

Spring 2024 Newsletter

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Who We Are

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Welcome to the Faculty of Federal Advocates Spring 2024 Electronic Newsletter

www.facultyfederaladvocates.org

The Newsletter brings you news about FFA events and CLE programs along with useful information for federal practitioners, including links to relevant websites. The FFA welcomes contributions to our Newsletter from our membership.

Newer attorneys, experienced attorneys, and law students are all encouraged to submit articles. If you are interested in submitting an article to be considered for publication, please contact the FFA by emailing Executive Director Dana Collier at: dana@facultyfederaladvocates.org.

Judges Respond to Survey Results By Sean D. G. Camacho

On December 7, 2023, Magistrate Judges Scott T. Varholak and N. Reid Neureiter provided insight into the magistrate judge performance review process, including the results from their most recent attorney reviews. (These reviews are internal court records and are not publicly available.) Unlike Article III judges who serve under U.S. Senate-confirmed lifetime appointments, full-time magistrate judges serve renewable eight-year terms as Article I officials. As a magistrate judge approaches the mid-point of his or her term, the U.S. District Court for the District of Colorado solicits anonymous feedback from attorneys who have appeared before the magistrate judge. The federal judiciary solicits attorney feedback on a magistrate judge's performance, including demeanor, preparedness, legal John Arceci Cyrus Chung Hetal Doshi Ariel DeFazio Jenipher Jones David Lichtenstein Anna Martinez Laura Menninger Alan Schindler Michael Schuster Wendy Shea David Tonini Rebecca Weber

Dana Collier Executive Director

Mission of the Faculty of Federal Advocates

The Faculty of Federal Advocates

(FFA) is an organization of attorneys dedicated to improving the quality of legal practice in the federal courts in Colorado by enhancing advocacy skills, professionalism, and the integrity of practice.

The FFA provides continuing legal education classes, mentoring and pro bono opportunities, and other support services to foster and demonstrate commitment to the highest standards of advocacy and professional and ethical conduct. The FFA promotes support. mentorship, education, and camaraderie for federal court practitioners.

Become a member or learn more at our website: facultyfederaladvocates.org knowledge, communication, and docket management. Magistrate Judge Varholak explained that magistrate judges receive only two weeks of training once appointed, and the job has a steep learning curve. Anonymous attorney feedback allows magistrate judges to "course correct" to improve performance.

The magistrate judges explained that attorney feedback can range from mean to well-measured and respectful critiques. For example, Magistrate Judge Neureiter shared that one attorney said, "he looks embarrassing on the bench. Disheveled, disinterested, and unprepared." While another attorney commented he has "grown tremendously" since starting the job. To his credit, Magistrate Judge Neureiter admitted he often bikes to work so he can appreciate why someone would believe he appears "disheveled." Magistrate Judges Varholak and Neureiter each acknowledged that the disparity in the reviews requires them to sometimes take the feedback with a grain of salt. Still, each magistrate judge acknowledged crediting thoughtful, candid, and professional feedback.

In addition to providing insight regarding the feedback they had received, the magistrate judges discussed their thought processes and offered practice pointers for federal bar practitioners. Magistrate Judge Varholak shared that he was criticized for being inconsistent, in that attorneys said he was sometimes too harsh and sometimes too lenient on attorneys who failed to follow the rules and his practice standards. Magistrate Judge Varholak admitted he routinely struggles with these issues because where an attorney fails to follow the rules, he hesitates to "gut an entire plaintiff's case and throw it out based on that." Ultimately, Magistrate Judge Varholak's goal is to do justice and get the law right, and having more practitioners who just follow the rules will help.

Magistrate Judge Neureiter also addressed a common critique of his performance and a pet peeve that can quickly change his demeanor. Magistrate Judge Neureiter shared that attorneys often claim he "crafts arguments on behalf of pro se litigants" that were not otherwise raised. Magistrate Judge Neureiter wryly admitted that he was "guilty" of doing this, and explained that cases involving pro se litigants are difficult because they may have a facially valid claim that has been framed incorrectly. Federal judges must read pro se pleadings liberally to assist an unrepresented party. Despite his willingness to be flexible with pro se litigants, Magistrate Judge Neureiter has zero patience for tardiness. He shared that the quickest way to frustrate him and his colleagues is to "not show up on time." Sharing an example, he explained that if a party has a 10:00 a.m. telephonic hearing, the party should dial in early and be prepared to start. Showing up early helps the Court maintain its schedule and is respectful to the magistrate judges and other parties. Magistrate Judge Neureiter cautioned that he can quickly turn rude and annoyed when parties are late, so be prepared.

Quick Links

Join the Faculty of Federal Advocates Here!

U.S. Supreme Court

U.S. Court of Appeals 10th Circuit

> U.S. District Court District of Colorado

U.S. Bankruptcy Court, District of Colorado

U.S. Attorney's Office Colorado

Federal Public Defender Colorado/ Wyoming

Colorado State Courts

Our Courts

A key takeaway from this valuable CLE is that the anonymous attorney review process greatly assists magistrate judges in addressing deficiencies and adjusting their performance to address the concerns of federal practitioners.

The Judges' practice standards were the written materials for the program.

The 2023 Amendments to the Federal Sentencing Guidelines By Thomas E. Goodreid and Martha Eskesen

On December 15, 2023, Assistant United States Attorney (AUSA) Rebecca Weber and Assistant Federal Public Defender (AFPD) Mary Butterton gave a presentation to the Faculty of Federal Advocates about the "2023 Amendments to the Federal Sentencing Guidelines." Ms. Weber has been an Assistant United States Attorney since 2014 and works in the Economic Crimes Section of the U.S. Attorney's Office for the District of Colorado as the Environmental Crimes Coordinator. Ms. Butterton is a Senior Litigator in the Office of the Federal Public Defender for the Districts of Colorado and Wyoming and is the Training Director there.

The purpose of the talk was to go through changes in federal criminal law, which stemmed from the United States Sentencing Commission's recent changes to the Federal Sentencing Guidelines. Those amendments to the Guidelines had gone into effect in November 2023. This presentation proved of particular interest to members of the Faculty who practice federal criminal defense and provided dual perspectives from the prosecution and the defense on the amendments.

AUSA Weber and AFPD Butterton began their presentation with a discussion of *ex post facto* laws. The presenters noted that such laws are prohibited by Article I, Section 9 of the United States Constitution. Ms. Butterton noted that, as such, prohibitions on criminal conduct must be prospective only. This principal is embodied in §1B1.11 of the Sentencing Guidelines. Federal criminal practitioners were advised that they may have to consult more than one version of the Guidelines in order to protect their clients adequately from changes in the Guidelines. Lawyers need to review the Guidelines in effect at the time that charged conduct occurred and the Guidelines in effect at the time of sentencing to determine if there are *ex post facto* issues.

Ms. Butterton addressed the fact that there has been a change in the assessment of status points vis-à-vis criminal history under the Guidelines, at §4A1.1. Prior to the November 2023 amendment, a defendant received two criminal history points "if the defendant committed the instant offense while under any criminal justice sentence, including probation, parole, supervised release, imprisonment, work release, or escape status." USSG

§4A1.1(d) (2021). The amendment alters the former §4A1.1(d) by adding new language to §4A1.1(e):

Add 1 point if the defendant (1) receives 7 or more points under subsection (a) through (d), and (2) committed the instant offense while under any criminal justice sentence, including probation, parole, supervised release, imprisonment, work release, or escape status.

Accordingly, defendants will no longer receive *any* points for being under a criminal justice sentence unless they already have at least 7 criminal history points. In terms of retroactivity, if a criminal defendant previously received 2 criminal history points under the old §4A1.1(d), they may now be eligible for a 1-2 point reduction in their criminal history score. A defendant with less than 7 points, not including the 2 points under §4A1.1(d), would now receive zero points. If the defendant had 7 or more points, they would still receive a 1-point reduction to their criminal history score.

This change became retroactive, beginning on February 1, 2024. A sentencing reduction under the amendment is not automatic. The defendant, court, or government must first move for a reduction under 18 U.S.C. § 3582(c)(2), and even if the defendant is eligible because application of the new amendment would lower their applicable guidelines range, the court still has broad discretion in determining whether to grant a reduction and to what extent. In doing so, the court is required to consider the sentencing factors listed under 18 U.S.C. § 3553(a). The Office of the Federal Public Defender is determining whose sentences are impacted by the amendment and it will file motions on behalf of defendants who are eligible. Ms. Butterton urged lawyers to contact her office if they have clients who qualify for the status point reduction.

AUSA Weber discussed the new "zero point" reduction for offenders. Under §4C1.1 of the Guidelines, an individual with no prior criminal history, with certain exceptions, will receive a two-point reduction in his or her adjusted offense level. This reduction seems most likely to apply more often in white collar cases. AUSA Weber also noted that the commentary to §4A1.3 of the Guidelines now states that a downward sentencing departure may be warranted in instances where an offender has criminal history points from a sentence for possession of marihuana for personal use.

A change in the Guidelines related to "career offenders" was also discussed. The Guidelines provide for an increased punishment for federal defendants who are deemed "career offenders" under USSG §4B1.1. The career offender enhancement applies where (1) the defendant is at least 18 years old at the time they committed the instant offense; (2) the instant offense is a felony that is a "crime of violence" or "controlled substance offense"; and (3) the defendant had at least two prior felony convictions that are considered either a crime of violence or controlled substance offense.

Section 4B1.2 was amended to address an existing split in the federal circuits over whether inchoate offenses (such as aiding and abetting, attempt, and conspiracy) should be included within the terms "crime of violence" and "controlled substance offense."

AUSA Weber also talked about two relatively new crimes related to guns. 18 U.S.C. § 932 deals with straw purchases of firearms. 18 U.S.C. § 933 deals with trafficking in firearms. Section 2K2.1(b)(4)(B) of the Guidelines now addresses so-called "ghost guns," which does not contain a knowledge requirement by the defendant in order to be applicable.

Additionally, the "safety valve" provision in §5C1.2 of the Guidelines was finally amended to square with the safety valve provisions contained in 18 U.S.C. § 3553(f), the First Step Act of 2018. This significantly expands eligibility for defendants, who no longer need to have only zero or one criminal history point in order to receive the "safety valve" reduction in their sentencing calculation. This means that, as applicable, a federal criminal defendant may be eligible to receive a sentence below an otherwise applicable statutory mandatory minimum sentence. In the same vein, §1B1.13 of the Guidelines has been amended to add to the circumstances where a judge can provide "compassionate [early] release" to an incarcerated offender. On the enhancement side of the equation, the Guidelines were amended to increase the recommended penalties for a certain class of sexual abuse offenses and for the possession with intent to distribute fake prescription pills which contain fentanyl and involving circumstances where illegal drugs result in death or serious bodily injury.

Written materials from the program are available <u>HERE</u> and <u>HERE</u>.

Creating Effective and Ethical Environments for Individuals with Intellectual Disabilities

By Nicole Salamander Irby

Ms. Salamander Irby is Associate General Counsel for the Colorado Coalition for the Homeless and a member of the FFA. The views in this summary are her own and do not represent the Coalition.

People who have intellectual disabilities are part of all communities, with the same needs and wants as anyone else, including education, meaningful relationships, and a productive job. In "Creating Effective and Ethical Environments for Individuals with Intellectual Disabilities", presenters provided information and insight about "vision setting" for a better and more inclusive world. J. Chris Larson from the U.S. Attorney's Office moderated the panel, including speakers April M. McMurrey and Zoey Tanner from the Office of Attorney Regulation Counsel, and Dr. Jeanine Coleman from Regis University. Each presenter discussed their personal connections to people who have an intellectual disability or who are neurodiverse.

Dr. Coleman began the discussion with a reminder that, historically, people who have disabilities have been denied access to many spaces, including school and work, resulting in being "hidden away." However, she cited a statistic that one in four adults in the United States are disabled. An intellectual disability, defined as significant limitations in intellectual functioning and adaptive behavior originating before age 22, may not be clear. Examples include Down syndrome, autism spectrum disorder, fragile X syndrome, and fetal alcohol disorder.

Society often assumes people with intellectual disabilities are incapable or vulnerable to harm. Dr. Coleman proposed two counter-approaches. First, presume competence. Treat a person who has a disability like anyone else – with kindness and respect. Go slow and be okay with feeling uncomfortable. Second, honor the dignity in risk-taking. Paternalism interferes with independence. Dr. Coleman explained dignity in this context as the choice to try, fail, and bail.

From a legal perspective, inclusion of people who have intellectual disabilities means providing access to justice and the opportunity for meaningful participation. OARC Deputy Counsel McMurrey suggested reorienting lawyers to the <u>oath of admission for the State of Colorado</u>, which requires the delivery of legal services to be broad, inclusive, and directed toward bettering society.

Ms. McMurrey cited "Universal Design for Learning (UDL)" as a tool to increase inclusivity in the workplace. UDL promotes the design of workspaces for those who need the most support. Examples include physical changes such as curb cuts from sidewalks, and the use of technology such as screen readers. UDL recognizes there are different ways for employees to present, engage, and demonstrate their ability. Ms. McMurrey proposed modeling what task needs to be done, provide scaffolding for the person to reference, then release the individual to complete the task independently. Scaffolding supports the person in their independent approach by providing information such as written instructions, pictures, a predictable routine, and repetition.

Mr. Larson shared his personal and professional experiences with people who have intellectual disabilities. He showcased the "Awesome Mary Show" presented by Mary White, who has an intellectual disability and champions inclusive hiring practices. Ms. White explained that people who have an intellectual disability are motivated and dependable, and provide unique approaches to solving problems. Mr. Larson echoed that lawyers often are trained to think in similar ways. Another benefit of an employee who has an intellectual disability is they give immediate feedback as to the effectiveness of communication, an essential part of any lawyer's work. Mr. Larson encouraged attendees to coordinate with Dr. Coleman's academic program for people with intellectual disabilities to be placed as interns.

What about considerations for an attorney-client relationship with a person who has an intellectual disability? OARC Assistant Regulation Counsel Tanner addressed this question. The approach largely is the same as the attorney-client relationship where no disability is present. The Rules of Professional Conduct apply in the same manner. Attorneys should clearly identify the client and the scope of representation. This should be communicated in a way that the client understands. Attorneys must interact directly with the client to understand their capacity and, as much as possible, maintain a normal client-lawyer relationship as required by Rule 1.14. As with all clients, the client's interests are primary, and attorneys must communicate information and risks for the client to make an informed decision.

Ms. Tanner cited Colo. Rev. Stat. § 15-14-802, providing for supported decision making as a less-restrictive alternative to a guardianship or conservatorship, if a client needs support. Ms. Tanner also referenced two Formal Ethics Opinions, No. 126, "Representing the Adult Client with Diminished Capacity", and No. 131, "Representing Clients with Diminished Capacity where the Subject of the Representation is the Client's Diminished Capacity." A client-directed relationship, as required by Rule 1.2, means the client makes the decisions; the attorney should not substitute their own judgment. Attorneys interacting with people who have an intellectual disability should presume competence and honor their dignity and autonomy.

Written materials for the program are available <u>HERE</u> and <u>HERE</u>.

Examining Expert Witnesses at Trial By Frank C. Porada

On January 17, 2024, Andrew H. Myers, Esq., of Wheeler Trigg O'Donnell LLP, shared his experiences examining experts at trial.

Fed. R. Civ. P. 26(2)(B)(iii) requires a report of a specially retained expert to include "any exhibits that will be used to summarize or support" the expert's opinions. While it varies from court to court, and even from judge to judge, in practice, demonstrative exhibits to be used by experts are often disclosed later as part of a supplemental disclosure. Nevertheless, it is best practice to develop demonstratives early.

Expert witnesses may rely upon inadmissible evidence if similar experts in the field rely upon such facts and data in forming opinions. With proper planning, this may allow the expert to testify regarding evidence that would otherwise be inadmissible, even hearsay. The opinion and reliance on the inadmissible evidence must be disclosed in the expert's report. Even when the underlying evidence may not be admitted, the expert's testimony regarding the inadmissible data or facts may be sufficient and persuasive.

There are pros and cons to using a client or client's employee to offer expert opinion testimony. A non-retained expert is not a hired gun, may have more knowledge of the facts, and may be able to explain issues based upon personal knowledge. On the other hand, such non-retained experts may appear biased, may have knowledge of the facts (including unfavorable facts), and may become a sounding board for bad company documents. The cons, particularly the last one mentioned, often outweigh the benefits of using client experts.

Planning for the expert's direct testimony involves two separate categories, needs and wants. It is often necessary for the expert to testify regarding the standard of care, causation, damages, and the rebuttal of an opposing expert's opinions. In addition, parties can gain a benefit if their expert testimony can support one or more of the case themes.

The qualifications for an expert are a pretty low bar. PowerPoint slides showing an expert's qualifications and experience can be useful at trial, and perhaps even more so at a *Daubert* hearing. In addition, PowerPoint slides can be a useful way to identify and summarize the expert's opinions for the jury. Such slides should express the expert's opinions in plain English and avoid legalese as much as possible. In addition, demonstratives can be used to help simplify complex information. It is important to keep in mind that graphics should never be misleading, as that can easily be used against your client or expert.

As is the case for most everything at trial, preparation is critical. The expert must be prepared for a *Daubert* challenge and be able to specifically explain the methodology employed. The expert must be prepared for negative facts and taught how to address them during cross-examination. The expert must be prepared for traps, including cross-examination questions that are outside the expert's area of expertise, and bad company documents, including those with which the expert may not be familiar. The qualification trap must also be avoided. For example, while an emergency room doctor may not be a neurologist, the emergency room doctor does have training in neurology and frequently diagnoses and treats neurological injuries, and thus has some expertise in the field.

With respect to the cross-examination of an opposing expert, it is important not to skip over the low-hanging fruit. This will include the opposing expert's methodology, and whether the methodology has a name, and can be read in a publication. Any credibility ammunition should be used. This includes cross-examination regarding an opposing expert's mistakes or exaggerations. Written materials for the program are available <u>HERE</u> and <u>HERE</u>.

Of Note from the United States District Court, District of Colorado

• Announcement of the Reappointment of Magistrate Judge Scott T. Varholak

The Judges of the United States District Court for the District of Colorado take great pleasure in announcing the reappointment of United States Magistrate Judge Scott T. Varholak to a second term of eight years effective October 1, 2024. The Court unanimously approved Judge Varholak's reappointment based upon the recommendation of a Merit Selection Panel, composed of Colorado attorneys and lay persons, that recently solicited comments from the public relating to Judge Varholak's performance.

• New Magistrate Judge Uniform Civil Practice Standards

The United States District Court for the District of Colorado Uniform Civil Practice Standards of the United States Magistrate Judges ("D.C.COLO.MJ"), available <u>HERE</u> and on each Magistrate Judge's webpage, shall go into effect April 1, 2024. Parties appearing in federal court, including attorneys and pro se litigants, with cases before a Magistrate Judge shall review and familiarize themselves with these Practice Standards.

• New Bill of Costs Procedure

Effective February 12, 2024, hearings on Bill of Costs are no longer mandatory in the District of Colorado. Costs disputes will be resolved primarily through electronic filing of supporting documentation in CM/ECF. Visit the Bill of Costs page <u>HERE</u> for further details.

Civil Pro Bono Panel Members:

The Clerk's Office is reviewing and refining our appointment process. All panel members are encouraged to review the appointment procedures outlined in D.C.COLO.LAttyR 15(f).

FACULTY OF FEDERAL ADVOCATES UPCOMING EVENTS AND CLE PROGRAMS

Sign-up on our website at www.facultyfederaladvocates.org.

TUESDAY, APRIL 23, 2024

"DEMYSTIFYING CRIMINAL LAW-BASICS OF CRIMINAL LAW FOR CIVIL PRACTITIONERS"

ADAM FRANK, Esq. FRANK LAW OFFICE

12 NOON-1:15 P.M.

WEBINAR ONLY

Adam Frank is a former longtime state public defender who has practiced civil rights law and criminal defense in both state and federal court for the past nine years. Drawing on Mr. Frank's extensive experience litigating criminal cases, this CLE will cover criminal law issues that commonly come up in civil litigation. These topics include: addressing the criminal liability of civil deponents; statutes of limitation, particularly for financial crimes; common resolutions and case timelines for people facing criminal charges; and a Q & A session.

2 general CLE credits granted.

Click <u>HERE</u> to register for this program.

"PRO BONO OPPORTUNITIES WITH THE U.S. DISTRICT COURT FOR THE DISTRICT OF COLORADO"

WEDNESDAY, MAY 8, 2024

JUDGE S. KATO CREWS JUDGE GORDON P. GALLAGHER U.S. District Court for the District of Colorado

FORMER MAGISTRATE JUDGE KRISTEN L. MIX Judicial Arbiter Group, Inc.

MATTHEW D. SKEEN, ESQ. Federal Pro Se Clinic

KEVIN D. HOMIAK, Esq., Moderator Wheeler Trigg O'Donnell, LLP

12 NOON-1:15 P.M.

HOSTED BY WHEELER TRIGG O'DONNELL, LLP at their offices 370 17th Street, Suite 4500, Denver

More than a thousand cases are filed each year in the Colorado federal court by pro se litigants. The Court has a wide range of services to assist these litigants on a pro bono basis, including the Federal Pro Se Clinic, the Federal Limited Appearance Program, the Pilot Program for Limited Pro Se Prisoner Assistance, and the Civil Pro Bono Panel. If you have ever wondered about these programs or how to get involved in them, this CLE will provide the information you need to get started. Our esteemed panel of federal court judges will explain the differences in the programs, the scope of the representation, the time commitment, and the potential opportunities to gain on-your-feet experience in federal court if you take one of these matters.

This program is being offered **FREE** to attorneys interested in exploring pro bono volunteer opportunities in Colorado's federal court system. There is no registration fee for this program **BUT REGISTRATION IS REQUIRED.**

2 general CLE credits requested.

Click <u>HERE</u> to register for this program.

THURSDAY, MAY 9, 2023

"GENERATIVE AI: UNDER THE HOOD AND TOUR D'HORIZON"

MR. GUERIN GREEN NOVEL COGNITION

DR. GARETH MIDDLETON HOLLAND & HART, LLP

ANDREW C. LILLIE, ESQ., MODERATOR HOLLAND & HART, LLP

12:00 - 1:15 P.M.

Alfred A. Arraj Courthouse Jury Assembly Room 901 19th Street, Denver and Simulcast Webinar

Generative Artificial Intelligence: We'll discuss what Generative AI is and what it isn't, and set out an easily digestible set of explanations designed to liberate you from reservations while not discounting the very real concerns. We will look at possible use cases, and the potential for custom GPTs to power a range of legal and regulatory solutions.

A former newspaper publisher, **Guerin Green** has been using AI tools for research and content creation since 2019. He has created a variety of training products in the digital asset and marketing space. Using his Novel Cognition brand to provide consulting, execution, and education in a variety of verticals and technical-use cases, Green brings a practiced yet skeptical eye to the application of AI for analysis and generative purposes.

Dr. Gareth Middleton is the Director of Innovation and Software Engineering at Holland & Hart, LLP where he leads a skilled team of technologists who are building industry-leading automation tools for practitioners across the organization. With the emergence of Generative AI, he has designed and launched a firm-specific chat and document-analysis tools, taking an enthusiastic-yet-pragmatic approach to the potential of this new technology. His role in collaborating with a broad cross-section of legal professionals combines with his two decades of experience in engineering and mathematics to provide him with a unique perspective on the true capabilities of AI in relation to the legal industry's expectations.

2 general CLE credits requested.

Click **<u>HERE</u>** to register for this program.

THURSDAY, MAY 16, 2023

"LITIGATION FINANCE 101"

MICHAEL GERMAN, ESQ. ANDREW KELLEY, ESQ. LEX FERENDA LITIGATION FUNDING (LF²)

12:00 - 1:15 P.M.

Alfred A. Arraj Courthouse Jury Assembly Room 901 19th Street, Denver

An overview of what litigation finance is and how it works, the reasons that clients and attorneys employ litigation finance, and the potential ethical and confidentiality issues surrounding litigation finance.

Michael German is the Co-Founder and Chief Investment Officer of Lex Ferenda Litigation Funding (LF²), a firm that specializes in funding domestic commercial litigation and arbitration. He is primarily responsible for the firm's strategic direction, investments, and fund risk management. Michael is an experienced litigator, trial lawyer, and litigation funder with more than a decade of experience litigating, resolving, and investing in complex commercial litigation and arbitration matters. Before founding Lex Ferenda, Michael practiced at an international law firm in New York, and was Managing Director at another litigation funding firm.

Andrew Kelley is LF²'s Managing Director, Underwriting & Risk. He is responsible for underwriting potential investments and developing programs to support cases LF² funds. Andrew is also responsible for monitoring funded cases and matching LF²'s internal expertise with the needs of our investments. A Colorado native, Andrew has more than two decades of complex commercial litigation experience in Denver, most recently as head of commercial litigation for a large publicly traded company. He has also practiced at several international law firms.

2 general/.5 ethics CLE credits requested.

Click **<u>HERE</u>** to register for this program.

HOLD THE DATE

FFA ROUNDTABLE

Friday, November 1, 2024

Watch your Inbox and the FFA website for details about this always popular event for Federal judges and practitioners.

NOT A MEMBER OF THE FFA?

Have you been enjoying member discounts to our CLE programs and events? Have you benefited from those programs and other services provided by the FFA? If you answered "no" to these questions, you should consider being a part of the organization committed to enhancing the practice of law in Colorado's Federal Courts!

Click <u>HERE</u> to join the FFA.

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