

DISTRICT COURT, DENVER COUNTY, COLORADO Court Address: 1437 BANNOCK STREET, ROOM 256 DENVER CO 80202	DATE FILED: June 27, 2023 8:48 AM FILING ID: 16726653B76DE CASE NUMBER: 2023CV31859
<b>Plaintiff:</b> UNITED RENTALS (NORTH AMERICA), INC.	▲ COURT USE ONLY ▲
<b>Defendants:</b> GREEN SAGE MANAGEMENT LLC AKA GS MANAGEMENT AND BRUCE MILLER	Case No:
Attorney Name and Address: Vinci Law Office, LLC 2250 S. Oneida St., Ste. 303 Denver, CO 80224 Benjamin D. Vinci, #26289 Phone: (303) 512-0340 Fax: (303) 226-1015 www.vincilaw.com	DIV.:  CTRM:
<b>COMPLAINT</b>	

1. Venue is proper as Defendants' principal place of business is within this County and/or entered into an agreement within this County.
2. The amount claimed exceeds one hundred thousand dollars (\$100,000.00).
3. Such claim arises from the following event(s) or transaction(s):
  - a. The Defendants entered into a specific agreement for the rental of diesel generators used in their marijuana growing operation on 9/28/2020, for which Defendants have failed to pay. Defendants have become liable to Plaintiff based on one or more of the following theories: Express Contract, Implied Contract, Quantum Meruit/Unjust Enrichment, Liquidated Debt arising out of a Contract, Promissory Note, Account Stated, and Contract Interest (or Statutory Interest, and/or Agreement to pay reasonable attorney's fees).
  - b. Plaintiff claims the right to recover from the Defendants, \$1,746,019.01, which represents the unpaid balance of invoices dated from December of 2021 through May of 2022 for services and/or credit provided to the Defendants and for which the Defendants have failed to pay. Plaintiff further claims the right to recover \$166,763.45 in interest on said unpaid invoices.
  - c. Plaintiff requests attorney fees be awarded by the Court pursuant to the Credit Application and Agreement Terms & Conditions signed by the Defendants, plus court costs.

4. Defendants have not provided information stating they are in the military service of the United States. Therefore, it is deemed they are engaged in civilian pursuits. Furthermore, the Defendants are not a minor or incompetent.
5. Plaintiff does not demand trial by jury.

**WHEREFORE**, Plaintiff seeks for judgment to enter against the Defendant(s) as set forth above.

ATTORNEY FOR PLAINTIFF

*/s/ Travis Johnson #55833*

Vinci Law Office, LLC

*Attorneys for Plaintiff*

Plaintiff's Address:  
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Stamford CT 06902

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