

STATE OF MINNESOTA

DISTRICT COURT

HENNEPIN COUNTY

FOURTH JUDICIAL DISTRICT  
CASE TYPE: CIVIL OTHER

Edain Altamirano Flores; Esperanza Herrera;  
Lori Nicol; Olutundun Arike Ogundipe;  
Jason Beck; Patricia Goggin; Norma Juarez;  
and Bruno Gorostieta, on behalf of  
themselves and all others similarly situated,

Court File No. 27-CV-16-14225  
Class Action  
Judge Mary R. Vasaly

Plaintiffs,

v.

Spiros Zorbalas; Stephen Frenz; Equity  
Residential Holdings, LLC; National  
Housing Fund, LLC; The Apartment Shop,  
LLC; ERT, LLC; Quarters for Creativity,  
LTD.; Emerald Square Properties, Inc.;  
Hennepin Quarters, Inc.; Powderhorn  
Quarters, Inc.; Hiawatha Quarters, Inc.; 25  
&3146 Properties, Inc.; Lahaha Holdings,  
Inc.; Arts Avenue Properties, Inc.; SS  
Quarters, Inc.; Berkeley Holdings, Inc.;  
1801Properties, Inc.; SZ112, Inc.; S1322,  
Inc.; R110, Inc.; G121, Inc.; Alpha-Omega  
Companies, Inc.; JAS Apartments, Inc.;  
Jennifer Frenz; Mary Brandt; and 2020  
Vision Investments, LLC,

Defendants.

**AFFIDAVIT OF  
MICHAEL F. COCKSON IN SUPPORT  
OF PLAINTIFFS’ MOTION FOR  
ATTORNEYS’ FEE AWARD, COST  
AWARD, AND CLASS  
REPRESENTATIVE SERVICE AWARD**

STATE OF MINNESOTA    )  
  )ss.  
COUNTY OF HENNEPIN    )

I, MICHAEL F. COCKSON, declare as follows:

1.     I am an attorney with the law firm of Faegre Baker Daniels LLP (“FaegreBD”),  
which represents the above-named Plaintiffs in this action. I make this Affidavit in support of

Plaintiffs' Motion for Attorneys' Fee Award, Cost Award, and Class Representative Service Award.

2. My firm and I represent the above-named Plaintiffs in this action (the "*Flores* Class Action") and on August 11, 2017, were appointed Class Counsel by the Court to represent a certified class of current and former tenants at Defendants' buildings (the "class"). (*See* Dkt. No. 261.)

3. The settlement agreement between Defendants and the class came after over two years of hotly contested litigation. This case was commenced on September 23, 2016, and was vigorously litigated by all parties from the date of filing until the parties reached a settlement at mediation on June 8, 2018. Since settlement was reached in principle, the parties continued to negotiate the specific terms of the settlement agreement, finalized that agreement, and sought and obtained preliminary approval of the settlement agreement by the Court.

4. The investigation of the claims in this case began after extensive trial and deposition testimony in another matter involving three of the Defendants. Additionally, Class Counsel undertook significant additional factual and legal research and analysis prior to filing of the Complaint. After concluding a thorough pre-suit investigation, Class Counsel prepared and filed on behalf of Plaintiffs a detailed 37-page complaint asserting theories of landlord liability and damages under Minn. Stat. § 504B.161, the Minnesota consumer protection statutes, and the veil-piercing doctrine.

5. What followed from the filing of the Complaint was extensive and hard-fought litigation. This included three rounds of contested dispositive motions; a contested class certification motion; a contested request to add punitive damages; motions for injunctive relief; and multiple discovery-related motions. In addition to motion practice, Plaintiffs and Defendants

conducted extensive discovery, so that by the time settlement discussions commenced shortly before trial, the parties had obtained substantially all the evidence relevant to resolution of the claims and defenses at trial.

6. Work on behalf of the Class also involved extensive efforts in a collateral fraudulent transfer lawsuit brought by class representatives Lori Nicol—on behalf of a putative class coextensive with the certified class in this action—to protect the class’s as Defendants creditors with respect to an eventual judgment in this case (“the *Nicol* Action”). *Nicol* Action was directly related to and simultaneously settled with the *Flores* Class Action. The *Nicol* Action is the source of millions of dollars in the common settlement fund. In the *Nicol* Action, the parties took discovery and filed several dispositive motions. Plaintiffs also negotiated and documented at least eight settlements with fraudulent-transfer defendants. These many negotiations were complex and time-consuming because the settlements involved agreements and/or discussions with numerous parties, title companies, escrow agents, and in at least one case, a potential lender.

7. Class Counsel represented the class representative(s) in both the *Flores* Class Action and the *Nicol* Action (collectively, “the Litigation”) on a contingency-fee basis that provided that Class Counsel would receive no payment if nothing was recovered. To date, Class Counsel has not been reimbursed for any of its legal fees or expenses incurred in prosecuting the claims of the class representatives or the class in the Litigation.

8. In representing Plaintiffs and the class, Class Counsel made a significant investment of time, labor, and dedication over the more than two years of the Litigation. The case turned out to be a unique combination of a civil rights case, a complex business litigation, and a financial fraud investigation, each aspect with its own challenges and risks. Class

Counsel’s efforts included, among other things, (1) conducting an extensive factual investigation into the alleged fraud; (2) vetting the complex and novel legal theories supporting Plaintiffs’ claims; (3) drafting the Complaint; (4) responding to Defendants’ motion to stay the litigation; (5) responding to Defendants’ motions to dismiss; (6) reviewing over 70,000 documents and 150,000 pages produced by Defendants; (7) moving to compel additional productions and discovery from Defendants; (8) moving for a protective order to limit certain discovery inquiries by Defendants; (9) taking 23 fact depositions from Defendants and Defendants’ employees; (10) taking or attending eight depositions of third party witnesses; (11) taking 5 depositions of Defendants’ expert witnesses; (12) defending 8 depositions of the Plaintiffs; (13) successfully moving for class certification; (14) successfully moving to add claims for punitive damages; (15) successfully opposing Defendants’ eight motions for summary judgment; (16) litigating a fraudulent transfer action; (17) preparing for trial; and (18) attending and monitoring City license revocation proceedings; (19) filings and appearances in a foreclosure action against several Defendants; and (20) engaging in extensive settlement negotiations over two sessions with two different mediators.

9. The below chart summarizes the metrics for key litigation events in the Litigation, which shows the complexity, difficulty, and intensity of this hotly contested complex litigation.

Topic	Summary
<b>Summary of Motions</b>	<ul style="list-style-type: none"> <li>• 44 Total Motions Filed</li> </ul>
<b>Court Filings</b>	<ul style="list-style-type: none"> <li>• 16 Total Key Court Orders</li> <li>• 275 Total Pages of Key Court Orders</li> <li>• 22,262 Total Number of Pages within Key Motion Papers (excluding exhibits)</li> <li>• 1,175 Total Number of Exhibits Filed with the Key Motions</li> </ul>
<b>Court Hearings/ Oral Arguments</b>	<ul style="list-style-type: none"> <li>• 18 Oral Arguments</li> </ul>

<b>Written Discovery</b>	<ul style="list-style-type: none"> <li>• 1,811 Total Number of Interrogatories Served</li> <li>• 2,565 Total Number of Requests for Production Served</li> <li>• 527 Total Number of Requests to Admit Served</li> </ul>
<b>Depositions</b>	<ul style="list-style-type: none"> <li>• 45 Depositions Taken</li> <li>• 354 Deposition Exhibits Marked</li> <li>• 161 Hours and 21 Minutes of Deposition Testimony (incl. breaks)</li> <li>• 5,493 Pages of Deposition Transcripts</li> </ul>
<b>Document Productions</b>	<ul style="list-style-type: none"> <li>• 74,838 Total Documents Produced</li> <li>• 211,641 Total Pages Produced</li> </ul>

10. Additionally, attached as **Exhibit A** is a more comprehensive breakdown of the court filings, court hearings, written discovery, and depositions involved in the Litigation.

11. The schedule attached as **Exhibit B**, and incorporated herein, is a detailed summary of the investment of time by my firm’s partners, counsel, associates, and paralegals who were involved in the Litigation through September 30, 2018. It does not include additional time spent on the Litigation after that date, including time to be spent preparing for the final approval hearing. Nor does this calculation include approximately \$80,000 of work performed by litigation support specialists, research librarians, and other paraprofessionals whose time is customarily billed to clients. The calculation of my firm’s investment is based on the rates billed by those professionals when the time was incurred. Exhibit B was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates reflected in Exhibit B are the standard hourly rates for the professionals’ respective services.

12. The total number of hours expended by my firm in the Litigation from inception through September 30, 2018, by my firm’s partners, counsel, associates, and paralegals is 13,696.1. The total investment by these professionals in the Litigation is \$6,967,921.

13. Additionally, Exhibit B contains a chart detailing the time spent in each calendar year in the Litigation. In 2016, among other work on behalf of the class, Class Counsel undertook factual and legal investigation into Plaintiffs' claims, drafted and filed the Complaint, brought a motion for temporary restraining order after Defendants' rental licenses were revoked by the City of Minneapolis, resisted Defendants' motion to stay the litigation, and prepared for and argued at hearings on the motion for temporary restraining order and motion to stay. In performing these tasks, Class Counsel worked 2,206.9 hours for a total investment of \$1,071,672.

14. In 2017, among other work on behalf of the class, Class Counsel responded to Defendants' motions to dismiss, moved for class certification, litigated Defendants' appeal of the Court's class certification order, responded to Defendant Mary Brandt's motion for summary judgment, moved to amend the Complaint to add claims for punitive damages, brought a motion for prejudgment attachment, responded to a motion for temporary restraining order filed by Defendants, and prepared for and appeared at 10 hearings. Further, Class Counsel initiated and assisted Plaintiffs in responding to discovery, took over 20 depositions, defended or otherwise appeared at 14 other depositions reviewed tens-of-thousands of documents, filed a motion to compel discovery from Defendants, and brought a motion for a protective order to limit certain discovery by Defendants. Additionally, Class Counsel investigated the claims in the *Nicol* Action, drafted and filed the Complaint, brought and responded to motion practice—including filing a motion to dismiss counterclaims and responding to motions for partial summary judgment and for discharge of *lis pendens*, and negotiated settlements with various defendants in the *Nicol* Action. In performing these tasks, Class Counsel worked 8,175.5 hours for a total investment of \$4,047,757.5.

15. In 2018, among other work on behalf of the class, through September 30 of that year, Class Counsel continued with discovery, taking an additional seven depositions, defending a deposition of one of Plaintiffs' expert witnesses, and serving additional discovery requests, responded to Defendants' motions for summary judgment, moved for prejudgment attachment and the appointment of a receiver, and continued litigating the *Nicol* Action, including serving and responding to discovery, bringing a motion for default judgment, and negotiating additional settlements that resulted in significant amounts of money being deposited with the court in the *Nicol* Action and eventually transferred to the settlement fund in this action. Additionally, Class Counsel began extensive preparations for trial in the *Flores* Class Action, which was scheduled for August 2018. Finally, Class Counsel spent significant time negotiating the settlement of this matter and prepared and filed the motion seeking preliminary approval of the settlement. In performing these tasks, Class Counsel worked 3,313.7 hours for a total investment of \$1,848,491.

16. My firm separately records expenses incurred on a matter. The expenses my firm incurred in the Litigation are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records, and other source materials, and accurately reflect the expenses incurred.

17. My firm incurred a total of \$269,372.49 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of the Litigation. An itemization of those expenses, listed by category, is attached as **Exhibit C**. My firm is not seeking reimbursement for approximately \$78,000 in costs associated with computerized legal research, including use of Westlaw and Lexis Nexus.

18. The settlement administrator, BrownGreer PLC had estimated its costs in providing initial class certification notice to the class along with class settlement notice and settlement administration work at \$115,000.

19. The class representatives have also devoted a significant amount of time to this litigation. Each participated in interviews and assisted Class Counsel in developing the factual record of the case and conferred with Class Counsel at all stages of the litigation. Each class representative responded to several sets of written discovery requests. Each class representative had his or her deposition taken by Defendants. Class representative Lori Nicol led a putative class action designed to undo, for the benefit of the class, alleged fraudulent transfers of Defendants' assets. Finally, the class representatives took an active role in settlement negotiations, including attending mediation in person, and considered the appropriateness of a proposed mediator's settlement number both in the presence of Class Counsel and outside of Class Counsel's presence, ultimately deciding to accept the mediator's proposed settlement number.

I declare under penalty of perjury that everything I have stated in this document is true and correct to the best of my knowledge and belief.

Dated: November 21, 2018

/s/Michael F. Cockson  
Michael F. Cockson



## EXHIBIT A

**Edain Altamirano Flores, et al. v. Spiros Zorbalas, et al (27-CV-16-14225)**

**Lori Nicol v. Equity Residential Holdings, LLC, et al. (27-CV-17-13581)**

<b>Topic</b>	<b>Summary</b>	<b>Page Nos.</b>
<b>Summary of Motions</b>	<ul style="list-style-type: none"><li>• 44 Total Motions Filed</li></ul>	<b>2-3</b>
<b>Key Court Filings</b>	<ul style="list-style-type: none"><li>• 16 Total Key Court Orders</li><li>• 275 Total Pages of Key Court Orders</li><li>• 16 Total Number of Key Motions</li><li>• 2,262 Total Number of Pages within Key Motion Papers (excluding exhibits)</li><li>• 1,175 Total Number of Exhibits Filed with the Key Motions</li></ul>	<b>4-15</b>
<b>Court Hearings/Oral Arguments</b>	<ul style="list-style-type: none"><li>• 18 Oral Arguments</li></ul>	<b>16-17</b>
<b>Written Discovery</b>	<ul style="list-style-type: none"><li>• 1,811 Total Number of Interrogatories Served</li><li>• 2,565 Total Number of Requests for Production Served</li><li>• 527 Total Number of Requests to Admit Served</li></ul>	<b>18-27</b>
<b>Depositions</b>	<ul style="list-style-type: none"><li>• 45 Depositions Taken</li><li>• 354 Deposition Exhibits Marked</li><li>• 161 Hours and 21 Minutes of Deposition Testimony (incl. breaks)</li><li>• 5,493 Pages of Deposition Transcripts</li></ul>	<b>28-31</b>
<b>Document Productions</b>	<ul style="list-style-type: none"><li>• 74,838 Total Documents Produced</li><li>• 211,641 Total Pages Produced</li></ul>	<b>32</b>

**SUMMARY OF MOTIONS**

<b>Date of Motion</b>	<b>Motion</b>
2016-10-14	Frenz Defendants' Motion to Dismiss
2016-11-01	Zorbalas Defendants' Motion to Dismiss
2016-11-16	Plaintiffs' Motion for Temporary Restraining Order and Appointment of Receiver
2016-11-18	Frenz Defendants' Motion to Dismiss
2016-11-23	Defendants' Motion to Stay Proceedings
2017-01-23	Plaintiffs' Motion to Confirm Amendment of Complaint Adding Parties or, in the Alternative, to Add Parties
2017-01-24	2020 Vision's Motion to Dismiss
2017-02-02	J. Frenz Motion to Dismiss
2017-03-07	Defendants' Motion to Compel City's Compliance
2017-03-31	Plaintiffs' Motion for Class Certification
2017-04-07	Plaintiffs' Motion to Compel
2017-07-24	Plaintiffs' Motions on Discovery
2017-08-11	Petitioners (Defendants) Petition for Discretionary Review
2017-09-11	Defendants' Motion to Stay Proceedings
2017-09-12	Plaintiffs' Motion for Prejudgment Attachment
2017-09-27	Sela's Motion to Dismiss ( <i>Nicol</i> )
2017-10-05	Brandt's Motion for Summary Judgment
2017-10-12	Zorbalas Defendants' Motion for Temporary Restraining Order
2017-10-16	Plaintiffs' Motion to Dismiss Counterclaims ( <i>Nicol</i> )
2017-11-06	Zorbalas Defendants' Motion for Contempt Against the City of Minneapolis
2017-11-06	City of Minneapolis Motion to Quash Subpoena
2017-11-06	Defendants' Motion for Partial Summary Judgment and Discharge of Lis Pendens ( <i>Nicol</i> )
2017-11-06	ERH et al, Motion for Partial Summary Judgment ( <i>Nicol</i> )
2017-11-06	ERH and Berkeley's Motion for Discharge of Lis Pendens ( <i>Nicol</i> )
2017-11-06	Berkeley's Motion for Partial Summary Judgment ( <i>Nicol</i> )
2017-11-06	2020's Motion for Partial Summary Judgment ( <i>Nicol</i> )
2017-11-06	SS Quarters' Motion for Partial Summary Judgment ( <i>Nicol</i> )
2017-11-06	2020's Motion for Discharge of Notices of Lis Pendens ( <i>Nicol</i> )
2017-11-06	SS Quarters' Motion for Discharge of Notices of Lis Pendens ( <i>Nicol</i> )

2017-12-06	Zorbalas Defendants' Motion for Summary Judgment
2017-12-06	Zorbalas's Motion for Summary Judgment
2017-12-06	Frenz Defendants' Motion for Summary Judgment
2017-12-06	ERH and NHF's Motion for Summary Judgment
2017-12-06	The Apartment Shop's Motion for Summary Judgment
2017-12-06	J. Frenz's Motion for Summary Judgment
2017-12-06	S. Frenz's Motion for Summary Judgment
2017-12-07	Plaintiffs' Motion for Punitive Damages
2018-04-02	Plaintiffs' Motion for Attachment and Receiver
2018-04-02	Plaintiffs' Motion to Amend Scheduling Order
2018-04-11	Plaintiffs' Motion for Default Judgment ( <i>Nicol</i> )
2018-04-13	Defendants' Motion for a Protective Order ( <i>Nicol</i> )
2018-04-16	Plaintiffs' Motion for Leave to File 2 <sup>nd</sup> Amended Complaint
2018-04-16	Plaintiffs' Motion for Order Requiring Defendants to Produce Punitive-Damages Discovery
2018-10-12	Plaintiffs' Motion for Preliminary Approval of Class Settlement

**Total No. of Motions Filed: 44**

**KEY COURT FILINGS**

<b>DATE</b>	<b>DOCUMENT</b>	<b>PAGE COUNT</b>	<b>NO. OF EXHIBITS</b>
<b>MOTIONS TO DISMISS</b>			
2016-10-14	Frenz Notice of Motion and Motion to Dismiss	2	-
2016-11-01	Zorbalas Rule 12 Notice of Motion and Motion to Dismiss	3	-
2016-11-18	Frenz Notice of Motion and Motion to Dismiss	3	-
2017-01-10	Frenz Amended Notice of Motion and Motion to Dismiss	2	-
2017-01-10	Zorbalas Amended Notice of Motion and Motion to Dismiss	2	-
2017-01-24	20/20 Vision's Motion to Dismiss	2	-
2017-02-02	Zorbalas Memorandum of Law in Support of Motion to Dismiss	25	-
2017-02-02	Affidavit of Mary Brandt	2	2
2017-02-02	Affidavit of Malcolm P. Terry	2	1
2017-02-02	Zorbalas Proposed Order	2	-
2017-02-02	Frenz Second Amended Notice of Motion and Motion to Dismiss	2	-
2017-02-02	Frenz Memorandum of Law in Support of Motion to Dismiss	35	-
2017-02-02	Affidavit of Bradley A. Kletscher	2	2
2017-02-02	Affidavit of Jeffrey Shields	2	1
2017-02-02	Frenz Proposed Order	2	2
2017-02-02	Jennifer Frenz Amended Notice of Motion to Dismiss	2	-
2017-02-02	Jennifer Frenz Memorandum of Law in Support of Motion to Dismiss	8	-
2017-02-02	Affidavit of Bradley A. Kletscher	2	3
2017-02-02	Jennifer Frenz Proposed Order	2	-
2017-02-21	Plaintiffs' Memorandum of Law in Opposition to Frenz Motion to Dismiss	35	-
2017-02-21	Plaintiffs' Memorandum of Law in Opposition to Zorbalas Motion to Dismiss	33	-
2017-02-21	Plaintiffs' Memorandum of Law in Opposition to Jennifer Frenz Motion to Dismiss	10	-
2017-02-21	Affidavit of Michael F. Cockson	8	24
2017-02-27	Frenz Reply Memorandum	12	-
2017-02-27	Zorbalas Reply Memorandum	12	-
2017-02-27	Jennifer Frenz Reply Memorandum	6	-
<b>SUBTOTAL</b>		<b>220</b>	<b>35</b>

DATE	DOCUMENT	PAGE COUNT	NO. OF EXHIBITS
2017-05-11	Order on Motions to Dismiss	45	-
<b>MOTION FOR TRO AND APPOINTMENT OF RECEIVER</b>			
2016-11-16	Plaintiffs' Notice of Motion and Motion for Temporary Restraining Order and Appointment of Receiver	2	-
2016-11-16	Plaintiffs' Memorandum of Law in Support of Motion for TRO and Appointment of Receiver	36	-
2016-11-16	Declaration of Bryan K. Washburn	8	50
2016-11-16	Declaration of Edain Altamirano Flores	2	-
2016-11-16	Declaration of Jilian Clearman	3	-
2016-11-16	Declaration of Laura Jo Busian (VLN)	4	-
2016-11-16	Declaration of Molly Hasbrook	3	-
2016-11-16	Declaration of Noah Schuchman	6	4
2016-11-16	Declaration of Michael F. Cockson	2	1
2016-11-16	Proposed Order	15	
2016-11-17	Declaration of Barbara Pratt	3	-
2016-11-17	Declaration of Eric Gustafson	4	-
2016-11-17	Jason Beck and Trish Goggin	3	-
2016-11-18	Frenz Memorandum of Law in Opposition to Motion for TRO and Appointment of Receiver	33	-
2016-11-18	Declaration of Greg Marita	5	-
2016-11-18	Affidavit of Bradley A. Kletscher	6	21
2016-11-18	Affidavit of Jeffrey Shields	3	2
2016-11-18	Proposed Order	2	-
SUBTOTAL		140	78
2016-11-21	Order Denying Motions for TRO and Appointment of Receiver	14	-
<b>DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT</b>			
2017-10-05	Mary Brandt's Notice of Motion and Motion for SJ	2	-
2017-10-05	Mary Brandt's Memorandum of Law in Support of Motion for SJ	15	-
2017-10-05	Malcolm Terry Affidavit	2	6
2017-10-05	Mary Brandt Affidavit	5	2
2017-10-05	Mary Brandt Proposed Order	2	-

DATE	DOCUMENT	PAGE COUNT	NO. OF EXHIBITS
2017-10-24	Plaintiffs' Response to Brandt Motion for Summary Judgment	25	-
2017-10-24	Michael F. Cockson Affidavit	4	3
2017-10-24	Isaac Hall Affidavit	3	15
2017-10-24	Proposed Order	2	-
2017-10-30	Mary Brandt Reply Memorandum	17	-
2017-10-30	Malcolm Terry Supplemental Affidavit	2	3
SUBTOTAL		79	29
2018-01-05	Order Granting Brandt Motion for Summary Judgment	16	-
2017-12-06	Frenz Defendants' Notice of Motion and Motion for Summary Judgment	2	-
2017-12-06	The Apartment Shop Notice of Motion and Motion for Summary Judgment	2	-
2017-12-06	Stephen Frenz Notice of Motion and Motion for Summary Judgment	2	-
2017-12-06	Jennifer Frenz Notice of Motion and Motion for Summary Judgment	2	-
2017-12-06	ERH and NHF Notice of Motion and Motion for Summary Judgment	2	-
2017-12-06	Zorbalas Notice of Motion and Motion for Summary Judgment	2	-
2017-12-06	Zorbalas Entities Notice of Motion and Motion for Summary Judgment	2	-
2017-12-06	Defendants' Proposed Order	2	-
2018-01-23	Jennifer Frenz Amended Notice of Motion and Motion for Summary Judgment	2	-
2018-01-24	Frenz Corp. Notice of Motion and Motion for Summary Judgment	2	-
2018-01-24	ERH and NHF Notice of Motion and Motion for Summary Judgment	2	-
2018-01-24	The Apartment Shop Notice of Motion and Motion for Summary Judgment	2	-
2018-01-24	Zorbalas Notice of Motion and Motion for Summary Judgment	2	-
2018-01-26	Stephen Frenz Memorandum of Law in Support of Motion for Summary Judgment	21	-
2018-01-26	Malcolm Terry Affidavit	5	21
2018-01-26	Tyler Eubank Affidavit	7	54
2018-01-26	Jennifer Frenz Memorandum of Law in Support of Motion for Summary Judgment	12	-
2018-01-26	Frenz Corps. Memorandum of Law in Support of Motion for Summary Judgment	21	-
2018-01-26	The Apartment Shop Memorandum of Law in Support of Motion for Summary Judgment	56	-
2018-01-26	ERH and NHF Proposed Order	2	-
2018-01-26	ERH and NHF Memorandum of Law in Support of Motion for Summary Judgment	35	-
2018-01-26	Zorbalas Defs. Memorandum of Law in Support of Motion for Summary Judgment	31	-
2018-01-26	Stephen Frenz Proposed Order	2	-

DATE	DOCUMENT	PAGE COUNT	NO. OF EXHIBITS
2018-01-29	The Apartment Shop Proposed Order	2	-
2018-01-29	Frenz Corps Proposed Order	2	-
2018-01-29	Jennifer Frenz Proposed Order	2	-
2018-02-14	Plaintiffs' Response Memorandum in Opposition to Summary Judgment	119	-
2018-02-14	Affidavit of Michael F. Cockson	16	157
SUBTOTAL		375	232
2018-05-17	Order Granting in Part and Denying in Part Summary Judgment	55	-
<b>PLAINTIFFS' MOTION TO COMPEL</b>			
2017-03-07	Zorbalas Defendants' Notice of Motion and Motion to Compel City's Compliance	2	-
2017-03-07	Zorbalas Defendants' Memorandum in Support of Motion to Compel City's Compliance	7	-
2017-03-07	Brooke C. Nelson Affidavit	4	-
2017-03-07	Proposed Order	2	-
2017-03-14	Zorbalas Defendants' Amended Notice of Motion and Motion to Compel	2	-
2017-03-15	Zorbalas Defendants' Affidavit of Service	1	-
2017-04-07	Plaintiffs' Notice of Motion and Motion to Compel	2	-
2017-04-07	Plaintiff's Memorandum in Support of Motion to Compel	30	-
2017-04-07	Adam Nodler Declaration in Support of Plaintiff's Motion to Compel	11	77
2017-04-07	Proposed Order re Motion to Compel	7	-
2017-04-13	Frenz Defendants' Memorandum in Opposition to Plaintiffs' Motion to Compel	4	-
2017-04-13	Malcolm Terry Affidavit in Opposition to Plaintiffs' Motion to Compel	5	1
2017-04-13	Stephen Frenz Affidavit in Opposition to Plaintiffs' Motion to Compel	3	-
2017-04-13	Proposed Order	2	-
2017-04-13	Frenz Defendants' Confidential Information Form	2	-
2017-04-13	The Apartment Shop Memorandum in Opposition to Plaintiffs' Motion to Compel	34	-
2017-04-13	Zorbalas Defendants' Memorandum in Opposition to Plaintiffs' Motion to Compel	11	-
2017-04-17	Plaintiffs' Reply Memorandum in Support of Motion to Compel	8	-
2017-04-17	Bradkley Kletscher Affidavit in Opposition to Plaintiffs' Motion to Compel	4	15
2017-04-17	Isaac Hall Declaration in Opposition to Plaintiffs' Motion to Compel	4	4
SUBTOTAL		145	96

DATE	DOCUMENT	PAGE COUNT	NO. OF EXHIBITS
2017-04-21	Order Appointing Special Master	4	-
2017-06-01	Order Granting in Part and Denying in Part Motion to Compel	6	-
2017-06-14	Amended Order Granting in Part and Denying in Part Motion to Compel	6	-
2017-06-15	Second Amended Order Granting in Part and Denying in Part Motion to Compel	5	-
<b>PLAINTIFFS' MOTION FOR CLASS CERTIFICATION</b>			
2017-03-31	Plaintiffs' Notice of Motion and Motion for Class Certification	3	-
2017-04-28	Plaintiffs' Memorandum of Law in Support of Motion for Class Certification	21	-
2017-04-28	Declaration of Ari Ogundipe	3	-
2017-04-28	Declaration of Bruno Gorostieta	3	-
2017-04-28	Declaration of Edain Altamirano Flores	3	-
2017-04-28	Declaration of Jason Beck	3	-
2017-04-28	Declaration of Lori Nicol	3	-
2017-04-28	Declaration of Norma Juarez	3	-
2017-04-28	Declaration of Isaac Hall	3	10
2017-04-28	Declaration of Michael Cockson	7	2
2017-04-28	Declaration of Patricia Goggin	3	-
2017-04-28	Declaration of Paul Bello	8	2
2017-04-28	Declaration of Greg Meyers	20	11
2017-05-02	Declaration of Jonathan Robles	5	3
2017-05-17	Frenz Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Class Certification	44	-
2017-05-17	Affidavit of Bradley A. Kletscher	3	19
2017-05-17	Affidavit of Todd C. Leyse	4	-
2017-05-17	Corrected Affidavit of Bradley A. Kletscher	3	20
2017-05-17	Zorbalas Defendants' Joinder in Frenz Opposition	1	-
2017-05-23	Plaintiffs' Reply in Support of Motion for Class Certification	28	-
2017-05-23	Supplemental Declaration of Isaac B. Hall	2	18
SUBTOTAL		173	85
2017-08-11	Order Granting Class Certification	35	-
<b>DEFENDANTS' PETITION FOR DISCRETIONARY REVIEW</b>			



DATE	DOCUMENT	PAGE COUNT	NO. OF EXHIBITS
2017-08-28	Defendants' Petition for Discretionary Review of Class Certification Order	14	-
2017-08-28	Addendum Index	1	2
2017-09-05	Plaintiffs' Memorandum in Response to Petition	17	-
2017-09-08	Defendants' Reply	10	-
SUBTOTAL		42	2
2017-09-27	Order Denying Petition for Discretionary Review	3	-
<b>PLAINTIFFS' MOTIONS ON DISCOVERY</b>			
2017-07-24	Plaintiffs' Notice of Motion and Motion on Discovery	3	-
2017-07-14	Plaintiffs' Memorandum of Law in Support of Motion on Discovery	16	-
2017-07-24	Michael Cockson Declaration	3	-
2017-07-24	Kathryn Razavi Declaration	2	8
2017-07-25	Jonathan Robles Declaration	4	3
2017-07-24	Proposed Order	3	-
2017-07-31	Defendants' Memorandum of Law in Opposition to Discovery Motion	19	-
2017-07-31	Bradley Kletscher Affidavit	2	5
2017-07-31	Stephen Frenz Affidavit	2	-
2017-08-02	Plaintiffs' Reply Brief	20	-
2017-08-02	Supplemental Kathryn Razavi Declaration	3	16
SUBTOTAL		77	32
2017-09-13	Order on Discovery Motions	20	-
2017-09-21	Amended and Redacted Order on Discovery Motions	20	-
<b>DEFENDANTS' MOTION TO STAY PROCEEDINGS UNTIL THE CITY OF MINNEAPOLIS RENTAL LICENSE PROCEEDING IS DETERMINED</b>			
2016-11-23	Defendants' Notice of Motion and Motion to Stay Proceedings	3	-
2016-11-23	Defendants' Memorandum of Law in Support of Motion to Stay Proceedings	9	-
2016-11-23	Affidavit of Bradley Kletscher in Support of Motion to Stay Proceedings	2	1
2016-11-23	Defendants' Proposed Order to Stay	2	-
2016-12-05	Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Stay	21	-
2016-12-05	Declaration of Bryan K. Washburn	4	17

DATE	DOCUMENT	PAGE COUNT	NO. OF EXHIBITS
2016-12-05	Plaintiffs' Proposed Order Denying Stay	2	-
2016-12-06	Defendants' Notice of Rescheduled Motion Hearing to Stay Proceedings	2	-
2016-12-07	Defendants' Reply Memorandum of Law in Support of Motion to Stay Proceedings	13	-
2016-12-07	Affidavit of Jeffrey Shields in Support of Motion to Stay Proceedings	2	2
2016-12-07	Confidential Financial Source Documents	2	-
SUBTOTAL		62	20
2017-01-05	Order Denying Stay	3	0
<b>PLAINTIFFS' MOTION FOR PREJUDGMENT ATTACHMENT</b>			
2017-09-12	Plaintiffs' Notice of Motion for Prejudgment Attachment	2	-
2017-09-12	Plaintiffs' Motion for Prejudgment Attachment	2	-
2017-09-12	Plaintiffs' Memorandum in Support of Plaintiffs' Motion for Preliminary Prejudgment Attachment	22	-
2017-09-12	Declaration of Michael F. Cockson	5	20
2017-09-14	Plaintiffs' Proposed Prejudgment Attachment Order	6	-
2017-09-14	Supplemental Cockson Declaration	3	6
2017-09-14	Defendants' Memorandum in Opposition	12	-
2017-09-14	Malcom Terry Affidavit	2	1
2017-09-15	Stephen Frenz Affidavit	7	-
2017-09-15	Spiros Zorbalas Affidavit	5	6
2017-09-15	Bradley Kletscher Affidavit	3	9
2017-09-15	Irving Properties Affidavit	3	-
2017-09-15	Frenz Defendants' Memorandum in Opposition	29	-
SUBTOTAL		101	42
<b>PLAINTIFFS' MOTION FOR PUNITIVE DAMAGES</b>			
2017-12-07	Plaintiffs' Motion for Punitive Damages	3	-
2017-12-07	Plaintiffs' Memorandum in Support of Motion for Punitive Damages	30	-
2017-12-07	Timothy Sullivan Affidavit	7	47
2017-12-07	Proposed Order	2	-
2017-12-14	Jennifer Frenz Responsive Memorandum	2	-

DATE	DOCUMENT	PAGE COUNT	NO. OF EXHIBITS
2017-12-14	Eubank Affidavit	4	34
2017-12-14	ERH Responsive Memorandum	35	-
2017-12-14	Zorbalas Responsive Memorandum	10	-
2017-12-14	Stephen Frenz Responsive Memorandum	4	-
2017-12-14	Frenz Corp. Responsive Memorandum	5	-
2017-12-18	Plaintiffs' Reply Brief	11	-
2017-12-18	Supplemental Sullivan Affidavit	2	3
SUBTOTAL		115	84
2018-02-21	Punitive Damages Order	28	-
<b>ZORBALAS DEFENDANTS' MOTION FOR TEMPORARY RESTRAINING ORDER</b>			
2017-10-12	Zorbalas Defendants' Notice of Motion and Motion	2	-
2017-10-12	Zorbalas Defendants' Memorandum in Support of Motion	13	-
2017-10-12	Proposed Order	7	-
2017-10-12	Stephen Frenz Affidavit	7	-
2017-10-12	Malcolm Terry Affidavit	3	3
2017-10-15	Plaintiffs' Memorandum in Opposition to Temporary Restraining Order	26	-
2017-10-15	Michael F. Cockson Affidavit	2	-
2017-10-15	Isaac Hall Affidavit	4	19
SUBTOTAL		64	22
2017-10-18	Order on Motion for Temporary Restraining Order	10	-
<b>PLAINTIFFS' MOTION FOR ATTACHMENT AND RECEIVER</b>			
2018-04-02	Plaintiffs' Notice of Motion and Motion for Attachment and Receiver	3	-
2018-04-02	Plaintiffs' Memorandum of Law in Support of Motion	22	-
2018-04-02	James Bartholomew Declaration	6	5
2018-04-02	Michael F. Cockson Affidavit	14	128
2018-04-02	Propose Order	5	-
2018-04-20	Frenz Defendants' Memorandum in Opposition	10	-
2018-04-20	ERH, NHF and TAS Memorandum in Opposition	35	-
2018-04-20	Stephen Frenz Memorandum in Opposition	3	-

DATE	DOCUMENT	PAGE COUNT	NO. OF EXHIBITS
2018-04-20	Spiros Zorbalas Defendants' Memorandum in Opposition	15	-
2018-04-20	Stephen Frenz Affidavit	5	18
2018-04-20	Bradley Kletscher Affidavit	7	38
2018-04-20	Jennifer Frenz Memorandum in Opposition	3	-
2018-04-20	Spiros Zorbalas Affidavit	3	-
2018-04-20	Malcolm Terry Affidavit	2	1
2018-04-20	Frenz Defendants' Memorandum in Opposition	10	-
2018-04-25	Plaintiffs' Reply	11	-
2018-04-25	James R. Rubin Declaration	3	-
2018-04-25	Isaac Hall Affidavit	3	9
SUBTOTAL		160	199
<b>MOTION FOR DEFAULT JUDGMENT (Nicol)</b>			
2018-04-11	Plaintiffs' Notice of Motion and Motion for Default Judgment	2	-
2018-04-11	Plaintiffs' Memorandum in Support of Motion for Default Judgment	7	-
2018-04-11	Brennaman Affidavit	4	9
2018-04-11	Proposed Order	3	-
2018-04-25	ERH's Memorandum in Opposition to Motion for Default Judgment	7	-
2018-04-25	Stephen Frenz Affidavit	3	11
2018-04-25	Tyler Eubank 2017 Affidavit	2	7
2018-04-27	Plaintiffs' Reply Memorandum	6	-
2018-04-27	Brennaman Supplemental Affidavit	2	6
2018-05-01	Swanson Declaration	4	-
SUBTOTAL		26	33
<b>MOTION FOR PARTIAL SUMMARY JUDGMENT / LIS PENDENS (Nicol)</b>			
2017-11-06	SS Quarters' Notice of Motion for Partial SJ	2	-
2017-11-06	SS Quarters' Memo regarding Motion for Partial SJ	29	-
2017-11-06	SS Quarters' Proposed Order re Motion for Partial SJ	2	-
2017-11-06	SS Quarters' Notice of Motion to Discharge Notice of Lis Pendens	2	-
2017-11-06	SS Quarters' Memo regarding Motion to Discharge Notice of Lis Pendens	19	-

DATE	DOCUMENT	PAGE COUNT	NO. OF EXHIBITS
2017-11-06	SS Quarters' Proposed Order re Motion to Discharge Notice of Lis Pendens	2	-
2017-11-06	ERH's Notice of Motion for Partial SJ	2	-
2017-11-06	ERH's Memo regarding Motion for Partial SJ	38	-
2017-11-06	ERH's Proposed Order re Motion for Partial SJ	2	-
2017-11-06	ERH's Notice of Motion to Discharge Notice of Lis Pendens	2	-
2017-11-06	ERH's Memo regarding Motion to Discharge Notice of Lis Pendens	19	-
2017-11-06	ERH's Proposed Order re Motion to Discharge Notice of Lis Pendens	2	-
2017-12-14	ERH's Reply Memo re Motion for Partial SJ	18	-
2017-12-14	ERH's Reply Memo re Motion to Discharge LP	15	-
2017-11-06	2020's Notice of Motion for Partial SJ	2	-
2017-11-06	2020's Memo regarding Motion for Partial SJ	27	-
2017-11-06	2020's Proposed Order re Motion for Partial SJ	2	-
2017-11-06	2020's Notice of Motion to Discharge Notice of Lis Pendens	2	-
2017-11-06	2020's Memo regarding Motion to Discharge Notice of Lis Pendens	19	-
2017-11-06	2020's Proposed Order re Motion to Discharge Notice of Lis Pendens	2	-
2017-11-06	Berkeley's Notice of Motion for Partial SJ	2	-
2017-11-06	Berkeley's Memo regarding Motion for Partial SJ	29	-
2017-11-06	Berkeley's Proposed Order re Motion for Partial SJ	2	-
2017-11-06	Stephen Frenz Affidavit	16	31
2017-12-14	Stephen Frenz Supp. Affidavit	2	2
2017-11-06	Bradley Kletscher Affidavit	2	17
2017-12-14	Bradley Kletscher Supplemental Affidavit	-	7
2017-12-14	Defs' Motion for Partial SJ and Discharge of LP Proposed Order	2	-
2017-12-08	Plaintiffs' Memo in Opp for Partial Summary Judgment and Discharge of Lis Pendens	55	-
2017-12-08	Plaintiffs' Affidavit of Nathan Brennaman	5	3
2017-12-08	Plaintiffs' Affidavit of Michael Cockson	8	57
2017-12-08	Plaintiffs' Affidavit of Service NON ECF parties for Partial SJ and Discharge of LP	2	-
SUBTOTAL		333	117
2018-01-05	ORDER Denying Partial Summary Judgment and Lis Pendens Motions	5	-
<b>MOTION TO DISMISS COUNTERCLAIMS (Nicol)</b>			

DATE	DOCUMENT	PAGE COUNT	NO. OF EXHIBITS
2017-10-16	Plaintiffs' Notice of Motion to Dismiss Counterclaims	2	-
2017-11-17	Plaintiffs' Amended Notice of Motion to Dismiss Counterclaims	2	-
2017-11-29	Plaintiffs' Second Amended Notice of Motion to Dismiss Counterclaims	3	-
2017-11-29	Plaintiffs' Memo ISO Notice of Motion to Dismiss Counterclaims	28	-
2017-11-29	Declaration of Nathan Brennaman	4	8
2017-11-29	Plaintiffs' Affidavit of Service re Notice of Motion to Dismiss Counterclaims	2	-
2017-11-29	Proposed Order	2	-
2017-12-08	Defendants' Memorandum in Opposition to Motion to Dismiss Counterclaims	36	-
2017-12-08	Affidavit of Bradley Kletscher	3	10
2017-12-08	Proposed Order	2	-
2017-12-14	Nicol Reply in Support of Motion to Dismiss Counterclaims	11	-
2017-12-14	Supplemental Declaration of Nathan Brennaman	3	14
SUBTOTAL		98	32
<b>MOTION TO FILE SECOND AMENDED COMPLAINT (Nicol)</b>			
2018-04-16	Plaintiff's Motion and Notice of Motion for Leave to file Second Amended Complaint	2	-
2018-04-16	Memorandum in Support of Motion for Leave to file Second Amended Complaint	11	-
2018-04-16	Affidavit of Nathan Brennaman	5	18
2018-04-16	Proposed Order	2	-
2018-04-17	Affidavit of Service for non-ECF Parties	3	-
2018-04-25	ERH's Response in Opposition to Motion for Leave to file Second Amended Complaint	17	-
2018-05-25	Affidavit Stephen Frenz	3	11
2018-04-25	Affidavit Tyler Eubank	2	7
2018-04-27	Supplemental Affidavit of Nathan Brennaman	2	1
2018-04-27	Plaintiff's Reply in Support of Motion for Leave to file Second Amended Complaint	5	-
SUBTOTAL		52	37

<b>Total Number of Key Court Orders:</b>	17
<b>Total Number of Pages in Key Court Orders:</b>	291

<b>Total Number of Key Motions:</b>	17
<b>Total Number of Pages in Key Motions (excluding exhibits):</b>	2,325
<b>Total Number of Exhibits from Key Motions:</b>	1,196

**COURT HEARINGS/ORAL ARGUMENTS**

***(Flores)***

Date of Hearing	Type of Hearing
November 18, 2016	Motion for Temporary Restraining Order
December 12, 2016	Defendants' Motion to Stay
March 2, 2017	Zorbalas Defendants' Motion to Dismiss
April 20, 2017	Plaintiffs' Motion to Compel Production of Documents
May 10, 2017	Oral Argument before Special Master Borg regarding Discovery
May 26, 2017	Plaintiffs' Motion for Class Certification
August 7, 2017	Plaintiffs' Discovery Motions: (1) a protective order barring further discovery from Plaintiffs directed to immigration, alienage, and related questions, (2) an order compelling Defendants to allow inspection of the apartment buildings at issue, (3) an order requiring Defendants to remove confidentiality designations for certain documents and (4) resolution of the parties' scheduling dispute
September 15, 2017	Plaintiffs' Motion for Preliminary Prejudgment Attachment
October 16, 2017	Zorbalas Defendants' Motion for Temporary Restraining Order
November 2, 2017	Defendant Mary Brandt's Motion for Summary Judgment
November 20, 2017	City's Motion to Quash
December 21, 2017	Plaintiffs' Motion to Assert a Claim for Punitive Damages
February 23, 2018	Frenz Defendants' Motion for Summary Judgment
April 30, 2018	Motion to Amend Scheduling Order, Appoint Receiver and for Prejudgment Attachment
December 27, 2018 <i>(to be heard)</i>	Final Approval Hearing



**(Nicol)**

Date of Hearing	Type of Hearing
December 19, 2017	2020 Vision's Motion to Discharge the Notices of Lis Pendens 2020 Vision's Motion for Partial Summary Judgment Berkeley's Motion for Partial Summary Judgment ERH and Berkeley's Motion to Discharge the Notices of Lis Pendens SS Quarters' Motion for Partial Summary Judgment SS Quarters' Motion to Discharge the Notices of Lis Pendens ERH's Motion for Partial Summary Judgment Plaintiff's Motion to Dismiss Counterclaims
May 2, 2018	Plaintiffs' Motion to Amend Complaint to Add Parties
June 1, 2018	Telephone discovery motion hearing

**Total No. of Court Hearings/Oral Arguments: 18**

**WRITTEN DISCOVERY**

<b>Date Served</b>	<b>Date Answered</b>	<b>Document</b>	<b># of Interrogatories</b>	<b># of Requests for Production</b>	<b># of Requests to Admit</b>
2017-01-03	2017-02-02	ERH Interrogatories to Edain Altamirano Flores	39		
2017-01-03	2017-02-02	ERH Requests for Production of Documents to Edain Altamirano Flores		71	
2017-01-03	2017-02-02	ERH Interrogatories to Esperanza Herrera	22		
2017-01-03	2017-02-02	ERH Requests for Production of Documents to Esperanza Herrera		71	
2017-01-03	2017-02-02	ERH Interrogatories to Lori Nicol	22		
2017-01-03	2017-02-02	ERH Requests for Production of Documents to Lori Nicol		71	
2017-01-03	2017-02-02	ERH Interrogatories to Olutundun Gundipe	22		
2017-01-03	2017-02-02	ERH Requests for Production of Documents to Olutundun Gundipe		71	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to 1801 Properties		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to 25 & 3146 Properties		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to Alpha-Omega Companies		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to Arts Ave Properties		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to Berkeley Holdings		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to Emerald Square Prop		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to ERT, LLC		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to G121, Inc.		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to Hennepin Quarters		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to Hiawatha Quarters		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to JAS Apartments		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to Lahaha Properties		26	

<b>Date Served</b>	<b>Date Answered</b>	<b>Document</b>	<b># of Interrogatories</b>	<b># of Requests for Production</b>	<b># of Requests to Admit</b>
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to Powderhorn Quarters		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to Quarters for Creativity		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to R110, Inc.		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to S1322, Inc.		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to SS Quarters		26	
2017-01-03	2017-02-02	Plaintiffs' First Set of Requests for Production to SZ112, Inc.		26	
2017-01-06	2017-02-06	Plaintiffs' First Set of Requests for Production to Equity Residential Holdings, LLC		43	
2017-01-06	2017-02-06	Plaintiffs' First Set of Requests for Production to National Housing Fund, LLC		43	
2017-01-06	2017-02-06	Plaintiffs' First Set of Requests for Production to The Apartment Shop, LLC		43	
2017-01-11	2017-02-10	Spiros Zorbalas Interrogatories to Edain Altamirano Flores	41		
2017-01-11	2017-02-10	Spiros Zorbalas Requests for Production of Documents to Edain Altamirano Flores		71	
2017-01-11	2017-02-10	Spiros Zorbalas Interrogatories to Esperanza Herrera	41		
2017-01-11	2017-02-10	Spiros Zorbalas Requests for Production of Documents to Esperanza Herrera		71	
2017-01-11	2017-02-10	Spiros Zorbalas Interrogatories to Lori Nicol	41		
2017-01-11	2017-02-10	Spiros Zorbalas Requests for Production of Documents to Lori Nicol		71	
2017-01-11	2017-02-10	Spiros Zorbalas Interrogatories to Olutundun Gundipe	41		
2017-01-11	2017-02-10	Spiros Zorbalas Requests for Production of Documents to Olutundun Gundipe		71	
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to 1801 Properties	31		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to 25 & 3146 Properties	31		
2017-01-20	2017-02-21	Plaintiffs' First Set of Interrogatories to Alpha-Omega Companies	31		

<b>Date Served</b>	<b>Date Answered</b>	<b>Document</b>	<b># of Interrogatories</b>	<b># of Requests for Production</b>	<b># of Requests to Admit</b>
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to Arts Ave Properties	31		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to Berkeley Holdings	31		
2017-01-20	2017-02-22	Plaintiffs' First Set of Requests for Production to Mary Brandt		41	
2017-01-20	2017-02-21	Plaintiffs' First Set of Interrogatories to Mary Brandt	16		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to Emerald Square Prop	31		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to Equity Residential Holdings, LLC	54		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to ERT, LLC	31		
2017-01-20	2017-02-27	Plaintiffs' First Set of Requests for Production to Jennifer Frenz		40	
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to Jennifer Frenz	16		
2017-01-20	2017-02-27	Plaintiffs' First Set of Requests for Production to Stephen Frenz		40	
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to Stephen Frenz	17		
2017-01-20	2017-02-21	Plaintiffs' First Set of Interrogatories to G121, Inc.	31		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to Hennepin Quarters	31		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to Hiawatha Quarters	31		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to JAS Apartments	31		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to Lahaha Properties	31		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to National Housing Fund, LLC	54		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to Powderhorn Quarters	31		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to Quarters for Creativity	31		
2017-01-20	2017-02-21	Plaintiffs' First Set of Interrogatories to R110, Inc.	31		
2017-01-20	2017-02-21	Plaintiffs' First Set of Interrogatories to S1322, Inc.	31		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to SS Quarters	31		
2017-01-20	2017-02-21	Plaintiffs' First Set of Interrogatories to SZ112, Inc.	31		
2017-01-20	2017-02-20	Plaintiffs' First Set of Interrogatories to The Apartment Shop, LLC	54		
2017-01-20	2017-02-27	Plaintiffs' First Set of Requests for Production to Spiros Zorbalas		41	
2017-01-20	2017-02-21	Plaintiffs' First Set of Interrogatories to Spiros Zorbalas	17		
2017-02-03	2017-03-03	ERH Interrogatories to Jason Beck	39		
2017-02-03	2017-03-03	ERH Requests for Production of Documents to Jason Beck		71	
2017-02-03	2017-03-03	ERH Interrogatories to Patricia Goggin	39		

Date Served	Date Answered	Document	# of Interrogatories	# of Requests for Production	# of Requests to Admit
2017-02-03	2017-03-03	ERH Requests for Production of Documents to Patricia Goggin		71	
2017-02-03	2017-03-03	ERH Interrogatories to Bruno Gorostieta	39		
2017-02-03	2017-03-03	ERH Requests for Production of Documents to Bruno Gorostieta		71	
2017-02-03	2017-03-03	ERH Interrogatories to Norma Juarez	39		
2017-02-03	2017-03-03	ERH Requests for Production of Documents to Norma Juarez		71	
2017-02-13	2015-03-15	Plaintiffs' First Set of Requests for Admissions to Equity Residential Holdings, LLC			59
2017-02-13	2015-03-15	Plaintiffs' First Set of Requests for Admissions to The Apartment Shop			61
2017-02-13	2015-03-15	Plaintiffs' First Set of Requests for Admissions to Stephen Frenz			97
2017-02-13	2015-03-15	Plaintiffs' First Set of Requests for Admissions to National Housing Fund			56
2017-02-13	2017-03-16	Plaintiffs' First Set of Requests for Admissions to Spiros Zorbalas			71
2017-02-14	2017-03-16	Plaintiffs' First Set of Requests for Admissions to Mary Brandt			12
2017-02-14	2017-03-15	Plaintiffs' First Set of Requests for Admissions to Jennifer Frenz			51
2017-03-14	2017-05-15	Nicol's First Set of Interrogatories to Stephen Frenz	42		
2017-04-10	2017-05-10	Spiros Zorbalas Second Requests for Production of Documents to Edain Altamirano Flores		1	
2017-04-21	2017-05-22	Ogundipe's Requests for Production of Documents to ERH		4	
2017-04-21	2017-05-22	Ogundipe's Requests for Production of Documents to The Apartment Shop		4	
2017-04-21	2017-05-22	Ogundipe's First Set of Interrogatories to National Housing Fund	11		
2017-04-21	2017-05-22	Ogundipe's First Set of Interrogatories to ERH	11		
2017-04-21	2017-05-22	Ogundipe's First Set of Interrogatories to Stephen Frenz	11		
2017-04-21	2017-05-22	Ogundipe's Requests for Production of Documents to Stephen Frenz		4	
2017-04-28	2017-05-23	ERH's Second Set of Interrogatories to Flores	4		
2017-09-27	2017-10-27	Beck's First Requests for Production of Documents to Frenz Defendants		17	

<b>Date Served</b>	<b>Date Answered</b>	<b>Document</b>	<b># of Interrogatories</b>	<b># of Requests for Production</b>	<b># of Requests to Admit</b>
2017-09-27	2017-10-27	Beck's First Requests for Production of Documents to Zorbalas Defendants		17	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to 1801 Properties		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to 25 & 3146 Properties		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Alpha-Omega Companies		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Arts Ave Properties		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Berkeley Holdings		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Mary Brandt		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Emerald Square Prop		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Equity Residential Holdings, LLC		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to ERT, LLC		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Jennifer Frenz		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Stephen Frenz		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to G121, Inc.		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Hennepin Quarters		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Hiawatha Quarters		1	

<b>Date Served</b>	<b>Date Answered</b>	<b>Document</b>	<b># of Interrogatories</b>	<b># of Requests for Production</b>	<b># of Requests to Admit</b>
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to JAS Apartments		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Lahaha Properties		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to National Housing Fund, LLC		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Powderhorn Quarters		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Quarters for Creativity		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to R110, Inc.		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to S1322, Inc.		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to SS Quarters		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to SZ112, Inc.		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to The Apartment Shop		1	
2017-09-29	2017-10-30	Plaintiffs' Second Set of Requests for Production of Documents to Zorbalas		1	
2017-10-04	2017-11-03	Zorbalas Second Set of Requests of Production of Documents to Goggin		11	
2017-10-04	2017-11-03	Zorbalas Second Set of Interrogatories to Goggin	12		
2017-10-04	2017-11-03	Zorbalas Second Set of Requests of Production of Documents to Juarez		11	
2017-10-04	2017-11-03	Zorbalas Second Set of Interrogatories to Juarez	12		
2017-10-04	2017-11-03	Zorbalas Second Set of Requests of Production of Documents to Beck		11	
2017-10-04	2017-11-03	Zorbalas Second Set of Interrogatories to Beck	12		

Date Served	Date Answered	Document	# of Interrogatories	# of Requests for Production	# of Requests to Admit
2017-10-04	2017-11-03	Zorbalas Second Set of Requests of Production of Documents to Gorostietz		11	
2017-10-04	2017-11-03	Zorbalas Second Set of Interrogatories to Gorostietz	12		
2017-10-04	2017-11-03	Zorbalas Second Set of Requests of Production of Documents to Nicol		11	
2017-10-04	2017-11-03	Zorbalas Second Set of Interrogatories to Nicol	12		
2017-10-04	2017-11-03	Zorbalas Second Set of Requests of Production of Documents to Flores		11	
2017-10-04	2017-11-03	Zorbalas Second Set of Interrogatories to Flores	12		
2017-10-04	2017-11-03	Zorbalas Second Set of Requests of Production of Documents to Ogundipe		11	
2017-10-04	2017-11-03	Zorbalas Second Set of Interrogatories to Ogundipe	12		
2017-10-04	2017-11-03	Zorbalas Second Set of Requests of Production of Documents to Herrera		11	
2017-10-04	2017-11-03	Zorbalas Second Set of Interrogatories to Herrera	12		
2017-10-06	2017-11-03	ERH's Requests for Admission to Gorostieta	1		15
2017-10-06	2017-11-03	ERH's Requests for Admission to Juarez	1		15
2017-10-06	2017-11-03	ERH's Requests for Admission to Goggin	1		15
2017-10-06	2017-11-03	ERH's Requests for Admission to Ogundipe	1		15
2017-10-06	2017-11-03	ERH's Requests for Admission to Herrera	1		15
2017-10-06	2017-11-03	ERH's Requests for Admission to Nicol	1		15
2017-10-06	2017-11-03	ERH's Requests for Admission to Flores	1		15
2017-10-06	2017-11-03	ERH's Requests for Admission to Beck	1		15
2017-12-18	2018-01-17	ERH's Requests for Production of Documents to Plaintiffs		8	
2018-02-02	2018-03-05	Defendant SS Quarters, Inc.'s Interrogatories to Plaintiff Lori Nicol (Set 1) (Nicol)	23		
2018-02-02	2018-03-05	Defendant 2020 Vision's Interrogatories to Plaintiff Lori Nicol (Set 1) (Nicol)	23		
2018-02-02	2018-03-05	Defendant ERH's Interrogatories to Plaintiff Lori Nicol (Set 1) (Nicol)	43		



<b>Date Served</b>	<b>Date Answered</b>	<b>Document</b>	<b># of Interrogatories</b>	<b># of Requests for Production</b>	<b># of Requests to Admit</b>
2018-02-02	2018-03-05	Defendant ERH's Requests for Production of Documents to Lori Nicol (Set 1) ( <i>Nicol</i> )		41	
2018-02-02	2018-03-05	Defendant Berkeley Holdings, Inc.'s Interrogatories to Lori Nicol (Set 1) ( <i>Nicol</i> )	19		
2018-03-09	2018-04-09	Plaintiff Lori Nicol's First Set of Requests for Production of Documents to 2020 Vision ( <i>Nicol</i> )		41	
2018-03-09	2018-04-09	Plaintiff Lori Nicol's First Set of Requests for Production of Documents to Berkeley Holdings ( <i>Nicol</i> )		36	
2018-03-09	2018-04-09	Plaintiff Lori Nicol's First Set of Requests for Production of Documents to ERH ( <i>Nicol</i> )		51	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to H Scott Properties ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to Irving Properties ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to KI 2400, LLC ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to KI Dupont ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to LO1 ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to LO2 ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to Lucian Holdings ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to Misco Holdings ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to Palmer Kolstad ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to Pinhoti ( <i>Nicol</i> )		36	

<b>Date Served</b>	<b>Date Answered</b>	<b>Document</b>	<b># of Interrogatories</b>	<b># of Requests for Production</b>	<b># of Requests to Admit</b>
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to Presidential Apartments ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to Secomb Apartments ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to Sittons Gulch ( <i>Nicol</i> )		36	
2018-03-09	2018-04-09	Plaintiff Lori Nicol's First Set of Requests for Production of Documents to SS Quarters ( <i>Nicol</i> )		41	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to T Apartments ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to Turtle Shell ( <i>Nicol</i> )		36	
2018-03-09		Plaintiff Lori Nicol's First Set of Requests for Production of Documents to Z Apartments ( <i>Nicol</i> )		36	
2018-03-09	2018-04-09	Plaintiff Lori Nicol's First Set of Interrogatories to 2020 Vision ( <i>Nicol</i> )	19		
2018-03-09	2018-04-09	Plaintiff Lori Nicol's First Set of Interrogatories to Berkeley ( <i>Nicol</i> )	17		
2018-03-09	2018-04-09	Plaintiff Lori Nicol's First Set of Interrogatories to ERH ( <i>Nicol</i> )	30		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to H Scott Properties ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to Irving Properties ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to KI 2400 ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to KI Dupont ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to LO1 ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to LO1 ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to Lucian Holdings ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to Misco Holdings ( <i>Nicol</i> )	14		

<b>Date Served</b>	<b>Date Answered</b>	<b>Document</b>	<b># of Interrogatories</b>	<b># of Requests for Production</b>	<b># of Requests to Admit</b>
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to Palmer Kolstad ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to Pinhoti ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to President Apartments ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to Secomb Apartments ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to Sittons Gulch ( <i>Nicol</i> )	14		
2018-03-09	2018-04-09	Plaintiff Lori Nicol's First Set of Interrogatories to SS Quarters ( <i>Nicol</i> )	19		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to T Apartments ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to Turtle Shell ( <i>Nicol</i> )	14		
2018-03-09		Plaintiff Lori Nicol's First Set of Interrogatories to Z Apartments ( <i>Nicol</i> )	14		

<b>Total Number of Interrogatories Served:</b>	<b>1,811</b>
<b>Total Number of Requests for Production Served:</b>	<b>2,565</b>
<b>Total Number of Requests to Admit Served:</b>	<b>527</b>

**DEPOSITIONS**

<b>Deponent</b>	<b>Title</b>	<b>Depo Date</b>	<b>Exhibits</b>	<b>Total Number of Deposition Exhibits Marked with Deponent</b>	<b>Time (including breaks)</b>	<b>Pages of Deposition Testimony</b>
Arechega, Gerardo	Apt. Shop Maint.	02/23/2017	None	0	(8:36 am – 9:54 am) 1 hr 18 min	34
Arechega, Rafael	Apt. Shop Maint.	02/23/2017	None	0	(10:02 am - 11:24 am) 1 hr 22 min	42
Beck, Jason	Plaintiff	03/24/2017	77-82	6	(9:03 am - 12:50 pm) 3 hr 47 min	170
Blaiser, Clint	Defs.' Expert	01/16/2017	351-355	5	(1:07 pm – 5:01 pm) 3 hr 54 min	153
Brandt, Mary	Defendant	10/18/2017	1-10	10	(11:02 am – 12:43 pm) 1 hr 41 min	69
Burton, Dionne	Apt. Shop Maint.	04/18/2017	83	1	(11:18am – 1:21pm) 2 hr 3 min	83
Burton, Earl	Apt. Shop Maint.	04/18/2017	None	0	(10:03am – 11:08am) 1 hr 5 min	53
Cogan, Michael	Be There Pest Control	04/19/2017	84-88	5	(1:07pm - 3:01pm) 1 hr 54 min	72
Deegan, Thomas	City of Minneapolis	05/15/2017	186-188	3	(9:04am – 10:32am) 1 hr 32 min	57
Engstrom, Marshall	Defs.' Expert	01/26/2018	None	0	(8:55am – 9:01am) 6 min	9
Flores, Edain Altamirano	Plaintiff	05/03/2017	168-179	12	(9:16am – 5:54pm) 8 hr 38 min	189
Frenz, Jennifer	Defendant	03/03/2017	1-5	5	(8:24am – 11:04am) 2 hr 40 min	95
Frenz, Peter	Apt. Shop Maint.	04/20/2017	89-96	8	(10:34am – 3:09pm) 4 hr 35 min	183
Frenz, Stephen 30.02(f)	Defendant	11/07/2017	189-223	35	(8:44am – 5:43pm) 8 hr 59 min	254

Deponent	Title	Depo Date	Exhibits	Total Number of Deposition Exhibits Marked with Deponent	Time (including breaks)	Pages of Deposition Testimony
Frenz, Stephen 30.02(f)	Defendant	11/09/2017	246-278	33	(8:38am – 4:13pm) 7 hr 35 min	460
Frenz, Stephen	Defendant	11/13/2017	None	0	(5:22pm – 6:02pm) 40 min	32
Galvan, Roque	Apt. Shop Maint.	2/23/2017	None	0	( 2:33pm – 3:09pm) 36 min	20
Goggin, Patricia	Plaintiff	03/13/2017	61-76	16	(9:04am – 1:24pm) 4 hr 20 min	158
Gorostieta, Bruno	Plaintiff	04/24/2017	96-109	14	(9:12am – 5:13pm) 8 hr 1 min	168
Gutierrez, Carlos	Apt. Shop Maint.	02/23/2017	None	0	(3:18pm- 4:50pm) 1 hr 32 min	40
Herrera, Esperanza	Plaintiff	03/07/2017	1-24	24	(9:08am – 5:02pm) 7 hr 54 min	161
Johnston, Jeffrey	Defs.' Expert	01/17/2018	356-359	4	(8:58am – 10:41am) 1 hr 43 min	57
Juarez, Norma	Plaintiff	04/27/2017	152-153	2	(9:13am – 4:44pm) 7 hr 31 min	168
Leyse, Todd	Defs.' Expert	01/17/2018	360-363	4	(12:31pm – 2:50pm) 2 hr 19 min	95
Morris, Leonard	Apt. Shop Maint.	04/18/2017	None	0	(2:02pm – 3:23pm) 1 hr 21 min	60
Myers, Greg	Plts.' Expert	01/24/2018	374-385	12	(9:02am – 4:08pm) 7 hr 6 min	246
Nelson, Collin	Defs.' Expert	01/19/2018	364-373	10	(9:12am – 4:31pm) 7 hr 19 min	254
Nicol, Lori	Plaintiff	03/28/2017	25-45	21	(9:01am – 2:58pm) 5 hr 57 min	178
Ogundipe, Olutundun Arike	Plaintiff	03/09/2017	46-59	14	(9:05am – 2:25pm) 5 hr 20 min	160

Deponent	Title	Depo Date	Exhibits	Total Number of Deposition Exhibits Marked with Deponent	Time (including breaks)	Pages of Deposition Testimony
Palacios, Oscar	Apt. Shop Maint.	05/31/2017	None	0	(8:37am – 9:44am) 1 hr 7 min	27
Rodriguez, Marco	Apt. Shop Maint.	02/23/2017	None	0	(1:07pm – 2:22pm) 1 hr 15 min	32
Roman-Sobrio, Juan	Apt. Shop Maint.	04/18/2017	None	0	(8:36am – 9:54am) 1 hr 18 min	34
Rosas, Juan Jesus Arroya	Apt. Shop Maint.	02/23/2017	None	0	(11:33am – 12:25pm) 52 min	25
Rowland, Joel ( <i>Nicol matter</i> )		04/13/2018	1-6	6	(8:30am - 10:51 am) 2 hr 21 min	106
Rumppe, Michael	City of Minneapolis	05/11/2017	182-185	4	(9:06am – 10:41am) 1 hr 35 min	66
Sattler, Timothy	Apt. Shop Maint.	04/18/2017	None	0	(3:41pm – 4:51pm) 1 hr 10 min	56
Sayers, Robert	City of Minneapolis	05/04/2017	180-181	2	(9:09am – 11:43am) 2 hr 34 min	91
Schuchman, Noah	City of Minneapolis	04/25/2017	110-133	24	(9:02am – 4:03pm) 7 hr 1 min	237
Shields, Jeffrey	Apt. Shop	11/08/2017	232-245	14	(11:10am – 4:37pm) 5 hr 27 min	167
Shields, Jeffrey 30.02(f)	Apt. Shop	11/08/2017	224-231	8	(8:33am – 11:03am) 2hr 30 min	102
Velde, Joann	City of Minneapolis	04/26/2017	134-151	18	(9:02am – 3:02pm) 6 hr 0 min	175
Wolf, Lee	City of Minneapolis	05/02/2017	154-167	14	(9:01am – 2:30pm) 5 hr 29 min	170
Zorbalas, Spiros	Defendant	11/29/2017	1-37	37	(9:04am – 5:22pm) 8 hr 18 min	355
Zorbalas, Spiros	Defendant	02/12/2018	38-44	8	(12:32pm – 1:55pm) 1 hr 23 min	61

<b>Deponent</b>	<b>Title</b>	<b>Depo Date</b>	<b>Exhibits</b>	<b>Total Number of Deposition Exhibits Marked with Deponent</b>	<b>Time (including breaks)</b>	<b>Pages of Deposition Testimony</b>
Zorbalas, Spiros 30.02(f)	Defendant	02/12/2018	45-49	5	(2:00pm – 3:13pm) 1 hr 13 min	69

<b>Total Number of Depositions Taken</b>	<b>45 Total Depositions</b>
<b>Total Number of Deposition Exhibits Marked</b>	<b>354 Deposition Exhibits</b>
<b>Total Amount of Time Spent Taking/Defending Depositions</b>	<b>161 Hours and 21 Minutes of Depositions</b>
<b>Total Number of Pages Of Deposition Transcripts</b>	<b>5,493 Pages of Deposition Transcripts</b>

**DOCUMENT PRODUCTIONS**

<b>Produced By</b>	<b>Bates Number Prefix</b>	<b>Total Documents Produced</b>	<b>Total Pages Produced</b>
20/20 Vision	2020V	3	118
Be There Pest Control	BTPC	91	229
Berkeley Holdings, Inc.	BHI	6	89
Equity Residential Holdings	BF	1	15
Equity Residential Holdings	ERH	41,652	49,200
Equity Residential Holdings	ERH – CITY OF MPLS	198	514
Equity Residential Holdings	QT	8	1,578
Equity Residential Holdings	N-ERH	105	2,119
Equity Residential Holdings (City of Minneapolis)	CITY OF MPLS	53	1,772
Equity Residential Holdings (Kanata Properties)	KANATA	114	463
InquilinXs UnidXs Por Justicia	IUPJ	222	634
KI 2400, LLC; KI Dupont, LLC	KI2400Dupont	54	144
Plaintiffs (docs. received from Jennifer Strand)	PLFS_STRAND	1,727	2,325
Plaintiffs ( <i>Flores</i> )	PLFS	2,210	26,375
Plaintiffs ( <i>Nicol</i> )	NICOL	770	8,251
Sela	S	1	54
Spiros Zorbalas	ZB CITY	1,766	13,679
Spiros Zorbalas	ZB	2,891	7,505
Spiros Zorbalas	ZB_LEYSE	1	1
SS Quarters, Inc.	SSQ	4	149
Stephen Frenz	FRENZ	1,550	2,654
Stephen Frenz (Stroz)	AS-STROZ	20,901	75,375
City of Minneapolis	mpls	423	2,370
Equity Residential Holdings	EHR	87	16,028
<b>TOTAL</b>		<b>74,838 Total Documents Produced</b>	<b>211,641 Total Pages Produced</b>



## EXHIBIT B

### HOURS WORKED AND INVESTMENT

REPORTING PERIOD: Inception through November 18, 2018

<u>Name</u>	<u>Title</u>	<u>Investment (\$)</u>	<u>Hours Worked</u>	<u>Blended Rate</u>
Cockson, Michael F.	Partner	1,854,836.00	2,742.8	676
Nodler, Adam M.	Partner	1,121,082.50	2,219.3	505
Poradek, James W.	Partner	683,700.00	950.8	719
Sullivan, Timothy M.	Partner	324,849.50	621.1	523
Razavi, Katherine S.	Partner	240,568.00	466.4	516
Volling, James L.	Partner	147,384.00	165.6	890
Ellingboe, Deborah A.	Partner	91,216.00	130.1	701
Ferrell, Charles S.	Partner	24,967.00	35.5	703
Macdonald, D. Charles	Partner	18,346.00	26.5	692
Gross, David J.F.	Partner	11,500.00	11.5	1,000
Tomizuka, Lica	Partner	6,352.50	12.1	525
Van Oort, Aaron D.	Partner	6,314.00	8.4	752
Mertz, Stephen M.	Partner	3,192.00	4.4	725
Dierssen-Morice, Rikke	Partner	2,291.50	3.8	603
Stewart, Michael R.	Partner	1,085.50	1.3	835
Webber, Charles F.	Partner	955.00	1.3	735
Moe, Paul S.	Partner	894.00	1.2	745
Walker, Leita A.	Partner	643.50	1.3	495
Hoffman, Erin L	Partner	517.50	0.9	575
Pfau, James M.	Partner	406.00	0.6	677
Forschler, Richard A.	Partner	312.50	0.5	625
Jones, Bruce	Partner	213.00	0.3	710
Brennaman, Nathan A.	Counsel	309,986.00	597.2	519
Zylstra, Nathaniel J.	Counsel	80,526.00	151.8	530
Johnson, Laura L.	Counsel	17,628.00	42.1	419
Thiede, Jeffrey S.	Counsel	1,116.00	2.4	465
Middlestead, Peggy	Counsel	31.50	0.1	315
Hall, Isaac B.	Associate	585,602.00	1,454.7	403
Fermoyle, Kelly J.	Associate	411,724.00	1,156.0	356
Steinhauser, Lauren	Associate	194,855.50	427.3	456
Lindevig, Blake J.	Associate	137,238.00	308.4	445

<b>Washburn, Bryan</b>	Associate	45,463.50	151.3	300
<b>Collins, Rory</b>	Associate	43,368.00	114.0	380
<b>Bottini, Patrick C.</b>	Associate	33,160.00	86.5	383
<b>Graham, Dadri-Anne A.</b>	Associate	31,594.50	86.2	367
<b>Fohey, Nicholas M.</b>	Associate	9,547.50	28.5	335
<b>Chung, Doowon</b>	Associate	6,048.00	19.2	315
<b>Kieselbach, Peter</b>	Associate	3,551.00	10.6	335
<b>Engelsma, Brad</b>	Associate	2,848.00	8.9	320
<b>Bodtke, Emily</b>	Associate	1,657.50	5.1	325
<b>Scheibel, Elizabeth M.C.</b>	Associate	1,050.00	2.8	375
<b>Baga, Courtney N.</b>	Associate	650.00	2.0	325
<b>Knight, Jamal L.</b>	Associate	637.50	1.7	375
<b>Wahlstrand, Julie</b>	Associate	582.00	1.2	485
<b>Harayda, Christopher J.</b>	Associate	546.00	1.2	455
<b>Archer, David C.</b>	Associate	396.00	1.1	360
<b>Bartlett, Sarah M.</b>	Associate	390.50	1.1	355
<b>Wojciechowski, Jeff</b>	Associate	383.50	1.3	295
<b>Magnuson, Peter C.</b>	Associate	343.00	0.7	490
<b>Meyer, Shelley M.</b>	Paralegal	384,699.50	1,170.9	329
<b>Pratt, Barbara A.</b>	Paralegal	68,427.50	272.7	251
<b>Olson, Mary M.</b>	Paralegal	21,502.50	80.0	269
<b>Ouellette, Claire H.</b>	Paralegal	17,613.00	53.2	331
<b>Duoss, Tori A.</b>	Paralegal	4,869.50	19.3	252
<b>Koontz, David L.</b>	Paralegal	4,849.50	16.4	296
<b>Tecklenburg, Elaine J.</b>	Paralegal	1,596.00	8.4	190
<b>Flesher, Margaret M.</b>	Paralegal	1,202.50	3.7	325
<b>Hoso, Amra</b>	Paralegal	494.00	1.9	260
<b>Brosius, Daria S.</b>	Paralegal	117.50	0.5	235
<b>Total:</b>		<b>6,967,921.00</b>	<b>13,696.1</b>	

## HOURS WORKED AND INVESTMENT

REPORTING PERIOD: January 1, 2016 – December 31, 2016

<b>Name</b>	<b>Title</b>	<b>Investment (\$)</b>	<b>Hours Worked</b>	<b>2016 Rate</b>
Cockson, Michael F.	Partner	474,944.00	742.1	640
Razavi, Katherine S.	Partner	110,830.50	223.9	495
Poradek, James W.	Partner	64,789.00	96.7	670
Macdonald, D. Charles	Partner	4,026.00	6.1	660
Mertz, Stephen M.	Partner	2,736.00	3.8	720
Dierssen-Morice, Rikke	Partner	805.00	1.4	575
Walker, Leita A.	Partner	643.50	1.3	495
Webber, Charles F.	Partner	355.00	0.5	710
Forschler, Richard A.	Partner	312.50	0.5	625
Van Oort, Aaron D.	Partner	276.00	0.4	690
Brennaman, Nathan A.	Counsel	47,628.00	97.2	490
Thiede, Jeffrey S.	Counsel	1,116.00	2.4	465
Johnson, Laura L.	Counsel	450.00	1.2	375
Nodler, Adam M.	Associate	136,665.00	303.7	450
Steinhaeuser, Lauren	Associate	56,108.00	135.2	415
Washburn, Bryan	Associate	38,881.00	131.8	295
Bottini, Patrick C.	Associate	19,099.00	53.8	355
Fohey, Nicholas M.	Associate	9,547.50	28.5	335
Chung, Doowon	Associate	6,048.00	19.2	315
Hall, Isaac B.	Associate	3,808.00	11.2	340
Kieselbach, Peter	Associate	3,551.00	10.6	335
Sullivan, Timothy M.	Associate	2,957.50	6.5	455
Engelsma, Brad	Associate	2,848.00	8.9	320
Bodtke, Emily	Associate	1,657.50	5.1	325
Baga, Courtney N.	Associate	650.00	2.0	325
Wahlstrand, Julie	Associate	582.00	1.2	485
Harayda, Christopher J.	Associate	546.00	1.2	455
Wojciechowski, Jeff	Associate	383.50	1.3	295
Pratt, Barbara A.	Paralegal	63,100.00	252.4	250
Meyer, Shelley M.	Paralegal	9,858.00	31.8	310
Olson, Mary M.	Paralegal	3,570.00	14.0	255
Duoss, Tori A.	Paralegal	1,274.00	5.2	245
Koontz, David L.	Paralegal	1,204.00	4.3	280
Ouellette, Claire H.	Paralegal	305.00	1.0	305
Brosius, Daria S.	Paralegal	117.50	0.5	235

<b>Total:</b>		<b>1,071,672.00</b>	<b>2,206.90</b>	
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## HOURS WORKED AND INVESTMENT

REPORTING PERIOD: January 1, 2017 – December 31, 2017

<b>Name</b>	<b>Title</b>	<b>Investment (\$)</b>	<b>Hours Worked</b>	<b>2017 Rate</b>
Cockson, Michael F.	Partner	1,030,044.00	1,514.8	680
Poradek, James W.	Partner	384,536.00	541.6	710
Razavi, Katherine S.	Partner	129,737.50	242.5	535
Ellingboe, Deborah A.	Partner	41,752.00	61.4	680
Ferrell, Charles S.	Partner	19,390.00	27.7	700
Macdonald, D. Charles	Partner	13,580.00	19.4	700
Tomizuka, Lica	Partner	6,352.50	12.1	525
Van Oort, Aaron D.	Partner	2,628.00	3.6	730
Dierssen-Morice, Rikke	Partner	1,159.00	1.9	610
Stewart, Michael R.	Partner	1,085.50	1.3	835
Moe, Paul S.	Partner	894.00	1.2	745
Webber, Charles F.	Partner	600.00	0.8	750
Mertz, Stephen M.	Partner	456.00	0.6	760
Pfau, James M.	Partner	335.00	0.5	670
Jones, Bruce	Partner	213.00	0.3	710
Brennaman, Nathan A.	Counsel	178,256.00	342.8	520
Zylstra, Nathaniel J.	Counsel	50,610.00	96.4	525
Johnson, Laura L.	Counsel	17,178.00	40.9	420
Nodler, Adam M.	Associate	622,462.50	1,257.5	495
Hall, Isaac B.	Associate	318,706.00	838.7	380
Fermoyle, Kelly J.	Associate	287,523.00	833.4	345
Sullivan, Timothy M.	Associate	255,028.00	495.2	515
Steinhaeuser, Lauren	Associate	138,747.50	292.1	475
Lindevig, Blake J.	Associate	137,238.00	308.4	445
Collins, Rory	Associate	39,672.00	104.4	380
Graham, Dadri-Anne A.	Associate	21,863.50	59.9	365
Bottini, Patrick C.	Associate	14,061.00	32.7	430
Washburn, Bryan	Associate	6,197.50	18.5	335
Scheibel, Elizabeth M.C.	Associate	1,050.00	2.8	375
Knight, Jamal L.	Associate	637.50	1.7	375
Bartlett, Sarah M.	Associate	390.50	1.1	355
Meyer, Shelley M.	Paralegal	294,905.00	907.4	325
Olson, Mary M.	Paralegal	9,672.50	36.5	265
Ouellette, Claire H.	Paralegal	7,040.00	22.0	320
Pratt, Barbara A.	Paralegal	4,420.00	17.0	260

<b>Duoos, Tori A.</b>	Paralegal	3,595.50	14.1	255
<b>Koontz, David L.</b>	Paralegal	2,448.50	8.3	295
<b>Tecklenburg, Elaine J.</b>	Paralegal	1,596.00	8.4	190
<b>Flesher, Margaret M.</b>	Paralegal	1,202.50	3.7	325
<b>Hoso, Amra</b>	Paralegal	494.00	1.9	260
<b>Total:</b>		<b>4,047,757.50</b>	<b>8,175.50</b>	

## HOURS WORKED AND INVESTMENT

REPORTING PERIOD: January 1, 2018-November 18, 2018

<b>Name</b>	<b>Title</b>	<b>Investment (\$)</b>	<b>Hours Worked</b>	<b>2018 Rate</b>
Nodler, Adam M.	Partner	361,955.00	658.1	550
Cockson, Michael F.	Partner	349,848.00	485.9	720
Poradek, James W.	Partner	234,375.00	312.5	750
Volling, James L.	Partner	147,384.00	165.6	890
Sullivan, Timothy M.	Partner	66,864.00	119.4	560
Ellingboe, Deborah A.	Partner	49,464.00	68.7	720
Gross, David J.F.	Partner	11,500.00	11.5	1,000
Ferrell, Charles S.	Partner	5,577.00	7.8	715
Van Oort, Aaron D.	Partner	3,410.00	4.4	775
Macdonald, D. Charles	Partner	740.00	1.0	740
Hoffman, Erin L	Partner	517.50	0.9	575
Dierssen-Morice, Rikke	Partner	327.50	0.5	655
Pfau, James M.	Partner	71.00	0.1	710
Brennaman, Nathan A.	Counsel	84,102.00	157.2	535
Zylstra, Nathaniel J.	Counsel	29,916.00	55.4	540
Middlestead, Peggy	Counsel	31.50	0.1	315
Hall, Isaac B.	Associate	263,088.00	604.8	435
Fermoyle, Kelly J.	Associate	124,201.00	322.6	385
Graham, Dadri-Anne A.	Associate	9,731.00	26.3	370
Collins, Rory	Associate	3,696.00	9.6	385
Archer, David C.	Associate	396.00	1.1	360
Washburn, Bryan	Associate	385.00	1.0	385
Magnuson, Peter C.	Associate	343.00	0.7	490
Meyer, Shelley M.	Paralegal	79,936.50	231.7	345
Ouellette, Claire H.	Paralegal	10,268.00	30.2	340
Olson, Mary M.	Paralegal	8,260.00	29.5	280
Koontz, David L.	Paralegal	1,197.00	3.8	315
Pratt, Barbara A.	Paralegal	907.50	3.3	275
<b>Total:</b>		<b>1,848,491.50</b>	<b>3,313.70</b>	

## EXHIBIT C

### EXPENSE REPORT

REPORTING PERIOD: Inception through September 30, 2018

<u>DESCRIPTION</u>	<u>TOTAL</u>
Process Server	\$4,437.00
Messenger/Courier	\$5,068.77
Filing Fees and Other Court Fees	\$3,485.00
Expert Witnesses	\$9,900.00
Consultants/Other Professional Services	\$111,409.58
In-house Duplicating/Copying	\$37,289.95
Outside Duplicating/Copying	\$10,642.81
Postage	\$314.58
Computerized Litigation Support Services	\$11,675.65
Out of Town Travel Expenses	\$0.00
Transportation	\$4,004.37
Hotels	\$3,996.27
Taxis, Tips	\$410.35
Parking	\$197.00
Telephone/WIFI	84.85
Local Transportation	\$45.62
Special Master Fees	\$4,680.25
Deposition Transcripts	\$31,993.66
Other Transcripts	\$11,268.72
Alternative Dispute Resolution/Mediator	\$10,313.58
Expenses Related to Obtaining and Filing Official Documents	\$8,154.48
Process Server	\$4,437.00
<b>TOTAL EXPENSES</b>	<b>\$269,372.49</b>