

Dallas police-fire pension fund sues advisor for millions over ‘reckless and improper’ advise

BY STEVE THOMPSON, DALLAS MORNING NEWS, APRIL 5, 2016

The troubled police and fire pension fund is trying to recover millions of dollars from an advisory firm that the fund says led it into risky deals while scoring improperly high fees and other perks.

A legal claim filed late Tuesday by the Dallas Police and Fire Pension System pension fund alleges “multiple breaches of fiduciary duties” by CDK Realty Advisors, which at one time managed more than \$700 million for the fund. For many years, the small firm had its offices in the fund’s headquarters building.

“High-risk investments have resulted in write-downs and losses of more than \$320 million -- losses on assets managed by CDK that represent funds that should have been safeguarded for the benefit of Dallas’s loyal and hardworking police officers and firefighters,” the pension fund’s court filing says.

A lawyer for CDK said in a statement that the firm believes the fund’s allegations “are are totally without merit and untrue. We intend to dispute them vigorously in court.”

The fund’s board and management approved the deals, which “in the aggregate, have substantially increased the retirement funds of Dallas’s police and firefighters in the Pension System,” said the lawyer, Steven A. Schneider.

The fund’s claim was filed in response to a lawsuit CDK filed in February, which accused the fund of failing to pay \$139,479 in management fees.

The pension fund “knows it owes the fees, but has wrongfully, knowingly and intentionally withheld payment,” CDK’s lawsuit said.

CDK is not responsible for some of the fund’s more notorious bad investments, such as luxury houses in Hawaii; the fund managed those itself. But in 2005 CDK scouted the proposed development of what would eventually become Museum Tower, the luxury condominium building that has created controversy over the glare it casts in Dallas’ downtown Arts District. CDK didn’t end up managing the project.

Some of the investments that CDK managed for the fund led to huge losses, the new filing says. They included an investment called “Eagle,” which involved the purchase years ago of thousands of acres of undeveloped land outside of Boise, Idaho. The pension fund now claims CDK overvalued the property in periodic reports, allowing the advisory firm to charge inflated management fees.

The pension fund’s board removed its longtime director in 2014 and ousted CDK last year. The fund “subsequently learned that the entire Eagle investment was worth only a small fraction of the value invested,” according to the legal claim, and the plan to develop houses on the land was not feasible.

CDK Realty Advisors was formed in 2001 by Kenneth Cooley, Jon Donahue, and Brent Kroener. It was initially headquartered in the north Dallas home of Kroener, who already was doing business with the pension fund through other companies.

The partners began scouting real estate projects for the pension fund to invest in. The firm’s strategy was to connect investors to real estate developers with whom the partners had long-standing relationships, according to CDK’s web site. “Our approach to investment sourcing has provided CDK clients with unique and off-the-market real estate assets,” the site says.

The firm started with \$45 million in real estate under its management, according to information previously on its web site. It’s not clear how much of that may have been funded by the pension.

In 2008, the pension fund and CDK moved into separate floors of an office building on Harry Hines Boulevard, which the fund bought and CDK managed. The filing claims CDK later “abused its position as property manager to provide its friends and affiliates with below-market leases” at the fund’s expense.

The pension fund also accuses CDK of self-dealing in relationship to the investment in The Beat Lofts in the Cedars area just south of downtown Dallas.

CDK recommended that the pension fund “purchase the complex as a real estate investment, which it did through a limited partnership,” the claim says. “While acting as manager of this property, CDK entered into multiple sweetheart deals with friends, associates or persons associated with the other owners of the limited partnership to sell and rent units at below-market rates.”

Ultimately, the investment lost the fund \$6 million, the claim says.

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