the prior tenant had moved out because of mold growing in that room as well. Without other options, Plaintiff agreed to move to that room and did so with her roommate on or around Oct. 14, though Defendants insisted (and she agreed) to leave her belongings in her old room. Her symptoms persisted.

31. On or around the evening of Oct. 14 and the morning of Oct. 16, Maintenance finally came and did a superficial cleaning of Plaintiff's old dorm room, wiping down some surfaces. They left mold on Plaintiff's belongings. When Plaintiff questioned a Maintenance supervisor about the lack of thoroughness in the cleaning and mold treatment, the supervisor responded that, under the contract with Howard, that was all Maintenance was required to do.

32. The mold left on Plaintiff's belongings included in her fridge as well as on her microwave, luggage bag, a wooden sign that reads "Find Joy in the Journey," school supply materials on her desk, and a painting with significant personal meaning since it was gifted to her by her aunt. The back of the painting is below:



33. Plaintiff's symptoms continued. On or around the night of Oct. 16, she felt so ill that she walked alone to the emergency room of Children's National Hospital at around 11 p.m. She stayed there until she was seen by a doctor at 6 or 7 a.m. The doctor confirmed that her symptoms were consistent with mold exposure and that they would only worsen the longer she stayed in that environment. Plaintiff was finally discharged at 10:30 a.m., nearly 12 hours after she first entered the emergency room.

34. On Oct. 17, a representative of Corvias named Melissa visited Plaintiff's old room. She told Plaintiff that Corvias treats mold like bedbugs in that Corvias can only do so much to help. The Corvias representative insinuated that the mold was a result of bad living habits, including the failure of Plaintiff to sufficiently wash her belongings. The representative said Plaintiff should google a bleach to water ratio to clean the mold herself off of her belongings and told her that she should not have any items block the HVAC unit. These statements by the Corvias representative were baseless, as Plaintiff has always maintained her dorm room in a clean and neat manner and never blocked the HVAC unit.

35. Plaintiff has observed a number of other, possibly related problems in her rooms, on her

floor, in her building, and in the Quad that have largely gone unaddressed by Defendants. For example, the walls in her room and the Fourth Floor of Baldwin Hall are “bubbled” in several places, indicating that they suffer from water damage and are retaining water, an obvious possible source of mold.

36. Defendants’ actions have caused her illness, cost her several hours of personal time to deal with the matter, and damaged her personal property. In addition, had Plaintiff known before she moved to the fourth floor of Baldwin Hall that it suffered from widespread mold contamination that would go unaddressed by Defendants, she would have demanded an alternative housing placement.

CLASS ACTION ALLEGATIONS

37. Plaintiff brings this class action pursuant to D.C. Super. Ct. R. Civ. P. 23 and case law thereunder on behalf of herself and a Class of all others similarly situated.

38. The Class, represented by Plaintiff, is defined as: All individuals in the District of Columbia who do or have resided on the Fourth Floor of Baldwin Hall of the Quad since August 1, 2021.⁵

39. Excluded from the Class are: (a) any Judge or Magistrate presiding over this action and members of their families; (b) Defendants and their subsidiaries, affiliates, present and former employees, and family members; and (c) all persons who properly execute and file a timely request for exclusion from the Class.

40. *Numerosity*: The fourth floor of Baldwin Hall has 28 double units, which house 56 residents, making joinder impractical. Moreover, the Class is composed of an easily ascertainable set of individuals who resided at Baldwin Hall. The precise number of Class members can only be

⁵ Plaintiff reserves the right to amend the class definition to include other floors and units as information about pervasiveness of mold in Howard housing continues to come to light.

ascertained through discovery, which includes Defendants' records. The disposition of their claims through a class action will benefit both the parties and this Court.

41. *Commonality*: The critical questions of law and fact common to Plaintiff and the Class include whether it was unlawful for Defendants to rent, provide, manage, and advertise housing on the Fourth Floor of Baldwin Hall while failing to address pervasive mold contamination. Other questions of law and fact common to the Class predominate over any questions affecting only individual members of the Class and include:

- whether the Fourth Floor of Baldwin Hall has suffered, and continues to suffer, from widespread mold contamination in violation of the Housing Code, Air Quality Amendment Act, and CPPA;
- whether Defendants failed to implement policies and practices to prevent mold contamination;
- when Defendants knew or should have known of the mold contamination;
- whether Defendants should have disclosed the mold contamination to prospective tenants;
- whether Defendants have failed to address the mold contamination and provide habitable premises for their residents in violation of applicable law;
- whether Defendants misrepresented housing on the Fourth Floor of Baldwin Hall as in compliance with District regulations and housing code requirements, including the implied warranty of habitability, when, in fact, the housing is uninhabitable and posed serious risks to the health and safety of the tenants;

- whether Defendants misrepresented that Defendants would and did address the mold contamination and instead provided temporary, surface level, and ineffective fixes that failed to remedy the problem;
- whether Plaintiff and the Class are entitled to statutory damages;
- whether Plaintiff and the Class are entitled to restitution and/or disgorgement.

42. *Typicality*: Plaintiff's claims are typical of the claims of the members of the Class, as all such claims arise out of Defendants unlawful and unfair practices arising out of their ownership, management, and supply of housing with respect to the Fourth Floor of Baldwin Hall.

43. *Adequate Representation*: Plaintiff will fairly and adequately protect the interests of the members of the Class and has no interests antagonistic to those of the Class. Plaintiff has retained counsel experienced in the prosecution of complex class actions, including but not limited to consumer class actions involving, among other things, overcharges for consumer services and consumer protection.

44. *Predominance*: This class action is appropriate for certification because questions of law and fact common to the members of the Class predominate over questions affecting only individual members, and a Class action is superior to other available methods for the fair and efficient adjudication of this controversy, since individual joinder of all members of the Class is impracticable. Should individual Class members be required to bring separate actions, this Court would be confronted with a multiplicity of lawsuits burdening the court system while also creating the risk of inconsistent rulings and contradictory judgments. In contrast to proceeding on a case-by-case basis, in which inconsistent results will compound the delay and expense to all parties and the court system, this class action presents far fewer management difficulties while

providing unitary adjudication, economies of scale, and comprehensive supervision by a single court.

COUNT I
VIOLATIONS OF THE AIR QUALITY AMENDMENT ACT AND D.C. HOUSING
CODE
(Brought Individually and on Behalf of the Class)

45. Each of the preceding paragraphs is incorporated by reference herein.

46. Plaintiff brings this claim on behalf of herself, the general public, and the putative Class.

47. Defendants violated: (1) Title 14 of the District of Columbia Municipal Regulations (14 DCMR § 100 *et seq.*) (“Housing Code”) and (2) the Air Quality Amendment Act (“AQAA”) (*i.e.*, D.C. Code § 8-241.01, *et seq.*).

48. Defendants violated the Housing Code by, among other things:

- a. Failing to maintain housing in compliance with the requirements of the Housing Code (14 DCMR § 301.1);
- b. Offering to supply housing that is not in clean, safe, and sanitary condition, and in repair (14 DCMR § 400.3);
- c. Failing to maintain the facilities, utilities, and services of the housing (14 DCMR § 400.4);
- d. Failing to maintain the floors and interior walls reasonably free of dampness and moisture (14 DCMR § 706.5); and
- e. Failing to correct dampness and moisture in the wall and floor surfaces of habitable rooms (14 DCMR § 706.6).

49. Defendants violated the AQAA, particularly D.C. Code § 8-241.04, which provides:

- (a) A residential property owner who receives written or electronic notice from a

tenant that indoor mold or suspected indoor mold exists in the dwelling unit or in a common area of the property shall inspect the property within 7 days and remediate the condition in accordance with subsections (b) and (c) of this section within 30 days of the inspection unless a shorter timeframe is ordered by a court or the Mayor.

...

(b) If a residential property owner knows or has reason to know that indoor mold contamination exists in a tenant's dwelling unit or in a common area of the property, the residential property owner shall cause the mold to be remediated by an indoor mold remediation professional.

48. Defendants knew or should have known that indoor mold contamination existed on the Fourth Floor of Baldwin Hall, including in the individual dorm rooms, but failed to cause the mold to be remediated by a professional.

49. Defendants received written notice of the mold problem no later than Oct. 6, 2021, Defendants have not conducted a sufficient, timely inspection. Although 30 days has not yet passed, Defendants told Plaintiff that they have completed their work with respect to the mold contamination by conducting a surface level cleaning, so awaiting the full 30 days is futile.

50. For relief for the foregoing unlawful practices by Defendants, Plaintiff seeks actual damages, punitive damages, injunctive relief, and reasonable attorney's fees for herself and all others similarly situated.

COUNT II
UNFAIR AND DECEPTIVE TRADE PRACTICES – DC Code § 28-3905
(Brought Individually, on Behalf of the Class, and on Behalf of the General Public of the District of Columbia)

50. Each of the preceding paragraphs is incorporated by reference herein.

51. Plaintiff, on behalf of herself as an individual, on behalf of all others similarly

situated, and on behalf of the general public, files this action pursuant to D.C. Code § 28-3905(k).

52. The District of Columbia Consumer Protection Act prohibits unlawful trade practices in connection with the offer, lease, and supplying of consumer goods. 28-3901(a)(6). Consumer goods include “real estate transactions.” 28-3901(a)(7).

53. The CPPA defines merchant as “a person, whether organized or operating for profit or for nonprofit purpose, who in the ordinary course of business does or would sell, lease(to), or transfer, either directly or indirectly, consumer goods or services, or a person who in the ordinary course of business does or would supply the goods or services which are or would be the subject matter of a trade practice.” CPPA. 28-3901(a)(3). A merchant is not limited to the direct supplier of goods or services to consumers, but includes any person connected with the supply-side of a consumer transaction.

54. Defendants are merchants under the CPPA because they lease, manage and otherwise are sufficiently connected to supplying dorm housing to consumers, both directly and indirectly.

55. The CPPA defines consumer as a person who “does or would purchase, lease (as lessee), or receive consumer goods...or does or would otherwise provide the economic demand for a trade practice.” 28-3901(a)(2). Plaintiff has leased and received consumer goods and otherwise provides the economic demand for the trade practice and is therefore a consumer under the CPPA.

56. Under the CPPA, it is an unlawful trade practice to:

- a. represent that goods or services have a source, sponsorship, approval, certification, accessories, characteristics, ingredients, uses, benefits, or quantities that they do not have;

- b. represent that goods or services are of a particular standard, quality, grade, style, or model, if in fact they are of another;
- c. misrepresent as to a material fact which has a tendency to mislead;
- d. fail to state a material fact if such failure tends to mislead;
- e. use innuendo or ambiguity as to a material fact, which has a tendency to mislead.

D.C. Code 28-3904.

57. Defendants violated the CPPA by

- a. Representing and misrepresenting, expressly and implicitly, that the dorms on the fourth floor of Baldwin Hall complied with the lease, District regulations, and housing code requirements, including the implied warranty of habitability, when, in fact, the housing was uninhabitable and posed serious risks to the health and safety of the tenants;
- b. Representing and misrepresenting, expressly and implicitly, that the dorms on the fourth floor of Baldwin Hall were in safe, habitable conditions and that any mold contamination would be remedied by Defendants;
- c. Representing and misrepresenting that Defendants would abate any mold contamination and instead only providing temporary, surface level, and ineffective fixes that failed to remedy the root causes of the problem.

58. Defendants intentionally made these misrepresentations or omissions knowing that they misled reasonable consumers, such as Plaintiff.

59. These misrepresentations and omissions had the capacity and tendency to mislead

consumers. D.C. Code § 28-3901(c) establishes an enforceable right to truthful information from merchants about consumer goods and services that are or would be received in the District of Columbia. Violating Title 16 of the D.C. Municipal Regulations is also a per se violation of the CPPA. 28-3904 (dd). Defendants have violated section 3305 of Title 16, which covers violations of the Housing Code under Title 14 DCMR.

60. The violations of the Housing Code and AQAA set forth in Count I are fully incorporated herein and constitute predicates for violations of the CPPA.

61. Defendants' unfair and deceptive acts and omissions were flagrant and willful and created an imminent danger to Plaintiff, her family, and the putative class.

62. Defendants' acts and omissions are unfair in that they (1) offend public policy; (2) are immoral, unethical, oppressive, and unscrupulous; and (3) cause substantial injury to consumers.

63. Defendants' acts and omissions are also unfair in that they cause substantial injury to consumers far in excess of any conceivable benefit; and are injuries of a nature that they could not have been reasonably avoided by consumers.

64. As a result of Defendants' unfair and deceptive trade practices detailed herein, Plaintiff and the Class have suffered substantial injury including but not limited to living in residences that are not safe, sanitary, and habitable.

65. Defendants have also deprived Plaintiff and consumers in the District of Columbia of truthful information regarding their residences.

66. The injuries described arise from Defendants' policies and practices with respect to the supply and maintenance of housing for Plaintiff and the putative class. The injuries do not arise from training and credentialing.

67. As a result of Defendants' unfair and deceptive trade practices, Plaintiff seeks actual

damages, statutory damages, punitive damages, injunctive relief, and reasonable attorney's fees for herself and all others similarly situated.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Kaedrianna Turenne on behalf of herself, all others similarly situated, and the general public of the District of Columbia, prays for a judgment against Defendants as follows:

A. Finding that this action satisfies the prerequisites for maintenance as a class action set forth in D.C. Super. Ct. R. Civ. P. 23(a), (b)(2) and/or (b)(3);

B. Designating Plaintiff as representative of the Class and her counsel as Class counsel;

C. Entering judgment in favor of Plaintiff, the Class, and the general public of the District of Columbia and against Defendants for all compensatory, individual, and class damages;

D. Granting Plaintiff, the Class and the general public of the District of Columbia treble damages or statutory damages, whichever is greater;

E. Granting Plaintiff her costs of prosecuting this action, including attorneys' fees, experts' fees and costs together with interest;

F. Granting injunctive relief requiring Defendants to cease and desist committing any unlawful trade practices that violate the CPPA; compelling Defendants to remedy widespread mold contamination and violations of the Housing Code at the Fourth Floor of Baldwin Hall; and otherwise prohibiting Defendants from misrepresenting the habitability of their housing until these persistent violations have been permanently abated; and

G. Granting such further relief as the Court deems just.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

Dated: October 26, 2021

Respectfully submitted,

MIGLIACCIO & RATHOD LLP

/s/ Jason S. Rathod

Jason S. Rathod, Esq. (D.C. Bar No. 1000882)

Nicholas A. Migliaccio, Esq. (D.C. Bar No.484366)

MIGLIACCIO & RATHOD LLP

412 H St. NE

Washington, DC 20002

(202) 470-3520 (Tel.)

(202) 800-2730 (Fax)

jrathod@classlawdc.com

nmigliaccio@classlawdc.com