

Sent: Tuesday, July 7, 2020 11:07 AM

To: Stephen Dane <sdane@fairhousinglaw.com>

Subject: Hallmark Claim # 7736OH077150/ Miami Valley Fair Housing Ctr. v. Carillon House

Good Morning,

I'm sorry I missed you yesterday. We insure Carillon House Condominium. We received copy of the lawsuit filed by your client, Miami Valley Fair Housing. Our general liability policy has numerous coverage issues in handling the lawsuit, but we are interested in resolving for something reasonable. The lawsuit states that your clients incurred \$6572. This is a high amount two months of attorney fees? Can you please explain the figure?

Thanks.

Karma Johnson

Complex Claims Adjuster | Claims

D 210.504.4568 | F 800.722.4052

kjohnson@hallmarkgrp.com



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From: Stephen Dane <sdane@fairhousinglaw.com>

Sent: Tuesday, July 7, 2020 3:28 PM

To: Karma Johnson <KJohnson@hallmarkgrp.com>

Subject: RE: Hallmark Claim # 7736OH077150/ Miami Valley Fair Housing Ctr. v. Carillon House

Ms. Johnson – Thank you for your inquiry. Sorry I was not available when you called earlier today.

Attached is a pre-filing demand for reimbursement of costs incurred by the Miami Valley Fair Housing Center (MVFHC) in conducting its investigation and completing its resolution of fair housing civil rights claims against Carillon House. As you can see from the last page, the time and expense incurred by MVFHC for that investigation and time spent negotiating a resolution was \$4,072. It incurred an additional \$2,500 in attorneys fees because the Carillon House initially refused to correct its unlawful Pet Brochure, and MVFHC was forced to engage its own attorney to bring the matter to resolution. Attached is just one letter indicating that MVFHC attempted to resolve the matter without counsel in March, 2020. But because the Carillon House resisted such efforts, it took me and MVFHC two more months (and several more letters) to convince Carillon House to correct its mistake. That's where the additional \$2,500 comes into play.

Because of my experience and reputation in fair housing compliance and enforcement, my hourly rate is high. It doesn't take many hours to incur substantial fees. Those fees will grow considerably higher if this matter continues to be litigated in federal court, which has already cost MVFHC \$400 just in court filing fees. Despite the fees incurred to prepare and file the complaint in court, MVFHC would be willing to resolve this now with a payment of its complaint demand of \$4,572 + \$400 filing fee = \$4,972.

I should be available most of tomorrow, Wednesday, July 8 to discuss further with you. Please give me a call so I can provide any additional information you may need.

Steve Dane

sdane@fairhousinglaw.com

www.fairhousinglaw.com

419-873-1814

From: Karma Johnson <KJohnson@hallmarkgrp.com>

Sent: Monday, July 13, 2020 10:16 AM

To: Stephen Dane <sdane@fairhousinglaw.com>

Subject: RE: Hallmark Claim # 7736OH077150/ Miami Valley Fair Housing Ctr. v. Carillon House

Good Morning Mr. Dane,

I hope you enjoyed your weekend. Please see the attached release.

Thanks.

From: Stephen Dane <sdane@fairhousinglaw.com>

Sent: Tuesday, July 14, 2020 12:28 PM

To: Karma Johnson <KJohnson@hallmarkgrp.com>

Subject: RE: Hallmark Claim # 7736OH077150/ Miami Valley Fair Housing Ctr. v. Carillon House

Ms. Johnson – Attached is the redlined version of what my client had approved, along with a final pdf version with all changes incorporated. Please forward these to your attorneys for review and approval. We can adjust the payment due date if that is absolutely necessary, but in my experience a settlement for this low amount should be able to be processed very quickly.

Steve Dane

sdane@fairhousinglaw.com

www.fairhousinglaw.com

419-873-1814

From: Karma Johnson <KJohnson@hallmarkgrp.com>

Sent: Wednesday, July 15, 2020 9:26 AM

To: Stephen Dane <sdane@fairhousinglaw.com>

Subject: RE: Hallmark Claim # 7736OH077150/ Miami Valley Fair Housing Ctr. v. Carillon House

Good Afternoon,

I can approve the changes, minus the overnight. I will issue the payment upon receipt of the executed release so I would assume, it would be received within 7-10 business days but that's dependent on the mail. Please remove the overnight language and we will approve.

Thanks.

Thanks.

From: Stephen Dane <sdane@fairhousinglaw.com>

Sent: Wednesday, July 15, 2020 10:44 AM

To: Karma Johnson <KJohnson@hallmarkgrp.com>

Subject: RE: Hallmark Claim # 7736OH077150/ Miami Valley Fair Housing Ctr. v. Carillon House

Ms. Johnson – Thank you for your consideration. I changed the payment term to remove the quick turnaround as you requested, and understand that my client may not receive the settlement check for several weeks. Attached is the signed and notarized Full Release. I will file a dismissal of the lawsuit as soon as the check is received.

Steve Dane

sdane@fairhousinglaw.com

www.fairhousinglaw.com

419-873-1814

From: Karma Johnson <KJohnson@hallmarkgrp.com>

Sent: Wednesday, July 15, 2020 12:00 PM

To: Stephen Dane <sdane@fairhousinglaw.com>

Subject: RE: Hallmark Claim # 7736OH077150/ Miami Valley Fair Housing Ctr. v. Carillon House

Good Morning,

Thanks. I entered the check in the system. It will be printed tomorrow morning and should go out by Friday at the latest.

Thanks.