



MR. JOSHUA MOND

Eligible to Practice in Texas

DALLAS POLICE AND FIRE PENSION SYSTEM

Bar Card Number: 14263500

TX License Date: 05/10/1991

Primary Practice Location: Dallas , Texas

4100 Harry Hines Blvd., Suite 100
Dallas, TX 75219

CONTACT INFORMATION

Tel: 214-382-3097

Practice Areas: Government/Administrative

Statutory Profile Last Certified On: 03/02/2017

PRACTICE INFORMATION

Firm: Dallas Police and Fire Pension System

Firm Size: Solo

Occupation: Government Lawyer

Practice Areas: Government/Administrative

Services Provided:

Hearing impaired translation: Not Specified

ADA-accessible client service: Not Specified

Language translation: Not Specified

Fee Options Provided:

None Reported By Attorney

Please note: Not all payment options are available for all cases, and any payment arrangement must be agreed upon by the attorney and his/her client. The State Bar of Texas is not responsible for payment arrangements between an attorney and his/her client.

COURTS OF ADMITTANCE

Federal:

None Reported By Attorney

Other Courts:

None Reported By Attorney

Other States Licensed:

New York



MR. GARY B. LAWSON

Eligible to Practice in Texas

FISHERBROYLES

Bar Card Number: 12058490

TX License Date: 02/20/1985

Primary Practice Location: Frisco , Texas

13770 Noel Rd # 803524
Dallas, TX 75240-4324

CONTACT INFORMATION

Tel: 469-399-0332

Practice Areas: Business, Government/Administrative, Intellectual Property, Labor-Employment, Taxation, Disability Law

Statutory Profile Last Certified On: 01/04/2017

PRACTICE INFORMATION

Firm: FisherBroyles

Firm Size: Over 200

Occupation: Private Law Practice

Practice Areas: *Business, Government/Administrative, Intellectual Property, Labor-Employment, Taxation, Disability Law*

Services Provided:

Hearing impaired translation: Not Specified

ADA-accessible client service: Yes

Language translation: Not Specified

Fee Options Provided:

None Reported By Attorney

Please note: *Not all payment options are available for all cases, and any payment arrangement must be agreed upon by the attorney and his/her client. The State Bar of Texas is not responsible for payment arrangements between an attorney and his/her client.*

RECOGNITION



Pro Bono College

COURTS OF ADMITTANCE

Federal:

US Supreme Court

US Tax Court

Fifth Circuit Court of Appeals

Texas Northern District Court

Texas Western District Court

Other Courts:

None Reported By Attorney

Other States Licensed:

Illinois

IN THE NEWS

ON THE MOVE

Chad Baruch and **Randall Warmbrodt** have joined the newly formed firm of Warmbrodt Baruch Ray in Plano.

Cami Dawson Boyd has joined Friedman & Feiger as a partner.

Charles Cantu has joined Alston & Bird LLP as an associate in the trial and litigation practice.

Lori Carr, Dawn Estes, Jane Taber and **Jessica Thorne** have formed Taber Estes Thorne & Carr PLLC.

Tobey S. Elliott has opened T.S. Elliott Law Office, PLLC, located at 600 S. Denton Tap Rd., Suite 134, Coppell, TX 75019-5441. His practice focuses on federal firearms and explosives license regulation defense, small business needs, real estate leases and transactions, land use law, estate planning, elder law, disability law, and education law.

David C. Gair, Ashley E. Johnston and **Lindsey Jandal Postula** have joined Looper Reed & McGraw, P.C. as associates.

Stephen J. Gilhooly has joined Linage Power as general counsel.

Melinda Wyatt Gilliam has joined Rose • Walker, L.L.P., and **Bryan Rose** has joined the firm's litigation practice.

Curtis Graves and **Richard Hathaway** have joined Sessions Lambert Selwyn, LLP as senior associates.

Alyson Gregory has joined Gregory & Conner in Denton and is practicing family law.

Tanya D. Henderson has joined Greenberg Traurig, LLP as a shareholder in the litigation practice group.

Bruce F. Howell has joined Powell Goldstein LLP as counsel.

at 202 W. Sandy Lake Road, Suite 103, Coppell TX 75019.

Kenn W. Webb has joined Thompson & Knight LLP as partner in its corporate and securities practice group.

KUDOS

Chris Converse, Steve Smith and **Tom Wright** have been promoted to partner at Gardere Wynne Sewell LLP.

John T. "Trey" Cox III has been elevated to name partner at the firm now known as Lynn Tillotson Pinker & Cox LLP.

Sheri D. Crosby, an associate with Wilson Elser Moskowitz Edelman & Dickler LLP, was selected as the Texas Young Lawyers Association's Outstanding Young Lawyer in Texas.

Teresa Clark Evans was named partner with the law firm of McClure Duffee & Eitzen LLP.

T. Ray Guy has been named head of the litigation/regulatory practice for the Dallas office of Weil, Gotshal & Manges LLP.

Rhonda Hunter, past president of the DBA and a family law practitioner, has received the Women of Spirit Award from the American Jewish Congress. The award is presented to Dallas women who have worked on behalf of social justice and human rights for all Americans.

John H. Martin, a partner at Thompson & Knight LLP, has been inducted as a fellow of the International Academy of Trial Lawyers.

FROM THE DAIS

Robert J. Matlock of Woods, May & Matlock, P.C. spoke at the Collaborative Law Spring Conference sponsored by the State Bar of Texas. His presentation was entitled "Ethics Across the Team: Balancing Full Disclosure With Duties to a Client."

Alan E. Sherman recently spoke on "Texas Property, Sales and Margin Taxes" at the Texas Wine and Grape Growers Association Conference in Houston.

News items regarding current members of the Dallas Bar Association are included in Headnotes as space permits. Please send your announcements to Judi Smalling at JSmalling@dallasbar.org.

U.S. Senate Confirms Judge Catharina Haynes and Becky Gregory

Judge Catharina Haynes was confirmed in April to the U.S. Court of Appeals for the Fifth Circuit. She was nominated by President George W. Bush in July 2007.

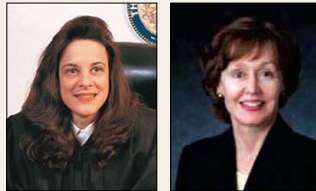
In 1998, Judge Haynes was elected judge of the 191st District Court in Dallas, and was re-elected in 2002, where she presided over 190 jury trials and approximately 100 bench trials. In 2007, she returned to private practice at Baker Botts, LLP, where she worked in the litigation department.

Judge Haynes graduated second in her class from Emory University School of Law. Previously, she graduated first in her class from the Florida Institute of Technology, earning a B.S. in psychology at age 19.

In 1996 and 2002, Judge Haynes was presented with the DBA's Jo Anna Moreland Outstanding Committee Chair Award. Additionally, she has been active in numerous pro bono efforts over the years, and spearheaded a legal clinic in the Vickery Meadow community through the DBA Pro Bono Activities Committee.

In April, the U.S. Senate also confirmed the nomination of **Rebecca "Becky" Gregory** to serve as U.S. Attorney for the Eastern District of Texas.

Becky Gregory served as first assistant U.S. Attorney for the Eastern District of Texas from 2002-2005, and has worked in the appellate, civil and criminal sections. She was also selected for a special assignment in



Judge Catharina Haynes Becky Gregory

Washington D.C., where she worked on terrorism investigations.

In 2005, she was appointed to the 283rd Judicial District Court in Dallas, where she presided over felony criminal cases. In 2007, she joined the law firm of Curran, Tomko, and Tarski.

Ms. Gregory graduated from the University of Dallas in 1972 and St. Mary's University Law School in 1978.

The Eastern District of Texas covers a 43-county area and has six fully staffed offices in Beaumont, Plano, Tyler, Sherman, Texarkana and Lufkin.

Also, in April, **James C. Ho** was appointed by Attorney General Greg Abbot as the new Solicitor General of Texas. As the state's chief appellate lawyer, Mr. Ho will oversee both criminal and civil litigation before the state and federal appeals courts and will represent Texas before the U.S. Supreme Court.

Previously, he served as chief counsel to U.S. Sen. John Cornyn from 2003 to 2005, and was a law clerk for U.S. Supreme Court Justice Clarence Thomas.



EXPERIENCE

Keith Dean,
20 Years of Criminal
Judicial Experience.

Practicing law with an
emphasis on Criminal
Law in Federal, State
and Juvenile Courts

KEITH DEAN
1825 MARKET CENTER BLVD., SUITE 320
DALLAS, TEXAS 75207
OFFICE 214-747-1825
CELL 214-704-4854
kdean@crimlawdallas.com

Greater Dallas & North Texas Pre-Suit Mediation and Arbitration, Inc.

is the successor ADR entity formerly known as
"Greater Dallas Pre-Suit Mediation Association," which operated
for approximately 3 years in the 1990s, and successfully handled
pre-suit mediations with a settlement rate of 70%.

- A panel of experienced mediators is assembled, including 3 former judges or "Agreed Special Masters."
- Mediation pre-suit is featured but Arb-Med is offered where parties agree.
- The entity is applying for 11 USC 501 (c)(3) status.
- Application has been made to foundations for grants to furnish funds for fees for mediator and counsel where pro se parties lack funds.
- The entity is accepting referrals, including court or institution referrals.

Greater Dallas Pre-Suit Mediation and Arbitration, Inc.
1401 Elm Street, Suite 4585, Elm Place, Dallas, TX 75202
(214) 749-1070 ■ (214) 748-5288

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: Summer Loveland
Cc: 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: 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 <joshuam@dpfp.org>; Carol Huffman <Carolh@dpfp.org>; Julie Kobel <julie.kobel@dpfps.org>
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

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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 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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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"):

1. **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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

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,

/s/ Julie Kobel, Requestor

When Will Richard Tettamant Pay for His Recklessness?

The FBI raid was in April. We're still waiting.

BY TIM ROGERS, PUBLISHED IN FRONTBURNER, OCTOBER 14, 2016



[Ed: This post was corrected. An earlier version incorrectly said that the pension had been raided by the FBI. In fact, a financial firm called CDK was raided. The firm had offices in the same building as the pension and had a cozy relationship with Tettamant.]

This morning, as I read the news that the Dallas Police and Fire Pension System is foundering and needs millions upon millions in taxpayer money to stay afloat, I thought of one man: Richard Tettamant. He's the guy who did this. There are others who are culpable for the mess we're in now — the junket-taking cops and firefighters who sat on the pension board over the years, the feckless City Council members who did the same — but Tettamant is the man. He was the head of the snake.

I spoke with someone this morning who closely watches the workings of the pension fund, and this person said the liability generated by its bad investments and shoddy accounting would bankrupt most cities. The pension wants a \$36 million life raft from the city right now; it soon could come asking for hundreds of millions more. This mess spills over into every corner of the city. Hiring more cops, fixing our third-world streets, building a 50-mile trail loop, funding arts groups, hiring a management team to run Fair Park — it is all put in jeopardy because of the pension mess. Oh, and the city-owned buildings. Our own Peter Simek recently used his house key to gain entrance to the DMA's art vault, because the elevators there are in such a sad state. Between the DMA and the Meyerson and everything else, the city has \$58 million in major maintenance needs at its cultural facilities. Good luck with that. Tettamant has likely torpedoed it all.

So let's briefly remind ourselves how we got here and then have a look at how Tettamant is faring these days, shall we?

Many, many years ago, the pension was run from an office in City Hall. Tettamant worked there. He was a city employee, and the city manager controlled his operating budget and how much office space he could have. Wanting more autonomy, Tettamant maneuvered to change the pension's operational structure, turning it into a pension *system*, and moving the thing into its own building on Harry Hines. Along the way, all those city employees had to be transitioned over; they became pension employees.

Tettamant had already worked so long for the city, though, that his personal pension remained with the Employee Retirement Fund, the city's civilian pension. So while he was buying \$20 million houses in Hawaii and taking nice trips to see how the pension's investments were holding up, his money was safe. As he made risky real estate investments all over the place, taking out variable-interest-rate loans from Japanese banks to build speculative projects, and then overvaluing the pension's holdings on its books, his money was safe.

It is entirely possible that in 2014, as it became increasingly clear that the pension he ran was in serious trouble and Tettamant stepped down, he was already drawing his pension from the much more stable and responsibly run Employee Retirement Fund. At that point, his salary was about \$370,000. Sweet deal if you can get it.

And today? According to his LinkedIn profile, Tettamant works as a senior advisor at a real estate investment firm called - wait for it- Ethika. The firm's site says the name comes from "Aristotle's most influential work, in which he states logic, perseverance, and goal-directed ethics are key principles in achieving success."

As we know, back in April the FBI raided the offices of a financial firm that had close connections to the pension and officed in the same building. I have a favor to ask of John R. Parker, the U.S. attorney for the Northern District of Texas. Please, when this thing finally goes to trial, ask Tettamant about Aristotle and goal-directed ethics.

In the meantime, I think every cop on the Dallas police force should be familiar with the name Tettamant. He doesn't live in Dallas. But surely his work for Ethika periodically takes him into the city whose first responders once entrusted their retirement money to him. Should he ever be pulled over, the cop who does so might wish to express his or her thanks.