

**In re Soaring Eagles Townhomes Association, Inc.
United States Bankruptcy Court for the District of Colorado
Case No. 26-15148 TBM**

Addendum to Proof of Claim of RowCal Construction & Maintenance CO, LLC

Soaring Eagles Townhomes Association, Inc. (the “Debtor”) is a homeowner’s association located in El Paso County, Colorado, consisting of common area owned by the Debtor and 150 individually owned townhome lots. In 2024 a hailstorm caused significant damage to townhomes within the homeowner’s association. Debtor had insurance in effect, but it had a high deductible. A third-party insurance claims adjuster was assigned and determined the cost to repair the damage was \$3,604,548, subject to a deductible of \$3,112,817, which deductible amount the Debtor would have to pay to make the necessary repairs.

To pay the \$3,112,817 in necessary repairs, the Debtor’s board levied a special assessment on all the 150 units in the association in equal shares of \$20,752.

Most of the 150 unit owners paid the special assessment. Eighteen of them did not, placing the Debtor association and the homeowners who paid the special assessment in financial jeopardy.

The Debtor contracted with RowCal Construction & Maintenance CO, LLC (“RowCal Construction”) to repair the hailstorm damage. RowCal Construction repaired the damage, and upon completion passed inspection. RowCal Construction furnished labor, materials, and/or services for the construction, alteration, or improvement of real property located within the boundaries of the Debtor (the “Property”).

RowCal Construction was not paid in full for the labor, materials, and/or services it furnished on units located within the Property. RowCal Construction timely recorded a blanket mechanics’ lien against the Property pursuant to C.R.S. §§ 38-22-103(4) and 38-22-109, in the principal amount of \$722,600.37 plus all other amounts authorized by law (the “Mechanics’ Lien”).

As a result, RowCal Construction has commenced a mechanic’s lien action against the homeowners, District Court for El Paso County, Colorado, Case No. 2026CV31849 (the “Mechanics’ Lien Action”). The Mechanics’ Lien Action to judicially foreclose the Mechanics’ Lien pursuant to C.R.S. §§ 38-22-110 and 38-22-111.

An itemization of damages is included with the Proof of Claim.

***Note regarding secured status – RowCal believes that its claim is fully secured to non-debtor property, i.e. the individual townhome lots.**

CREDITOR RESERVES ALL RIGHTS TO (i) SUPPLEMENT OR AMEND THIS PROOF OF CLAIM; (ii) ASSERT AN ADMINISTRATIVE EXPENSE CLAIM; AND (iii) ANY OTHER DAMAGES AND CLAIMS.