# Dallas Police & Fire Pension Committees

**DPFP BOARD APPOINTMENTS 2015 - 2017** 

**Diamond McCarthy Committee** – System trustees Tho Tang Ho (Chair), Clint Conway, and Brian Hass; inaugural committee appointments made during a Special meeting of the Board on August 27, 2015. No meetings have ever been publically posted for this committee.



The Madison, Suite 600 15851 Dallas Parkway Addison, TX 75001 214.514.2272 Direct caforensicsIIc.com

December 1, 2016

Mr. Lee M. Kleinman Member, Dallas City Council 1500 Marilla St, 5FS Dallas, TX 75201-6390

Dear Councilmember Kleinman:

#### **RE: Dallas Police & Fire Pension System**

It would be interesting to understand why former administrator Richard Tettamant has not been sued by the Dallas Police & Fire Pension System for the obvious benefit of taking Tettamant's deposition, but then again, the same could be said for former and at least one current trustee.

It would also be interesting to understand the Board's decision on August 11, 2016, to authorize its executive staff to enter into a settlement agreement with its former real estate manager, having spent hundreds of thousands litigating the matter but with no legal discovery to show. I trust you would agree.

Sincerely,

/s/ Columbus A. Alexander, III, CPA Certified Fraud Examiner

Enclosures (38)

From:

Joshua Mond

To: Cc: Summer Loveland Kelly Gottschalk

Subject:

Re: ORR for Alexander

Date:

Saturday, October 29, 2016 07:02:25

I just need to check what she sent versus what we filed against CDK. I will do that Tuesday and we can reply then. They are only seeking the date we filed all those pleadings, almost all of which we did not file. (Threw the comma in for you Summer.)

# Sent from my iPad

On Oct 28, 2016, at 9:55 AM, Summer Loveland < summerl@dpfp.org > wrote:

Josh,

All of the ORRs for Alexander are due Monday. Can you let us know status with Andrea/Julie?

#### Summer L. Loveland

Chief Financial Officer
Dallas Police & Fire Pension System
4100 Harry Hines Blvd., Suite 100
Dallas, TX 75219

214.780.2815 phone 214.638.6403 fax summerl@dpfp.org

#### Julie Kobel

From: Joshua Mond [joshuam@dpfp.org]
Sent: Thursday, December 01, 2016 11:57 AM

To: julie.kobel@dpfps.org
Cc: julie.kobel@dpfps.org
Carol Huffman; Joshua Mond

Subject: RE: Request for Status - Open Records Requests ID # 1611-023 thru 1611-058

Ms. Kobel, there are no documents responsive to your requests noted below.

From: Julie Kobel [mailto:julie.kobel@dpfps.org]
Sent: Tuesday, November 29, 2016 9:29 AM

To: info@dpfp.org

Cc: Joshua Mond <<u>joshuam@dpfp.org</u>>; Carol Huffman <<u>Carolh@dpfp.org</u>>; Julie Kobel <<u>julie.kobel@dpfps.org</u>>

Subject: Request for Status - Open Records Requests ID # 1611-023 thru 1611-058

Officer for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act – Open Records Requests
Dallas Police & Fire Pension System
ID # 1611-023 thru 1611-058
Request for Status

On Monday, November 7, 2016, pursuant to the Texas Public Information Act, I submitted (via email) thirty-six separate requests for information regarding the Dallas Police & Fire Pension System.

The aforementioned requests for information may be identified by Open Records ID 1611-023 thru 1611-058, and are regarding litigation filed by former DPFP real estate manager CDK and the Dallas Police & Fire Pension System, and related litigation discovery by and between the parties.

Not wanting to be a pest, but the status of the aforementioned thirty-six information requests submitted to your attention on November 7, 2016, would be appreciated. Thank you.

Sincerely,

Julie Kobel

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-023

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **CDK Realty Advisors, LP** - All "Request for Production of Documents" discovery requests issued by the System, and/or its attorneys, and/or its law firms to CDK Realty Advisors, LP in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-024

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **CDK Advisors, LLC** - All "Request for Production of Documents" discovery requests issued by the System, and/or its attorneys, and/or its law firms to CDK Advisors, LLC in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-025

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Kenneth Cooley - All "Request for Admissions" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Kenneth Cooley in the abovereferenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-026

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Kenneth Cooley - All "Request for Interrogatories" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Kenneth Cooley in the abovereferenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-027

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Kenneth Cooley - All "Request for Production of Documents" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Kenneth Cooley in the abovereferenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-028

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Kenneth Cooley** - All "Notice of Intent to take Oral Deposition" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Kenneth Cooley in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-029

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Jon Donahue - All "Request for Admissions" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Jon Donahue in the above-referenced causeof-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-030

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Request for Interrogatories" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Jon Donahue in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-031

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Jon Donahue - All "Request for Production of Documents" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Jon Donahue in the abovereferenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-032

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Notice of Intent to take Oral Deposition" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Jon Donahue in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-033

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Brent Kroener - All "Request for Admissions" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Brent Kroener in the above-referenced causeof-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-034

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Brent Kroener** - All "Request for Interrogatories" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Brent Kroener in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-035

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Brent Kroener - All "Request for Production of Documents" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Brent Kroener in the abovereferenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-036

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Brent Kroener - All "Notice of Intent to take Oral Deposition" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Brent Kroener in the abovereferenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-037

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Marshall Edwards - All "Request for Admissions" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Marshall Edwards in the abovereferenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-038

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Marshall Edwards - All "Request for Interrogatories" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Marshall Edwards in the abovereferenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-039

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Marshall Edwards** - All "Request for Production of Documents" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Marshall Edwards in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-040

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Marshall Edwards** - All "Notice of Intent to take Oral Deposition" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Marshall Edwards in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-041

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 CDK Realty Advisors, LP - All "Request for Production of Documents" discovery requests issued by CDK Realty Advisors, LP to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-042

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **CDK Advisors, LLC** - All "Request for Production of Documents" discovery requests issued by CDK Advisors, LLC to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-043

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Kenneth Cooley - All "Request for Admissions" discovery requests issued by Kenneth Cooley to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-044

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Kenneth Cooley** - All "Request for Interrogatories" discovery requests issued by Kenneth Cooley to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-045

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Kenneth Cooley - All "Request for Production of Documents" discovery requests issued by Kenneth Cooley to the System, and/or its attorneys, and/or its law firms in the abovereferenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-046

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Kenneth Cooley - All "Notice of Intent to take Oral Deposition" discovery requests issued by Kenneth Cooley to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-047

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Jon Donahue - All "Request for Admissions" discovery requests issued by Jon Donahue to the System, and/or its attorneys, and/or its law firms in the above-referenced causeof-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-048

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Request for Interrogatories" discovery requests issued by Jon Donahue to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-049

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Request for Production of Documents" discovery requests issued by Jon Donahue to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-050

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Notice of Intent to take Oral Deposition" discovery requests issued by Jon Donahue to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-051

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Brent Kroener** - All "Request for Admissions" discovery requests issued by Brent Kroener to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-052

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Brent Kroener** - All "Request for Interrogatories" discovery requests issued by Brent Kroener to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-053

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Brent Kroener - All "Request for Production of Documents" discovery requests issued by Brent Kroener to the System, and/or its attorneys, and/or its law firms in the abovereferenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-054

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Brent Kroener - All "Notice of Intent to take Oral Deposition" discovery requests issued by Brent Kroener to the System, and/or its attorneys, and/or its law firms in the abovereferenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-055

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

 Marshall Edwards - All "Request for Admissions" discovery requests issued by Marshall Edwards to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-056

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Marshall Edwards** - All "Request for Interrogatories" discovery requests issued by Marshall Edwards to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-057

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Marshall Edwards** - All "Request for Production of Documents" discovery requests issued by Marshall Edwards to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas. Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act - Open Records Request CDK Realty Advisors, LP v Dallas Police & Fire Pension System Cause No. DC-16-01566 ID # 1611-058

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Marshall Edwards** - All "Notice of Intent to take Oral Deposition" discovery requests issued by Marshall Edwards to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,