

**DISTRICT COURT, COUNTY OF DENVER, STATE  
OF COLORADO  
1437 Bannock  
Denver, CO 80202**

Joanne Addison, Margarita Bianco, Wendy Bolyard, Lois  
Brink, Sasha Breger Bush, Sarah Fields, Melissa Furness,  
Carol Golemboski, Bryn Harris, Erin Hauger, Julee Herdt,  
Maryann Hoffmann, Sheila Huss, Lorna Hutchison,  
Jennifer Reich, Ronica Rooks, Lori Geismar-Ryan, Karen  
Sobel, Elizabeth Steed, Geeta Verma, and Diana White,

Individually and on behalf of those similarly situated,

**Plaintiffs,**

v.

The Regents of The University of Colorado, a body  
corporate,

**Defendant.**

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Case No. \_\_\_\_\_

Division: \_\_\_\_

**CLASS ACTION COMPLAINT AND JURY DEMAND**

Plaintiffs Joanne Addison, Margarita Bianco, Wendy Bolyard, Lois Brink, Sasha Breger Bush, Sarah Fields, Melissa Furness, Carol Golemboski, Bryn Harris, Erin Hauger, Julee Herdt, Maryann Hoffmann, Sheila Huss, Lorna Hutchison, Jennifer Reich, Ronica Rooks, Lori Geismar-Ryan, Karen Sobel, Elizabeth Steed, Geeta Verma, and Diana White through their undersigned counsel, individually and on behalf of all those similarly situated, for their Complaint and Jury Demand, allege the following:

## **I. INTRODUCTION**

1. This case arises from the University of Colorado at Denver's ("CU Denver") pattern and practice of paying its female faculty less than its male faculty. Even though its pay equity problem has been long known to CU Denver, it has failed to act to meaningfully remedy this known problem.

2. Based on these facts, Plaintiffs assert individual and class-wide claims for pay discrimination based on gender under the Colorado Equal Pay for Equal Work Act ("CEPEWA").

## **II. JURISDICTION AND VENUE**

3. Jurisdiction is proper in this Court for Plaintiffs' CEPEWA claim pursuant to the Colorado Constitution Article VI, Section 9.

4. Venue is proper in this Court under Rule 98(c)(1) of the Colorado Rules of Civil Procedure, because the Board of Regents of the University of Colorado and CU Denver do business in the County of Denver, State of Colorado. Specifically, CU Denver's campus is located in Denver. Moreover, the Colorado University ("CU") system which governs CU Denver through Defendant Regents is a Colorado State constitutional entity located and operated in Denver, Colorado. The offices of the University President and the Board of Regents are in Denver, Colorado. Upon information and belief, the decisions regarding pay equity were made at the system level in Denver, Colorado.

## **III. PARTIES**

5. Plaintiff Joanne Addison is a resident of the State of Colorado.

6. Plaintiff Margarita Bianco is a resident of the State of Colorado.

7. Plaintiff Wendy Bolyard is a resident of the State of Colorado.

8. Plaintiff Lois Brink is a resident of the State of Colorado.

9. Plaintiff Sasha Breger Bush is a resident of the State of Colorado.

10. Plaintiff Sarah Fields is a resident of the State of Colorado.

11. Plaintiff Melissa Furness is a resident of the State of Colorado.

12. Plaintiff Carol Golemboski is a resident of the State of Colorado.

13. Plaintiff Bryn Harris is a resident of the State of Colorado.
14. Plaintiff Erin Hauger is a resident of the State of Colorado.
15. Plaintiff Julee Herdt is a resident of the State of Colorado.
16. Plaintiff Maryann Hoffmann is a resident of the State of Colorado.
17. Plaintiff Sheila Huss is a resident of the State of Colorado.
18. Plaintiff Lorna Hutchison is a resident of the State of Colorado.
19. Plaintiff Jennifer Reich is a resident of the State of Colorado.
20. Plaintiff Ronica Rooks is a resident of the State of Colorado.
21. Plaintiff Lori Geismar-Ryan is a resident of the State of Colorado.
22. Plaintiff Karen Sobel is a resident of the State of Colorado.
23. Plaintiff Elizabeth Steed is a resident of the State of Colorado.
24. Plaintiff Geeta Verma is a resident of the State of Colorado.
25. Plaintiff Diana White is a resident of the State of Colorado.
26. Defendant Regents of the University of Colorado (“the Regents”) governs the University of Colorado System, including CU Denver, a public university. It is a body corporate created in Article 9, Section 12 of the Colorado Constitution.

#### **IV. FACTUAL ALLEGATIONS**

##### **A. Faculty Positions at CU Denver.**

27. At CU Denver, faculty positions include Full Professor, Associate Professor, Assistant Professor, Teaching Professor, Instructor, and Clinical Faculty.

##### **a. Full Professor.**

28. At CU Denver, Full Professor is a tenured faculty position.

29. In terms of skill, CU Denver requires a Full Professor to have the terminal degree appropriate to their field or its equivalent. Full Professors must conduct research and/or creative work relating to their academic discipline, must be capable of teaching at both the undergraduate and graduate levels, and must provide service to their Academic Unit, to CU Denver (typically the Department in which they are rostered)<sup>1</sup> and often to scholarly

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<sup>1</sup> As used in this Complaint, the term “Academic Unit” refers to any department or program in the College of Liberal Arts and Sciences; the Business School; the College of Architecture and Planning; the College of Arts and Media; the College of Engineering, Design and

organizations at the national and international level. Generally, they are required to have a record that, taken as a whole, is judged to be excellent, including significant contributions to graduate and undergraduate education, and substantial, significant, and continued growth, development, and accomplishment in teaching (or librarianship), scholarly/creative work, and leadership after receiving tenure and promotion to Associate Professor.

30. In terms of effort, the duties of a Full Professor—teaching, research, and service to the academic discipline—require considerable mental exertion.

31. In terms of responsibilities, Full Professors are expected to teach courses, evaluate students, advise students, conduct research and/or creative work, act in service to their academic discipline and to CU Denver, and perform additional responsibilities as required by their Academic Unit.

32. Full Professors working in the same Academic Unit have similar jobs and perform substantially similar work in terms of skill, effort and responsibility. Similar skill is required because they must have a Ph.D. or other terminal degree in the same or similar academic discipline to work in the same Academic Unit; they must be tenured; they must be capable of teaching courses in the same or similar academic discipline; they must be capable of conducting research and/or creative work in the same or similar academic discipline; and they must have a similar record of excellence. Similar effort is required because there is similar mental effort necessary to teach and conduct research and/or creative work in the same or similar academic discipline. Similar responsibilities are required because faculty in the same Academic Unit teach courses, evaluate students, advise students, conduct research and/or creative work, and provide service within the same or similar academic discipline.

**b. Associate Professor.**

33. Associate Professor is a tenured position. CU Denver requires Associate Professors to have the terminal degree appropriate to their field or its equivalent, considerable successful teaching experience, and promising accomplishment in research and/or creative work.

34. In terms of skill, effort, and responsibility, Associate Professors have mostly the same job requirements as Full Professors. The main difference is that Associate Professors are not required to have the record of excellence expected of Full Professors but must at least have promising accomplishments in research and/or creative work.

35. Associate Professors working in the same Academic Unit have similar jobs and perform substantially similar work based on skill, effort, and responsibility. As described in the Full Professor section of this Complaint, Associate Professors working in the same Academic Unit require substantially similar skills, experience, and accomplishments; require substantially similar mental effort; and have substantially similar responsibilities for teaching, research and/or creative work, and service.

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Computing; the School of Education and Human Development; the School of Public Affairs, or the Library.

36. Furthermore, many of the Academic Units rank their Associate Professors by merit, based on a composite score of teaching, research and/or creative work, and service. This ranking or grouping further indicates that Associate Professors in the same Academic Unit have similar jobs and perform substantially similar work.

**c. Assistant Professor.**

37. Assistant Professor is a tenure track position.

38. CU Denver requires Assistant Professors to have the terminal degree appropriate to their field or its equivalent plus some teaching experience. They must be well-qualified to teach at the undergraduate or graduate levels and possess qualifications for research or scholarship in a special field.

39. Like Full Professors and Associate Professors, Assistant Professors have teaching, research and/or creative work, and service responsibilities. However, they do not have tenure and are not expected to have the level of accomplishments that Associate Professors and Full Professors have.

40. Assistant Professors working in the same Academic Unit have similar jobs and perform substantially similar work based on skill, effort, and responsibility. As described in the Full Professor section, Assistant Professors working in the same Academic Unit require substantially similar skills and experience; require substantially similar mental effort; and have substantially similar responsibilities for teaching, conducting research and/or creative work, and service.

41. Furthermore, many of the Academic Units rank their Assistant Professors by merit, based on a composite score of teaching, research, and service. This ranking or grouping further indicates that Assistant Professors in the same Academic Unit have similar jobs and perform substantially similar work.

**d. Teaching Professor.**

42. Teaching Professor is a non-tenure track position.

43. CU Denver requires Teaching Professors to have the terminal degree appropriate to their field or equivalent experience, and a consistent record of excellent teaching and pedagogical development. Generally, teaching professors have teaching and service requirements, but some individual schools and colleges at CU Denver may require teaching professors to perform research or scholarly duties.

44. Teaching Professors perform the same work or similar work but receive higher recognition than Associate and Assistant Teaching Professors.

45. Teaching Professors, Associate Teaching Professors and Assistant Teaching Professors within the same Academic Unit have similar jobs and perform substantially similar work based on skill, effort, and responsibility. For skill they must have the terminal degree within the same or similar academic discipline, and they must have the capacity to teach within the same or similar academic discipline. For effort, teaching in the same of similar

academic discipline requires similar mental effort. For responsibility they have the same teaching and service responsibilities for the Academic Unit.

**e. Instructors.**

46. Instructors and Senior Instructors are non-tenure track positions.

47. CU Denver requires Instructors to have their master's degree, or its equivalent, and should be otherwise well-qualified to teach at the undergraduate level. Generally, Instructor positions at CU Denver only have teaching and service requirements, but some individual schools and colleges at CU Denver may require Instructors to perform research or scholarly activities.

48. Senior Instructors perform the same or similar work but receive higher recognition than Instructors.

49. Instructors and Senior Instructors within the same Academic Unit have similar jobs and perform substantially similar work based on skill, effort, and responsibility. For skill, they must have at least a master's degree or its equivalent within the same or similar academic discipline, and they must have the capability to teach at the undergraduate level within the same or similar academic discipline. For effort, teaching in the same or similar academic discipline requires similar mental effort. For responsibility, they have the same teaching and service responsibilities for the Academic Unit.

**f. Clinical Faculty.**

50. Clinical Faculty teach in the clinics offered by some of the Academic Units at CU Denver. These Clinical Teaching Track positions include tenured and tenure-track faculty such as Assistant Professors, Associate Professors, and Full Professors as well as non-tenured track Instructors and Senior Instructors and Teaching Professors.

51. For the same reasons outlined in this Complaint's above faculty descriptions, Clinical Faculty with the same rank and working in the same Academic Unit have similar jobs and substantially similar work.

**B. The Plaintiffs.**

**1. College of Liberal Arts and Sciences ("CLAS").**

52. Plaintiff Dr. Joanne Addison is a tenured Full Professor in the CLAS English Department. She began her employment with CU Denver in August of 1995. Throughout her tenure, she has received uniformly excellent performance reviews and her most recent review rated her as a 5 exceeds expectations, which is the highest rank. Dr. Addison has held a number of administrative positions, most recently as Director of the ESL Academy from 2019-2022.

53. In her position as Director of the ESL Academy, Dr. Addison performed substantially the same responsibilities as a department chair, including responsibilities for fostering academic excellence, representing and guiding the department, managing faculty and staff recruitment and evaluation, ensuring compliance with University policies, directing

student admission, placement and graduation, overseeing budgets and resources, negotiating space, collaborating with internal and international partners, and maintaining open communication with faculty, staff, students, and administrators. Nonetheless, Dr. Addison did not receive the same 15% AY stipend that the other male English Department chairs received and who served during the same time frame. When this Director position was advertised in the summer of 2025, female faculty complained about the inequity and the 15% academic year (“AY”) stipend was added to the position listing based on feedback about the workload. Additionally, she is paid significantly less than two male Full Professors in the English Department. She is paid less than them even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Specifically, Dr. Addison and these male professors perform substantially similar work in that they each teach, perform research, and have held various administrative and leadership positions. Additionally, her average merit scores over the past five years are higher than one of the male comparators and the same as the other. She has significantly more years of service than the male professor with the same average merit scores.

54. Plaintiff Dr. Sarah Fields is a tenured Full Professor in the CLAS Communication Department. She began her employment with CU Denver as an Associate Professor with tenure in August of 2013 and was promoted to Full Professor in 2018. Throughout her tenure, she has received uniformly excellent performance reviews and her most recent review rated her as a 5 exceeds expectations, which is the highest rank. Dr. Fields has served in various administrative roles including having served as Associate Dean, Interim Honors Director, HSP Faculty Coordinator and various Faculty Assembly roles. She is also a Fellow in the National Academy of Kinesiology.

55. Dr. Fields is currently paid substantially less than one of the male Full Professors of Communication. Moreover, she is paid substantially less than nearly all of the male Full Professors in CLAS. Being paid a lower base salary than her male peers also affects her administrative stipends as they are set based on a percentage of her base salary. She is paid less than her male peers even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Additionally, her publications are significantly more important than the male counterparts, she receives more and larger grants, and she has a significantly better record of service and leadership.

56. Plaintiff Dr. Jennifer Reich is a tenured Full Professor in the CLAS Sociology Department. She began her employment with CU Denver as an Associate Professor in August of 2014 and was granted tenure and promoted to Full Professor in 2017. Throughout her tenure, she has received uniformly excellent performance reviews and her most recent review rated her as a 5 exceeds expectations, which is the highest rank. Dr. Reich has also served as Director of University Honors since Sept 2019. She was named a TIAA Chancellor’s Urban Engaged Scholar in 2022 and received the University’s Distinguished Honor Award for Pandemic Research and Creative Activities Awards (2021) and the Outstanding Faculty Achievement Award from the College of Liberal Arts and Sciences (2018).

57. Dr. Reich is currently paid less than the male Full Professor in Sociology who was just promoted to Full Professor in 2023. Moreover, she is paid substantially less than nearly all of the male Full Professors in CLAS. Being paid a lower base salary than her male peers also affects her administrative stipend as it is set based on a percentage of her base salary. She is paid less than her male peers even though they occupy similar jobs and perform

substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Additionally, her publications are significantly more important than the male counterparts, she is sought after as a speaker on a national level, is the recent Vice President of the American Sociological Association, and she has significantly better record of service and leadership.

58. Plaintiff Dr. Ronica Rooks is a tenured Full Professor in the CLAS Health and Behavioral Sciences Department. She began her employment with CU Denver in August of 2007 as an Assistant Professor and was granted tenure and promoted to Associate Professor in 2014. She was promoted to Full Professor in 2022. She has also served as Director of Graduate Studies in the Department of Health and Behavioral Sciences from 2014-2017 and Director of Online Education for the CLAS from 2019 - present. Throughout her tenure, she has consistently received ratings of exceeds expectations or outstanding on her performance reviews.

59. Dr. Rooks is currently paid less than the two other male Full Professors in the Health and Behavioral Sciences Department including one who was just promoted to Full Professor in 2024. She is paid less than her male peers even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. She is also paid less than numerous other male Full Professors within the College who work in other Departments but who perform substantially similar work.

60. Plaintiff Dr. Diana White is a tenured Associate Professor in the CLAS Mathematical and Statistical Science Department. She began her employment with CU Denver in August of 2008 as an Assistant Professor and was granted tenure and promoted to Associate Professor in 2014. Dr. White has received over \$2.5 million in external funding. She has an extensive publishing record of over 50 peer and editorial reviewed journal articles, book chapters, and proceedings papers. In addition, she has held multiple elected positions in faculty shared governance, recently as chair of the Faculty Advisory Committee to the Auraria Board, the faculty representative on the Auraria Board of Directors, and chair-elect of the CU-System Faculty Council.

61. Dr. White is currently paid significantly less than the other male Associate Professors in the Mathematical and Statistical Science Department. Additionally, she is paid substantially less than a lower ranking male Assistant Professor in the same department who was hired in 2022 and an incoming male Assistant Professor who will be starting in August 2025. She is paid less than her male peers even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility.

62. Plaintiff Maryann Hoffmann is a Senior Teaching Professor in CU Denver's English Department, CLAS. She began teaching at CU Denver in 2003 and was promoted to her current position as a Senior Instructor in 2019. While at CU Denver, she has served in administrative posts, including as an undergraduate advisor. Ms. Hoffmann also taught a full course-load, sponsored student internships, provided independent studies for students, supported a work study student though and ethics complaint, and taught an upper-division course each summer. Ms. Hoffman was also thanked by a student featured in a welcome video on CLAS's website. All of Ms. Hoffman's annual ratings exceeded expectations.

63. Ms. Hoffman has been and continues to be paid less than other male Senior

Instructors in CLAS's English Department. At least two male Senior Instructors in the English Department are paid more than Ms. Hoffmann. One of them is paid roughly \$11,000 more. Both are paid more even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility in that each teach courses in the Writing Program. Both of the male Instructors have shorter tenures at CU Denver than does Ms. Hoffmann.

64. Plaintiff Dr. Lorna Hutchison is an Associate Teaching Professor, in the CLAS English Department and in the Masters of Humanities and Master of Social Sciences Program ("MHMSS"), now called the Interdisciplinary Studies Program ("ISP"). Dr. Hutchison commenced her employment at CU Denver in 2016. She received her PhD from McGill University in 2005 and began her teaching career as an Associate Teaching Professor in 2007. Dr. Hutchison currently serves as CLAS Undergraduate Advisor to the Interdisciplinary MHMSS/ISP minors. She serves on MHMSS/ISP thesis/project committees as Chair and Reader. She has served as MH Director and Assistant Director. Dr. Hutchison has numerous peer-reviewed publications and peer-reviewed creative works.

65. In her position, Dr. Hutchison and her male colleagues in the English Department and MHMSS/ISP occupy similar jobs and perform substantially similar work, regardless of job title based upon a composite of skill, effort and responsibility. For example, Dr. Hutchison and her male colleagues in the English Department teach English classes and perform service and research. Dr. Hutchison and one of her male colleagues in MHMSS teach both undergraduate and graduate level courses and perform service and research. Despite this, Dr. Hutchison is paid \$11,000 a year less than a male Associate Teaching Professor in the English Department who received his PhD five years after Dr. Hutchison. Dr. Hutchison earns \$10,000 less in base salary than a male Lecturer in the CU Denver English Department despite holding a higher rank in the Department. She also makes approximately \$7,000 a year less than a male Senior Instructor in the English Department who received his PhD in 2009. Dr. Hutchison also earns almost \$27,000 less than a male Research Associate Professor in the ISP Program. Whereas Dr. Hutchison is at 100% CU time, this male ISP colleague is only at 66.6% CU Denver time. Dr. Hutchison receives no compensation for her undergraduate advisor duties, whereas her male colleague receives over \$7,000 in compensation and stipends which sets this colleague's salary at over \$25,000 more than that of Dr. Hutchison. Another male colleague who is an Associate Professor in ISP is paid a stipend for graduate student advising whereas Dr. Hutchison receives no stipend for undergraduate advising. A male Associate Professor in MHMSS/ISP is also being compensated for his advising role in ISP by receiving a course release whereas Dr. Hutchison is not receiving this compensation despite also having an advising role.

## **2. School of Public Affairs ("SPA").**

66. Plaintiff Dr. Wendy Bolyard is an Associate Teaching Professor in CU Denver's SPA. She has taught at CU Denver since August of 2015 and has received a number of promotions. She was a Program Director for an undergraduate program from January of 2016 to August of 2021. Dr. Bolyard has received consistently excellent performance ratings. She has received SPA's IRC Award for Research in 2024, for Leadership and Service in 2023, and for Teaching in 2022. She has been honorable mention for Leadership and Research, and for Teaching in most years that she has been at CU Denver. Her service at the campus and national levels exceeds most other teaching faculty in the SPA.

67. Dr. Bolyard has been paid significantly less than at least one other male teaching faculty in Public Affairs. She is paid less than him even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Specifically, Dr. Bolyard and this male professor perform substantially similar work in that they are both in teaching lines, teach undergraduate and graduate level courses, and serve on SPA and campus committees. The male faculty member was actually hired part-time at the same salary that Dr. Bolyard received for her initial full-time role. Dr. Bolyard earned her PhD ten years before this male comparator, has seven years more teaching experience, and has received higher ranks on performance reviews.

68. Plaintiff Dr. Sasha Breger Bush is a tenured Associate Professor in the SPA. Dr. Breger Bush has worked at CU Denver since August of 2014. From then, until August of 2024 when she joined the SPA, Dr. Bush worked in the CLAS' Political Science Department. She has received excellent performance reviews during her entire tenure. She served as the Chair of the Faculty Assembly from 2023-2025, which is an important elected leadership position. Dr. Bush has published three books, teaches innovative courses across multiple disciplines, and received several awards for her teaching, research, leadership, and service.

69. In the Political Science Department, Dr. Bush was paid less than male Associate Professors. She was paid less than them even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort, and responsibility. Specifically, Dr. Bush and these male Professors perform substantially similar work in that they are expected to perform the same amount of research, teaching and service, are tenured, regularly teach and advise both graduate and undergraduate students, and are evaluated annually for merit and periodically for promotion under the same criteria. During the academic year beginning in August of 2024, she was paid significantly less than two other Associate Professors in the SPA for substantially similar work. Their work is substantially similar in that they are expected to perform the same amount of research, teaching and service, are tenured, regularly teach and advise both graduate and undergraduate students, and are evaluated annually for merit and periodically for promotion under the same criteria.

70. Plaintiff Sheila Huss is an Assistant Teaching Track Professor in the SPA. Dr. Huss has taught at CU Denver since August of 2014. During her tenure, she has received outstanding performance reviews and two promotions. She has served as Program Director for the Undergraduate Criminal Justice Program and Director of the Center for Community Safety and Resilience. She has obtained several grants totaling almost \$1.75 million. On several occasions, she has won SPA and campus teaching awards.

71. Dr. Huss has been paid less than at least one other male teaching faculty in her program considering their years of service. She is paid less than him even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Specifically, Dr. Huss and this male professor perform substantially similar work in that they each teach multiple undergraduate and graduate level courses and serve on SPA and campus committees. Dr. Huss is of a higher rank than this male faculty member and has a longer tenure with SPA and CU Denver.

### **3. Library.**

72. Plaintiff Dr. Karen Sobel is a tenured Full Professor. Dr. Sobel has been employed by CU Denver since January of 2008. She has been tenured since 2014 and became a Full Professor in 2022. Between May of 2020 and June of 2025, her responsibilities were split 51% to UCD's Auraria Library and 49% as Director of the Center for Faculty Development & Advancement. Beginning on June 30, 2025, she will return to working full time as Library faculty. Dr. Sobel's performance has been consistently rated as outstanding. She has published two books, one of which is a monograph and one of which is an edited volume, as well as numerous peer-reviewed articles in professional journals. She has presented her work and conferences across the country and in three European countries.

73. In recent years, the Library has hired a number of male instructors with annual salaries as much as \$20,000 more than Dr. Sobel's. She is paid less than them even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Specifically, Dr. Sobel and the male professor perform substantially similar work in that they each perform a range of instructional, reference, and outreach work. Additionally, Dr. Sobel has a higher rank than most of these male faculty, as well as longer tenure and stronger credentials than each of them.

#### **4. School of Education and Human Development ("SEHD").**

74. Plaintiff Dr. Geeta Verma is a tenured Full Professor in CU Denver's SEHD. Dr. Verma began teaching at CU Denver in August of 2010. She was promoted to tenured Full Professor in 2019. For all or most of her tenure, she has received exceeds expectations ratings in her annual performance reviews.

75. Despite her consistently strong performance, Dr. Verma has been paid less than at least two male Full Professors in SEHD, one male Associate Professor, and one male Associate Teaching Professor, both of whom hold lower ranks – one of whom is not on the tenure track and works at 80% FTE. After a recent pay increase, she is still paid less than one male Full Professor, as well as the male Associate Professor and Associate Teaching Professor. She is paid less than them even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Dr. Verma and these male professors perform substantially similar work, including teaching, research and service, and fulfills comparable leadership and mentoring roles, as reflected in her performance evaluations. Over the years, Dr. Verma has received stronger performance reviews and demonstrated higher levels of productivity in areas such as research output, external funding, and doctoral student mentorship.

76. Plaintiff Dr. Elizabeth Steed is a tenured Full Professor in CU Denver's SEHD. Dr. Steed began teaching at CU Denver in August of 2013. She was promoted to tenured Associate Professor in 2017 and Full Professor in 2023. For all or most of her tenure, she has received exceeding ratings of 4.5 or outstanding ratings of 5, which is the highest rating in her annual performance reviews.

77. Despite her outstanding performance, Dr. Steed is paid substantially less than at least two male Full Professors in her Department. She is also paid less than a lower ranking male Associate Professor who is also rated lower on his performance evaluations and a male non-tenured Teaching Professor. She is paid less than them even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Specifically, Dr. Steed and these male

professors perform substantially similar work in that they each teach, engage in scholarly activity, and take on leadership and service roles within the School and the University. In comparison to those male faculty members, Dr. Steed has a higher rank than one of them and has outperformed each comparator in research contributions (e.g. publications, grants received). She has received higher teaching evaluations and has mentored more doctoral students than at least one of the comparators, as reflected in her performance reviews.

78. Plaintiff Dr. Bryn Harris is a tenured Full Professor in CU Denver's SEHD with a secondary academic appointment in the Department of Pediatrics (Developmental Pediatrics). Dr. Harris began teaching at CU Denver in August of 2008. She was promoted to tenured Associate Professor in 2016 and Full Professor in 2022. For all or most of her tenure, she has received the highest possible rating in her annual performance review. Dr. Harris has served as a Program Director for her Department's doctoral program and created and directs her Department's bilingual program. In the Spring of 2025, she was promoted to the position of Director for the Center of Development and Advancement, which is a 0.5 FTE administrative position.

79. Despite her outstanding performance, Dr. Harris is paid less than at least two male Professors in her Department, including one at a lower rank. She is paid less than them even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Specifically, Dr. Harris and these male professors perform substantially similar work in that they are each required to teach, perform research, and assume service responsibilities. In comparison to those two male faculty members, Dr. Harris actually has a higher rank than one of them and has significantly outperformed the other in publishing and grant acquisition. She has also received much stronger student ratings than at least one of the comparators.

80. Plaintiff Dr. Margarita Bianco is a tenured Associate Professor in CU Denver's SEHD. Dr. Bianco began teaching at CU Denver in August of 2006. She was promoted to tenured Associate Professor in 2013. For all or most of her tenure, she has received exceeds expectations ratings in her annual performance reviews.

81. Despite her outstanding performance, Dr. Bianco is paid less than at least one male Associate Professor in her Department. She is also paid less than a male Associate Teaching Professor, who is not on the tenure track and works at 80% FTE. She is paid less than them even though they occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Specifically, Dr. Bianco and these male professors perform substantially similar work in that they each teach, engage in scholarly activity, and take on leadership and service roles within the SEHD and the University. In comparison to those male faculty members, Dr. Bianco actually has a higher rank than one of them and has outperformed the other in research productivity (e.g. publications, grants received), teaching evaluations, program development, National and International recognition, and National and University-wide awards for teaching and research as reflected in her performance reviews and documented on her Curriculum Vitae

82. Plaintiff Lori Geismar-Ryan is a Teaching Professor in the SEHD. She began teaching at CU Denver in June of 2013. She has received consistently excellent performance reviews and received multiple promotions. She has served as Program Lead, which is equivalent to the position of Department Chair, on three occasions. In August of 2025, she was promoted to the position of Teaching Professor.

83. Dr. Geismar-Ryan has been paid substantially less than at least one other male faculty in the SEHD. For several years, he has earned the equivalent of \$30,000 per year more than Dr. Geismar-Ryan. She has been paid less than him even though they occupy the similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Specifically, Dr. Geismar-Ryan and this male professor perform substantially similar work in that they both have the same title and teaching load, serve as Program leads, and both serve on SEHD's Leadership and Finance Committee. Dr. Geismar-Ryan's performance, however, has been consistently rated higher than his performance over the past 12 years.

## **5. College of Arts and Media ("CAM").**

84. Plaintiff Melissa Furness is a Full Professor in the Department of Visual Arts ("DVA"), CAM, at CU Denver. Professor Furness received her Master of Fine Arts ("MFA") in 2002. She became an Assistant Professor of Art at CU Denver in 2007. She was awarded tenure and became an Associate Professor of Art in 2014 and was promoted to Full Professor of Art in 2022. Professor Furness served as Chair of the Vice Chancellor's Advisory Committee during which she reviewed all CU Denver faculty dossiers for promotion and tenure. She has served as CU Denver's Program Director of Art Practices and as Associate Chair of Painting and Drawing, Art Practices and Illustration. In these roles she has advised students and developed curriculum for the DVA. She has numerous refereed exhibitions, publications, and presentations.

85. Professor Furness and male faculty in CAM DVA occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Despite this, Professor Furness is paid less than some of her male colleagues. For example, Professor Furness and a male Associate Professor in CAM both teach illustration and conduct creative research. However, Professor Furness receives a base salary approximately \$10,000 less than this individual who is of a lower rank and who has less seniority at CU Denver than Professor Furness. In addition, Professor Furness is paid approximately \$30,000 less than a male Senior Instructor in CAM DVA. Professor Furness and the male Senior Instructor have similar teaching loads and are held to similar job expectations. This individual also has a lower rank than Professor Furness and is not tenured. Professor Furness is also paid less than three male CAM Full Professors, as well as two other lower ranked male Associate Professors.

86. Dr. Erin Hauger is a Full Professor of Music, Music and Entertainment Industry Studies Department ("MEIS"), CAM. She also serves as the Chair of DVA, CAM. Dr. Hauger received her Doctor of Musical Arts in 2003. Dr. Hauger commenced her employment as a Lecturer with CU Denver in 2003. She was promoted to the position of Instructor in 2005, Assistant Professor in 2011, Associate Professor in 2018 and Full Professor in 2024. Dr. Hauger has received more than 50 national and international credits. Her student groups have won over 50 performance awards and have brought in substantial philanthropic dollars. Dr. Hauger has served on numerous committees including CAM Dean Search Committees, the CAM Bylaws Committee, the MEIS Chair Search Committee, CU Denver Faculty Senate, CU Denver Women's Issue Committees and others.

87. Dr. Hauger and male faculty in CAM MEIS occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and

responsibility. For example, Dr. Hauger teaches similar classes to her male colleagues and is held to similar expectations as her male colleagues with respect to service and research. In fact, Dr. Hauger's contributions in service and research exceed those of her male colleagues. Despite this, Dr. Hauger is paid less than some of her male colleagues. Dr. Hauger currently earns a base salary of \$93,668.21. By comparison a MEIS male Full Professor with less CU Denver seniority than Dr. Hauger currently earns \$104,214.83. Significantly, when Dr. Hauger was promoted Full Professor in the summer of 2024, she was paid a base salary of \$91,831.58 which was less than the \$95,790.00 that CU Denver paid this male comparator when he was promoted to Full Professor in 2023. This disparity existed even though both Dr. Hauger and this male comparator each had approximately seven years of prior experience as Associate and Assistant Professors at the time of their respective promotions to Full Professor. Dr. Hauger is also paid approximately \$10,000 to \$12,000 less on an annual basis than three MEIS male Full Professors, two of whom have less seniority than she does at CU Denver.

88. Carol Golemboski is a Full Professor of Photography in CU Denver's CAM DVA. She received her MFA in 1999, commenced her employment as Assistant Professor of Photography in 2002, received tenure and was promoted to the position of Associate Professor of Photography in 2009 and to the position of Full Professor of Photography in 2016. She served in various leadership roles within DVA for 18 years, including Area Head of Photography, Associate Chair of Shared Facilities, Program Director of Photography and Art Practices, and Program Director of Photography. Professor Golemboski has received national and regional credits for her numerous exhibitions, panels and presentations and receives extremely high FCQs for her teaching.

89. Professor Golemboski and male faculty in CAM DVA occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. For example, Professor Golemboski and her male colleagues teach CAM DVA classes. However, Professor Golemboski is required to perform more service and research than some of her male colleagues who have a lower rank but are paid more. Thus, Professor Golemboski earns approximately \$20,000 per year less than a Senior Instructor in CAM DVA who has a lower rank. This individual does not hold a tenure track position. She also earns thousands of dollars less than an Associate Professor in CAM DVA who was hired as an Assistant Professor the same year that Professor Golemboski was promoted to Associate Professor, and who performs substantially similar work.

## **6. College of Architecture and Planning.**

90. Lois Brink is a Full Professor, Landscape Architecture, in CU Denver's College of Architecture and Planning ("CAP"). Professor Brink commenced her employment at CU Denver in 1988. She became a tenured Associate Professor in 2006 and was promoted to Full Professor at CU Denver in 2010. Professor Brink previously served as the Chair of the Department of Landscape Architecture and head of the Colorado Center for Community Development ("CCCD"). She has received CU Denver's Dean's Mentoring Award. Professor Brink has dozens of refereed publications. She has received numerous significant grants. She consistently receives exceeding expectations performance evaluations.

91. Professor Brink and male faculty in the CAP, occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Professor Brink and male CAP faculty who earn more than she does teach

similar classes and perform similar service and research. Despite this, Professor Brink is paid less than some of her male colleagues. For example, Professor Brink earns approximately \$22,000 less per year than another former male Professor in the Department of Architecture who received his terminal degree approximately ten years after Professor Brink commenced her employment at CU Denver and who started at CU Denver in only 2019. Professor Brink also earns approximately \$5,000 less per year than another Professor in the Department who received his terminal degree the same year that Professor Brink commenced her employment at CU Denver and who started at CU Denver in 2005.

92. Julee Herdt is a Senior Professor of Architecture in the CAP. Professor Herdt received her terminal degree in 1989 and commenced her employment at CU Denver in 1993. She received tenure and was promoted to the position of Associate Professor in 2002 and to Full Professor in 2007. Professor Herdt was elected to and has served on the CU President's Council for Innovation and Entrepreneurship. She has multiple patents for her work as a Sustainable Building Material Inventor. She has received numerous grants and cooperative agreements for environmental architecture and green building material innovations and technologies. Her patents are the first architecture patents in CU history. She has served as Principal Investigator on numerous grants including with the United States Department of Defense, Army, Department of Energy, The United States Department of Agriculture ("USDA"), the State of Colorado, Health and Human Services Department and the Environmental Protection Agency ("EPA"). She is the longest serving Full Professor in the College of Architecture and Planning.

93. Professor Herdt and male faculty in the CAP occupy similar jobs and perform substantially similar work, regardless of job title, based upon a composite of skill, effort and responsibility. Professor Brink and male CAP faculty who earn more than she does teach similar classes and perform similar service and research. Thus, Professor Herdt is paid approximately \$12,000 less per year than another former male Professor in the Department of Architecture who received his terminal degree approximately ten years after Professor Herdt commenced her employment at CU Denver. This individual started at CU Denver twenty-five (25) years after Professor Herdt, in 2019.

### **C. CU Denver's Pattern and Practice of Paying Female Faculty Less than Male Faculty.**

#### **1. CU Denver's Equity Analysis.**

94. The Colorado Equal Pay for Equal Work Act ("CEPEWA"), C.R.S. §8-5-103, *et seq.*, was passed on May 22, 2019, and took effect on January 1, 2021. The CEPEWA provides that "an employer shall not discriminate between employees on the basis of sex...by paying an employee of one sex a wage rate less than the rate paid to an employee of a different sex for substantially similar work, regardless of job title, based on a composite of skill, effort...and responsibility." See C.R.S. § 8-5-102. The CEPEWA provides for remedies including up to six years of back pay commencing as of the date of any violation of the Act and liquidated damages for an amount equal to the actual unpaid wages. This statute provided much broader protections against unequal pay than any previous State or Federal Law.

95. Upon passage of the CEPEWA, the CU system's President and Board of Regents began discussing the requirements of the new law. As part of that planning process,

CU decided that each of its four campuses-CU Denver, the University of Colorado Boulder (“CU Boulder”), the University of Colorado Colorado Springs (“CU Springs”), and the University of Colorado Anschutz Medical Campus (“CU Anschutz”)-would conduct an equity analysis to determine what actions were required to come into compliance with the new law.

96. For example, the CU system decided to conduct an equity analysis at CU Boulder. The results of that analysis were made publicly available.

97. CU Boulder’s equity report revealed that at least 387 female faculty were underpaid relative to their male counterparts. In January 2022, CU Boulder increased the salaries of all 387 female faculty to match those of their male counterparts, although it did not agree to pay back pay to the female faculty until it was threatened with a class action lawsuit which it settled in 2024. In that settlement, CU Boulder agreed to pay the class \$4.5 million for their back pay losses. It also agreed to take steps to ensure that gender-based pay inequities did not arise in the future. Those steps included greater wage transparency and an agreement to conduct periodic equity reviews.

98. The results of the CU Denver equity analysis were published internally in early 2022. While CU Denver has refused to make its analysis publicly available on the grounds of privilege, based on information and belief, the analysis reflected widespread pay inequities among tenured and tenure track faculty based on gender. With knowledge of those inequities, CU Denver did not adjust the compensation of those who were adversely impacted by the new evidence of unequal pay and did not pay back pay.

99. Based on information and belief, even though CU Denver employs more non-tenure track faculty than it does tenured and tenure track employees, CU Denver did not include non-tenure track faculty in this or any other equity analysis. At the current time, CU Denver employs approximately 740 non-tenure track faculty, of which roughly 384 are female.

## **2. Provost Level Equity Analyses.**

100. The Provost at CU Denver is the Chief Academic Officer. The Provost, together with the Executive Vice Chancellor for Finance Administration, has the responsibility to maintain CU Denver’s budget. They are also the final decision makers with respect to faculty appeals asserting salary inequities based upon gender.

101. Beginning with the passage of the CEPEWA and continuing annually, CU Denver’s Provost office began conducting its own equity analyses entitled Faculty Salary Equity Analysis. Nonetheless, in these analyses, the Provost’s Office discovered that nearly 100 out of approximately 131 female tenure track faculty in any given year were paid less than one would expect because of their gender.

102. The methodology employed by CU Denver’s Provosts with respect to tenure track faculty was deeply flawed and appeared designed to underestimate the unequal pay problem. As just one of several examples, the analyses combine race and gender as one variable and uses “non-minority” men as the reference category. This approach creates a variable that measures gender and race as single factor, with white men, falling into one category and everyone else (white women, women of racial minorities, and men of racial minorities) being placed into a single “other” category. This approach does not allow for the

impact of gender and race on salary to be assessed separately.

103. Despite finding that CU Denver was not in compliance with the CEPEWA, CU Denver did not increase the salaries of the adversely impacted female faculty and did not pay them back pay.

104. Additionally, even though CU Denver employs more non-tenure track faculty than it does tenured and tenure track faculty, CU Denver has not included non-tenure track faculty in these analyses. Assuming that the gender-based pay inequities for the non-tenure track faculty are comparable to those found among tenured and tenure track, there are likely somewhere between 250 and 275 female non-tenure track faculty who have or currently are being paid less than a male counterpart because of gender. CU Denver has not acted to remedy these inequities.

### **3. Further Notice to CU Denver of Its Unequal Pay Problem.**

105. In numerous contexts, CU Denver and the Regents have received notice of its widespread pay disparities from its female faculty.

106. For example, leadership from CU Denver's Faculty Assembly has conducted numerous meetings about unequal pay issues. CU Denver counsel attended many of the meetings and also communicated with the group's leadership about these matters. In these meetings, CU Denver was notified that it had a widespread problem of paying female faculty less than male faculty. Additionally, during those meetings, the Faculty Assembly proposed that CU Denver adopt the transparency and periodic equity review policies implemented by CU Boulder in order to help remedy and prevent inequities. CU Denver refused to do so.

107. Additionally, dozens of female faculty have filed equity grievances alleging specific instances of unequal pay. While the grievances were initially filed with Department Chairs, leadership at the top levels of CU Denver and at the system level were involved in responding to the grievances. The Provost was the final decision-maker. Irrespective of the merits of the grievances, all or almost all of the grievances were denied. Many have simply been ignored. A handful received small pay increases with the Provost stating reasons for the increases other than gender inequities. No female faculty member received back pay for previous losses.

108. Even though CU Denver's counsel was involved in responding to the grievances, the grievances were denied in part based upon rationales not permitted by the new law such as market rate at the time of hiring.

109. In 2025, counsel for CU Denver informed numerous female faculty that CU Denver would not pay back pay to any faculty in response to an equity issue or grievance unless or until CU Denver is sued for violating the law.

110. Since the passage of the CEPEWA and the resulting increased attention to equity issues, numerous CU Denver leaders, including at the Dean level, have acknowledged widespread gender-based pay inequity issues at CU Denver and the system's failure to meaningfully address those issues.

## V. CLASS ALLEGATIONS.

111. Plaintiffs bring their claim for violation of the CEPEWA on behalf of themselves and members of the following proposed class of similarly situated individuals:

All CU Denver Faculty Members (including Full Professors, Associate Professors, Assistant Professors, Teaching Faculty, Instructors, Senior Instructors, and Clinical Faculty) employed by CU Denver who, from January 1, 2021, through the present, identified as female and were paid less than similarly situated male faculty.

112. Plaintiffs have met the prerequisites for class action certification under Colo. R. Civ. P. 23 as follows:

a. The proposed Class is numerous and ascertainable. The proposed class includes approximately 350-375 female faculty members of CU Denver and therefore joinder of all individual female faculty members would be impractical.

b. This action involves questions of law and fact common to the class, including, but not limited to:

- i. whether salary equity decisions at CU Denver were made by a centralized body of decision-makers;
- ii. whether statistical evidence demonstrates a pattern and practice of unequal pay for females at CU Denver;
- iii. whether a centralized body of decision-makers, including CU Denver's leadership and/or system level administrators, made the decision to bring CU Denver into compliance with the CEPEWA and initiated equity reviews in order to determine whether CU Denver had engaged in pay discrimination against any and all female faculty;
- iv. whether the equity reviews found that each member of the class had been paid less than male counterparts within their respective Academic Units;
- v. whether the equity reviews established that non-discriminatory factors cannot explain the pay disparities;
- vi. whether CU Denver and system level leadership failed to rectify known unequal pay for female faculty;
- vii. whether CU Denver's decision not to rectify unequal pay for female faculty who it had determined were underpaid under the CEPEWA was made in good faith for the determination of liquidated damages under the CEPEWA; and

viii. Whether leadership at CU Denver and the system level decided that no back pay would be awarded to any female faculty who had been subjected to pay inequity unless a lawsuit was brought.

c. The Plaintiffs' claims are typical of Class members' claims because they are female faculty who were employed by CU Denver and were paid less than male employees with similar jobs and for substantially similar work.

d. The Plaintiffs are able to fairly and adequately protect the interests of all members of the class because it is in Plaintiff's best interests to prosecute the claims alleged herein to obtain full compensation due to the Class for all work performed and to obtain injunctive relief to protect the class from violations of the CEPEWA going forward. Plaintiffs have selected counsel who have the requisite ability and resources to prosecute this case as a class action and are experienced labor and employment lawyers who have successfully litigated other cases involving similar issues, including in class and collective actions.

113. This lawsuit is properly maintained as a class action under Colo. R. Civ. P 23 (b)(2) because CU Denver has implemented an unlawful wage rate scheme that is generally applicable to the class, making it appropriate to issue final injunctive and corresponding declaratory relief with respect to the class as a whole as a prelude to monetary relief.

114. This lawsuit is also properly maintained as a class action under Colo. R. Civ. P 23 (b)(3) because it presents common questions of law and fact that predominate over any questions affecting only individual members of the class. For all these and other reasons, a class action is superior to other available members for the fair and efficient adjudication of the controversy set forth herein.

115. This lawsuit is also properly maintained as a hybrid in which there is (1) a 23(b)(2) class, including all of the putative class members, that seeks declaratory relief that CU Denver willfully violated the CEPEWA; (2) a 23(b)(3) class, including all of the putative class members, that seeks individual monetary relief, based on a declaratory finding for the 23(b)(2) class that CU Denver willfully failed to provide backpay to the putative class members.

116. Alternatively, this suit may also be brought as a Rule 23(b)(2) class that is bifurcated into a class liability phase and an individual remedy phase pursuant to *Int'l Bhd. of Teamsters v. United States*, 431 U.S. 324, 97 S. Ct. 1843 (1977).

## **VI. CLAIM FOR RELIEF**

### **Unlawful Pay Discrimination in Violation of The Colorado Equal Pay For Equal Work Act C.R.S. § 8-5-101 *Et. Seq.***

**(Brought by all Plaintiffs on Behalf of Themselves and the Plaintiff Class)**

117. Plaintiffs hereby re-allege and reincorporate by reference each and every allegation as if fully set forth herein.

118. At all times, CU Denver was a qualified "employer" under the CEPEWA because "employer" under the statute means the state of Colorado or any political subdivision, commission, department, institution, or school district thereof, and every other

person employing a person in the state.

119. At all times, Plaintiffs and all Class Members were “employees” under the CEPEWA because they were employed by CU Denver.

120. At all times, Plaintiffs and all Class Members were female or identified as female as their gender identity.

121. Defendant has violated the CEPEWA by refusing to pay the individually named Plaintiffs and the potential class at the same level as male faculty for substantially similar work.

122. Plaintiffs and all Class Members are entitled to declaratory relief that CU Denver violated the CEPEWA by not providing pay increases and backpay to Plaintiffs and all Class Members.

123. Plaintiffs and all Class Members are entitled to declaratory relief that CU’s decision to not provide pay increases and backpay to Plaintiffs and all Class Members was not in good faith and that CU Denver lacked reasonable grounds for believing that not providing backpay and pay increases would not violate C.R.S. § 8-5-102(1).

124. Plaintiffs and all Class Members are entitled to all available statutory remedies including legal and equitable relief, which may include employment, reinstatement, promotion, pay increase, payment of lost wage rates, liquidated damages; and reasonable costs including attorney fees.

WHEREFORE, Plaintiffs, on behalf of themselves and all others similarly situated, respectfully request that this Court enter judgment in their favor and against the Defendant and award them the following:

- a) Injunctive and declaratory relief;
- b) All equitable and legal relief allowed by law;
- c) All lost wages and benefits, including all back pay damages;
- d) Pay increases or front pay;
- e) All lost retirement benefits;
- f) Liquidated Damages as allowed for by law;
- g) Attorney’s fees and costs as provided for by law;
- h) Pre- and Post- Judgment Interest, costs and expert witness fees; and
- i) Any and other such relief as this Court deems just and proper.

**PLAINTIFFS REQUEST A TRIAL BY JURY ON ALL ISSUES SO TRIABLE.**

Respectfully submitted this 9th day of January 2026.

**BENEZRA & CULVER, P.C.**

/s/ **Seth J. Benezra**  
Seth J. Benezra, Esq.  
John A. Culver, Esq.  
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*Attorneys for Plaintiffs*