OARC Evidence Index and Source Map

Advanced Consulting Inc. v. Peter C. Pfeiffer
Case No. 2025CV31047

Purpose. This packet organizes the original filings, emails, court records, and party communications supporting the accompanying OARC narrative. The documents are offered for investigation of what was written, transmitted, authorized, supervised, and corrected. Their inclusion does not itself establish knowledge, intent, or a disciplinary violation.

Important limitation. The separate July 6, 2026, 10:35 a.m. email to Aaron Menza quoted in the narrative was not located in the assembled source files and is not included. Exhibit F contains the July 6 "E-service" email and the available three-page Status Report. The Status Report's referenced Exhibits 1, 2, and 3 are not included because they were not present in the records assembled for this packet.

Ex.	Document	Documentary point
A	March 2 and March 12, 2026 emails transmitting and following up on the proposed Case Management Order.	Shows the staff-directed transmission, counsel copied on the communications, the request for input, and the stated intent to file by March 13.
B	Plaintiff's March 13, 2026 Proposed Case Management Order as filed.	Contains the challenged telephone-conferral statement and the "/s/ Peter C. Pfeiffer" entry under "APPROVED AS TO FORM."
C	Peter Pfeiffer's March 20, 2026, 8:01 a.m. fourteen-item written list to Edison McDaniels.	Documents pre-entry objections, the statement that the proposal was not ready to be finalized, and the request to address the telephone statement and other disputed matters.
D	March 20, 2026 entered Case Management Order.	Shows the order entered after the disputed proposal and permits comparison with the proposed language and the objections supplied that morning.
E	March 23, 2026 email transmitting draft comments and objections, together with the March 24 video-meeting invitation.	Documents that approval had not been given and that the substantive meeting occurred by video after the March 13 filing.
F	July 6, 2026 "E-service" email and the three available Status Report pages.	Shows the statement "You have been served," identifies McDaniels as the serving attorney, references Exhibits 1–3 not present in this record, and states that a self-represented party requiring direct service would be served through the Court's mail function.
G	Plaintiff's August 25, 2026 Notice of Conferral and Certificate of Service.	Contains the separate statement that counsel conferred with Defendant by telephone on

		August 17, 2026 and identifies the authorizing attorney and staff-signed service certification.
H	Peter Pfeiffer's August 25, 2026 Formal Request to Confer Regarding Service and Communication Protocol.	Provides detailed written notice of the service, missing-document, staff-communication, conferral, and correction concerns.
I	Peter Pfeiffer's September 14, 2026 Notice Correcting the Record, with the court-generated service page addressed to 35045 Roan Drive.	Places the August 17 telephone-conferral dispute and the incorrect street number before the court in writing.
J	Selected May 8 and August 5–6, 20, and 21, 2026 mediation and communication records.	Documents willingness to mediate, the direction to use the firm "team," the selected September dates and neutral, and Defendant's August 21 court filings.
K	Peter Pfeiffer's May 2026 initial disclosures and May 15 transmission/response email.	Documents the disclosure content, mailing/transmission, counsel's receipt of the email, and the request to resend the attachment in another format.
L	February 5, 2026 direct email to Edison McDaniels.	Establishes early direct notice of the disputed project, identified evidence, permit and lien concerns, and the statement that counsel was "being scammed just like I was." It is offered as notice, not proof of counsel's knowledge or intent.
M	July 20, 2026 Motion to Dismiss and certificate of service.	Establishes later formal, detailed notice of alleged conflicts between Plaintiff's representations and the documentary record. The allegations remain disputed and are included to show what counsel was asked to investigate, answer, or correct.

Use and verification

- Before submission, compare this index with the final narrative and confirm that each included document is a true and correct copy from your records.
- Do not represent the July 6 Status Report's Exhibits 1–3 as attached; this packet documents that they were absent from the assembled records.
- Retain the original electronic files and complete email archives. OARC may request native files, complete threads, metadata, or additional context.
- AI-created analyses, checklists, and summaries are not included as evidence. The packet uses original communications, filed documents, court records, and Defendant's disclosures. Exhibits L and M are included to document notice and the chronology of counsel's opportunity to review; their allegations are not treated as independently proven facts.

Prepared for submission with the OARC narrative of Peter C. Pfeiffer.

EXHIBIT A

March 2 and March 12, 2026 emails transmitting and following up on the proposed Case Management Order.

Staff transmission, counsel copied, request for input, and stated filing deadline.

Subject: RE: Advanced Consulting Inc v. Pfeiffer, Peter C | 2025CV031047
From: LeighAn Jaskiewicz <LeighAn.Jaskiewicz@omtrial.com>
Date: 3/12/2026, 12:27 PM
To: Peter Pfeiffer <pcpfeiffer@msn.com>
CC: David Roth <David.Roth@omtrial.com>, Edison McDaniels <Edison.McDaniels@omtrial.com>

Good Afternoon Mr. Pfeiffer:

Following regarding the below message. Reminder that the Case Management Conference is Friday, March 20, 2026 at 8:30 appearance via WebEx. Kindly review the attached Proposed Case Management Order. We would like to schedule a time to discuss this and add your input. If we do not hear from you we will file the Proposed Case Management on deadline (Friday, March 13, 2026).

Thank you.

LeighAn Jaskiewicz
Paralegal
LeighAn.Jaskiewicz@omtrial.com
OGBORNMIHM LLP
TRIAL LAWYERS

From: LeighAn Jaskiewicz
Sent: Monday, March 2, 2026 1:17 PM
To: Peter Pfeiffer <pcpfeiffer@msn.com>
Cc: David Roth <David.Roth@omtrial.com>; Edison McDaniels <Edison.McDaniels@omtrial.com>
Subject: Advanced Consulting Inc v. Pfeiffer, Peter C | 2025CV031047

Good Afternoon Mr. Pfeiffer:

I'm Mr. McDaniels and Mr. Roth's paralegal and will be one of the primary contacts for this case. I did receive your request to not email you; however, I will need to email on occasion to make sure receive pleadings – such as this email. Mr. McDaniels and Mr. Roth are the attorneys for this matter, with Mr. McDaniels being the primary attorney. Please find attached the below listed documents.

1. Notice Case Management Conference scheduled for Friday, March 20, 2026 at 8:30 appearance via WebEx (link is on the notice);
2. Proposed Case Management Order - please review and if you would to schedule a time to discuss with Mr. McDaniels please let us know; and
3. Plaintiff's Initial Disclosures and documents bates labelled AC_0001-0021.

Thank you.

LeighAn Jaskiewicz
Paralegal
LeighAn.Jaskiewicz@omtrial.com

EXHIBIT B

Plaintiff’s March 13, 2026 Proposed Case Management Order as filed.

Challenged telephone-conferral statement and “/s/ Peter C. Pfeiffer” under “APPROVED AS TO FORM.”

DISTRICT COURT, JEFFERSON COUNTY, STATE OF COLORADO 100 Jefferson County Parkway Golden, CO 80419	DATE FILED March 13, 2026 5:50 PM FILING ID: A111397B75111 CASE NUMBER: 2025CV31047
Plaintiff: ADVANCED CONSULTING INC., a Colorado corporation, v. Defendant: PETER C. PFEIFFER, an individual.	▲COURT USE ONLY▲ Case No.: 2025CV31047 Div.: 7
PROPOSED CASE MANAGEMENT ORDER	

The parties, by and through their undersigned attorneys, propose the following Case Management Order:

The Case Management Conference is scheduled for Friday, March 20, 2026 at 8:30 a.m.

1. The "at-issue" date is December 31, 2025.

2. Responsible attorney's name, address, phone numbers and email address:

Attorneys for Plaintiffs:
Edison P. McDaniels, III, Reg. No. 50797
Ogborn Mihm, LLP
1700 Lincoln Street, Suite 2700
Denver, CO 80203
Phone: (303) 592-5900
Edison.McDaniels@OMTrial.com

3. Counsel for Plaintiff and Defendant, conferred by telephone pursuant to C.R.C.P 16(b)(3) – Counsel for Plaintiff reached out Defendant via email Monday, March 2, 2026 and Thursday, March 11, 2026. Defendant has been non-responsive[1].

4. The following is a brief description of the case and the issues to be tried:

[1] Defendant was also non-responsive during the coordination of the Case Management Conference. Notice of Case Management Conference was served on Defendant via email, U.S. first class mail, and certified mail.

Plaintiffs: On December 2, 2024, Defendant Pfeiffer entered into a written roofing contract with Plaintiff AC INC for $19,400.00 to remove and replace the roof, gutters, and downspouts at the property located at 30545 Roan Drive, Evergreen, Colorado 80439.

Plaintiff issued an invoice dated December 17, 2024 for the full contract amount of $19,400.00, with payment due January 1, 2025. Defendant made a partial payment of $9,700.00 on December 20, 2024, ~~leaving an unpaid balance of $9,700.00. AC INC completed the work as agreed upon.~~

Plaintiff sent a Notice of Intent to Lien on January 23, 2025. When Defendant failed to pay the outstanding balance within ten days, Plaintiff recorded a mechanics lien against the property on February 24, 2025 at Reception No. 2025009778.

Defendants:

5. There are currently no pending motions before the Court. there will be shortly

6. ~~Brief~~ assessment of each party's position on the application of the proportionality factors, including those listed in C.R.C.P. 26(b)(1): The parties considered and understand the proportionality factors of Rule 26, including those of C.R.C.P 26(b)(1) and agree that discovery in this matter should not require judicial application of proportionality factors as the parties agree to use the discovery deadlines and limits as outlined by Rule 26. The parties understand the presumptive limit on discovery. If a party believes additional discovery is necessary, but said discovery is disputed by another party, the party requesting additional discovery not contained within this Case Management Order will contact the Court and explain their reasons.

7. ~~The parties have discussed possible settlement but have not reached any settlement agreement.~~

8. Deadlines for:

   a. Amending or supplementing pleadings: *(not more than 105 days after case at issue):* April 15, 2026

   b. Joinder of additional parties: *(not more than 105 days after case at issue):* April 15, 2026

c. Identifying non-parties at fault: *(90 days from the commencement of the action):* September 29, 2025

9. Disclosures: Initial disclosures are due January 28, 2026.

Objections, if any, about their adequacy: The parties agree to confer in good faith regarding objections, if any, to the adequacy of their disclosures in attempt to resolve any objections. If the parties cannot resolve their objections, they will seek assistance from the Court.

10. If full disclosure of information under C.R.C.P. 26(a)(1)(C) was not made because of a party's inability to provide it, provide a brief statement of reasons for that party's inability and the expected timing of full disclosures: Not applicable at this time.

11. Proposed limitations on and modifications to the scope and types of discovery, consistent with the proportionality factors in C.R.C.P. 26(b)(1): None

a. Number of depositions per party: The parties agree to limit the number of depositions to each of the adverse parties + 2 other persons + any expert endorsed by any other party.

b. Number of interrogatories per party: 30

c. Number of requests for production of documents per party: 20

d. Number of requests for admission per party: 20

e. Any physical or mental examination per C.R.C.P. 35: Not applicable.

f. Any limitations on awardable costs: The parties reserve the right to dispute the reasonableness of any costs sought by a prevailing party.

g. State the justifications for any modifications in the foregoing C.R.C.P. 26(b)(2) limitations: N/A.

12. Subjects for Expert Testimony

Plaintiffs: None indicated at this time. Plaintiffs reserve the right to obtain an expert as needed to refute claims by the Defedant.

Defendant:

13. Proposed Deadlines for Expert Disclosures

a. Production of expert reports:

i. Plaintiff's Expert Disclosures: 126 days before trial.

ii. Defendants' Expert Disclosures: 98 days before trial.

iii. Rebuttal Expert Disclosure: 77 days before trial.

b. Rule 702 Motions: 70 days before trial.

c. Production of expert witness files: The parties shall produce expert witness files 14 after report (or 7 days before deposition, if scheduled, in advance).

14. Oral Discovery Motions

All parties shall timely comply with C.R.C.P. 16 and 26. The parties will also comply with any Court order regarding pretrial discovery disputes.

15. Electronically Stored Information

The parties understand and agree that this is not a case which is likely to have a substantial amount of electronic evidence appropriate for discovery. As such, it is agreed between the parties that there is no need to take expensive and extensive steps to preserve same. For example, the parties agree that there is no need to create mirror images of computers or servers, retain a third party to gather and hold electronic data, seek the appointment of a discovery master, or hire outside parties to search and index the computers or servers of the parties.

The foregoing notwithstanding, the parties, through counsel, recognize and confirm the need to take reasonable steps to ensure that materials, including electronic materials, relevant to, or related to, the disputes giving rise to their action, not be destroyed, deleted or otherwise rendered inaccessible.

Counsel for the parties certify that they conferred about reasonable preservation of all relevant documents and things, including electronically stored information. Counsel certifies that they instructed their respective clients about the need to take affirmative steps to reasonably preserve information and documents available to them that relate to the above captioned matter.

16. Discovery Completion Deadline – 49 days before trial:

a. The Parties' best estimate of the length of the trial: 3-days

b. The Trial and Pretrial Conference in this matter have not been set. *Counsel for Plaintiff will file a Notice to Set Trial and Pretrial Conference within 3 business days upon service of the Court's Order Granting this Joint Proposed Case Management Order.*

17. Other Appropriate Matters:

a. All redactions made to protect privileged, confidential or protected information contained in any document disclosed shall be made in black or other visible marking in such a manner as to indicate the extent and scope of the information redacted. The purpose and grounds for redactions shall be indicated with reasonable specificity on an associated privilege log along with a general description of the subject matter of the redacted information.

APPROVED AS TO FORM, as submitted on March 13, 2026:

/s/
Edison P. McDaniels, III
OGBORN MIHM, LLP
1700 Lincoln Street, Suite 2700
Denver, CO 80203
Phone: (303) 592-5900
Edison.McDaniels@OMTrial.com
Attorneys for Plaintiffs

/s/
Peter C. Pfeiffer, *pro se*
30545 Roan Drive
Evergreen, CO 80439
(720)314-6600
pcpfeiffer@msn.com

CASE MANAGEMENT ORDER

IT IS HEREBY ORDERED that the foregoing, including any modifications made by the court, is and shall be the Case Management Order in this case.

Dated this ___ day of _____ 2026.

BY THE COURT:

_____
District Court Judge

EXHIBIT C

Peter Pfeiffer’s March 20, 2026 fourteen-item written list.

Pre-entry objections, nonapproval, and request to address disputed statements.

Subject: List
From: Peter Pfeiffer <pcpfeiffer@msn.com>
Date: 3/20/2026, 8:01 AM
To: Edison McDaniels <Edison.McDaniels@omtrial.com>

Mr. McDaniels,

As noted yesterday evening, I wanted to put together a list of issues. I am not prepared to finalize a case management plan until these are addressed. If they are not addressed that is important to learn also.

1. Please explain why the delay, dismissal, and removal of dismissal; the change in personnel. (motion not sent to me)
2. Please explain the "wild animals accusation. (details not sent to me)
3. Please explain when you decided the case is at issue and why you did not contact me immediately for a 14 day Meet and Confer.
4. Please explain why you have pursued a case management meeting and case management order without discussing with A through E per Meet and Confer requirements.
5. The above (#4) should include details on: one or more tortious acts; AC Inc (sic) worked diligently to finish; I failed to pay for work completed (it was not completed); these repeated again twice. Further, AC did not provide labor; why substantially performed and not done at my instance and request and Schindler v. Green (1905); how and why I breached the contract; explain injuries/damages suffered. Etc. RE second claim for relief.
6. Please provide proof--my signature--of service RE mechanics' lien twice.
7. Please explain good faith efforts to finish the project by your client.
8. Please explain your reasoning for considering the project was completed given your review of the lists on my website--annotated photo of house, list provide to Nick Bennett in person at my home in Dec. 2025, and list and reasoning for withholding final payment (another list) sent to Mr. Donald and Mr. Bennett 1/17/25 with no effort to correct or communicate (e.g., no letter and no visit or inspection).
9. Please provide signed permit per Jeffco requirements; why no one from AC Inc Roofing attended; and driveway damage preventing access and explaining my behavior; and why Mr. Jaen had no problem parking in the street and meeting me at a later date.
10. Please explain your 3/2/25 (stated date; received 3/8) and the use of the same false "certified mail" envelope. Please explain your involvement/supervision of all mailings to me and confirmation of dates and methods sent.
11. Please explain why you have not reviewed and included in case management documents and actions all emails to and from me and regarding me and the project as I have mention numerous times.
12. Please explain why you still have not replied to my email to you on 3/2/26. I only received a reply this week for the first time when I sent Fraud #1 and Fraud #2.
13. Continued emails from your assistant and your request that I email various "team" members at your firm. My email is personal and not a company or law firm. This must be resolved. If necessary, do not send any emails at all; send everything via USPS promptly with time for me to reply in writing also by mail. Your assistants last emails--"I know you don't want me to email

you" one began were too late and not received by me to be actionable.

14. Please explain why you said we can meet in-person at the courthouse and you still set an appointment a virtual meeting without contacting me.

Most of all I would like to discuss--two months ago--each allegation in your action, e.g., process service, tort violations, breach by me, etc. which conflict with the facts. This should have been done been done as required and much confusion and contention could have been avoided.

As I have informed the clerk and will say at the meeting, I am not prepared to discuss case management because I have a long list of questions and concerns to be addressed first. This must be done with the Responsible Attorney.

You have stated we talked on the phone in the document you emailed me; your footnote to that is inappropriate and contentious.

This list may be incomplete. Again, I need time to prepare for such a Meet and Confer in order to address all issues of concern.

Thank you.

Peter Pfeiffer

EXHIBIT D

March 20, 2026 entered Case Management Order.

Comparison with the proposed language and objections supplied that morning.

DISTRICT COURT, JEFFERSON COUNTY, STATE OF COLORADO 100 Jefferson County Parkway Golden, CO 80419	DATE FILED March 20, 2026
Plaintiff: ADVANCED CONSULTING INC., a Colorado corporation, v. Defendant: PETER C. PFEIFFER, an individual.	**▲COURT USE ONLY▲** Case No.: 2025CV31047 Div.: 7

CASE MANAGEMENT ORDER

The parties, by and through their undersigned attorneys, propose the following Case Management Order:

The Case Management Conference is scheduled for Friday, March 20, 2026 at 8:30 a.m.

1. The "at-issue" date is December 31, 2025.

2. Responsible attorney's name, address, phone numbers and email address:

Attorneys for Plaintiffs:
Edison P. McDaniels, III, Reg. No. 50797
Ogborn Mihm, LLP
1700 Lincoln Street, Suite 2700
Denver, CO 80203
Phone: (303) 592-5900
Edison.McDaniels@OMTrial.com

3. Counsel for Plaintiff and Defendant, conferred by telephone pursuant to C.R.C.P 16(b)(3) – Counsel for Plaintiff reached out Defendant via email Monday, March 2, 2026 and Thursday, March 11, 2026. Defendant has been non-responsive[1].

4. The following is a brief description of the case and the issues to be tried:

[1] Defendant was also non-responsive during the coordination of the Case Management Conference. Notice of Case Management Conference was served on Defendant via email, U.S. first class mail, and certified mail.

Plaintiffs: On December 2, 2024, Defendant Pfeiffer entered into a written roofing contract with Plaintiff AC INC for $19,400.00 to remove and replace the roof, gutters, and downspouts at the property located at 30545 Roan Drive, Evergreen, Colorado 80439.

Plaintiff issued an invoice dated December 17, 2024 for the full contract amount of $19,400.00, with payment due January 1, 2025. Defendant made a partial payment of $9,700.00 on December 20, 2024, leaving an unpaid balance of $9,700.00. AC INC completed the work as agreed upon.

Plaintiff sent a Notice of Intent to Lien on January 23, 2025. When Defendant failed to pay the outstanding balance within ten days, Plaintiff recorded a mechanics lien against the property on February 24, 2025 at Reception No. 2025009778.

Defendants:

5. There are currently no pending motions before the Court.

6. Brief assessment of each party's position on the application of the proportionality factors, including those listed in C.R.C.P. 26(b)(1): The parties considered and understand the proportionality factors of Rule 26, including those of C.R.C.P 26(b)(1) and agree that discovery in this matter should not require judicial application of proportionality factors as the parties agree to use the discovery deadlines and limits as outlined by Rule 26. The parties understand the presumptive limit on discovery. If a party believes additional discovery is necessary, but said discovery is disputed by another party, the party requesting additional discovery not contained within this Case Management Order will contact the Court and explain their reasons.

7. **Parties are ordered to mediate and will schedule medication within 35 days of this order.**

8. Deadlines for:

   a. Amending or supplementing pleadings*: (not more than 105 days after case at issue):* April 15, 2026

   b. Joinder of additional parties: *(not more than 105 days after case at issue):* April 15, 2026

c. Identifying non-parties at fault: *(90 days from the commencement of the action):* September 29, 2025

9. Disclosures: Initial disclosures are due January 28, 2026.

Objections, if any, about their adequacy: The parties agree to confer in good faith regarding objections, if any, to the adequacy of their disclosures in attempt to resolve any objections. If the parties cannot resolve their objections, they will seek assistance from the Court.

10. If full disclosure of information under C.R.C.P. 26(a)(1)(C) was not made because of a party's inability to provide it, provide a brief statement of reasons for that party's inability and the expected timing of full disclosures: Not applicable at this time.

11. Proposed limitations on and modifications to the scope and types of discovery, consistent with the proportionality factors in C.R.C.P. 26(b)(1): None

a. Number of depositions per party: The parties agree to limit the number of depositions to each of the adverse parties + 2 other persons + any expert endorsed by any other party.

b. Number of interrogatories per party: 30

c. Number of requests for production of documents per party: 20

d. Number of requests for admission per party: 20

e. Any physical or mental examination per C.R.C.P. 35: Not applicable.

f. Any limitations on awardable costs: The parties reserve the right to dispute the reasonableness of any costs sought by a prevailing party.

g. State the justifications for any modifications in the foregoing C.R.C.P. 26(b)(2) limitations: N/A.

12. Subjects for Expert Testimony

Plaintiffs: None indicated at this time. Plaintiffs reserve the right to obtain an expert as needed to refute claims by the Defendant.

Defendant:

13. Proposed Deadlines for Expert Disclosures

a. Production of expert reports:

i. Plaintiff's Expert Disclosures: 126 days before trial.

ii. Defendants' Expert Disclosures: 98 days before trial.

iii. Rebuttal Expert Disclosure: 77 days before trial.

b. Rule 702 Motions: 70 days before trial.

c. Production of expert witness files: The parties shall produce expert witness files 14 after report (or 7 days before deposition, if scheduled, in advance).

14. Oral Discovery Motions

All parties shall timely comply with C.R.C.P. 16 and 26. The parties will also comply with any Court order regarding pretrial discovery disputes.

15. Electronically Stored Information

The parties understand and agree that this is not a case which is likely to have a substantial amount of electronic evidence appropriate for discovery. As such, it is agreed between the parties that there is no need to take expensive and extensive steps to preserve same. For example, the parties agree that there is no need to create mirror images of computers or servers, retain a third party to gather and hold electronic data, seek the appointment of a discovery master, or hire outside parties to search and index the computers or servers of the parties.

The foregoing notwithstanding, the parties, through counsel, recognize and confirm the need to take reasonable steps to ensure that materials, including electronic materials, relevant to, or related to, the disputes giving rise to their action, not be destroyed, deleted or otherwise rendered inaccessible.

Counsel for the parties certify that they conferred about reasonable preservation of all relevant documents and things, including electronically stored information. Counsel certifies that they instructed their respective clients about the need to take affirmative steps to reasonably preserve information and documents available to them that relate to the above captioned matter.

16. Discovery Completion Deadline – 49 days before trial:

a. The Parties' best estimate of the length of the trial: 3-days

b. **The Court Trial is set on November 4-6, 2026. Trial will start at 8:00am in Courtroom 430.**

c. **Pretrial Conference is set on October 2, 2026 at 3:30pm via WebEx.**

17. Other Appropriate Matters:

a. All redactions made to protect privileged, confidential or protected information contained in any document disclosed shall be made in black or other visible marking in such a manner as to indicate the extent and scope of the information redacted. The purpose and grounds for redactions shall be indicated with reasonable specificity on an associated privilege log along with a general description of the subject matter of the redacted information.

APPROVED AS TO FORM, as submitted on March 20, 2026:

/s/
Edison P. McDaniels, III
OGBORN MIHM, LLP
1700 Lincoln Street, Suite 2700
Denver, CO 80203
Phone: (303) 592-5900
Edison.McDaniels@OMTrial.com
Attorneys for Plaintiffs

Peter C. Pfeiffer, *pro se*
30545 Roan Drive
Evergreen, CO 80439
(720)314-6600
pcpfeiffer@msn.com

CASE MANAGEMENT ORDER

IT IS HEREBY ORDERED that the foregoing, including any modifications made by the court, is and shall be the Case Management Order in this case.

Dated this 20th day of March, 2026.

BY THE COURT:

District Court Judge

EXHIBIT E

March 23 comments and objections with March 24 video-meeting invitation.

Nonapproval and timing/method of the later substantive meeting.

Subject: Re: [EXTERNAL] Fwd: Fwd: Fwd: 30545 Roan Drive RE Case #2025CV31047 -- Defendant comments to case management order
From: Peter Pfeiffer <pcpfeiffer@msn.com>
Date: 3/23/2026, 7:51 AM
To: Edison McDaniels <Edison.McDaniels@omtrial.com>

Good Morning Mr. McDaniels,

Attached are my DRAFT comments to you draft case management order. Please note I have not reviewed or approved other items save for my draft amendments.

These remove all references to a lien due to:

1. improper/unproven service;

2. the $100 credit for driveway damage in the emails (i.e., the amount requested is more than the amount due);

3. the numerous deficiencies again proving the amount sought is more than the amount due and no good faith effort was made to resolve these issues.

Therefore, I contend your lien contentions are void.

Thank you for sending this to me last week. I still have not received a written mailing of this which you said was mailed Friday 3/13/26 and the document you sent does not include a certificate of mailing page.

Best,

Peter Pfeiffer

On 3/18/2026 9:39 AM, Edison McDaniels wrote:

> For the Court,
>
> Because Mr. Pfeiffer is complaining of non-compliance, I have included you in this email explaining the efforts we have taken to cooperate with Mr. Pfeiffer and provide him with what he needs to understand the allegations against him. In addition to the documents identified in my response below, I have included the remainder of the thread he forwarded to you (attached email with Fraud#1 in the subject), including where he states that my assistant's (paralegal's) "email[s] go to [his] junk" folder. Given Mr. Pfeiffer's repeated accusations of unethical conduct and violations of the Colorado Rules of Civil Procedure and his intentional dismissal of communications from my office, I believe Friday's case management conference is absolutely necessary for us to complete the case management order.
>
> Mr. Pfeiffer,

Subject: Fwd: Case Management Call with Peter Pfeiffer -- Meet and Confer
From: Peter Pfeiffer <pcpfeiffer@msn.com>
Date: 3/23/2026, 7:58 AM
To: Edison McDaniels <Edison.McDaniels@omtrial.com>

Mr. McDaniels,

I found this in my spam folder. I do not want to reply to anyone but you to encourage this.

Per our meeting last week this should be 2 hours. I'd like to allocate plenty of time to review the emails and other items some of which were sent to you last week.

I noticed there is a change to a critical document since your pleading and no explanation has been provided; I may need to send an email about that and some information on the problem of unseen/ unwanted emails later today as well.

Thank you,

Peter Pfeiffer

-------- Forwarded Message --------
Subject: Case Management Call with Peter Pfeiffer
Date: Fri, 20 Mar 2026 19:39:34 +0000
From: Aaron Menza <Aaron.Menza@omtrial.com>
To:pcpfeiffer@msn.com <pcpfeiffer@msn.com>, Edison McDaniels <Edison.McDaniels@omtrial.com>
CC: David Roth <David.Roth@omtrial.com>, LeighAn Jaskiewicz <LeighAn.Jaskiewicz@omtrial.com>

Microsoft Teams meeting

Join: https://teams.microsoft.com/meet/26888994810711?p=OHQuZoO8aoOGNGhZmN

Meeting ID: 268 889 948 107 11

Passcode: j2Wm7qH3

Need help? | System reference

Dial in by phone

+1 469-998-7258,,968852731# United States, Dallas

Find a local number

Phone conference ID: 968 852 731#

For organizers: Meeting options | Reset dial-in PIN

► Aaron Menza has invited you to Case Management Call with Peter Pfeiffer

Attachments:

Attached Message Part.ics 4.1 KB

EXHIBIT F

July 6, 2026 “E-service” email and three available Status Report pages.

Claimed service, missing referenced Exhibits 1–3, and stated mail procedure.

Subject: E-service: Advanced Consulting Inc v. Pfeiffer, Peter C | 2025CV031047
From: LeighAn Jaskiewicz <LeighAn.Jaskiewicz@omtrial.com>
Date: 7/6/2026, 10:25 AM
To: Peter Pfeiffer <pcpfeiffer@msn.com>
CC: David Roth <David.Roth@omtrial.com>, Edison McDaniels <Edison.McDaniels@omtrial.com>, Aaron Menza <Aaron.Menza@omtrial.com>

Alert For: Peter Pfeiffer

Court: Jefferson County
Case Caption: Advanced Consulting Inc v. Pfeiffer, Peter C
Case Number: 2025CV031047
Date Served: July 6, 2026
Served by: Edison P. McDaniels, III

You have been served the following document:

Status Report Regarding Mediation

Thanks!

LeighAn Jaskiewicz
Paralegal
LeighAn.Jaskiewicz@omtrial.com
OGBORN MIHM LLP
TRIAL LAWYERS

1700 Lincoln St, Suite 2700
Denver, Colorado 80203
Denver: 303.592.5900
Jackson Hole: 307.733.8000
Los Angeles: 323.403.5900
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Fax: 303.592.5910
www.omtrial.com

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Attachments:

2026.07.06 Status Report Regarding Mediation.pdf 132 KB

DISTRICT COURT, JEFFERSON COUNTY, STATE OF COLORADO 100 Jefferson County Parkway Golden, CO 80419	
Plaintiff: ADVANCED CONSULTING INC., a Colorado corporation, v. Defendant: PETER C. PFEIFFER, an individual.	**▲COURT USE ONLY▲** Case No.: 2025CV31047 Div.: 7
Attorneys for Plaintiff: Michael J. Ogborn, Reg. No. 20932 David M. Roth, Reg No. 44800 Edison P. McDaniels III, Reg. No. 50797 OGBORN MIHM, LLP 1700 Lincoln Street, Suite 2700 Denver, CO 80203 Phone: (303) 592-5900 Mike.Ogborn@OMTrial.com David.Roth@OMTrial.com Edison.McDaniels@OMTrial.com	

STATUS REPORT REGARDING MEDIATION

Plaintiff, Advanced Consulting Inc., by and through its attorneys, Ogborn Mihm, LLP, hereby submits this Status Update as follows:

1. On June 2, 2026, the court issued a Delay Reduction Order – Notice of Mediation requiring the parties to file a status as to mediation or a certificate of mediation completion within 35 days.

2. Since issuance of the Case Management Order on March 20, 2026, Plaintiff has tried to engage the participation of the Pro Se Defendant.

3. After a lengthy call between the parties on March 24, 2026, Plaintiff has been unsuccessful in obtaining adequate participation from Defendant.

4. Defendant represented there were significant communications, documents, and admissions that supported his theory of the case on March 24, which he would disclose.

5. On April 15, 2026, after being unsuccessful obtaining any meaningful response from Defendant, Plaintiff reminded Defendant of the need for disclosures by email. Ex. 1, Email Thread, at 4.

6. Defendant reversed course on May 1, 2026, and stated that he did not "know what documents or communications" we were expecting from him. *Id*.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 6th day of July 2026, a true and correct copy of the foregoing **STATUS REPORT REGARDING MEDIATION** was filed and served via Colorado Courts E-filing system on all parties that have entered an appearance in this case.

Any party not represented by counsel or otherwise required to be served directly will be served by mail at their addresses of record with the Court through the Court's service-by-mail function.

s/ LeighAn M. Jaskiewicz
LeighAn M. Jaskiewicz, Paralegal

EXHIBIT G

Plaintiff’s August 25, 2026 Notice of Conferral and Certificate of Service.

Separate August 17 telephone-conferral statement and service certification.

DISTRICT COURT, JEFFERSON COUNTY, STATE OF COLORADO 100 Jefferson County Parkway Golden, CO 80419	DATE FILED August 25, 2026
Plaintiff: ADVANCED CONSULTING INC., a Colorado corporation, v. Defendant: PETER C. PFEIFFER, an individual.	▲ COURT USE ONLY ▲
Attorneys for Plaintiff: Michael J. Ogborn, Reg. No. 20932 David M. Roth, Reg No. 44800 Edison P. McDaniels III, Reg. No. 50797 OGBORN MIHM, LLP 1700 Lincoln Street, Suite 2700 Denver, CO 80203 Phone: (303) 592-5900 Mike.Ogborn@OMTrial.com David.Roth@OMTrial.com Edison.McDaniels@OMTrial.com	Case No.: 2025CV31047 Div.: 7

PLAINTIFF'S NOTICE OF CONFERRAL REGARDING PLAINTIFF'S CROSS MOTION FOR SUMMARY JUDGMENT

Plaintiff, Advanced Consulting Inc., through undersigned counsel, certifies that counsel conferred with Defendant by telephone on August 17, 2026 regarding the Plaintiff's Cross Motion for Summary Judgment ("Motion"). Plaintiff's counsel had not received a response prior to the filing of the Motion.

Respectfully submitted this 25th day of August 2026.

OGBORN MIHM, LLP

/s/ Edison. P. McDaniels III
Michael J. Ogborn, Reg. No. 20932
David M. Roth, Reg No. 44800
Edison P. McDaniels III, Reg. No. 50797
Attorneys for Plaintiff

2608252023 0062 1-101-1010 2

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 25th day of August 2026, a true and correct copy of the foregoing **PLAINTIFF'S NOTICE OF CONFERRAL REGARDING PLAINTIFF'S CROSS MOTION FOR SUMMARY JUDGMENT** was filed with the Court served via Colorado E-Filing System to all parties who have entered an appearance in this matter.

/s/ LeighAn Jaskiewicz
LeighAn Jaskiewicz, Paralegal

EXHIBIT H

August 25 Formal Request to Confer Regarding Service and Communication Protocol.

Detailed written notice of service, missing-document, staff, conferral, and correction concerns.

Peter C. Pfeiffer

30545 Roan Drive
Evergreen, CO 80439
pcpfeiffer@msn.com

August 25, 2026

VIA EMAIL AND UNITED STATES MAIL

Edison P. McDaniels III
Ogborn Mihm, LLP
1700 Lincoln Street, Suite 2700
Denver, Colorado 80203

Re: Advanced Consulting Inc. v. Peter C. Pfeiffer, Case No. 2025CV31047
Formal Request to Confer Regarding Service and Communication Protocol

Dear Mr. McDaniels:

This is a formal request to confer via email pursuant to C.R.C.P. 121 § 1-15(8) concerning a proposed service-and-communication solution for the problems encountered on this case.

The current system has failed. Multiple members of your staff have sent communications concerning filings, mediation, and court scheduling despite my repeated written notices that I do not accept staff email as a reliable means of communicating substantive matters in this case. At the same time, communications and documents I have sent to those staff members have not received a substantive response from responsible counsel.

The problem began prior to my first email to you on February 5, 2026 in which I was forced to contact you. On February 4, 2026, LeighAn Jaskiewicz emailed Division 7 requesting conference dates and copied me, you, and David Roth. On February 5, Logan Studer, clerk for Judge Meegan A. Miloud, circulated available Webex dates. On February 6 at 7:42 a.m., Ms. Jaskiewicz selected Plaintiff's availability. At 8:07 a.m., I wrote Ms. Jaskiewicz, 'Please do not Email Me.' I asked that firm email originate from you only when necessary or exigent, explained that other email could go to junk and could not be assumed read or received, requested prompt mailing of motions and responses because I could not access the E-Filing system, and stated that I preferred contact through the United States Postal Service.

The same structure affected the Case Management Order. Plaintiff filed the proposed Case Management Order on March 13, 2026. On March 16, I wrote you concerning a contemplated motion to dismiss, asked you to stop assistant communications, and requested information about case-management plans and activities. At 10:40 a.m., you responded that it was not realistic to expect you to be my sole contact, that 'that is not the way we operate,' and that the office would continue to contact me through staff. You said you would treat my motion discussion as a conferral, but also invited a 'true conferral' about its legal basis. On March 18 at 9:40 a.m., you copied Division 7, Ms. Jaskiewicz, Aaron Menza, and Mr. Roth, stated that you had roughly fifty cases, and explained that you relied upon staff for scheduling and transmitting disclosures. At 10:47 a.m., Mr. Studer said the issues would be addressed at the March 20 case-management conference. The communication problem nevertheless continued.

My willingness to mediate was also communicated directly and repeatedly. In my May 8, 2026

email to you at 9:06 a.m., I wrote, 'I firmly state I wish to pursue, and I am ready to participate in, mediation immediately and I have been since the judge's order.' On August 6 at 11:40 a.m., in response to your assertion that I had not answered mediation requests, I reminded you: 'Not true. I wrote you months ago saying I am available for mediation immediately. It is dated May 8.' These direct statements preceded the later scheduling dispute.

On June 3, 2026, Mr. Menza identified himself as the legal assistant who would correspond with me to schedule mediation and supplied four proposed mediators: Susan Demidovich, Jennifer Friedman, Gregory Garner, and Eric Moutz. On June 4 at 7:27 a.m., I again wrote, 'Please do not email me,' stated that this had been mentioned to you numerous times, and noted that I had not received replies to my mailings. Mr. Menza nevertheless sent additional dates at 4:38 p.m. On June 12 at 1:35 p.m., I told Mr. Menza that I still had not heard from you regarding mediation, said that the materials I supplied should be provided to the mediator, and reiterated my request for a mediator with legal-ethics experience, preferably a retired judge. On July 6 at 10:11 a.m., I sent Mr. Menza additional materials, expressly stated that I assumed he would share them, repeated that I preferred no firm email, and explained that I was sending the materials to confer and communicate. One attachment contained the first five draft pages of my contemplated motion.

The July 6, 2026 Status Report Regarding Mediation demonstrates the resulting problem. Ms. Jaskiewicz emailed the Status Report to me at 10:25 a.m. On that same date, at 10:35 a.m., I again notified your office through Mr. Menza that email from Ms. Jaskiewicz would not be received or read. Your filed certificate of service did not state that service upon me was completed by that email. It represented that a self-represented party requiring direct service would be served by mail through the Court's service-by-mail function.

I did not receive the Status Report by mail. The copy transmitted by Ms. Jaskiewicz also did not contain Exhibits 1, 2, and 3 cited throughout the Report. I therefore had no mailed copy of the accusations, no complete copy of the supporting materials, and no practical opportunity to address them before the status conference.

A related problem occurred when Mr. Menza communicated with the Court concerning dates for the status conference. On July 7, the Court entered an order setting an in-person status hearing regarding mediation. On July 8 at 10:38 a.m., Mr. Menza contacted Division 7 for dates. On July 13 at 11:05 a.m., Mr. Studer circulated available dates. On July 14 at 1:26 p.m., Mr. Menza supplied counsel's available dates and copied me, Mr. Roth, you, and Ms. Jaskiewicz. On July 15 at 9:22 a.m., after receiving your out-of-office reply, I selected August 7 because a prompt response appeared necessary; at 10:46 a.m., Mr. Studer emailed that the conference was set for August 7 at 9:00 a.m. in Courtroom 430. I did not receive a mailed order or notice confirming that conference and could not independently verify it on the E-Filing docket.

That scheduling thread was separate from my July 14 request to confer with you concerning my proposed Motion to Dismiss. At 8:18 a.m., I emailed you the draft and expressly requested conferral. After receiving your automatic out-of-office response, I forwarded the request and draft to Mr. Menza at 8:21 a.m. No attorney responded substantively before the motion was filed. Administrative scheduling communications could not reasonably substitute for attorney-to-party conferral concerning the merits of the proposed motion. If your office requires me to include designated staff, substantive materials sent to those staff members must be transmitted to responsible counsel; conversely, staff scheduling traffic should not later be characterized as substantive conferral.

The August communications repeated the same problem. On August 5, Ms. Jaskiewicz emailed

Plaintiff's Response in Opposition to my Motion to Dismiss. On August 6 at 10:23 a.m., I again asked you to stop assistant email and explained that I was not in the E-Filing system and did not have e-service. At 11:04 a.m., you responded that the firm would not alter its team workflow. On August 20 at 11:10 a.m., after receiving your August 7 letter by mail on August 17, I accepted Julie Thomerson on September 9 or 14, or Glynna Baker on September 8 as a backup. At 12:30 p.m., you offered September 9 at 11:00 a.m.; at 12:48 p.m., I accepted that date and neutral. At 1:26 p.m., Ms. Jaskiewicz contacted the scheduler to confirm September 9 with Ms. Thomerson. On August 21 at 8:45 a.m., the scheduler announced that Ms. Thomerson was no longer available and circulated new dates; at 12:23 p.m., Ms. Jaskiewicz again requested my availability by email. This sequence confirms both my prompt participation and the need for one reliable communication procedure.

Through an AI-assisted systematic review, I have now reconstructed the communication record presently available from my preserved Thunderbird emails and attachments. The review allowed me to place communications from multiple senders and separate threads into chronological context; each material entry used here has been checked against the preserved communication. I may not have read all these emails given the problems and I once again request not to receive them. I am only aware now of the wide-ranging effort.

On August 20, 2026, you instructed me in bold and underlined text: “If you email me, you need to copy my team,” and “Every email you send me should be sent to my entire team.” You identified no rule, court order, agreed protocol, or fixed list of recipients requiring me to communicate with an undefined and changing group of attorneys and staff. I request clarification whether this was merely your firm’s administrative preference or whether you contend that I am legally required to follow it. I also request identification of the persons included within “your entire team” and the role of each person in this case.

Further, this directive does not resolve the underlying problem. When I have sent substantive communications or documents to members of your designated team, responsible counsel has not consistently acknowledged or answered them. Conversely, your staff’s emails have sometimes transmitted or referenced substantive filings and court matters without ensuring that I received complete service by an authorized and reliable method.

Proposed protocol

1. All motions, reports, declarations, exhibits, notices, and other papers filed or served by Plaintiff will be served upon me in complete form by United States Mail at my address of record.
2. Plaintiff will promptly mail me any court order or scheduling notice received through E-Filing that concerns a proceeding initiated or requested by Plaintiff and that the Court has not separately mailed to me.
3. Any courtesy email copy will be clearly labeled as such and will not replace the mailed copy.
4. Every mailed or transmitted filing will include all exhibits and attachments referenced in the filing.
5. Certificates of service will identify the actual method used, mailing date/delivery to USPS, address used.
6. Substantive conferral concerning contemplated motions, legal positions, alleged noncompliance, sanctions, disclosures, or settlement will occur directly between you - or another attorney who has entered an appearance - and me.
7. One designated staff member may transmit strictly ministerial scheduling information. The

communication will clearly identify the requested action and deadline and will not be duplicated by multiple members of the office.

8. Responses and documents I send to a designated staff member will be promptly transmitted to responsible counsel.
9. No staff scheduling communication will be characterized as substantive conferral unless an appearing attorney actually participated concerning the merits and requested relief.

Records and information still missing

Because I cannot access E-Filing, please provide the following in complete form by mail, with a courtesy electronic copy if practicable:

a. The affidavits and all exhibits supporting Plaintiff's November 4, 2025 Motion to Set Aside Dismissal, including the affidavits of Edison P. McDaniels III and the process server.

b. The complete July 6, 2026 Status Report Regarding Mediation, including Exhibits 1, 2, and 3 exactly as filed.

c. Any separate motion, written request, declaration, or proposed order seeking mediation-related relief or prompting the July 7 order, August 7 conference, or August 7 Minute Order. If no separate motion exists, please confirm that in writing.

d. The August 7 conference recording or transcript, or the information necessary to order it, including the reporter or recording-system identification and request procedure.

e. Every order or notice establishing or confirming the August 7 conference, with the date, method, and address of service upon me.

f. Confirmation whether and when the July 6 Status Report was mailed through the Court's service-by-mail function, the address used, and whether all three exhibits were included.

Please respond in writing by noon Thursday August 27, 2026, stating whether Plaintiff agrees to the proposed procedure and identifying any provisions Plaintiff would modify. I am available to discuss any disputed provision directly with you in a professional manner in an effort to reach agreement without court intervention.

If we cannot resolve these issues through conferral, I also intend to request an expedited in-person status conference concerning service, notice, conferral, and the missing record. I will ask the Court to review a chronological communication index and supporting communications, establish a prospective protocol, and correct any materially inaccurate characterization of my responsiveness or compliance.

This request is not a refusal to communicate, mediate, receive valid service, or comply with court orders. It is intended to ensure complete notice, direct attorney accountability, reciprocal treatment of communications, and an accurate record.

Sincerely,

Peter C. Pfeiffer

EXHIBIT I

September 14 Notice Correcting the Record and wrong-address service page.

Written correction of the August 17 statement and 35045/30545 address issue.

DISTRICT COURT, JEFFERSON COUNTY, COLORADO 100 Jefferson County Parkway Golden, Colorado 80401 Plaintiff: ADVANCED CONSULTING INC., d/b/a AC INC. ROOFING v. Defendant: PETER C. PFEIFFER	**COURT USE ONLY** Case Number: 2025CV31047 Division: 7

DEFENDANT'S MOTION TO CORRECT THE RECORD REGARDING PLAINTIFF'S AUGUST 25, 2026 NOTICE OF CONFERRAL AND JULY 6, 2026 CLAIMED ELECTRONIC SERVICE

Defendant Peter C. Pfeiffer, appearing pro se, respectfully moves for an order correcting the record concerning Plaintiff's August 25, 2026 Notice of Conferral and the claimed electronic service of Plaintiff's July 6, 2026 Status Report Regarding Mediation.

This Motion is limited to the accuracy of Plaintiff's conferral certification and the manner and timing of service. It does not address the substantive allegations in Plaintiff's July 6 Status Report, which Defendant reserves the right to address separately after receiving and reviewing the complete filing and referenced exhibits.

C.R.C.P. 121 § 1-15(8) CONFERRAL

On 9/14/26, Defendant sent Edison P. McDaniels III a written request to correct or withdraw the August 25, 2026 Notice of Conferral and to clarify the claimed July 6, 2026 electronic service.

FACTUAL BACKGROUND

1. Defendant is self-represented and is not participating in this action through the Colorado Courts E-Filing System.
2. Defendant has not agreed to accept electronic service from Plaintiff, Plaintiff's counsel, or counsel's staff as a substitute for service required by the Colorado Rules of Civil Procedure or an applicable court order.

3. On July 6, 2026, LeighAn Jaskiewicz sent an email to Defendant with the subject line "E-service: Advanced Consulting Inc v. Pfeiffer, Peter C.—Case No. 2025CV31047."
4. The email stated: "You have been served the following document: Status Report Regarding Mediation."
5. The email further identified the document as having been served by Edison P. McDaniels III.
6. Defendant did not see, open, or read the July 6 email or its attachment at that time.
7. At 10:35 a.m. on July 6, 2026, Defendant sent a separate email to Aaron Menza stating: "Repeat: No email from LeighAn Jaskiewicz will be received or read."
8. Defendant received no response from Mr. Menza or Mr. McDaniels and received no paper copy of the Status Report by USPS from Plaintiff, Plaintiff's counsel, counsel's staff, counsel's firm, or the Court.
9. Defendant did not receive the July 6 Status Report through a Colorado Courts E-Filing account.
10. During Defendant's later reconstruction and review of the email record, Defendant located the three-page Status Report attached to the July 6 email. The Status Report refers to Exhibits 1, 2, and 3, but those exhibits were not attached to the email and have never been provided to Defendant.
11. On August 25, 2026, Plaintiff filed **Plaintiff's Notice of Conferral Regarding Plaintiff's Cross-Motion for Summary Judgment**.
12. That Notice states: "Plaintiff's counsel conferred with Defendant by telephone on August 17, 2026 regarding the Plaintiff's Cross Motion for Summary Judgment."
13. That statement is factually incorrect. Defendant did not speak with Mr. McDaniels by telephone on August 17, 2026 concerning the cross-motion.
14. Defendant has never spoken with Mr. McDaniels by telephone.
15. Defendant's only direct meeting with Mr. McDaniels was an earlier court-ordered meet-and-confer conducted by video.

16. The court-ordered video meeting was arranged through Aaron Menza, occurred approximately two months after it was initially expected, and was scheduled for one hour after Defendant had stated during the court conference that two hours were needed.
17. That meeting was not a telephone conversation, did not occur on August 17, 2026, and was not a conferral concerning Plaintiff's subsequently filed Cross-Motion for Summary Judgment.
18. The August 25 Notice bears the electronic signature `/s/ Edison P. McDaniels III`.
19. The accompanying court-generated service document identifies Edison Preston McDaniels as the "Authorizing Attorney."
20. The Certificate of Service, signed by LeighAn Jaskiewicz, states that the Notice was served through the Colorado E-Filing System upon all parties who had entered an appearance.
21. Defendant did not receive the Notice through an electronic-filing account. Defendant eventually received a paper copy, on or about the beginning of September 2026, through a court-generated mailing addressed to the wrong street number.
22. That mailing was addressed to **35045 Roan Drive**, rather than Defendant's correct address, **30545 Roan Drive**.
23. True and correct copies of the Notice, Certificate of Service, court-generated mailing document, and corresponding envelope are attached as Exhibit A.

ARGUMENT

A. The record should not reflect a telephone conferral that did not occur.

C.R.C.P. 121 § 1-15(8) requires a moving party to confer in good faith before filing a motion and to describe the result of the conferral. The accuracy of that certification is important because the Court relies upon it in determining whether the parties attempted to resolve or narrow the disputed issue before invoking judicial intervention.

Plaintiff's August 25 Notice does not merely state that counsel attempted to contact Defendant. It affirmatively certifies that counsel **conferred with Defendant by telephone on August 17, 2026 regarding the cross-motion**.

No such telephone conversation occurred. Defendant has never spoken with Mr. McDaniels by telephone. The earlier court-ordered video meet-and-confer cannot substantiate the certification because it was a different court-ordered conference, conducted by a different means, on a different occasion, and for a different purpose.

The Notice is signed by Mr. McDaniels and identifies him as the authorizing attorney. The record should therefore be corrected so that the nonexistent August 17 telephone conferral is not treated as an established procedural fact.

B. The July 6 email did not provide Defendant with actual notice of the Status Report.

The July 6 email characterized itself as "E-service" and stated that Defendant had been served with the Status Report. Defendant, however, was not participating in the case through an electronic-filing account, had not consented to email service from Plaintiff or counsel's staff, and did not see, open, or read the email or its attachment at the time.

Defendant therefore did not receive actual notice of the Status Report on July 6 merely because counsel's staff sent an email bearing the label "E-service."

Neither Plaintiff, Plaintiff's counsel, counsel's staff, counsel's firm, nor the Court subsequently provided the Status Report to Defendant by USPS. During Defendant's later reconstruction and review of the email record, Defendant located the three-page Status Report attached to the July 6 email. The Status Report refers to Exhibits 1, 2, and 3, but those exhibits were not attached to the email and have never been provided to Defendant.

C. The incorrectly addressed mailings corroborate Defendant's service and notice concerns.

The court-generated mailing containing the August 25 Notice was addressed to **35045 Roan Drive**, rather than Defendant's correct address, **30545 Roan Drive**.

This was not an inconsequential typographical error. It caused or contributed to delayed and uncertain delivery of filings affecting Defendant's obligations and response periods. The physical envelopes contain markings showing that the address was incorrect.

This incorrectly addressed mailing provides additional documentary support for Defendant's pending request that filings and court notices be mailed reliably to Defendant's correct address.

D. Any response period should run from valid service or actual receipt, not from an unseen email.

Defendant should not be treated as having received a filing merely because counsel's staff sent it to an email address without Defendant's agreement to accept email service.

Defendant also should not lose response time because the court-generated mailing containing the August 25 Notice was sent to the wrong street number. To the extent a response to the July 6 Status Report or August 25 Notice is permitted or required, the applicable period should be measured from valid service or Defendant's documented actual receipt or notice, as appropriate.

REQUEST FOR RELIEF

Defendant respectfully requests that the Court:

1. Determine that Defendant did not confer with Mr. McDaniels by telephone on August 17, 2026 concerning Plaintiff's Cross-Motion for Summary Judgment;

2. Direct Plaintiff to withdraw or correct the factually inaccurate August 25, 2026 Notice of Conferral;

3. Determine that the July 6, 2026 email did not, standing alone, establish Defendant's receipt or acceptance of electronic service;

4. Direct Plaintiff to provide Defendant by USPS a complete copy of the July 6, 2026 Status Report, including the precise documents submitted or referenced as Exhibits 1, 2, and 3;

5. Determine that any applicable response period runs from valid service or Defendant's documented actual receipt or notice, as appropriate;

6. Direct that Defendant's correct mailing address—**30545 Roan Drive, Evergreen, Colorado 80439**—be used for all future service and court-generated mailings;

7. Consider these documents as additional evidence supporting Defendant's pending motion concerning USPS service, court notice, access to filed documents, and communications with Plaintiff's responsible attorney; and

8. Grant such other relief as the Court determines just and appropriate.

_____

Peter C. Pfeiffer, Defendant pro se
30545 Roan Drive
Evergreen, Colorado 80439

CERTIFICATE OF SERVICE

I certify that on _____, 2026, I served a true and correct copy of the foregoing Defendant's Motion for a Tailored Service Notice and Conferral Protocol and for Production of Missing Filed Materials by United States Mail, postage prepaid, addressed to:

Edison P. McDaniels III
Ogborn Mihm, LLP
1700 Lincoln Street, Suite 2700
Denver, Colorado 80203

_____

Peter C. Pfeiffer

Ogborn Mihm LLP
Edison Preston McDaniels
1700 Lincoln Street
Suite 2700
Denver CO 80203 US

PETER C PFEIFFER
35045 ROAN DRIVE
EVERGREEN CO 80439

1-101-1010

To: Peter C Pfeiffer

Subject: Service of documents in Advanced Consulting Inc v. Pfeiffer, Peter C.

You are being served with documents filed electronically through the Colorado Courts E-Filing system. Please review the following details concerning this service.

- Court Location: Jefferson County
- Case Number: 2025CV031047
- Case Name: Advanced Consulting Inc v. Pfeiffer, Peter C
- Filing ID: A28C42B52CDD0
- Filed Document Title(s):
  - Notice of Conferral regarding Cross Motion for Summary Judgment
- Submitted on Date/Time: Tue Aug 25 17:30:08 MDT 2026
- Submitted by Authorizing Organization: Ogborn Mihm LLP
- Submitted by Authorizing Attorney: Edison Preston McDaniels

If you have a question about the above listed case, please contact the court. Information for all Colorado court locations is listed on the Colorado Judical Branch website http://www.courts.state.co.us/Index.cfm.

EXHIBIT J

Selected May 8 and August 5–6, 20, and 21 mediation and communication records.

Willingness to mediate, team directives, selected dates/neutral, and August 21 filings.

Subject: RE: [EXTERNAL] Fwd: Disclosures -- Fri 5/8/26
From: Edison McDaniels <edison.mcdaniels@omtrial.com>
Date: 5/8/2026, 10:09 AM
To: Peter Pfeiffer <pcpfeiffer@msn.com>
CC: LeighAn Jaskiewicz <LeighAn.Jaskiewicz@omtrial.com>, Aaron Menza <Aaron.Menza@omtrial.com>, David Roth <David.Roth@omtrial.com>

Mr. Pfeiffer,

As has been requested numerous times, please copy my team on all emails. We work together as a team and all need to stay informed of developments in this matter.

I apologize but I am having a hard time understanding your concerns. I also don't understand your allegations of malice. This is a mechanic's lien foreclosure action. The ideal resolution for us would be to receive payment. We do not want to foreclose on your property but your refusal to pay leaves us with this remedy under the law. We are happy to resolve this without going to trial and would prefer to resolve by way of mediation or negotiation. That being said, you have refused to provide any disclosures despite your representations that you have evidence that my client is not being truthful, the work was not done in a workmanlike manner, and various other categories of defenses. Although I understand you have concerns with the action against you, I do not have any evidence of my client being untruthful or any of the other items you mentioned during our video call and thereafter. I cannot just take you at your spoken word when all of the evidence I have contradicts your statements. I would like mediation to be productive and have disclosed the items we have concerning this litigation. If you are adamant about not providing disclosures we have two options. We can set a discovery dispute hearing with the court, which will require:

Discovery Disputes: The Court requires discovery motions to be presented orally. If there is a discovery dispute, parties are expected to confer in a meaningful way in person or by telephone to try and resolve the dispute. An exchange of emails, text messages or voice messages does not qualify.

If parties cannot resolve the dispute, please email 01Division7@judicial.state.co.us to set a hearing either in person or via WebEx. **Parties must file a joint brief no more than two pages outlining the discovery dispute and supporting law for their request or objection a day prior to the hearing.** If a joint brief is not filed, the Court may dispense with the hearing.

This comes straight from the court's Civil Procedure Order (paragraph 9), also attached. I'm happy to discuss this again by phone if you'd like but I find it to be futile if you are not going to provide initial disclosures.

Or we can go to mediation, which I don't think will be productive without disclosure. I have no information indicating that my client's lien amount is incorrect, improper, excessive, etc., and therefore have no basis to reduce the amount demanded from what is in the complaint. At this point, we are still seeking full payment as indicated in the complaint and contract.

For your records, a copy of the motion to set aside and the supporting affidavit is attached. This motion was granted and is not relevant to the dispute in this case.

As has been the case, all items filed by the court or by my office are being mailed to you at the address given. We are also sending an additional courtesy copy of each item we file. If you are not receiving mail, please address that with

the court. I believe you may be able to sign up for e-mail alerts for filings as well. Again, I urge you to discuss this with the court, the clerk should be able to help direct you to get this resolved.

Please let me know if you are wiling to provide initial disclosures. If not, I will draft a brief to send over for your review and additions to file with the request for a discovery dispute hearing.

Thanks,

Edison McDaniels
edison.mcdaniels@omtrial.com
OGBORNMIHM LLP
TRIAL LAWYERS

From: Peter Pfeiffer <pcpfeiffer@msn.com>
Sent: Friday, May 8, 2026 9:06 AM
To: Edison McDaniels <edison.mcdaniels@omtrial.com>
Subject: [EXTERNAL] Fwd: Disclosures -- Fri 5/8/26

Mr. McDaniels,

I am reading a printout of your motion to set aside dismissal now. Long ago, I was able to persuade a clerk to send it to me. I believe I have mentioned this already. I do not have the attachments (unless maybe they are with the original email). I am still without access to this, because *you* have not sent it to me along with a record, as you showed me on your screen, of all court documents. This puts me at a disadvantage. I have already informed you of 4.3: Dealing with Unrepresented Person in ABA Rules of Professional Conduct and responsibilities of the Responsible Attorney.

Anyway, your motion to set aside dismissal represents the start of the problem; there are numerous wild elk and deer in unincorporated Jefferson County and in my neighborhood. My home is in perfect condition and repair, nothing as described; any nuances would be attributable to your client. I may need to incorporate this procedure for the case management order. You did not respond at all after the case became at issue, including to your knowledge at that time of the numerous untruths in your petition. To date your initial disclosures are bizarre: you, and these people, have no documents, photographs, or evidence which you are sharing at all? And they, the AC Inc Roofing employees will testify they did not supervise the subcontractors, never inspected inspected it after they left, paid no attention to the numerous problems, did not verify the service, etc. It is an exceedingly simple case: If they lie, each to and from email confirms it.

You have failed to produce any evidence that the project was completed, with or without the my satisfaction or approval. You have included no letters, inspections, etc. You told me: Nick Bennett, as I have proven to you (and get the documents, e.g., photos, from Jeffco), said so is all you have. (BTW, as you know or should know, photos on my property without my approval are not allowed). You have no proof because there is none. Again, it started with the motion to set aside and it continues to this day--you have *kindly* intentionally refused evidence I have provided to you.

Subject: E-service: Advanced Consulting Inc v. Pfeiffer, Peter C | 2025CV031047
From: LeighAn Jaskiewicz <LeighAn.Jaskiewicz@omtrial.com>
Date: 8/5/2026, 3:15 PM
To: Peter Pfeiffer <pcpfeiffer@msn.com>
CC: David Roth <David.Roth@omtrial.com>, Edison McDaniels <Edison.McDaniels@omtrial.com>, Aaron Menza <Aaron.Menza@omtrial.com>

Alert For: Peter Pfeiffer

Court: Jefferson County
Case Caption: Advanced Consulting Inc v. Pfeiffer, Peter C
Case Number: 2025CV031047
Date Served: August 5, 2026
Served by: Edison P. McDaniels, III

You have been served the following document:
Plaintiff's Response In Opposition of Defendant's Motion to Dismiss Plaintiff's Complaint With Prejudice and For Sanctions

LeighAn Jaskiewicz
Paralegal
LeighAn.Jaskiewicz@omtrial.com
OGBORN MIHM LLP
TRIAL LAWYERS

1700 Lincoln St, Suite 2700
Denver, Colorado 80203
Denver: 303.592.5900
Jackson Hole: 307.733.8000
Los Angeles: 323.403.5900
Sioux Falls: 605.432.8900
Fax: 303.592.5910
www.omtrial.com

This e-mail and any attachments thereto are intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of this e-mail or any attachments thereto, you have received this e-mail in error and your use of such materials is strictly prohibited. If you have received this e-mail in error, please immediately notify me by reply e-mail and permanently delete the original and any copy of any e-mail and any printout thereof. These files and documents are legal documents that have been prepared by Ogborn Mihm, LLP.

Attachments:

2026.08.05 Response in Opposition to MTD.pdf 218 KB

Subject: RE: Please Stop Assistant Email - District Court Case
From: Edison McDaniels <edison.mcdaniels@omtrial.com>
Date: 8/6/2026, 11:04 AM
To: Peter Pfeiffer <pcpfeiffer@msn.com>
CC: LeighAn Jaskiewicz <LeighAn.Jaskiewicz@omtrial.com>, Aaron Menza <Aaron.Menza@omtrial.com>, David Roth <David.Roth@omtrial.com>

Mr. Pfeiffer,

As I have stated time and time again, we work as a team and will not alter our workflow to accommodate your request that all emails originate from me. Given you responses, you are clearly receiving our emails. The main reason we have sent you emails with the items we have filed is so you receive notice ASAP. Your request to receive all communication by US Mail will cause certain items to arrive in your possession too late for proper consideration. For example, we filed our response to your motion to dismiss with the court yesterday. We have also sent it by US Mail, but there is a hearing on Friday that we believe having that filing would be in your best interest before the hearing. Additionally, if you choose to file a Reply, it is due seven days after our Response was filed, not seven days after you receive it in the mail. We are doing this as a courtesy to you so you may have the best opportunity to participate.

Although it is clear that you are receiving our emails, you have not once responded to any of our requests for your availability for mediation or evaluation of mediators. Additionally, I have personally left you voicemails requesting that you respond by phone or email to our requests for mediation. Your affirmative failure to communicate and unreasonable demands on communication methods despite receipt of our attempts to communicate are not our responsibility. We continue to provide proper notice by US mail in addition to emailing filings to you to ensure you have timely notice.

Regarding your letters and materials sent by mail, to date we have only received one item. Your "initial disclosure" that arrived on or about 5/19/26. You referenced "the return of formal correspondence sent via certified mail" in your motion. I am unsure what you expect my office to do regarding mail that was not delivered to us. If it was returned to you there must have been some sort of defect in the address or some other item to prevent it from arriving. Our address is the same as it was when the initial disclosure was sent.

The letter you attached to your email was never received by my office by US Mail. Again, the only item we have received from you is the initial disclosure document.

Edison McDaniels
edison.mcdaniels@omtrial.com
Ogborn Mihm, LLP
-----Original Message-----
From: Peter Pfeiffer <pcpfeiffer@msn.com>
Sent: Thursday, August 6, 2026 10:23 AM
To: Edison McDaniels <edison.mcdaniels@omtrial.com>
Subject: Please Stop Assistant Email - District Court Case

CAUTION: External Email

Mr. McDaniels,

Once again, please stop your assistant ("paralegal") from sending me email. Another was sent yesterday. I am not in the e-system for this case and do not have "e-service."

I have received numerous other unwanted emails from your assistants as well.

Also, I have not received any letters or replies from materials and emails recently sent to you.

See attached letter(s) mailed to you in May.

Thank you,

Peter Pfeiffer

Subject: Re: Mediation
From: Peter Pfeiffer <pcpfeiffer@msn.com>
Date: 8/20/2026, 12:48 PM
To: Edison McDaniels <edison.mcdaniels@omtrial.com>
CC: David Roth <David.Roth@omtrial.com>, LeighAn Jaskiewicz <LeighAn.Jaskiewicz@omtrial.com>, Aaron Menza <Aaron.Menza@omtrial.com>

As stated I will accept the 9/9 date and neutral.

Peter Pfeiffer

On 8/20/2026 12:30 PM, Edison McDaniels wrote:

> Mr. Pfeiffer,
>
> Unfortunately, as identified in my letter, I was holding those dates open on my calendar through 8/18. Since that date passed, I opened my calendar and at this point I am no longer available on 9/14 or 9/8. I do still have availability on 9/9 at 11:00am, if that date is still available with the mediator. We will reach out to inquire and schedule if still available. Although you have repeatedly demand we do not email you and recently have demanded that we only communicate with you by US Mail, we will be copying you on those communications.
>
> **As I have requested numerous times, if you are going to email me you need to copy my team to ensure your requests are handled timely. You seem to have no problem emailing Aaron Menza when you've received my out-of-office response but every email you send me should be sent to our entire team. This is in your best interest as it allows us to respond and address concerns quickly.**
>
> Edison McDaniels
> edison.mcdaniels@omtrial.com
> OGBORNMIHM LLP
> TRIAL LAWYERS
>
> ---
>
> **From:** Peter Pfeiffer <pcpfeiffer@msn.com>
> **Sent:** Thursday, August 20, 2026 11:10 AM
> **To:** Edison McDaniels <edison.mcdaniels@omtrial.com>
> **Subject:** Mediation

CAUTION: External Email

Thank you for your efforts and letter Mr. McDaniels. I cc'd you on Ms. Thomerson, my first choice for either Sept. 9 or 14 and Ms. Baker on the 8th as a potential backup.

Regards,

Peter Pfeiffer

-------- Forwarded Message --------

Subject: Fwd: Subject: Time-sensitive mediation availability — Jefferson County District Court

Date: Thu, 20 Aug 2026 11:07:42 -0600

From: Peter Pfeiffer <pcpfeiffer@msn.com>

To: Scheduler Debbie <scheduler.debbie@gmail.com>

Hello again,

I have emailed Ms. Thomerson stating the 14th is preferred and the 9th as a backup.

If possible, and I have not heard confirmation form Mr. McDaniels, I elect Ms. Baker on Sept. 8 at 8am as a backup.

Thank you

Peter Pfeiffer

-------- Forwarded Message --------

Subject: Re: Subject: Time-sensitive mediation availability — Jefferson County District Court

DISTRICT COURT, JEFFERSON COUNTY, COLORADO Court Address: 100 JEFFERSON COUNTY PARKWAY, GOLDEN, CO, 80401-6002	
Plaintiff(s) ADVANCED CONSULTING INC v. **Defendant(s)** PETER C PFEIFFER	DATE FILED August 7, 2026 10:48 AM CASE NUMBER: 2025CV31047 ⚠ **COURT USE ONLY** ⚠
	Case Number: 2025CV31047 Division: 7 Courtroom:

Minute Order

25CV31047 STAT MAM/GWG/FTR, crtm. 430 on Aug. 7, 2026, at 9:16:20 am.

Appearances: Edison McDaniels #50797 appeared in person for the Plaintiff. The Defendant failed to appear.

Proceedings:
The Court held a status conference. The Court gave the Defendant additional time to appear. The Court returned on the record at 9:16:20am. The Court finds the Defendant fails to appear. The Defendant selected this date and was provided notice of the hearing.

The Court addressed the status of mediation with Plaintiff's counsel. The Plaintiff requested the Court vacate the order for mediation. The Court continued the mediation order and ordered the parties schedule mediation and file notice by 5:00pm on August 21, 2026.

The Court addressed lack of disclosures by Defendant. The Court orders the Defendant comply with disclosure orders by 5:00pm on August 21, 2026. If the Defendant does not comply, the Court will address the Plaintiff's request for sanctions and attorney fees.

Defendant is on notice that the Court may order Defendant to pay attorney fees and or other sanctions for failure to comply with Court orders to mediate and provide disclosures. The Court can consider Defendant's actions that cause delay or harassment, unnecessarily expand proceedings, or other improper conduct. *See* C.R.S. §13-17-702(4); C.R.C.P. 37.

Pre-Trial Conference is set on October 2, 2026 at 3:30pm in Courtroom 430 of the Jefferson County Courthouse. Defendant is ordered to appear in person.

Court Trial is set on November 4-6, 2026 at 8:00am in Courtroom 430 of the Jefferson County Courthouse. Defendant is ordered to appear in person.

The Court recessed at 9:28:40am

Issue Date: 8/7/2026

MEEGAN ALAINE MILOUD
District Court Judge

DISTRICT COURT, JEFFERSON COUNTY, COLORADO 100 Jefferson County Parkway Golden, Colorado 80401 Plaintiff: ADVANCED CONSULTING, INC., a Colorado corporation d/b/a AC INC. Roofing v. Defendant: PETER C. PFEIFFER	**▲ COURT USE ONLY ▲** **Case No. 2025CV31047** **Division 7** **Courtroom 430**

DEFENDANT'S NOTICE OF SCHEDULED MEDIATION

Defendant Peter C. Pfeiffer, appearing pro se, submits this Notice in compliance with the mediation-scheduling directive in the Court's August 7, 2026 Minute Order.

SCHEDULED MEDIATION

1. The Minute Order directed the parties to schedule mediation and file notice of the scheduled mediation by 5:00 p.m. on August 21, 2026.
2. After receiving the Minute Order on August 17, Defendant independently contacted Susan Demidovich, Andrew Haas, and Sharyn Beers regarding mediation availability.
3. Plaintiff's counsel's letter was dated August 7, received by Defendant on August 17, and requested a response by August 19. Defendant responded on the morning of August 20, before the Court's August 21 deadline, and accepted the offered mediators and dates in order of preference.
4. Counsel then advised that Defendant's first-choice date of September 14 was no longer available. Defendant accepted Julie Thomerson and the September 9, 2026, 11:00 a.m. date within minutes by replying to counsel's email and copying counsel's team as requested. The parties have therefore agreed to that mediator, date, and time.
5. Defendant remains ready and willing to participate and will cooperate with any administrative arrangements required by the mediator.

REQUESTED RELIEF

WHEREFORE, Defendant respectfully requests that the Court accept this Notice as compliance with the mediation-scheduling directive in the August 7, 2026 Minute Order.

August 21, 2026

Respectfully submitted,

_____

Peter C. Pfeiffer, Defendant pro se
30545 Roan Drive
Evergreen, Colorado 80439
Telephone: 303-670-5174

CERTIFICATE OF SERVICE

I certify that on August 21, 2026, I served the foregoing by depositing a true and correct copy in the United States mail, postage prepaid, addressed to counsel of record at Ogborn Mihm, LLP, 1700 Lincoln Street, Suite 2700, Denver, Colorado 80203.

_____

Peter C. Pfeiffer

EXHIBIT K

May 2026 initial disclosures and May 15 transmission/response email.

Disclosure content, mailing/transmission, receipt, and request to resend in another format.

IN THE COLORADO DISTRICT COURT
FOR THE STATE OF COLORADO

Civil Action No. 2025CV31047

Plaintiff, Advanced Consulting, Inc. (aka AC Inc Roofing)

v.

Defendant(s), Peter C. Pfeiffer

PLAINTIFF'S INITIAL DISCLOSURES UNDER C.R.C.P. 26(a)(1)

☐ **Original**	☐ ~~Supplemental~~	☐ ~~Amended~~

I. List of Individuals

Name of Individual With Information	Address and Telephone Number (if known)	Subject of Information
Mr. Nicholas Bennett, Owner, AC Inc Roofing.	Per Plaintiff disclosures c/o Ogborn Mihm, LLP, 1700 Lincoln Street, Suite 2700, Denver, CO 80203, 303/592-5900. 6145 Broadway, Suite 25, Denver, CO 80216, 303/550-4530 per acincroofing.com.	All company/case communications including email, texts, and phone communications confirming the abandoned project, not workmanlike performance, and contract violations (e.g., not customer approval, unsupervised third party contractors).

Name of Individual With Information	Address and Telephone Number (if known)	Subject of Information
Mr. Ricky Donald, former and/or current sales and project manager, AC Inc Roofing.	Per Plaintiff disclosures c/o Ogborn Mihm, LLP, 1700 Lincoln Street, Suite 2700, Denver, CO 80203, 303/592-5900. 6145 Broadway, Suite 25, Denver, CO 80216, 303/550-4530 per acincroofing.com.	All company/case communications including email, texts, and phone communications confirming the abandoned project, not workmanlike performance, and contract violations (e.g., not customer approval, unsupervised third party contractors).
Mr. Britton Jaen, Jefferson County building inspector.	Per Plaintiff disclosures 100 Jefferson County Parkway, Golden, CO 80401, 303/271-8260.	Knowledge of the fraudulent tactics by AC Inc Roofing to obtain permit verification without a final inspections; documents, email, telecons, and subsequent in-person inspection/meeting.
Mr. Peter C. Pfeiffer, Defendant	30545 Roan Drive, Evergreen, CO 80439, 720/314-6600.	All company/case communications including email, texts, and phone communications confirming the abandoned project, not workmanlike performance, and contract violations (e.g., not customer approval, unsupervised third party contractors).
Unknown process server, first reported attempt.	Unknown.	Information and/or testimony regarding the “wild animals” and “nails” falsely/fraudulently delaying the case and disparaging the defendant.
Unknown process server, second attempt.	Unknown; likely JCSO, Golden, CO.	Information and/or testimony regarding the second process service.

Name of Individual With Information	**Address and Telephone Number (if known)**	**Subject of Information**
Names unknown; all dayworkers, both for the roof and gutter installations (separate days and crews).	Unknown.	Each will confirm in testimony (or contract information and communications which they may possess) that they were unsupervised third-party contractors contrary to the allegations and the project contract.
Handyman hired to review improper mechanics' lien documents. (Name unavailable; requires research and finding cashed check.)	Unknown.	Will testify that service is improper and documents are "garbage."

II. List of Documents, Electronically Stored Information (ESI) or Tangible Things *(in Defendant's possession, custody or control)*

Description by Category of Document, ESI or Tangible Thing	Location
Webpages with lists of incomplete/unapproved project items; notes/agenda from meeting with Nicholas Bennett; annotated calendar; pictures of problem areas on home; video of walk around house with narration; and description and analysis of the issues.	pcpfeiffer.co (formerly, mid 2024 to mid 2025 pcpfeiffer.org). Specifically: https://pcpfeiffer.co/uncategorized/nick-bennett-ac-inc-roofing-scam/.
Email, to and from, covering sale, daily progress, and lack of completion, satisfaction or not between Peter Pfeiffer and AC Inc Roofing. These include Nicholas Bennett, Ricky Donald, at least one administrative assistant, and a AC Roofing Inc field supervisor (name currently unavailable).	Stored on Peter Pfeiffer personal computers and MSN (Microsoft) servers.
Text and phone records between Peter Pfeiffer and Ricky Donald.	(May be still) stored on Peter Pfeiffer personal phone(s).

III. Computation of Damages

Category of Damages Claimed	Computation of Amount Claimed	Documents or Other Evidence on Which Computation is Based
Costs incurred due to abandoned project which when completed will be approximately or over the $9,600 final payment withheld.	Estimate(s) based on list of incomplete or non-workmanlike items included in the overall project.	Receipts for all work performed and paid for to date totaling approximately $7,000. Several tasks remain portentially amounting to $5,000-$10,000 (rough/unknowable estimate).
Direct out-of-pocket expenses due to frivolous, malicious, or vexatious lawsuit.	Ongoing computation—court fees, mailings, etc. totaling only several hundred dollars; potentially trebled.	Estimated itemization available.

Note: These disclosures do not alleviate the possibility of further action (e.g., seeking damages for fraud or malicious prosecution) or additions or amendments to this document.

Dated: 5/14/26

_____
(Signature of party)

Print Name:_____

Address:_____

_____

Telephone Number:_____

Email Address:_____

CERTIFICATE OF SERVICE

I hereby certify that on _____ , ____, 202_____, I sent a copy of the **PLAINTIFF'S INITIAL DISCLOSURES UNDER C.R.C.P. 26(a)(1)** to the following parties in the way described below each party's name:

Party Name:_____

How Served:_____

Party Attorney's Name:_____

Address:_____

_____

Telephone Number:_____

Email Address:_____

_____

(Signature of person completing service)

Print Name:_____

Address:_____

_____

Telephone Number:_____

Email Address:_____

Subject: Re: [EXTERNAL] initial disclosures attached and mailed
From: Edison McDaniels <edison.mcdaniels@omtrial.com>
Date: 5/15/2026, 8:50 AM
To: Peter Pfeiffer <pcpfeiffer@msn.com>
CC: Aaron Menza <Aaron.Menza@omtrial.com>, LeighAn Jaskiewicz <LeighAn.Jaskiewicz@omtrial.com>, David Roth <David.Roth@omtrial.com>

Mr. Pfeiffer,

I am out of the office through Wednesday of next week. I cannot open the file format you sent, please revise and send again and copy my team so they can process the documents and ensure we can read them upon my return.

As I have stated numerous times, you must copy my team on all communications. I understand you only want communications to come from me, but it disrupts our process quite heavily when you don't copy my team. Especially when I am out for extended periods, as happens frequently. We are doing our best to accommodate you by sending paper courtesy copies of all items filed. Respectfully, I'd appreciate you doing the same by copying my team on all communications.

Finally, please send some dates you are available in the next few weeks to attend mediation. My team will reach out and get a mediation scheduled that works for both of our availability. Please do not fail to copy my team on this as I am out of the office, and this is a function they fully perform. Responses from me will be heavily delayed over the next week and I want to ensure things keep moving forward.

Edison McDaniels
edison.mcdaniels@omtrial.com
OGBORNMIHM LLP
TRIAL LAWYERS

From: Peter Pfeiffer <pcpfeiffer@msn.com>
Sent: Friday, May 15, 2026 7:40:42 AM
To: Edison McDaniels <Edison.McDaniels@omtrial.com>
Subject: [EXTERNAL] initial disclosures attached and mailed

Mr. McDaniels,

Attached are initial disclosures also delivered personally to Evergreen post office yesterday.

I anticipate making addition(s).

Regards,

Peter Pfeiffer

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

EXHIBIT L

February 5, 2026 direct email to Edison McDaniels.

Early direct notice of the project dispute and identified evidence; offered as notice, not proof of knowledge or intent.

Subject: Fwd: Advanced Consulting Inc v. Peter Pfeiffer | Case No. 2025CV31047 | CMC dates
From: Peter Pfeiffer <pcpfeiffer@msn.com>
Date: 2/5/2026, 9:43 AM
To: Edison McDaniels <Edison.McDaniels@omtrial.com>

Mr. McDaniels,

Please do not have your staff send me *any email*, especially those which may be considered threatening, harassing, or unwanted.

I am available at 8AM tomorrow for a telecon, this assuming you are prepared to discuss the abandoned project, each email, text, telephone call, or in-person meeting I was involved in, the fraud concerning the permit, the no-service mechanics' lein(s), virtually all work (*not* up to workmanlike standards per legal precedent, all pictures, video, and narrative on my website shared and delivered to the plaintiff, etc. If you wish to decline this invitation I will continue to look into this and I will respond appropriately: I have seen no amount sought or reason such a discussion is necessary and I am prepared to go to trial immediately. You should already possess everything mentioned above.

While perhaps preemptive, I am shocked by the ethics violations already encountered; the email below is a continuation. I will file a complaint. Some of this is just laughable--wild animals? A notary in Louisiana claiming I have been served for a hearing? I still have no idea what happened with or to the original attorney from your firm on this case. Anyway, the delays and excuses have been excessive. I will include the work "vexation" here.

In a nutshell, you are being scammed just like I was. My compensation to compete the project with the remaining half-payment was and is a fair settlement. The vendor should have stopped there.

Finally, I write this respectfully. I do believe you know the facts. Me? I graduated from Michigan and Georgia and went to GWU while working in the director's office at FBI headquarters. My home is still in disrepair, BTW the driveway damage caused by your client is $1,200, one example, and I have done nothing wrong. I am a victim.

Sincerely,

Peter C. Pfeiffer

-------- Forwarded Message --------
Subject: Advanced Consulting Inc v. Peter Pfeiffer | Case No. 2025CV31047 | CMC dates
Date: Wed, 4 Feb 2026 17:05:46 +0000
From: LeighAn Jaskiewicz <LeighAn.Jaskiewicz@omtrial.com>
To:01Division7@judicial.state.co.us <01Division7@judicial.state.co.us>

EXHIBIT M

July 20, 2026 Motion to Dismiss and certificate of service.

Formal detailed notice of alleged documentary conflicts; allegations remain disputed.

DISTRICT COURT, JEFFERSON COUNTY, STATE OF COLORADO 100 Jefferson County Parkway Golden, Colorado 80401	
Plaintiff(s): Advanced Consulting, Inc., a Colorado corporation d/b/a AC INC. Roofing v. **Defendant(s)**: Peter C. Pfeiffer	▲ **COURT USE ONLY** ▲
Attorney or Party Without Attorney: Peter C. Pfeiffer 30545 Roan Drive, Evergreen, CO 80439 Phone Number: 303/670-5174 E-mail: pcpfeiffer@msn.com FAX Number: NA Atty. Reg. #: NA	Case Number: 2025CV31047 Division: 7 Courtroom:

DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT WITH PREJUDICE AND FOR SANCTIONS PURSUANT TO C.R.S. § 13-17-102 AND C.R.C.P. 11

Duty to Confer Pursuant to C.R.C.P. 121 § 1-15, the undersigned has attempted to confer with opposing counsel regarding the relief requested in this Motion. Opposing counsel has been unavailable for approximately three weeks. Further, communication has been significantly obstructed by Plaintiff's counsel's failure to maintain reliable methods of correspondence, including the recent return of formal correspondence sent via certified mail and a lack of involvement from other listed parties. Despite these obstacles, Defendant provided notice of this filing to Plaintiff's counsel. Given the urgent nature of the procedural and substantive defects addressed herein, Defendant has proceeded with this Motion to preserve the integrity of the Court's proceedings.

Defendant, Peter C. Pfeiffer, appearing pro se, respectfully moves this Court to dismiss Plaintiff's Complaint with prejudice and to enter an award for reasonable costs and litigation expenses. In support of this motion, Defendant states as follows:

I. INTRODUCTION & RELIEF SOUGHT

Defendant contends that this action has been maintained through factual representations that are materially inconsistent with the contemporaneous documentary record. Plaintiff seeks damages for breach of contract and foreclosure of a mechanic's lien, relying on the central factual assertion that it substantially performed a residential roofing contract.

The contemporaneous, objective physical record—including email correspondence, photographic logs, and third-party repair invoices—directly refutes Plaintiff's position, demonstrating that Plaintiff abandoned the project, leaving behind extensive defects including driveway damage, leaking gutters, and wrong gutter guards that has required $6,850 in corrective expenses so far.

Rather than a routine construction dispute over workmanship quality, this action has been maintained through a sequence of material misrepresentations to administrative and judicial bodies during the permitting process and subsequent litigation. To achieve clarity at a glance for the Court, the core factual and procedural deceptions are structured as follows:

Summary of Factual and Procedural Deceptions

Stage / Proceeding | Plaintiff's Explicit Representation | The Objective, Verifiable Truth | Primary Attached Proof

1. Permitting Process | Work was fully completed and ready for final building inspector approval. | Reused and relabeled mid-construction photos to falsely pass inspection. | Exhibits C,

D, E, F, and G.

2. Mechanic's Lien | The Mechanic's Lien was improperly perfected and not served via statutory certified mail. | Certified-mail service failed completely; counsel was notified of the void service in writing. | Exhibits H, I, and J

3. Reinstatement Motion | Service was physically blocked by "loose animals" and "driveway debris." | Only a single service attempt was made; driveway/property access was clear. | Exhibits K and N.

4. Pleadings & Disclosures | Plaintiff substantially performed its contractual obligations. | Contract was abandoned and remained materially incomplete (e.g., leaking gutters and wrong gutter guards). | Exhibits A, B, C, D, I, J, K, L, M, N, O, and P.

Because Plaintiff and Plaintiff's counsel have willfully maintained an action they know to be substantially groundless, frivolous, and vexatious, Defendant requests that this Court enforce its statutory obligations under C.R.S. § 13-17-102, its sanctioning mechanisms under C.R.C.P. 11, and its inherent authority to protect the integrity of the judicial system by dismissing the Complaint with prejudice.

II. STATEMENT OF RELEVANT FACTS AND CHRONOLOGY

The Contract: The parties entered into a written residential construction contract under which Plaintiff agreed to provide labor, materials, and supervisor oversight to perform roofing repairs and replacement. The contract explicitly mandated a joint final inspection and approval process.

Abandonment and Defects: Plaintiff’s third-party crews abandoned the worksite before completion. Defendant sent multiple contemporaneous emails notifying Plaintiff that no

supervisor was present and that the workmanship was defective. Plaintiff failed to return to complete or correct the work. Defendant subsequently incurred $7,300 to date in out-of-pocket costs to retain contractors to correct deficiencies.

The Permitting Deception: To bypass a proper in-person inspection, Plaintiff compiled a PowerPoint presentation for the Jefferson County building inspector. Plaintiff captured photographs during mid-construction and deceptively relabeled them as "final" completed roof work to obtain administrative sign-off.

The Defective Lien: Plaintiff recorded a Mechanic's Lien and filed a Notice of Intent. Plaintiff’s counsel failed to satisfy the strict certified-mail service requirements mandated by C.R.S. § 38-22-109. Defendant notified Plaintiff's counsel in writing of this fatal statutory defect, enclosing the physical envelopes as proof. Plaintiff’s counsel ignored the notice.

Dismissal and Fabricated Reinstatement: This Court dismissed Plaintiff's Complaint for a failure to prosecute. To undo the dismissal, Plaintiff’s counsel filed a Motion to Set Aside the Order of Dismissal, asserting to the Court that timely service had been physically obstructed by "loose animals" and "debris, nails” blocking the driveway." Process server records confirm only a single service attempt was logged and no such physical barriers existed.

III. THE MATERIAL MISREPRESENTATIONS TO ADMINISTRATIVE AND JUDICIAL BODIES

A. Misrepresentations to the Building Inspector (Permit Approval)

Plaintiff presented a falsified PowerPoint deck to the Jefferson County building inspector, mischaracterizing the actual, mid-construction state of the property as a compliant, finalized roof. Plaintiff further declared that Defendant actively prevented an in-person inspection. In

reality, Defendant was attempting to prevent the inspector from driving into an un-barricaded construction hole left behind by Plaintiff's sub-contractors. Plaintiff then used this deceptively-obtained administrative approval to validate the civil claims filed in this court.

B. Maintenance of a Void Mechanic's Lien

Under Colorado law, mechanic’s liens are strictly construed. Plaintiff failed to complete certified-mail service with a signed return receipt. Despite being provided physical proof of this statutory failure via written correspondence, Plaintiff’s counsel deliberately incorporated the invalid lien into the Second Claim for Relief in the Complaint, seeking foreclosure, a deficiency judgment, and attorney fees.

C. Fabricated Evidentiary Grounds in the Motion to Set Aside Dismissal

To revive a case dismissed by their own failure to prosecute, Plaintiff's counsel used a narrative of obstruction. They alleged that counsel's unverified medical leave and an impassable driveway covered in nails and loose animals prevented prosecution. Upon reviewing the Court file, Defendant notes that Plaintiff's Certificate of Service falsely alleges service was executed in a manner directly contradicted by objective tracking and delivery logs. Defendant contends that these factual representations were inconsistent with the objective documentary record and materially influenced the Court's decision to reinstate the case.

D. Verified Compliance in Pleadings and Initial Disclosures

Plaintiff's Complaint explicitly alleges that "AC INC substantially performed its part of the contract." Plaintiff’s Initial Disclosures continued this narrative by producing documents intended to mask the outstanding $7,300 structural deficiency, violating the core verification duties required of litigants in Colorado courts.

IV. LEGAL ARGUMENT & AUTHORITIES

A. Dismissal and Defendant’s Costs are Mandated Under C.R.S. § 13-17-102

C.R.S. § 13-17-102(2) dictates that a court shall assess reasonable litigation costs, expenses, and statutory fees against any party or attorney who has brought or maintained a civil action that is "substantially frivolous, substantially groundless, or substantially vexatious."

Groundless Claims: A claim is groundless if its allegations are not supported by any credible evidence. Plaintiff's central claim of "substantial performance" lacks any evidentiary anchor and is directly refuted by independent repair invoices, pictures, and video logs.

Vexatious Conduct: An action is vexatious if it is brought or maintained in bad faith. Maintaining a foreclosure claim on a mechanic's lien after receiving direct, written notice that statutory service was completely defective constitutes vexatious conduct.

B. Violation of C.R.C.P. 11 Certifications

By signing the Complaint and subsequent Motion to Set Aside, Plaintiff's counsel certified pursuant to C.R.C.P. 11 that the factual contentions had evidentiary support. Counsel knew, or through reasonable inquiry should have known, that the factual assertions regarding perfect roof completion and driveway service obstructions were false. When an officer of the court signs off on manufactured facts to sustain an action, severe sanctions, including dismissal, are warranted.

C. The Court’s Inherent Authority to Penalize Abuse of Judicial Machinery

Colorado trial courts possess an inherent, absolute authority to protect the integrity of the judicial process and ensure litigation is conducted honestly. Where a party's conduct perverts the administration of justice—such as using manipulated photographs to pass regulatory inspection

and utilizing fabricated claims of physical obstruction to bypass a failure-to-prosecute order—the court is empowered to dismiss the action completely to safeguard the tribunal's integrity.

V. PRAYER FOR RELIEF

WHEREFORE, Defendant Peter C. Pfeiffer respectfully requests that this Court exercise its inherent authority, alongside its mandatory obligations under C.R.S. § 13-17-102 and C.R.C.P. 11, and enter an Order:

A. DISMISSING Plaintiff's Complaint with prejudice in its entirety;

B. AWARDING Defendant his reasonable and documented out-of-pocket litigation expenses incurred in defending this groundless and vexatious action;

C. HOLDING Plaintiff and Plaintiff’s counsel jointly and severally liable for the award of costs and expenses; and

D. GRANTING such other and further relief as the Court deems just and proper.

Dated: July 20, 2026

Respectfully submitted,

_____

Peter C. Pfeiffer, Defendant Pro Se

30545 Roan Drive, Evergreen, CO 80439

Phone: 303/670-5174

Email: pcpfeiffer@msn.com

CERTIFICATE OF SERVICE

I certify that on July 20, 2026, I served a true and correct copy of the foregoing Defendant's DEFENDANT’S MOTION TO DISMISS PLAINTIFF'S COMPLAINT WITH PREJUDICE AND FOR SANCTIONS PURSUANT TO C.R.S. § 13-17-102 AND C.R.C.P. 11 upon counsel for Plaintiff by depositing the same in the United States Mail, postage prepaid, addressed as follows:

Mr. Edison P. McDaniels III

Ogborn Mihm, LLP

1700 Lincoln Street, Suite 2700

Denver, CO 80203

_____

Peter C. Pfeiffer

DISTRICT COURT, JEFFERSON COUNTY, COLORADO
Case No.2025CV31047
Division: 7

PLAINTIFF: AC INC,
v.
DEFENDANT: Peter C. Pfeiffer

[PROPOSED] ORDER GRANTING DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT WITH PREJUDICE AND FOR SANCTIONS PURSUANT TO C.R.S. § 13-17-102 AND C.R.C.P. 11

THE COURT, having reviewed Defendant Peter C. Pfeiffer's Motion to Dismiss Plaintiff's Complaint with Prejudice and for Mandatory Sanctions Pursuant to C.R.S. § 13-17-102 and C.R.C.P. 11, any response or reply thereto, the court file, and being otherwise fully advised in the premises, hereby finds and orders as follows:

Dismissal: Defendant's Motion is GRANTED. Plaintiff AC INC's Complaint is hereby DISMISSED WITH PREJUDICE in its entirety.

Statutory Sanctions: The Court finds that Plaintiff and Plaintiff's counsel have maintained a civil action that is substantially groundless, frivolous, and vexatious pursuant to C.R.S. § 13-17-102.

Rule 11 Violations: The Court further finds that filings submitted by Plaintiff's counsel lacked reasonable factual or evidentiary inquiry in violation of C.R.C.P. 11.

Costs and Expenses: Defendant Peter C. Pfeiffer is awarded his reasonable expert fees, documented out-of-pocket litigation expenses, and costs incurred in defending this action. Plaintiff AC INC and Plaintiff's counsel shall be jointly and severally liable for this award.

Costs Hearing: Defendant shall file an affidavit of reasonable costs and expenses within 21 days of this Order. If Plaintiff objects to the reasonableness of the amounts requested, Plaintiff may request a hearing on the issue of reasonableness within 14 days of Defendant's filing.

SO ORDERED this _____ day of _____, 2026.

BY THE COURT:

_____
District Court Judge