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| ARAPAHOE COUNTY DISTRICT COURT STATE OF COLORADO  Court Address:  7325 South Potomac Street Centennial, Colorado 80112  **Plaintiff(s):**  **Defendant(s):**  *Attorneys for Plaintiff*  ADDRESS:  Phone Number:  Fax Number: | DATE FILED: August 23, 2018 5:56 PM  FILING ID: CDoFu82rt3DU2sDe3O59n7ly2  CASE NUMBER: 2018CV32021  Case Number:  Division/ Courtroom: |
| **COMPLAINT FOR DECLARATORY ORDER CONFIRMING ARBITRATION AWARD AND REDUCING AWARD TO JUDGMENT PURSUANT TO C.R.S. § 13-22- 222(1) AND C.R.S. § 13-22-225(1)** | |

**COMES NOW**, the Plaintiff, High Impact, Inc., by and through its attorneys, Anderson Hemmat, LLC, and for its Complaint for Order Confirming Arbitration Award and Reducing Award to Judgment Pursuant to C.R.S. § 13-22-222(1) and C.R.S. § 13-22-225(1), states and alleges as follows:

1. High Impact, Inc. is a for profit corporation organized under the laws of the State of Colorado with a principal office located at 8008 East Arapahoe Court, Suite 200, Centennial, Colorado.
2. Defendant Eldridge Suggs, IV is a resident and domiciliary of the County of Fulton, State of Georgia with a business address of 3500 Lenox Road, Suite 1500, Atlanta, Georgia 30326.
3. Defendant The Suggs Law Firm, P.C., is a for profit corporation organized under the laws of the State of Georgia with a principal office located at 3500 Lenox Road, Suite 1500, Atlanta, Georgia 30326.
4. Pursuant to C.R.C.P. 98(c)(1), venue is proper in Arapahoe County, State of Colorado, because venue is proper in any county designated in this Complaint where, as here, Defendants are nonresidents of the state of Colorado
5. This Court has jurisdiction over this Complaint for Declaratory Judgment pursuant to C.R.S. § 13-51-101, *et. seq.,* and C.R.C.P. 57.

# FACTUAL ALLEGATIONS

1. Plaintiff incorporates herein all allegations contained in paragraphs 1 through 4 in the preceding section.
2. On August 14, 2018, an Arbitrator’s Opinion was handed down as a result of an arbitration the parties submitted to in the underlying matter.
3. The Opinion awarded Plaintiff $10,125.00 in attorneys’ fees expended in the underlying matter, plus $1,400.00 for costs, in addition to the sum of $2,433.75 previously awarded to Plaintiff, for a total sum of $13,915.75. *See* Supplemental Arbitrator’s Opinion and Award attached as **Exhibit 1** at ¶ 7.

# FIRST CLAIM FOR RELIEF

**(Declaratory Judgment)**

1. Plaintiff incorporates herein all allegations contained in paragraphs 1 through 7 in the preceding sections.
2. Plaintiff seeks a declaratory order of the Court pursuant to C.R.S. § 13-51-101, *et. seq.,* and C.R.C.P. 57.
3. More specifically, Plaintiff seeks a declaratory order of the Court confirming the arbitration award referenced above and reducing this award to judgment pursuant to C.R.S. § 13- 22-222(1) and C.R.S. § 13-22-225(1).
4. Plaintiff is an interested party consistent with C.R.C.P. 57(d).
5. Accordingly, Plaintiff prays for a declaratory judgment confirming the arbitration award and reducing it to judgment.

WHEREFORE, Plaintiff prays for relief as is more particularly hereinafter set forth. WHEREFORE, on account of the matters set forth in the First Claim For Relief, Plaintiff,

High Impact, Inc., seeks a declaratory judgment against Defendants Eldridge Suggs, IV., and Suggs Law Firm, P.C., pursuant to C.R.S. § 13-51-101, *et. seq.,* and C.R.C.P. 57, confirming the arbitration award for a total of $13,915.75 and reducing the award to judgment pursuant to C.R.S.

§ 13-22-222(1) and C.R.S. § 13-22-225(1), and for such other and further relief as to the Court may deem appropriate and just including all costs, attorneys’ fees and for such other and further relief as to the Court appears proper on the premises.

Respectfully submitted this 22nd day of August, 2018.

FIRM

*s/ LAWYER*

*Attorneys for Plaintiff*

Plaintiff’s Address: