

# Boulder COUNTY

## BAR ASSOCIATION

## OCTOBER SIDE BAR

Please join us for the Side Bar presentation **Current Trends in the Regulation of the Provision of Legal Services to Increase Access to Justice**, presented by Colorado Supreme Court Justice Melissa Hart.

In the past several years, a growing number of states has started to explore reforms to the regulation of the legal profession. These states – Utah, California, Arizona, Oregon, Illinois, Minnesota, and many others – are primarily looking at changes that would permit licensed paraprofessionals to provide legal advice in limited contexts and shift the focus of regulation away from regulation of lawyers and toward regulation of the services being provided. This presentation will outline some of the proposals being considered in other states and then describe what is under consideration in Colorado.

This Side Bar will be capped at 22 in-person attendees. We ask that if you come in person, you are fully vaccinated and agree to wear a mask during the presentation. Following the presentation, a happy hour will be held on the front patio, with masks optional.

This presentation will be held in person at the BCBA Office from 4:00 - 5:00 pm, followed by a networking and social hour with appetizers, wine and beer included. If you are unable to attend in person, the recording will be available as a home study CLE offering by the following afternoon through the BCBA website.

**New chapter  
for the BCBF  
Page 3**

**[Please click here to register](#)**

## IN THIS ISSUE

CALENDAR OF EVENTS 2

BOULDER COUNTY BAR FOUNDATION 3

PRESIDENTS PAGE 4-5

NEW BCBA MEMBERS 5

BCBA SEPTEMBER IN PHOTOS 6-7

BUSINESS LAW ARTICLE 8-10

PROFESSIONALISM & PRO BONO 11

CLASSIFIEDS 12



# CALENDAR OF EVENTS

**Wednesday, October 6**

**Bagels with the Bar**

8:00 - 10:00 AM @ BCBA Office (3269 28th St.)

Free for BCBA Members

**Wednesday, October 13**

**Bagels with the Bar**

8:00 - 10:00 AM @ BCBA Office (3269 28th St.)

Free for BCBA Members

**Thursday, October 14**

**Side Bar CLE: Current Trends in Regulatory and Court Reform to Increase Civil Access to Justice**

**Presented by Justice Melissa Hart**

4:00 - 6:00 PM CLE @ BCBA Office (3269 28th St.)

\$25 CLE & Happy Hour | \$15 New/Young Lawyer | \$10 No CLE

[Please click here to register](#)

**Wednesday, October 20**

**Bagels with the Bar**

8:00 - 10:00 AM @ BCBA Office (3269 28th St.)

Free for BCBA Members

**Wednesday, October 27**

**Bagels with the Bar**

8:00 - 10:00 AM @ BCBA Office (3269 28th St.)

Free for BCBA Members

**Wednesday, October 27**

**Family Law: Extreme Risk Protection Orders**

**Presented by Evan Branigan**

12:00 - 1:00 PM @ BCBA Office (3269 28th St.)

\$25 CLE | \$15 New/Young Lawyer | \$10 No CLE

[Please click here to register](#)

**Thursday, October 28**

**BCBF Virtual Musical Bingo**

5:00 - 6:15 PM @ BCBF Zoom Meeting Room

\$25 Contribution

Please click here to register

**Wednesday, November 3**

**Bagels with the Bar**

8:00 - 10:00 AM @ BCBA Office (3269 28th St.)

Free for BCBA Members

**Wednesday, November 3**

**Criminal Law: On Felony DUI and DUID**

**Presented by Abe Hutt**

12:00 - 1:00 PM CLE @ BCBA Office (3269 28th St.)

\$25 CLE | \$15 New/Young Lawyer | \$10 No CLE

[Please click here to register](#)

**Wednesday, November 10**

**Bagels with the Bar**

8:00 - 10:00 AM @ BCBA Office (3269 28th St.)

Free for BCBA Members



**David  
Driscoll**

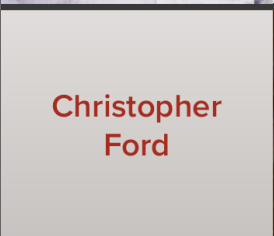


**Kimberly  
Hult**

**HutchinsonBlackandCookLLC**

Attorneys at Law

921 Walnut, Suite 200  
Boulder, Colorado



**Christopher  
Ford**



**Glen  
Gordon**

## PERSONAL INJURY & WRONGFUL DEATH

Our team has a long-history of successfully representing those who have been severely impacted by someone else's negligence.

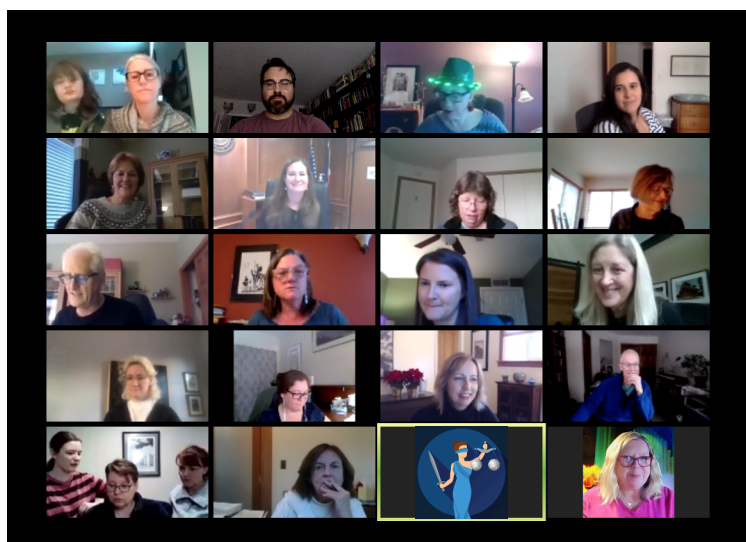
- An average of more than 25 years' experience
- Impressive history of verdicts and settlements
- Highly experienced litigators
- Recognized by *Super Lawyers* and *Best Lawyers*

CALL OUR OFFICE AT 303-442-6514 TO TELL US MORE ABOUT YOUR SITUATION

# EVOLUTION OF BOULDER BAR FOUNDATION

We are pleased to announce that the Boulder County Bar Foundation Board and the BCBA Board have executed an agreement that will streamline governance and fiduciary management of our Foundation. This agreement merges both organization's Boards of Directors and simplifies the Foundation's operations, fundraising, and grant awards. The future of the Foundation is bright, and we hope you will renew your engagement as we transition to an event and campaign focused giving strategy. We want to thank the hundreds of Fellows who have supported the Foundation over the years, and we invite all BCBA members to join our effort to champion social justice, train the next generation of attorneys, and provide legal access for all. For more details and to get involved with the Foundation, please [click here](#).

## VIRTUAL MUSICAL BINGO FUNDRAISER



Please join us for Virtual Musical Bingo! This is a fun event with great prizes to help get you reacquainted with some fantastic music from the 60's, 70's and 80's.

Each player gets a virtual bingo card with the numbers replaced by song titles and artist names. Our virtual host plays the music and players rush to identify it on their cards. The first player to complete a straight line gets bingo. We will then play for double bingo and blackout. Prizes will be awarded for each level.

Join us for some laughs while hearing about the worthy causes that the foundation supports.

**Thursday, October 28**

**5:00 - 6:15 pm via Zoom**

**\$25 Contribution to benefit Boulder County Bar Foundation**

**[Click here to register](#)**



# PRESIDENT'S PAGE

## BRETT LANDIS

The past 18 months have wreaked an incredible transformation on American society. The cost in human lives is innumerable, but there are more tangible financial losses, as well. 114 million jobs were lost in 2020. The average American household is \$145,000 in debt. 19 million families reported lacking enough food in the week of September 4-13, 2021. With these losses, our low-income population has dramatically increased as has the need for legal services to low-income people.

At Boulder County Legal Services, and across the state at Colorado Legal Services, we have seen an increase in demand in every area of law where we serve our low-income and senior clients.

Housing has been a major concern since the start of the pandemic, and, rightfully, a significant amount of attention and resources has been directed towards eviction defense, housing retention, and rental assistance. That being said, attorneys in this field have worked to stay atop an every-changing landscape of landlord-tenant laws and executive orders. Much credit goes towards the County's Housing Helpline (providing rental assistance), City of Boulder's and City of Longmont's community mediation programs (working with landlords and tenants to resolve cases without an eviction), and the City of Boulder and Bridge to Justice (for their work providing eviction defense as part of the No Eviction Without Representation ordinance). All this work has done much to prevent a major eviction crisis in our community. However, the need for continued resources and support remains high, especially as federal and state protections against eviction expire.

As a corollary to the housing crisis, we may also see a consumer debt crisis soon. As the costs of goods and services increase, people are relying more and more on credit cards to make ends meet. Additionally, the pandemic interrupted many people's health insurance at the same time medical care became more critical. Consumers are facing debt at a much



higher rate than ever before and seeking help from the legal community.

Our safety net has also been tested in a way it has never been before. While I am proud of the way our state and county governments have responded to this crisis, I also recognize that the workload for our state and county workers to administer the benefits families and individuals need to survive has increased dramatically. Particularly, our state Department of Labor and Employment saw a dramatic increase in unemployment benefits claims.

Finally, the cumulative effect of stay-at-home orders, fewer opportunities for official and bystander interventions, and a community mental health crisis has led to an increase in family separations, and an increase in the severity of conflict in those families. October is Domestic Violence Awareness Month, and it behooves us to think about the increased need survivors of domestic violence have for legal support in protection order, divorce, and custody cases. I have spoken to several private family law practitioners, and all confirm that there has been a general increase in demand for their services and an increase in the complexity of their cases.



# PRESIDENT'S PAGE CONTINUED

All of this leads to an increased need for civil legal services, not just now, but in the next year or two as we continue to see the after-effects of the Covid 19 pandemic in our community. While the BCLS staff and volunteers continue to serve clients and the BCBA started our innovative Virtual Free Legal Clinics (staffed by some wonderful attorney volunteers) to cover the need for legal advice, the demand for civil legal services is greater than the resources available.

On September 13, 2021, I was incredibly honored to attend our 2021 Pro Bono Luncheon-ette to honor the people who had generously donated their time, expertise, and hearts to serving low-income clients' needs. As always, it was an inspiring event (if toned-down to suit the present public health needs), but I was also stuck by what a small group we were compared to prior years. The honorees included attorneys I have grown to respect and admire over the past several years, but I was also struck by the losses in our number. Some of our prior attorneys and non-attorney volunteers had stepped back due to health concerns and retirement. We even lost some very special volunteers to death in the past year and a half. However, at a time when the need is greatest, we have not seen new pro bono volunteers fill the ranks of the people we've lost.

I understand the reasons why it is difficult for many attorneys to tackle a pro bono case. New Lawyers are graduating with significantly more student loan debt

than prior generations of attorneys. The average new lawyer graduates \$160,000 in debt. The old model of large firms paying new lawyers six-figure salaries died several years ago during the last economic recession, and the current job market is far less stable.

Additionally, as our world has gotten more complex, the cases demanding pro bono services have been more complex and the clients who are suffering from the collective trauma of our moment in history and the individual trauma of their legal case can be challenging to work with and help. That being said, the need and value of the experience of taking on a pro bono case has only become greater. We are unique in that our profession specifically states a duty to provide pro bono service in Colorado Rule of Professional Conduct Rule 6.1. It states, "Every lawyer has a professional responsibility to provide legal services to those unable to pay." While this is an aspirational goal, it is an important one, and it sets us, as a profession, apart from other types of work. It is why we, as lawyers, are special. Our training, our expertise, our brains. These exist to serve causes greater than ourselves. They exist to serve our community.

October, in addition to being Domestic Violence Awareness Month, is also Pro Bono Month. Please take this time to consider taking a case, serving a low-income or senior member of our community. I'll even make it easy for you! Contact Kellie Cuevas at BCLS at 303-449-2197 to get started!

## WELCOME NEW BCBA MEMBERS

Mary Slosson  
Reilly Meyer  
Madeline Curry  
Haley Roe Van Broekhoven  
Austin Baxter  
Logan DeSouza  
Jessie Goldfarb  
Joseph Middleton  
Lauren Brown  
Malia Eastman

Robbie Morrison  
Anthony D Wojciechowsky  
Peter Selimos  
Richard F Phillips  
Laura McClure  
Shay Moon  
Lauren Davis  
Stuart L Crenshaw  
Nicholas L DeBruyne  
Nasrah Alfahmi

# BCBA SEPTEMBER EVENTS



BCBA HAPPY HOUR FOLLOWING THE SEPTBMER 9 SIDE BAR



BCBA HAPPY HOUR FOLLOWING THE SEPTBMER 9 SIDE BAR

## Keating Wagner Polidori Free

TRIAL ADVOCATES. PLAINTIFF FOCUSED.

1290 Broadway, Suite 600 Denver, CO 80203 | (303) 534-0401 | [keatingwagner.com](http://keatingwagner.com)



Randy Barnhart



Laurence Free



Aaron Goldhamer



Christina Habas



Melissa Hailey



Michael Keating



Deirdre Ostrowski



Ross Pulkrebek



Lidiana Rios



Melissa Sullivan



Bradley Unkeless



Robert Wagner



Daniel Wartell



Zachary Warzel

PERSONAL INJURY. WORKERS' COMPENSATION. BUSINESS LITIGATION. INSURANCE DISPUTES.



# BCBA SEPTEMBER EVENTS



**BCLS LUNCHEON IN THE BCBA OFFICE**



**BAGELS WITH THE BAR**

Our office, yours, or video?

Accord  
**ADR**  
Group

Mediation • Arbitration • Facilitation

303-530-2137

[mediatelaw.com](http://mediatelaw.com)

BOULDER • DENVER • STATEWIDE



GUNNING

CLYMER

MCQUISTON



# HEADS UP! THE UCC APPLIES TO CONTRACTS SECURING NEGOTIABLE INSTRUMENTS

## KAREN A. HAMMER, ESQ., LL.M., HAMMER-LAW

Remember December 2019? That was the month we initially identified as the beginning of the COVID-19 pandemic.

On December 26, 2019, the Colorado Court of Appeals issued a decision that on the surface merely extended the statute of limitations for secured negotiable instruments by applying the Uniform Commercial Code ("UCC"). *Gunderson v. Weidner*, 463 P.3d 315 (Colo.App. 2019) (*cert. denied*, May 4, 2020, 2020SC103). *Gunderson* has far-reaching effects on lawyers handling transactions or litigation involving negotiable instruments, especially today.

How so? After *Gunderson* and the Colorado Supreme Court's denial of certiorari (*id.*), the medical pandemic has spawned a secondary economic epidemic: commercial and consumer borrowers fell behind on debt. And some of these missed payments relate to mortgages and other secured debt. Experts suggest that attempts to collect on this debt will hit court dockets soon.

So this is a great time for lawyers and their clients (whether consumer or commercial) to be thinking about how the UCC may be applied generally to all types of secured negotiable instruments. If you're asking, what's a "negotiable instrument?" I refer you back to the UCC for a question well beyond the scope of this article. Here, we assume that the promissory note on which the payor is deficient is a negotiable instrument.

### A. *Gunderson*: the UCC statute of limitations applies to foreclosure on delinquent negotiable instruments.

In *Gunderson*, the loan was payable on demand and did not require monthly installment payments. The debtor argued the general six-year statute of limitations (C.R.S. §13-80-103.5(a)) applied, preventing



foreclosure. The creditor argued that the ten-year UCC limitations for payable-on-demand negotiable instruments (C.R.S. § 4-3-118(b)) applied, permitting foreclosure.

The Court of Appeals applied the longer UCC period. At first blush, a longer statute of limitations period appears to be a great result for creditors (and bad result for debtors) because it extended the effective collections period. Creditors could celebrate, consumers groan.

But not so fast...

### B. Context Matters.

*Gunderson* issued after the Supreme Court explicitly acknowledged that it would not yet "reach the question of whether a deed of trust is a negotiable instrument under Article 3." *Liberty Mortg. v. Fiscus*, 379 P.3d 278, 283 (Colo. 2016) ("we need not and do not"). The debtor's cert petition offered the Supreme Court a more recent opportunity to address the issue presented directly in *Gunderson*. The Court declined.

That leaves *Gunderson* as legal authority that applies the UCC to contracts **securing** negotiable instruments.

# CONTRACTS CONTINUED

## C. Why Gunderson matters.

While some negotiable instruments are payable-on-demand, many involve standard monthly installments. While the UCC limitations for on-demand negotiable instruments is ten years (four years longer than the general limitation period otherwise applicable to the secured aspects of loans), the period for “enforcing” accelerated monthly-installment negotiable instruments is six years (the same as the general limitations period). *C.R.S. §4-3-118(a)*.

But here’s the rub. A lawsuit to collect on a note enforces the note, but a suit to foreclose on a secured asset is a separate type of action. They are both forms of debt collection, but different types. *Obduskey v. McCarthy & Holthus LLP*, 139 S. Ct. 1029, 1036 (2019) (“foreclosure *is* a means of collecting a debt”) (*emphasis added*). Foreclosure doesn’t seek a judgment forcing the debtor to pay, it seeks sale of the security for the note. *Id.*

The six-year UCC statute of limitations only applies to “action[s] to enforce the obligation...to **pay** a note.” *C.R.S. §4-3-118(a)* (*emphasis added*). Originally, negotiable instruments could not contain any conditions qualifying the obligation to pay or the right to collect or additional promises. Samuel Williston, *Negotiable Instruments*, American Institute of Banking (1915) §29 at 28. Colorado adopted the UCC in 1897, and eventually amended it to permit certain supplemental obligations as an exception that doesn’t defeat negotiability. *C.R.S. §4-3-117* (“the obligation of a party to an instrument to pay the instrument may be...supplemented...by a separate agreement of the obligor and a person entitled to enforce the instrument, if the instrument is issued or the obligation is incurred in reliance on the agreement or as part of the same transaction giving rise to the agreement”). Thus, Section 4-3-117 created a new type of negotiable instrument that didn’t previously exist.

Why does this matter? The UCC has a special, shorter limitations period for actions “to enforce an

obligation, duty, or right arising under this article” that don’t otherwise fit within any of the other specific UCC limitations periods. *C.R.S. §4-3-118(g)(iii)*. That period is three years (a one-half reduction).

Negotiability is an essential element in the world of finance – it’s the grease for the wheel that permits a viable market for the resale of loans (again, a larger topic than can be addressed here). Among types of negotiable instruments, secured-loans are more valuable than unsecured loans. **Secured** negotiable instruments allow lenders to bundle together **mortgage**-backed loans for different debtors into a trust that sells shares to more than one investor (securitization). Without 4-3-117 (and its uniform equivalent in other states), “asset-backed” investments would not have achieved the star status that became publicized during the residential mortgage crisis. But the asset-backed market is much broader than consumer debt, and has strongly relied on commercial loans.

The natural and logical application of *Gunderson* includes the broader holding that significant aspects of the UCC apply to the rights and obligations from contracts intertwined with negotiable instruments. For example, the UCC requires that a debtor is entitled to present certain defenses in any action to enforce negotiable instruments (and now to enforce intertwined supplemental obligations). *E.g.*, *C.R.S. §4-3-305* (“the right to enforce the obligation of a party to pay an instrument is subject to the following” defenses); *§4-1-103(b)* (“Unless displaced by the particular provisions of this title, the principles of law and equity, including the law merchant and the law relative to capacity to contract, principal and agent, estoppel, fraud, misrepresentation, duress, coercion, mistake, bankruptcy, or other validating or invalidating cause shall supplement its provisions”).

One essential aspect of the *Gunderson* holding was a reminder of the important common law principle of statutory interpretation—a specialized statute prevails over a generalized one. Thus, when the special UCC provisions that apply to negotiable

# CONTRACTS CONTINUED

instruments conflict with a statute that doesn't explicitly apply to negotiable instruments, the UCC controls. The UCC was carefully drafted to prevent implied repeal by subsequent legislation that does not directly state its intention to repeal or revise the UCC. *C.R.S. §4-1-104* ("no part of it shall be deemed to be impliedly repealed by subsequent legislation if such construction can reasonably be avoided").

*Gunderson* even has broad implications in the context of abbreviated residential foreclosures under the public trustee system and C.R.C.P. 120. For example, by statute a person who is the "holder of the evidence of debt" may file a notice of election and demand ("NED") that the public trustee sell a property after an abbreviated foreclosure under Rule 120. *C.R.S. §38-38-101(1)*. Rule 120 only permits the person "entitled to enforce" the debt to obtain an order authorizing a public trustee foreclosure sale. *Rule 120(a)*. Thus, Rule 120 was revised in 2018 to explicitly require that real party in interest issues be examined in these abbreviated foreclosures, but common law had already expanded to require this result. *Goodwin v. District Court*, 779 P.2d 837, 843 (Colo. 1989).

The substantive law question of who is "entitled to enforce" a negotiable instrument (and thus entitled to file a Rule 120 motion for foreclosure relating to a negotiable instrument) can only be answered under the UCC (as confirmed by *Gunderson* but not originating with *Gunderson*). The UCC determines whether a default under a negotiable instrument exists that triggers the right to foreclose on the property securing the loan. *See, e.g., C.R.S. § 4-3-305; C.R.S. §4-3-201(b)* ("if an instrument is payable to an identified person, negotiation requires transfer of possession of the instrument and its indorsement by the holder" and only proper "negotiation" results in the benefits of a negotiable instrument). Thus, a person who qualifies to file an NED is not automatically qualified to seek a Rule 120 order authorizing sale in foreclosure relating to a **negotiable** instrument.

The UCC requires a higher burden of proof for contracts securing **negotiable** instruments than that permitted under Rule 120 (which makes no distinction between negotiable and non-negotiable instruments). *C.R.S. § 4-1-201(b)(8)* (the "existence of the fact is more probable than its nonexistence"); *Rule 120(d)(1)* ("reasonable probability" standard). This is important because *Gunderson* applies the UCC to contracts securing negotiable instruments, so the UCC's higher burden of proof applies to claims under such contracts. This conclusion is already supported by controlling legal authority in Colorado. Here, statutory **substantive** law (such as burden of proof standards) takes priority over the Court's own **procedural** rules (such as Rule 120). *People v. Hoskin*, 380 P.3d 130, 136 (Colo. 2016) ("the overall burden necessary to prove a civil claim is a matter of public policy," which is set by the General Assembly") (citing *Borer v. Lewis*, 91 P.3d 375, 380 (Colo. 2004)).

## D. CONCLUSION

After *Gunderson*, business lawyers (whether transactional lawyers or litigators of business issues) should keep in mind that their prior assumptions about which statutes and other bodies of law apply may no longer be accurate. Colorado Rule of Professional Conduct 1.1 requires that lawyers be familiar with controlling legal authority as a matter of competence, regardless of whether the law evolves to require new perspectives.

Karen Hammer of Hammer-Law is the Co-Chair of the Boulder County Bar Association's Business Section and the former Chair of the Real Estate, Housing, and Land Use Section of the District of Columbia Bar Association. She is the Chair of the Colorado Bar Association's Ethics Hotline subcommittee, and Co-Secretary of the CBA Ethics Committee. Hammer is an appointee to the Hearing Board for the Office of the Presiding Disciplinary Judge. She served on the Supreme Court's Proactive Management Based Program subcommittee that developed the Lawyer Self-Assessment program for the Office of Attorney Regulation Counsel. Hammer is an approved CLE provider, writing and speaking on a variety of topics including business law, ethics, and professionalism.



## PROFESSIONALISM ON CALL

October 4	Meghan Pound	303.443.8010
October 11	Tom Rodriguez	303.604.6030
October 18	Karl Kumli	303.447.1375
October 25	Trip DeMuth	303.447.7775

The Professionalism Committee assists lawyers, clients, and other members of the community with questions or complaints about behavior by lawyers that fails to meet generally accepted standards of professionalism and courtesy, or that is contrary to the BCBA Principles of Professionalism.

The Professionalism Committee does not address allegations of criminal or ethical violations by lawyers, as regulated by the Colorado Rules of Professional Conduct, and any such violations should be addressed to the Office of Attorney Regulation Counsel.

## BOULDER COUNTY FREE LEGAL CLINIC

The Boulder County Free Legal Clinics have been replaced with our Virtual Legal Clinic until further notice.

## THANKS TO OUR VOLUNTEERS

The BCBA Virtual Legal Clinic remains ongoing and has served over 30 people to date. Thank you to the attorneys who serve as volunteers:

Dan Droege	Amy Stengel	Beth Kelley
Jennifer Huston	Laura Herndon	Dipak Patel
Sherri Murgallis	Maki Iatridis	Lindsey Killion
Craig Small	K.C. Cunilio	Karen Burns
Scott Hamerslough	Fern O'Brien	Susan Spaulding
Starla Doyal	George Farmer	Chris Lane
Jeff Skovron	TJ Willard	Connie Eyester
Lila Sol	David Harrison	Beth Montague
Georgiana Scott	Ann England	Kurt Hofgard

## PRO BONO REFERRALS

Three cases were referred in the month of July Thank you to the following attorneys:

**Rick Romeo**  
**Shirin Chahal**  
**Graham Fuller**  
**Lila Sol**  
**Kurt Hofgard**  
**Rick Samson**

## PRO SE VOLUNTEERS

There were four Pro Se Clinics held, thanks to the help of the following attorneys:

**Kathleen Franco**  
**Josh Anderson**  
**Chris Jeffers**  
**John Hoelle**

## PRO BONO CORNER

Interested in a Pro Bono case? Please call Kellie at 303-449-2197. CLE credits available for pro bono service.

# CLASSIFIED ADS

**Seeking attorney in Professional Liability, Commercial Litigation & Insurance Bad Faith.** Gordon Rees Scully Mansukhani, a national law firm, has immediate needs for attorneys in its Denver office. The ideal candidates will possess 3 years or more of experience in professional liability, commercial litigation, or first party bad faith/coverage. Candidates should have experience with litigation involving insurance agents/brokers, insurance companies, financial professionals, attorneys, businesses, and business owners. Click here for more information. Colorado Bar licensure is required. For consideration, please email your resume and writing sample to [taustin@grsm.com](mailto:taustin@grsm.com).

**Office Space Available.** Nice office on main floor of historic building in Boulder near downtown. Would fit a single lawyer, but may be space for staff if wanted. Off street parking, copier/scanner/fax, in a building with several other lawyers. Contact Dave Harrison –[dave@millerandharrison.com](mailto:dave@millerandharrison.com), 303-449-2830.

**Seeking attorney in Health Care Defense and Professional Liability.** Gordon Rees Scully Mansukhani, a national law firm, has immediate need for an attorney in its Denver office to join its Health Care and Professional Liability Defense team. The ideal candidate will possess three years or more of experience in litigation. Experience in health care defense and professional liability defense is preferred. Click here for more information. Colorado Bar licensure is required. For consideration, please email your resume and writing sample to [taustin@grsm.com](mailto:taustin@grsm.com).

**Litigation Attorney Needed.** Part-time, contract-based. Litigation experience a must. Small, growing practice based in Boulder focuses on construction defect and outdoor recreation litigation, in addition to insurance coverage. For consideration, please submit a resume and legal writing sample to [jennifer@arnettlawyers.com](mailto:jennifer@arnettlawyers.com).



We are updating group participation in BCBA Law Section Groups, and will use your choices to add or remove groups to your BCBA membership profile. Section membership is free, so please join as many sections as you like. We regularly send targeted e-blasts about CLE programs and other news to specific groups, and this will assist us in keeping you up-to-date on group activities.

**Please click here to update your BCBA Group Preferences**

# BoulderCOUNTRY

## BAR ASSOCIATION

THE BCBA NEWSLETTER IS A MONTHLY ELECTRONIC PUBLICATION BY THE BOULDER COUNTY BAR ASSOCIATION. ARTICLES BY GUEST LAWYERS MAY NOT BE REPRODUCED WITHOUT PERMISSION FROM THE BOULDER COUNTY BAR ASSOCIATION OR THE AUTHORS.

COMMERCIAL ADVERTISING INFORMATION IS AVAILABLE BY CONTACTING  
[laura@boulder-bar.org](mailto:laura@boulder-bar.org)  
OR THE BAR'S WEBSITE  
[www.boulder-bar.org](http://www.boulder-bar.org)



**LAWPAY**  
CREDIT CARD PROCESSING

PAYMENT PROCESSING,  
EXCLUSIVELY  
FOR ATTORNEYS.

BOULDER COUNTY BAR ASSOCIATION  
Proud Member Benefit Provider

1.95% per transaction | No swipe required | No equipment needed

[www.LawPay.com/bcba](http://www.LawPay.com/bcba) | 866.376.0950

AffinityPay is a registered ISO/MSP of BMO Harris Bank, N.A., Chicago, IL