

August 31, 2014

Dan Ruben
Executive Director
Equal Justice America
13540 East Boundary Road
Building II, Suite 204
Midlothian, VA 23112

Dear Mr. Ruben,

Many thanks for supporting my internship at Greater Boston Legal Services' Consumer Rights Unit this summer, where I participated in a wide variety of consumer rights cases. I also continued the anti-foreclosure work that I was already engaged in through law school, particularly in the Legal Services Center Post-Foreclosure Eviction Defense Housing Clinic last spring, and with the canvassing group Project No One Leaves. The Equal Justice America Fellowship made it possible for me to spend ten weeks at this non-paid internship learning skills and gaining experiences that will help me immeasurably in the future as a consumer rights legal aid lawyer.

My very first day of work was the first day of a multi-day hearing before the Massachusetts Committee Against Discrimination, which the office had been preparing for five years, and in which we represented seventeen Latino clients who were among hundreds of victims of a loan modification scam. I had never attended a state administrative hearing before, and was fascinated by the differences and similarities between it and a trial. From participating in the preparation for and debriefing of each day of the hearing, I learned a great deal about how lawyers adjust as a hearing or trial progresses over the various days that it takes place. The post-hearing briefs have not yet been submitted, but whatever the outcome, I believe it meant a great deal to each of our clients and the community supporting them to have this public forum to tell their stories.

I worked under the supervision of a number of different attorneys while at GBLS to gain experience in a variety of different areas of housing and consumer law. For one supervisor, I wrote various memoranda on constructive and resulting trusts for bankruptcy-related adversarial proceedings, which became the basis of the Answer that he filed after my departure. I successfully argued a motion for lis pendens before Judge Wexler in Chelsea District Court on behalf of two immigrant single mothers, who had been living together for over a decade in order to pool resources and help one another, but were under threat of foreclosure. I also participated in a number of consumer bankruptcy consults, performed intake every week, drafted a QWR, and benefited from a CORI records sealing training.

The work that was most important to me grew from our observation of a pattern in condo foreclosure cases. Last year, a local community organization referred a case to us in which a local corporate investment realty company was pushing out a long-time condo owner in Dorchester, after purchasing other units in the building at foreclosure auctions and appointing

themselves trustees without notifying other owners, under the auspices of one of its numerous LLCs. The company then began to assess extremely high common fees and then brought actions against our client for nonpayment of these fees, late fees, and legal fees, in addition to establishing a super lien that gave its lien priority over the mortgage. In this way, they sought to take over the building and displace a long-time homeowner. This June, when the same community organization referred a second case to GBLS with a nearly identical fact pattern, I was assigned to write the client's opening memo and to draft a motion to dismiss or to file a late answer in the alternative.

Because these cases suggested a larger pattern, I researched records in the Registry of Deeds and found a few more complaints identical to the ones of our clients, and a large number of addresses of condominiums that appeared to be in various stages of the take-over process. As a part of Project No One Leaves, I organized a number of targeted canvasses in Dorchester, Mattapan, Roslindale, Chelsea and Revere to offer legal representation to other individuals and families in the same position as the first two clients. Through these efforts, I was able to find four more clients for whom the Consumer Rights Project is now preparing a joint 93A letter. I also connected more than a half dozen families in Chelsea who had not yet received complaints but were at the early stage of the takeover process with GBLS for consultation and representation in their negotiations with the corporate investment realty company. Along the way, I ran into a tenant with developmental disabilities in a building where the condo takeover process was complete, who was told by City Realty that she would be able to stay, but who had just received notice of her impending eviction. I referred her to the GBLS Housing Unit, which has taken her case for full representation. I further connected the other affected individuals I met through canvassing with City Life organizers. While I was still at GBLS I conducted further research on Massachusetts condo law and wrote a memo outlining possible legal strategies.

Equal Justice America's support made it possible for me to observe and participate in a great variety of housing and consumer rights cases, as well as to draw on the community and skills I have built in the Housing movement over the past year to identify a new pattern of harmful activity, and by investigating it, inform homeowners of their rights, connect them with legal services, and thereby bring the issue to the attention of local legal service providers and community organizers. This work was enormously satisfying and confirmed my sense that I wish to spend my life working in and as a part of the community as a legal aid lawyer.

All best wishes,

K-Sue Park
Harvard Law School