A message from Joanna Ellis, CEO and Founder, Edge2Learn:

COVID-19 is a pandemic that has affected everyone in our industry both in business and personal life. In my 35+ years in the multifamily industry, this is certainly something that I did not anticipate. On the other hand, we have technology that allows us to continue business interactions until things return to normal. With this in mind, we've created resources to assist you with adjusting and taking precautions as needed. Together, we'll keep the multi-family industry moving forward and ready to handle what comes next.



IN THE KNOW Legal Considerations

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COVID-19



What are some legal considerations for how we communicate changes to policies and operations, whether they are government mandated or community imposed?

A1

01

At this time, we are not aware of any legal mandates or restrictions on how you communicate. As always, you want to communicate in an effective, efficient way while making all reasonable efforts to avoid the risk of harm to others.

If you have resident email addresses, you can send information via email and post signs in common areas reminding residents to check their email for updates to policies and procedures. This method involves minimal cost, is a quick method of transmitting information, and allows you to include significant details, instruction, guidance and other specifics.

Since team members likely already use email, this is an easy way to continue communications.

EXAMPLES

"How should we communicate a change in package delivery policies and personal delivery of rent checks to the leasing office? How can we establish social distancing policies for open spaces and dog parks, and ensure fair use of outdoor amenities, like playgrounds? How do we request that all residents comply with new policies so everyone has an equal opportunity to use common spaces?"

RESPONSES

Regarding package deliveries, post notices on doors and in common areas; contact your local Fed Ex and post offices if you need to change delivery locations.

For rent drop off, post a sign by the office mail slot. If there is no mail slot, instruct residents to leave documents/rent checks, etc., in a basket, knock on the door and then step away six feet until someone answers. Or, create a payment dropbox where residents can leave payments during work hours and receive a mailed or emailed receipt later.

Regarding facility use, you can post a rotating schedule based on unit numbers. Ensure you are following any applicable ordinances (i.e., gatherings must have no more than ten people, so the eleventh person needs to return later, etc.). Include instructions on what number to call if the facilities are not available so that an alternate schedule can be offered.

"Our residents are calling to ask what specific preventative measures we are taking to deal with coronavirus. How can we communicate our measures in a way that does not bind us to particular outcomes?"

"Our community is in the process of creating a policy to delay routine service requests. In the meantime, how should we respond if we receive a routine request from a resident?"

"It's likely we will adjust our touring policies. Whether we decline an offered handshake, refuse tours to customers who appear sick, have special requirements about passing IDs back and forth, or clean every surface after a resident touches it, could we face potential discrimination issues?" Let your residents know that your community is monitoring and following mandates and guidance from the CDC, local county health department, local ordinances and statewide governance. Explain that the entire community's cooperation with these authorities is imperative to maintaining a safe environment.

Confirm that the maintenance request is not an emergency. For example, it's not a critical situation if an apartment has two toilets and one isn't functioning properly. But if an apartment's only toilet is clogged, maintenance should certainly consider it an emergency.

Assure the resident that the request will be put in the queue and handled when it is safe for maintenance personnel to enter the premises. Explain any stop-gap measures you would like the resident to take to minimize the seriousness of the repair and to perhaps provide a temporary fix.

The key to avoiding discrimination claims is to treat all people similarly and to document the reasons for your actions. If you enact a policy changing the way staff interacts with customers, ensure it is applied uniformly to all potential residents. For example, if a policy against handshaking is enacted, staff should be instructed to stop shaking hands with all customers, not only those who appear potentially sick. To the extent possible, we highly recommend moving to virtual tours.





In response to COVID-19 transmission concerns, what are some legal considerations regarding which policies and services can be changed and how we change them?

A2

Even when the law requires you to take or not take certain actions (such as providing reasonable accommodations for disabled persons, or not denying housing to disabled persons), during a time of crisis, some requirements can be suspended if they create an undue hardship. Document the undue hardship and consult with your local legal counsel on whether the facts support a conclusion that an undue hardship will result.

Essentially, you want to continue providing the same policies and services unless you have concluded a particular action causes more harm than good. In that case, document the circumstances and your reasons, and stay flexible as the COVID-19 pandemic is a very fluid situation, with facts, figures, requirements and suggestions changing daily (and sometimes hourly).

Additionally, emergency declarations in certain localities or states may require a change to some policies or services, such as the use of fitness areas. Be sure to consult with your local legal counsel and understand laws specific to your jurisdiction regarding the effect of any emergency declarations on the community.

Common sense and calm, rational decision-making with deliberate thought and consideration for all stakeholders will serve you well. For consistency, one key person should be involved in all decision-making to ensure that individuals are treated similarly and fairly.

 community asks a series of pre-screening questions about the resident's health. Are there any risks associated with doing this? How can we reduce the legal risk and still obtain the necessary information?" Let them know you are looking to officials and experts for advice on when maintenance can be restored to its normal schedule. Questions about health always come with risk. For the limited purpos of ensuring the safety of a worker entering the apartment, you should ask the resident for the least amount of information needed that is not already available to you. A general question asked to all residents upon request for maintenance should suffice: "Do you or any member of your household have a communicable disease that would pose a risk of health or safety to a maintenance worker entering your apartment?" If the answer is yes, determine if the maintenance can be performed when the resident is not present and/or in conjunction with a deep cleaning to protect your worker. Management teams may also want to consider training employees on sanitation procedures to ensure 	EXAMPLES	RESPONSES
 community asks a series of pre-screening questions about the resident's health. Are there any risks associated with doing this? How can we reduce the legal risk and still obtain the necessary information?" Let them know you are looking to officials and experts for advice on when maintenance can be restored to its normal schedule. Questions about health always come with risk. For the limited purpos of ensuring the safety of a worker entering the apartment, you should ask the resident for the least amount of information needed that is not already available to you. A general question asked to all residents upon request for maintenance should suffice: "Do you or any member of your household have a communicable disease that would pose a risk of health or safety to a maintenance worker entering your apartment?" If the answer is yes, determine if the maintenance can be performed when the resident is not present and/or in conjunction with a deep cleaning to protect your worker. Management teams may also want to consider training employees on sanitation procedures to ensure 	respond to emergency/urgent service requests. Routine and cosmetic repairs are being put on hold indefinitely. Normally, we have a guarantee for routine maintenance to be done in 2 business days, and we promise emergency response within 24 hours. How should we communicate this change to residents,	Assure them you are monitoring the situation and following all guidance and mandates from the CDC, local county health officials,
(See #3 on the next page).	community asks a series of pre-screening questions about the resident's health. Are there any risks associated with doing this? How can we reduce the legal risk and still obtain the necessary	 when maintenance can be restored to its normal schedule. Questions about health always come with risk. For the limited purpose of ensuring the safety of a worker entering the apartment, you should ask the resident for the least amount of information needed that is not already available to you. A general question asked to all residents upon request for maintenance should suffice: "Do you or any member of your household have a communicable disease that would pose a risk of health or safety to a maintenance worker entering your apartment?" If the answer is yes, determine if the maintenance can be performed when the resident is not present and/or in conjunction with a deep cleaning to protect your worker. Management teams may also want to consider training employees on sanitation procedures to ensure they can clean a surface effectively before performing maintenance





What are some legal considerations for handling COVID-19 transmission prevention and/ or disinfection after a resident with COVID-19 has moved out? What type of documentation should take place to reduce legal risk?

A3

Follow CDC guidelines for cleaning and simply write down who did what and when.

EXAMPLES

"A resident is hospitalized and later dies from COVID-19. Their family removes their possessions. When talking to a new potential resident, does our leasing team have to reveal the apartment home was previously occupied by a person who tested positive?"

RESPONSES

Follow the CDC guidelines for cleaning and document the process. Out of an abundance of caution, if you can, wait a few days to ensure that any contaminants left on surfaces are no longer active.

If you have followed all available protocols and checked with state and local law, then you may not need to disclose the history of the unit. On the other hand, you are not likely to face a complaint or lawsuit if you do disclose this information because the potential resident can make an informed decision within their own comfort zone.

However, ensure your staff answers any direct questions honestly, or establish a standard policy to turn such questions over to a supervisor.

"Our maintenance team needs to prepare this apartment home for a future resident, and the technicians are concerned for their own health. What are some important legal considerations?" Your standard of care for your employees may be primarily based on state law, such as acting reasonably. What is reasonable depends on the facts and circumstances. Staying up-to-date on what others in your local industry are doing may be helpful in determining what is reasonable (if they can do it, you probably can, too assuming all applicable guidelines and laws are followed).

Practically speaking, you should ensure your staff is trained on the CDC guidelines and any direction from your local county health department. Do your best to mitigate known risks, give your employees as much information as you can, and listen carefully to their questions and concerns so you can address them quickly based on expert recommendations.





When a resident tests positive for COVID-19, how do we balance our legal responsibilities to both the resident and other people in the community? What legal considerations should we take?

A4

The focus is to balance the privacy of the individual who has tested positive for COVID-19 with the public health interests of the community at large. There may be a legal requirement to provide notice to residents of a positive COVID-19 case within a property.

To balance these interests, we recommend disclosing the fact of a positive case along with non-identifying information to residents and staff. Properties will want to consult their local legal counsel and their specific locality to determine whether, for example, any emergency declarations applicable to their city or state require such a disclosure.

EXAMPLE

"A resident sent me an email saying they tested positive for COVID-19. I have frequently seen this resident in open, shared spaces throughout the community. What do I tell employees and residents? Can I specifically ask the resident to stop visiting those shared spaces?"

RESPONSES

In the event a resident or staff member notifies the office they have tested positive for COVID-19, the management should provide written disclosure of the case to their residents and staff without identifying the individual or providing any identifiable information. The management should tell residents they have received notice of a positive case within the community. The notice should provide information on the relevant date ranges, to the extent they are known, including the first date the case was symptomatic and the date of testing.

If the case involves a staff member, disclose the last date the person was present on the property, and other information that would help people determine if they were exposed to the virus. Ideally, the information would be provided within 24 hours of the property's learning of the case. If there are enough staff members to ensure confidentiality, the notice should disclose if the case is a resident or staff member. For example, in a community with multiple buildings or floors and a substantial number of residents, the notice might identify the building or floor where the person lived or worked.

If the person is known to have been present in common areas, such areas should be identified on the notice, and the property should provide information on its efforts to disinfect these areas. The management should also request that residents do not enter these areas, if possible, until sanitation measures are completed.





When residents do not comply with community policy, what are some legal considerations for asking/ensuring their compliance?

A5

05

The CDC has stated that breaking a federal quarantine, if and when implemented in the United States, would be punishable by a fine or imprisonment. An individual found violating a federal quarantine order could face a fine of up to \$100,000, a year in jail, or both, according to a report from the Congressional Research Service, as reported by STAT news. Many states also have their own punishments for violating quarantine, though they vary widely. Local ordinances, such as limiting a gathering to less than a specific number of people, may be enforced by local authorities.

Scholars are already debating the question of whether such mandates would withstand a constitutional challenge (i.e., based on right to assemble under the First Amendment). The key analysis involves whether the risk to health and safety is a danger that outweighs our rights to assemble peacefully. For now, we recommend following all guidelines as well as mandates to stop the spread of COVID-19 and to politely and repeatedly encourage your residents and guests to do the same.

Even during this stressful time of uncertainty and unchartered territory, an opportunity exists to lead people through the crisis. We can engender a strong sense of community by sharing facts and focusing on positive developments that this unique experience is providing (e.g., more family time!). We are in this together. Working together to be part of the solution is empowering and may offset some of the significant mental strain we are all sharing.

EXAMPLES

"We have asked residents to limit use of the laundry room to minimize contact. Our guidelines are 2x a week, no more than 2 loads at a time, and no more than 2 people in the laundry room to maintain a 6' distance. One resident is doing laundry every day and sometimes uses more than 2 of the 4 machines. Other residents are complaining they can't get time in the laundry room because of this resident. What should we consider for our response?"

RESPONSES

Confirm that all of your residents are aware of the new laundry restrictions. If a person appears noncompliant, consider contacting them to encourage their voluntary cooperation. Evaluate the possibility of a sign-up sheet, especially if you can make it available online and everyone has access to it (or if residents can sign up by calling your office). Be creative and clever. Maybe lock and unlock the laundry room at staggered times for those who signed up.

Be mindful of not shaming a person into compliance, as they may have a very good reason for needing to do more laundry (e.g., a sick baby with diarrhea). Consider allowing that person to use the laundry room at "off times." However, if you allow use beyond the times stated in the new policy, be sure to ensure proper documentation by recording who made the decision, when, and why. This will minimize the risk of potential discrimination claims based on the application of such policies.

"Can we still serve eviction notices to residents who break community policies unrelated to nonpayment of rent? If a resident is smoking on his patio and the smoke wafts into the neighbor's apartment, how should we handle this noncompliance?" If your jurisdiction authorizes you to ban smoking, and your lease language allows eviction for failing to comply, you may start the eviction process. First, you might try a strong warning in an effort to get voluntary cooperation. Note that many courts are abating cases, expanding deadlines and statutes of limitations, and otherwise taking precautions to protect court staff and the public until the COVID-19 danger passes, so be aware this process may take longer than "usual." For further information on eviction issues that require attention to local laws, please see #7.





When residents complain about other residents who may not be compliant with community policies, what are some legal considerations?

A6

Ask the noncompliant resident to comply. Never share confidential information about one resident with another. Threaten eviction only after a resident has had an opportunity to address a concern and only for material breaches that the lease allows you to pursue as a ground for eviction. Property management teams may also want to consult with local counsel about whether a local or statewide emergency declaration including their property may impact their ability to threaten eviction.

EXAMPLE

"A resident who typically works from home during the day is now being disturbed by the upstairs neighbor, whose kids are home and making a lot of noise. The downstairs resident called the office to complain and wants me to do something about it."

RESPONSES

Remind residents that we are in this together and their cooperation is appreciated. Consider if there is a difficult resident who can help address noise concerns (sometimes a person who is part of the problem can become part of the solution).

In a cordial, non-threatening manner, remind all residents of the rules and regulations. Address complaints as quickly as possible. Again, document all complaints, responses, interactions and warnings.





What are some legal considerations for communicating community policy/lease agreements for residents who can't pay their rent?

A7

Q7

With respect to communicating policy changes (or any changes to address the novel issues presented by COVID-19), see the response to #1 above. The specific issue of residents being unable to pay rent as a result of hardships created by COVID-19 is fluid and being addressed differently by different locales. You should consult with your local legal counsel before making any eviction decisions for nonpayment of rent while COVID-19 restrictions remain in place.

The response to the example below highlights the need to be mindful of local laws and moratoriums prior to evicting residents for nonpayment of rent. Properties will want to consult their local legal counsel and their specific locality to determine whether, for example, any emergency declarations applicable to their city or state require such a disclosure.

EXAMPLE

"A resident has informed me they are not able to work due to the restrictions on restaurants. They do not have the resources to pay next month's rent and don't know when they will be able to pay. Our lease agreement covers this, but under the current circumstances, what legal issue should I be aware of?"

RESPONSES

Some locales are addressing this issue differently than others. For example, on March 14, 2020, the City of Santa Monica issued a supplement to its local emergency proclamation that places a temporary moratorium on evictions for nonpayment of rent by residential residents impacted by COVID-19. During the period of local emergency declared in response to COVID-19, a landlord in the City of Santa Monica cannot evict a resident for nonpayment of rent if the resident is unable to pay rent due to financial impacts related to COVID-19, including:

- being infected with COVID-19 or caring for a household or family member who is infected;
- (2) lay-off, loss of hours or other income reduction resulting from business closure or other economic or employer impacts of COVID-19;
- (3) compliance with a recommendation from a governmental health authority to stay home, self-quarantine or avoid congregating with others during the state of emergency;
- (4) extraordinary out-of-pocket medical expenses; or
- (5) child care needs arising from school closures related to COVID-19.

Given the infancy of this moratorium (and other similar COVID-19 laws and ordinances), it is unclear how much (or the type of) proof courts will require of residents to prove eligibility for this type of eviction protection. It should be assumed, however, that the burden of proof will be low given the national trend to provide as much assistance as possible to those impacted by the virus.

This is simply one example of how a city is handling the issue. The issues presented by COVID-19 are dynamic and constantly changing. It is likely that other locales will impose (or already have imposed) similar moratoriums. It is therefore imperative to ensure compliance with any local laws by consulting with legal counsel prior to making eviction decisions for nonpayment of rent.





What are some legal considerations for communicating with residents who are asking for reduction in rent due to a decrease in the community's provided amenities?

A8

08

Assuming a lease agreement does not state otherwise, there is no legal requirement to provide or consider providing a reduction in rent due to decreased amenities available to residents. The obligation to pay rent is typically only suspended or reduced when there has been damage or destruction to the premises or an interruption in utilities. Further, the language in many residential leases provides that amenities are incidental or are simply available.

That being said, in the event that lease language states otherwise, a rent reduction might be necessary or appropriate. Additionally, as more time goes by and amenities remain unavailable, the decision to provide a rent reduction to residents should be revisited.

Please note that if you are in a position to offer rent reductions or to negotiate a different rent payment plan with your residents, you might consider doing so. Without question, many residents are struggling financially due to an inability to work. That being said, a rent reduction would need to be provided uniformly to all residents.

EXAMPLES

"Residents are unhappy we have closed common area amenities like fitness centers, pools, clubhouses and laundry rooms. They want a concession because they can't use amenities they are paying for."

RESPONSES

It is understandable that residents are unhappy about the closure of common areas. However, taking cues from the CDC and various local mandates and guidelines, the temporary closure of common area amenities is meant to further promote social distancing and slow the spread of the virus.

As a general rule, it is not necessary to provide rent concessions at this point. Nonetheless, you are free to advise residents that this situation is constantly evolving and that you will inform them promptly of any changes to current policies.

"We've closed the laundry rooms for resident use and we don't have other options for access to key living essentials, like a washer/dryer in their apartment home. Does this put us at risk and what are some recommended options to reduce the risk?" This largely depends on the language in an applicable lease. Unless the lease indicates that onsite laundry is more than simply an amenity, a rent reduction is likely not required. However, the length of time that the laundry rooms are closed should determine if a rent reduction might eventually be provided to residents.

Moreover, we recommend you consult with legal counsel regarding emergency declarations with respect to necessary, basic services that must be provided to residents. For example, if a resident is quarantined and therefore unable to leave the apartment complex, then the decision to close all laundry rooms might constitute an improper withholding of necessities.





Q9 What are some guidelines for getting law enforcement involved and what considerations or preparation should be taken?

A9

Never hesitate to contact local law enforcement if you have reason to believe that a criminal law is being violated and there is potential of harm to the victim, perpetrator or others in and around your community. It's better to be safe than sorry.

In times like these, the Golden Rule can be helpful, but the Platinum Rule is even better. If it is appropriate, possible and safe, consider not only treating people how you would want to be treated, but also how they want to be treated.

EXAMPLES

"Our office is locked, but I live onsite and work at my desk after hours. A resident begins pounding on the door, demanding to be let inside. I ask if there is an emergency. The resident says no, but he wants to discuss his renewal. I explain we've been told only to speak with residents via email or phone to avoid close contact. I point to a sign on the door listing the community's phone number and email address. The resident continues pounding and shouts expletives, complaining it's ridiculous for him to call when he's right there."

RESPONSES

If you feel truly threatened or think an agitated resident is a danger to himself, herself or others, call 911. If you believe the resident needs medical attention, the dispatcher will be able to send an ambulance.





In efforts to reduce COVID-19 transmissions and respond to resident needs/concerns, what type of documentation should communities consider?

A10

Properties should consider posting CDC guidance regarding steps that can be taken to reduce the likelihood of transmission (e.g., handwashing, social distancing, coughing into elbow instead of hand, etc.). Properties should display these signs and other notifications in common areas, as appropriate, to help assure the community they are monitoring and following mandates from the CDC, local county health department and local ordinances. Resident and staff cooperation with these authorities is imperative to maintaining community safety. Properties should consult with their counsel on any additional official guidance adopted by their specific city or state.

EXAMPLES

"We've sent a few COVID-19 notices to residents so far. And the situation, mandates and guidelines seem to keep evolving by the hour. Is it our responsibility to send these or just a courtesy in case residents aren't following news or CDC recommendations on their own? Could we someday be expected to prove we sent sufficient notices about these conditions?"

RESPONSES

To minimize potential legal exposure, properties should continue monitoring the evolving guidance and mandates and should continue notifying residents of changes as they become available. While this is cumbersome, failure to do so may increase a property's legal exposure to potential future claims.

To provide updates to residents efficiently and to reduce the amount of administrative time involved, properties may want to issue such communications through email or an existing online messaging portal. In the event that residents do not have internet access in their apartments, management should also consider providing updates in paper form. In the event of a future claim, a property may need to prove its efforts to provide such information to residents.

"Suppose a new resident moves into an apartment where the previous resident had tested positive for COVID-19. The new resident tests positive a few weeks after moving in and finds out the previous resident had the virus. The new resident blames our staff and accuses the community of improper disinfection techniques. What can we do to cover our risk for situations like this?" In order to minimize risk in such a situation, properties should keep detailed documentation of their cleaning and sanitation efforts in the apartment following a prior resident's move-out, as described in #3 above. This will provide a record of the management's compliance with the guidance in place at that time.

Essentially, the property should have specific procedures to be followed when a resident moves out to ensure the apartment is disinfected pursuant to CDC and any other applicable standards. The management should document how such procedures were followed in the apartment, who was involved in the disinfection process and a record of the timeline in which they complied with such procedures.

To further mitigate the risk, the property should consider placing such an apartment on hold for the period during which guidance advises that COVID-19 could remain on surfaces. This would help ensure that any potential virus particles still in the apartment after move-out would expire before the apartment is rented to another resident. Currently, we believe the advised timeframe may be up to two weeks. Thus, at this time, a month hold on any apartment after disinfecting may be an effective way to minimize risk of such claims from a future resident.





How does the novel coronavirus impact a private landlord's duties under the Fair Housing Act?

A11

Q11

HUD has made clear that "exigencies associated with important and timely response to issues surrounding COVID-19 are not the basis for unlawful discrimination on the basis of race, color, religion, national origin, sex, disability, gender, familial status or ability to pay." Therefore, you must continue to provide reasonable accommodations to those with a disability unless and until there is an undue burden. At this time, there is no conclusive authority on whether a person who has COVID-19 might fit the definition of a person with a disability under the FHA. Evaluation of similar requests for accommodation under the ADA have shown that viral infections rarely create a disability due to the short nature of the illness (less than a month, when compared to a condition like tuberculosis, which has been shown to be a disability).

That being said, the FHA does not protect a person with a disability whose tenancy would constitute a direct threat to the health or safety of other individuals, unless that threat can be eliminated or significantly reduced by a reasonable accommodation. To determine whether a person poses a direct threat, there are various factors to consider, including: the nature of the risk as to how the disease was transmitted, the duration of the risk as to how long the person has been infectious, the severity of the risk to third parties, and the probability that the disease will be transmitted or cause harm. A requested accommodation from a person with COVID-19 is unreasonable if it imposes an undue financial or administrative burden on the housing provider or would fundamentally alter the nature of the housing provider's operation.

EXAMPLE

"How do we know who poses a direct threat?"

RESPONSE

In light of the novelty of COVID-19, housing providers should rely on objective medical evidence in dealing with residents who have tested positive for or have been exposed to COVID-19. Specifically, we recommend relying on advice and guidance from the CDC and local healthcare officials to determine if a person poses a direct threat to the safety of other residents and/or if a requested accommodation is reasonable.

For example, if you prohibit residents who have or have been exposed to COVID-19 from using apartment amenities, the CDC has provided guidelines based upon objective medical evidence for such individuals to self-quarantine. When treating residents who have or have been exposed to COVID-19 differently from those who have not, property management should point to such guidelines in support of their decisions.



CONCLUSION

Property leaders should rely on health officials, government leaders and other strong sources for local and up-to-date information. Stay apprised of the most recent information, share it quickly with those who need to know, stay calm and avoid panicking staff or residents. For most property owners and managers, your standard of care, as determined by your state law, is to act reasonably. Therefore, educate yourself on what others in your local industry are doing, deliberate carefully on your own decisions, and document the reasons for your actions. Never hesitate to consult with any experts (attorneys, medical personnel, county health department, etc.). We are all trying to do the best we can with what we have. Gather facts, rely on experts, and do not over promise. Respond thoughtfully instead of reacting. Do the best you can to help ensure your residents' safety, allay their fears and keep them informed.

During times of difficulty, true leaders often emerge. As we cope with this new landscape, acknowledge those who step up to help others or make sacrifices. Small acts of kindness and compassion can have big impacts. Be a good example, stay calm and think through each situation so you can respond with both care and knowledge.

Clark Hill Strasburger: We welcome your questions and comments so we can be part of your solution during this challenging time. You can find us in multiple states and cities. In Texas, we are Clark Hill Strasburger, 901 Main Street, Suite 6000, Dallas, TX 75202, and you can reach Katie Anderson at (214) 651-4685.

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