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13 Attorneys for Plaintiffs and all others similarly situated

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COUNTY OF SAN DIEGO - CENTRAL

ALEXIS NORMAN, an individual; NICOLETTE
COCHRAN, an individual; and ROES 1 through
100 inclusive;

Plaintiffs,

v.

ESSEX PROPERTY TRUST, INC., a Maryland
Corporation; ESSEX PORTFOLIO, L.P., a
California Limited Partnership; 95360
RESIDENCES, L.P., a California Limited
Partnership; 500 FOLSOM, L.P., a California
Limited Partnership; BAYPORT SERRANO
ASSOCIATES, L.P., a California Limited
Partnership; BELMONT AFFORDABLE
PARTNERS, L.P., a California Limited
Partnership; BEX FMCA, LLC, a Delaware
Limited Liability Company; BEX II GP, LLC, a
Delaware Limited Liability Company; BEX III
GP, LLC, a Delaware Limited Liability Company;
BEX IV GP, LLC, a Delaware Limited Liability
Company; BEX PORTFOLIO, LLC, a Delaware
Limited Liability Company; BEXAEW

Case No.:

[Imaged File]

CLASS ACTION

(Plaintiff Class, Cal. Code Civ. Proc., § 382)

JURY DEMAND

**CLASS ACTION COMPLAINT SEEKING
DECLARATIVE RELIEF, DAMAGES,
INJUNCTIVE RELIEF AND RESTITUTION**

1. Violation of Civil Code § 1950.5
2. Unfair Competition (Bus. & Prof. Code §§ 17200, *et seq.*)

**CLASS ACTION COMPLAINT SEEKING DECLARATIVE RELIEF, DAMAGES, INJUNCTIVE RELIEF
AND RESTITUTION**

1 California Limited Partnership; ESSEX
2 COCHRAN, L.P., a California Limited
3 Partnership; ESSEX COLUMBUS, L.P., a
4 California Limited Partnership; ESSEX DUBLIN
5 GP, L.P., a Delaware Limited Partnership; ESSEX
6 DUBLIN OWNER, L.P., a California Limited
7 Partnership; ESSEX EMERYVILLE GP, L.P., a
8 Delaware Limited Partnership; ESSEX
9 EMERYVILLE OWNER, L.P., a California
10 Limited Partnership; ESSEX ESPLANADE, L.P.,
11 a California Limited Partnership; ESSEX FORM
12 15, L.P., a California Limited Partnership; ESSEX
13 FOUNTAIN PARK APARTMENTS, L.P., a
14 California Limited Partnership; ESSEX FOX
15 PLAZA, L.P., a California Limited Partnership;
16 ESSEX GAS COMPANY LOFTS, L.P., a
17 California Limited Partnership; ESSEX
18 GATEWAY MANAGEMENT, LLC, a California
19 Limited Liability Company; ESSEX
20 HAMILTON, L.P., a California Limited
21 Partnership; ESSEX HAVER HILL, L.P., a
22 California Limited Partnership; ESSEX HGA,
23 LLC, a Delaware Limited Liability Company;
24 ESSEX HILLCREST PARK, L.P., a California
25 Limited Partnership; ESSEX HILLSBOROUGH
26 PARK, L.P., a California Limited Partnership;
27 ESSEX HILLSDALE GARDEN APARTMENTS,
28 L.P., a California Limited Partnership; ESSEX
HUNTINGTON BREAKERS, L.P., a California
Limited Partnership; ESSEX HUNTINGTON ON
EDINGER, L.P., a California Limited Partnership;
ESSEX JAYSAC TASMAN, L.P., a California
Limited Partnership; ESSEX JMS
ACQUISITION, L.P., a California Limited
Partnership; ESSEX JV, LLC, a Delaware Limited
Liability Company; ESSEX KIELY, L.P., a
California Limited Partnership; ESSEX KINGS
ROAD, L.P., a California Limited Partnership
ESSEX LE PARC, L.P., a California Limited
Partnership; ESSEX LORRAINE, L.P., a
California Limited Partnership; ESSEX
MANAGEMENT CORPORATION, a California
Stock Corporation; ESSEX MARBRISA LONG
BEACH, L.P., a California Limited Partnership;
ESSEX MARINA CITY CLUB, L.P., a California
Limited Partnership; ESSEX MCC, LLC, a

1 Delaware Limited Liability Company; ESSEX
2 MEADOWOOD, L.P., a California Limited
3 Partnership; ESSEX MERIDIAN, LLC, a
4 Delaware Limited Liability Company; ESSEX
5 MIRABELLA MARINA APARTMENTS, L.P., a
6 California Limited Partnership; ESSEX
7 MONARCH LA BREA APARTMENTS, L.P., a
8 California Limited Partnership; ESSEX
9 MONTEREY VILLAS, L.P., a California Limited
10 Partnership; ESSEX MONTEREY VILLAS, LLC,
11 a Delaware Limited Liability Company; ESSEX
12 NBN SPE, LLC, a Delaware Limited Liability
13 Company; ESSEX NOHO APARTMENTS, L.P.,
14 a California Limited Partnership; ESSEX PARK
15 CATALINA, L.P., a California Limited
16 Partnership; ESSEX PE LOFTS, L.P., a California
17 Limited Partnership; ESSEX PLEASANTON GP,
18 L.P., a Delaware Limited Partnership; ESSEX
19 PLEASANTON OWNER, L.P., a California
20 Limited Partnership; ESSEX REGENCY
21 ESCUELA, L.P., a California Limited
22 Partnership; ESSEX REXFORD, LLC, a
23 Delaware Limited Liability Company; ESSEX
24 RILEY SQUARE, L.P., a California Limited
25 Partnership; ESSEX SAN FERNANDO, L.P., a
26 California Limited Partnership; ESSEX SAN
27 RAMON PARTNERS L.P., a California Limited
28 Partnership; ESSEX SANTEE COURT, L.P., a
California Limited Partnership; ESSEX
SKYLINE, L.P., a California Limited Partnership;
ESSEX SPE, LLC, a Delaware Limited Liability
Company; ESSEX SUMMERHILL PARK, L.P., a
California Limited Partnership; ESSEX THE
COMMONS, L.P., a California Limited
Partnership; ESSEX THE POINTE, L.P., a
California Limited Partnership; ESSEX THE
WOODS, L.P., a California Limited Partnership;
ESSEX TIERRA VISTA, L.P., a California
Limited Partnership; ESSEX TIFFANY COURT,
LLC, a Delaware Limited Liability Company;
ESSEX TOLUCA LAKE, L.P., a California
Limited Partnership; ESSEX TOWNSHIP, L.P., a
California Limited Partnership; ESSEX
TREETOPS, L.P., a California Limited
Partnership; ESSEX VALLEY VILLAGE
MAGNOLIA, LLC, a Delaware Limited Liability

1 Company; ESSEX VISTA BELVEDERE, L.P., a
2 California Limited Partnership; ESSEX
3 WALNUT GP, L.P., a Delaware Limited
4 Partnership; ESSEX WALNUT OWNER, L.P., a
5 California Limited Partnership; ESSEX
6 WARNER CENTER, L.P., a California Limited
7 Partnership; ESSEX WATERFORD, L.P., a
8 California Limited Partnership; ESSEX WESCO
9 III, L.P., a California Limited Partnership; ESSEX
10 WESCO IV, LLC, a Delaware Limited Liability
11 Company; ESSEX WESCO V, LLC, a California
12 Limited Liability Company; ESSEX WESCO,
13 L.P., a California Limited Partnership; ESSEX
14 WILSHIRE, L.P., a California Limited
15 Partnership; FAIRHAVEN APARTMENT
16 FUND, LTD., a California Limited Partnership;
17 GBR PALMA SORRENTO LLC, a Delaware
18 Limited Liability Company; GR BLOCK B LLC,
19 a Delaware Limited Liability Company; GR
20 BLOCK C LLC, a Delaware Limited Liability
21 Company; JAPANTOWN ASSOCIATES LLC, a
22 Delaware Limited Liability Company; K-H
23 PROPERTIES, a California Limited Partnership;
24 MONARCH BUENA VISTA BORROWER,
25 LLC, a Delaware Limited Liability Company;
26 MONARCH ESSEX SCRIPPS GP, LLC, a
27 Delaware Limited Liability Company;
28 MONARCH ESSEX SCRIPPS, LLC, a Delaware
Limited Liability Company; NEW CENTURY
TOWERS, LLC, a Delaware Limited Liability
Company; NEWPORT BEACH NORTH LLC, a
Delaware Limited Liability Company; PALM
VALLEY ROLL-UP LLC, a Delaware Limited
Liability Company; PINE GROVE
APARTMENT FUND, LTD., a California
Limited Partnership; PPC SAGE APARTMENTS
MANAGER II LLC, a Delaware Limited Liability
Company; PPC SAGE LLC, a Delaware Limited
Liability Company; RICHMOND ESSEX, L.P., a
California Limited Partnership; SAC REDWOOD
CITY APARTMENTS LLC, a Delaware Limited
Liability Company; SANTA CLARA SQUARE,
LLC, a California Limited Liability Company;
SANTA MONICA AFFORDABLE PARTNERS,
L.P., a California Limited Partnership; SP/P

1 CHANNEL POINT, L.L.C., a Delaware Limited
2 Liability Company; THE OAKBROOK
3 COMPANY, an Ohio Limited Partnership;
4 VALLEY PARK APARTMENTS, LTD., a
5 California Limited Partnership; VILLA
6 ANGELINA APARTMENT FUND, LTD., a
7 California Limited Partnership; WC BRIO
8 APARTMENTS LLC, a Delaware Limited
9 Liability Company; WCP SERRANO, INC, a
10 Delaware Corporation; WESCO GP, LLC, a
11 Delaware Limited Liability Company; WESCO III
12 BEX, LLC, a Delaware Limited Liability
13 Company; WESCO III GP, LLC, a Delaware
14 Limited Liability Company; WESCO IV, LLC, a
15 Delaware Limited Liability Company; WESCO
16 IV, LLC, a Delaware Limited Liability Company;
17 WESTERN MOUNTAIN VIEW II INVESTORS,
18 a California Limited Partnership; WESTERN
19 RIVIERA INVESTORS, a California Limited
20 Partnership; WESTERN-SEVEN TREES
21 INVESTORS, a California Limited Partnership;
22 and DOES 1 through 100, inclusive,

23 Defendants.

24 Plaintiffs aver:

25 JURISDICTION

26 1. This Court has jurisdiction over the claims for relief asserted herein pursuant to Article
27 6, Section 10 of the Constitution of the State of California, which grants the Superior Court “original
28 jurisdiction in all causes except those given by statute to other courts.” The statutes under which this
action is brought do not specify any other basis for jurisdiction over Plaintiffs’ claims to another court.

2. This Court has jurisdiction over all defendants because upon information and belief,
each defendant is a resident of California, has sufficient minimum contacts in California, owns and
manages real property situated in California, and/or otherwise intentionally avails itself of the
California market so as to render this Court’s jurisdiction over it consistent with traditional notions of
fair play and substantial justice.

1 **VENUE**

2 3. Venue of this civil action is properly fixed in San Diego County, California, pursuant
3 to Sections 395 and 395.5 of the California Code of Civil Procedure because the acts herein complained
4 of occurred in the County of San Diego, and Plaintiffs' resulting injuries were sustained there. Further,
5 Defendants own and operate real property in California, including within the County of San Diego,
6 from which the allegations in this suit arise.

7 4. Certain averments of fact which are contained within certain Paragraphs of this
8 Complaint are made upon information and belief which may be grounded in whole or in part upon
9 matters discovered through investigation conducted by the undersigned counsel.

10 **PARTIES**

11 5. Plaintiff ALEXIS NORMAN is an individual, a resident of San Diego County and a
12 citizen of the State of California who resided at one of the Defendants' (defined below) apartment
13 complexes in San Diego County during all relevant times.

14 6. Plaintiff NICOLETTE COCHRAN is an individual, a resident of San Diego County and
15 a citizen of the State of California who resided at one of the Defendants' (defined below) apartment
16 complexes in San Diego County during all relevant times.

17 7. Plaintiffs ROES 1 through 100 are former tenants of one or more of the Defendants
18 herein, who, though not yet identified, are similarly situated to the above-named Plaintiffs, and who
19 may serve as additional class representatives. The true names of Plaintiffs ROES 1 through 100 will be
20 added to this Complaint when their identities become known. Hereinafter plaintiff ALEXIS
21 NORMAN, plaintiff NICOLETTE COCHRAN, and unidentified plaintiff ROES 1-100 shall be
22 collectively called "Plaintiffs".

23 8. Defendant ESSEX PROPERTY TRUST, INC., is a publicly traded, Maryland
24 corporation (hereinafter "EP TRUST"). Defendant ESSEX PORTFOLIO, L.P., is a California limited
25 partnership, (hereinafter "EP"). Defendant EP TRUST and EP (hereinafter collectively "ESSEX")
26 describe their business in 2021 10-K SEC filings as follows: "ESSEX operates as a self-administered
27 and self-managed real estate investment trust ("REIT") and is the sole general partner of the Operating
28

1 Partnership, defined in ESSEX’s 10-K as the “Essex Portfolio, L.P. and those entities/subsidiaries
2 owned or controlled by Essex Portfolio, L.P.” As of December 31, 2021, ESSEX owned
3 approximately 96.6% of the ownership interest in the Operating Partnership with the remaining 3.4%
4 interest owned by limited partners. As the sole general partner of the Operating Partnership, ESSEX
5 has exclusive control of the Operating Partnership's day-to-day management.” Thus, ESSEX has
6 complete control of each of the real properties owned by the Operating Partnership.

7
8 9. ESSEX’s 2021 10-K filing further provides: “Management operates Essex and the
9 Operating Partnership as one business. The management of Essex consists of the same members as the
10 management of the Operating Partnership. All of the Company's property ownership, development,
11 and related business operations are conducted through the Operating Partnership and Essex has no
12 material assets, other than its investment in the Operating Partnership. Essex's primary function is
13 acting as the general partner of the Operating Partnership. The Operating Partnership holds
14 substantially all of the assets of the Company, including the Company's ownership interests in its co-
15 investments. The Operating Partnership conducts the operations of the business.”

16
17 10. ESSEX states in its 2021 Annual Report that “Essex is a self-administered and self-
18 managed REIT that acquires, develops, redevelops, and manages apartment communities in selected
19 residential areas located on the West Coast of the United States. Essex owns all of its interests in its
20 real estate investments, directly or indirectly, through the Operating Partnership. Essex is the sole
21 general partner of the Operating Partnership and, as of December 31, 2021, had an approximately
22 96.6% general partner interest in the Operating Partnership.”

23
24 11. ESSEX further provides: “As of December 31, 2021, the Company owned or had
25 ownership interests in 252 operating apartment communities, comprising 61,911 apartment homes,
26 excluding the Company’s ownership in preferred equity co-investments, loan investments, three
27 operating commercial buildings, and a development pipeline comprised of one consolidated project
28 and one unconsolidated joint venture project.” On September 1, 2022, ESSEX’s market capitalization
was approximately \$17.26 billion.

12. Of its 252 apartment communities under its control, 193 are located in California.

1 ESSEX has organized its corporate structure as follows: The title to each apartment complex is held
2 by a “single-purpose” entity. The entity that holds title to the apartment complex then operates the
3 apartment community under a fictitious name (i.e., “doing business as [community name].”) The entity
4 property owner or “landlord” is further in a partnership with at least one other ESSEX fully owned and
5 controlled entity. Frequently, the ESSEX controlled entity that is the partner to the title-holding entity
6 is Defendant EP, Defendant ESSEX, Defendant ESSEX MANAGEMENT CORPORATION, and/or
7 Defendant ESSEX SPE, LLC.

8
9 13. Specifically, each of the following are the legal entities that Defendant ESSEX has
10 formed, owns, and operates that are the direct property owners or “landlords” of the apartment
11 complexes at issue in this litigation. Collectively the following entities that own the property are
12 referred to herein as ENTITY DEFENDANTS and their fictitious names are referred to herein as
13 “APARTMENT COMPLEXES”:

14 14. Defendant ESSEX KIELY, L.P. is a California Limited Partnership, which owns and
15 operates an apartment complex with 121 units doing business as “1000 Kiely” generally located at
16 1000 Kiely Blvd. Santa Clara, CA 95051 within Santa Clara County. Defendant ESSEX KIELY, L.P.
17 lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent
18 for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO,
19 CA 94403. Defendant ESSEX KIELY, L.P. operates in a partnership with Defendants ESSEX SPE,
20 LLC; ESSEX PORTFOLIO, L.P; and ESSEX PROPERTY TRUST, INC.

21 15. Defendant ESSEX SAN FERNANDO, L.P. is a California Limited Partnership, which
22 owns and operates an apartment complex with 323 units doing business as “101 San Fernando”
23 generally located at 101 E San Fernando St Ste 100 San Jose, CA 95112 within Santa Clara County.
24 Defendant ESSEX SAN FERNANDO, L.P. lists its business address as 1100 PARK PL STE 200 SAN
25 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
26 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX SAN FERNANDO, L.P.
27 operates in a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P; and ESSEX
28 PROPERTY TRUST, INC.

1 16. Defendant 360 RESIDENCES, L.P. is a California Limited Partnership, which owns
2 and operates an apartment complex with 213 units doing business as “360 Residences” generally
3 located at 360 S Market Street San Jose, CA 95113 within Santa Clara County. Defendant 360
4 RESIDENCES, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
5 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
6 200 SAN MATEO, CA 94403. Defendant 360 RESIDENCES, L.P. operates in a partnership with
7 Defendants ESSEX WESCO V, LLC; ESSEX PORTFOLIO, L.P; and ESSEX PROPERTY TRUST,
8 INC.

9 17. Defendant 500 FOLSOM, L.P. is a California Limited Partnership, which owns and
10 operates an apartment complex with 537 units doing business as “500 Folsom” generally located at 500
11 Folsom st. San Francisco, CA 94105 within San Francisco County. Defendant 500 FOLSOM, L.P.
12 lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent
13 for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO,
14 CA 94403. Defendant 500 FOLSOM, L.P. operates in a partnership with Defendants ESSEX 500
15 FOLSOM, LLC; ESSEX PORTFOLIO, L.P; and ESSEX PROPERTY TRUST, INC.

16 18. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
17 and operates an apartment complex with 284 units doing business as “5600 Wilshire” generally located
18 at 5600 Wilshire Blvd Los Angeles, CA 90036 within Los Angeles County. Defendant ESSEX
19 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
20 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
21 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
22 Defendant ESSEX PROPERTY TRUST, INC.

23 19. Defendant ESSEX HAMILTON, L.P. is a California Limited Partnership, which owns
24 and operates an apartment complex with 195 units doing business as “777 Hamilton” generally located
25 at 777 Hamilton Ave Menlo Park, CA 94025 within San Mateo County. Defendant ESSEX
26 HAMILTON, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its
27 registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200
28

1 SAN MATEO, CA 94403. Defendant ESSEX HAMILTON, L.P. operates in a partnership with
2 Defendant BEX IV GP, LLC.

3 20. Defendant ESSEX WALNUT OWNER, L.P. is a California Limited Partnership, which
4 owns and operates an apartment complex with 49 units doing business as “Agora” generally located at
5 1500 Newell Ave Walnut Creek, CA 94549 within Contra Costa County. Defendant ESSEX
6 WALNUT OWNER, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
7 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
8 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX WALNUT OWNER, L.P. operates in
9 a partnership with Defendants ESSEX WALNUT GP, L.P.; and ESSEX MANAGEMENT
10 CORPORATION.

11 21. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
12 and operates an apartment complex with 624 units doing business as “Alessio” generally located at
13 5700 W. Centinela Los Angeles, CA 90045 within Los Angeles County. Defendant ESSEX
14 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
15 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
16 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
17 Defendant ESSEX PROPERTY TRUST, INC.

18 22. Defendant ESSEX VALLEY VILLAGE MAGNOLIA, LLC is a Delaware Limited
19 Liability Company, which owns and operates an apartment complex with 97 units doing business as
20 “Allegro” generally located at 11945 Magnolia Blvd Valley Village, CA 91607 within Los Angeles
21 County. Defendant ESSEX VALLEY VILLAGE MAGNOLIA, LLC lists its business address as 1100
22 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE
23 MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

24 23. Defendant ESSEX JMS ACQUISITION, L.P. is a California Limited Partnership,
25 which owns and operates an apartment complex with 301 units doing business as “Alpine Village”
26 generally located at 2055 Arnold Way Alpine, CA 91901 within San Deigo County. Defendant ESSEX
27 JMS ACQUISITION, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
28

1 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
2 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX JMS ACQUISITION, L.P. operates
3 in a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX
4 PROPERTY TRUST, INC.

5 24. Defendant ESSEX ANAVIA, L.P. is a California Limited Partnership, which owns and
6 operates an apartment complex with 250 units doing business as “Anavia” generally located at 2045 S
7 State College Blvd Anaheim, CA 92806 within Orange County. Defendant ESSEX ANAVIA, L.P.
8 lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent
9 for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO,
10 CA 94403. Defendant ESSEX ANAVIA, L.P. operates in a partnership with Defendants ESSEX SPE,
11 LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

12 25. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
13 and operates an apartment complex with 367 units doing business as “Apex” generally located at 1102
14 S. Abel St Milpitas, CA 95035 within Santa Clara County. Defendant ESSEX PORTFOLIO, L.P. lists
15 its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for
16 service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA
17 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with Defendants ESSEX
18 PROPERTY TRUST, INC.

19 26. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
20 and operates an apartment complex with 500 units doing business as “Aqua at Marina Del Rey”
21 generally located at 4750 Lincoln Blvd Marina Del Rey, CA 90292 within Los Angeles County.
22 Defendant ESSEX PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN
23 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
24 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates
25 in a partnership with Defendant ESSEX PROPERTY TRUST, INC.

26 27. Defendant ESSEX TIERRA VISTA, L.P. is a California Limited Partnership, which
27 owns and operates an apartment complex with 373 units doing business as “Arbors at Parc Rose”
28

1 generally located at 1750 Montevina Circle Oxnard, CA 93030 within Ventura County. Defendant
2 ESSEX TIERRA VISTA, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO,
3 CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
4 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX TIERRA VISTA, L.P. operates in a
5 partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY
6 TRUST, INC.

7
8 28. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
9 and operates an apartment complex with 264 units doing business as “Ashton Sherman Village”
10 generally located at 12629 Riverside Drive Los Angeles, CA 91607 within Los Angeles County.
11 Defendant ESSEX PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN
12 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
13 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates
14 in a partnership with Defendants ESSEX PROPERTY TRUST, INC.

15
16 29. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
17 and operates an apartment complex with 440 units doing business as “Avant” generally located at 1420
18 S. Figueroa St Los Angeles, CA 90015 within Los Angeles County. Defendant ESSEX PORTFOLIO,
19 L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
20 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
21 MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with Defendants
22 ESSEX PROPERTY TRUST, INC.

23
24 30. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
25 owns and operates an apartment complex with 224 units doing business as “Avenue 64” generally
26 located at 6399 Christie Avenue Emeryville, CA 94608 within Alameda County. Defendant BEX
27 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
28 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
Defendant ESSEX PORTFOLIO, L.P.

1 31. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
2 and operates an apartment complex with 446 units doing business as “Avondale at Warner Center”
3 generally located at 22222 Victory Blvd Woodland Hills, CA 91367 within Los Angeles County.
4 Defendant ESSEX PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN
5 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
6 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates
7 in a partnership with Defendant ESSEX PROPERTY TRUST, INC.

8 32. Defendant ESSEX SAN RAMON PARTNERS L.P. is a California Limited Partnership,
9 which owns and operates an apartment complex with 462 units doing business as “Bel Air” generally
10 located at 2000 Shoreline Drive San Ramon, CA 94582 within Contra Costa County. Defendant
11 ESSEX SAN RAMON PARTNERS L.P. lists its business address as 1100 PARK PL STE 200 SAN
12 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
13 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX SAN RAMON PARTNERS
14 L.P. operates in a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and
15 ESSEX PROPERTY TRUST, INC.

16 33. Defendant ESSEX BELLA VILLAGIO, L.P. is a California Limited Partnership, which
17 owns and operates an apartment complex with 231 units doing business as “Bella Villagio” generally
18 located at 383 Vista Roma Way San Jose, CA 95136 within Santa Clara County. Defendant ESSEX
19 BELLA VILLAGIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
20 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
21 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX BELLA VILLAGIO, L.P. operates in
22 a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX
23 PROPERTY TRUST, INC.

24 34. Defendant ESSEX BELLERIVE, L.P. is a California Limited Partnership, which owns
25 and operates an apartment complex with 63 units doing business as “Bellerive” generally located at
26 1929 Beloit Ave Los Angeles, CA 90025 within Los Angeles County. Defendant ESSEX
27 BELLERIVE, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
28

1 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
2 200 SAN MATEO, CA 94403. Defendant ESSEX BELLERIVE, L.P. operates in a partnership with
3 Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

4 35. Defendant BELMONT AFFORDABLE PARTNERS, L.P. is a California Limited
5 Partnership, which owns and operates an apartment complex with 275 units doing business as “Belmont
6 Station” generally located at 1304 W 2nd St Los Angeles, CA 90026 within Los Angeles County.
7 Defendant BELMONT AFFORDABLE PARTNERS, L.P. lists its business address as 1100 PARK PL
8 STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON
9 located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant BELMONT
10 AFFORDABLE PARTNERS, L.P. operates in a partnership with Defendants ESSEX GATEWAY
11 MANAGEMENT, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

12 36. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
13 and operates an apartment complex with 71 units doing business as “Belmont Terrace” generally
14 located at 1060 Continentals Way Belmont, CA 94002 within San Mateo County. Defendant ESSEX
15 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
16 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
17 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
18 Defendant ESSEX PROPERTY TRUST, INC.

19 37. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
20 and operates an apartment complex with 164 units doing business as “Bennett Lofts” generally located
21 at 530 Brannan Street San Francisco, CA 94107 within San Francisco County. Defendant ESSEX
22 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
23 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
24 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
25 Defendant ESSEX PROPERTY TRUST, INC.

26 38. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
27 owns and operates an apartment complex with 216 units doing business as “Bernardo Crest” generally
28

1 located at 11820 Paseo Lucido San Diego, CA 92128 within San Diego County. Defendant BEX
2 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
3 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
4 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
5 Defendant ESSEX PORTFOLIO, L.P.

6 39. Defendant ESSEX CAL-WA, L.P. is a California Limited Partnership, which owns and
7 operates an apartment complex with 120 units doing business as “Bonita Cedars” generally located at
8 5155 Cedarwood Rd Bonita, CA 91902 within San Deigo County. Defendant ESSEX CAL-WA, L.P.
9 lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent
10 for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO,
11 CA 94403. Defendant ESSEX CAL-WA, L.P. operates in a partnership with Defendants ESSEX SPE,
12 LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

13 40. Defendant ESSEX TREETOPS, L.P. is a California Limited Partnership, which owns
14 and operates an apartment complex with 172 units doing business as “Boulevard” generally located at
15 40001 Fremont Blvd Fremont, CA 94538 within Alameda County. Defendant ESSEX TREETOPS,
16 L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
17 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
18 MATEO, CA 94403. Defendant ESSEX TREETOPS, L.P. operates in a partnership with Defendants
19 ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

20 41. Defendant ESSEX BRIARWOOD, L.P. is a California Limited Partnership, which
21 owns and operates an apartment complex with 160 units doing business as “Briarwood” generally
22 located at 4200 Bay St Fremont, CA 94538 within Alameda County. Defendant ESSEX
23 BRIARWOOD, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
24 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
25 200 SAN MATEO, CA 94403. Defendant ESSEX BRIARWOOD, L.P. operates in a partnership with
26 Defendants WESCO GP, LLC; ESSEX WESCO, L.P.; and ESSEX MANAGEMENT
27 CORPORATRION.
28

1 42. Defendant ESSEX BRIDGEPORT, L.P. is a California Limited Partnership, which
2 owns and operates an apartment complex with 184 units doing business as “Bridgeport” generally
3 located at 36826 Cherry St Newark, CA 94560 within Alameda County. Defendant ESSEX
4 BRIDGEPORT, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
5 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
6 200 SAN MATEO, CA 94403. Defendant ESSEX BRIDGEPORT, L.P. operates in a partnership with
7 Defendants BEX II GP, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

8 43. Defendant WESCO IV, LLC is a Delaware Limited Liability Company, which owns
9 and operates an apartment complex with 188 units doing business as “Bridgeport Coast” generally
10 located at 24100 Newhall Ranch Road Santa Clarita, CA 91355 within Los Angeles County. Defendant
11 WESCO IV, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its
12 registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200
13 SAN MATEO, CA 94403. Defendant WESCO IV, LLC operates in a partnership with Defendant
14 ESSEX WESCO IV, LLC.

15 44. Defendant WC BRIO APARTMENTS LLC is a Delaware Limited Liability Company,
16 which owns and operates an apartment complex with 300 units doing business as “Brio” generally
17 located at 161 N Civic Dr. Walnut Creek, CA 94596 within Contra Costa County. Defendant WC
18 BRIO APARTMENTS LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
19 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
20 PLACE STE 200 SAN MATEO, CA 94403. Defendant WC BRIO APARTMENTS LLC operates in
21 a partnership with Defendant SAC REDWOOD CITY APARTMENTS LLC.

22 45. Defendant ESSEX CAL-WA, L.P. is a California Limited Partnership, which owns and
23 operates an apartment complex with 188 units doing business as “Bristol Commons” generally located
24 at 732 E. Evelyn Ave Sunnyvale, CA 94086 within Santa Clara County. Defendant ESSEX CAL-WA,
25 L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
26 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
27 MATEO, CA 94403. Defendant ESSEX CAL-WA, L.P. operates in a partnership with Defendants
28

1 ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

2 46. Defendant THE OAKBROOK COMPANY is an Ohio Limited Partnership, which owns
3 and operates an apartment complex with 170 units doing business as “Brookside Oaks” generally
4 located at 1651 Belleville Way Sunnyvale, CA 94087 within Santa Clara County. Defendant THE
5 OAKBROOK COMPANY lists its business address as 42 EAST GAY STREET COLUMBUS, OH
6 43215. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
7 PLACE STE 200 SAN MATEO, CA 94403. Defendant THE OAKBROOK COMPANY operates in
8 a partnership with Defendants ESSEX MANAGEMENT CORPORATION.

9 47. Defendant ESSEX BUNKER HILL, L.P. is a California Limited Partnership, which
10 owns and operates an apartment complex with 456 units doing business as “Bunker Hill” generally
11 located at 234 S Figueroa St Los Angeles, CA 90012 within Los Angeles County. Defendant ESSEX
12 BUNKER HILL, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
13 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
14 200 SAN MATEO, CA 94403. Defendant ESSEX BUNKER HILL, L.P. operates in a partnership
15 with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST,
16 INC.

17 48. Defendant ESSEX CAMARILLO, L.P. is a California Limited Partnership, which owns
18 and operates an apartment complex with 564 units doing business as “Camarillo Oaks” generally
19 located at 921 Paseo Camarillo Camarillo, CA 93010 within Ventura County. Defendant ESSEX
20 CAMARILLO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
21 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
22 200 SAN MATEO, CA 94403. Defendant ESSEX CAMARILLO, L.P. operates in a partnership with
23 Defendant ESSEX CAMARILLO CORPORATION.

24 49. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
25 owns and operates an apartment complex with 320 units doing business as “Cambridge Park” generally
26 located at 3394 Daley Center Drive San Diego, CA 92123 within San Diego County. Defendant BEX
27 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
28

1 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
2 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
3 Defendant ESSEX PORTFOLIO, L.P.

4 50. Defendant ESSEX CAMINO RUIZ APARTMENTS, L.P. is a California Limited
5 Partnership, which owns and operates an apartment complex with 159 units doing business as “Camino
6 Ruiz Square” generally located at 105 Camino Ruiz Ste 21 Camarillo, CA 93012 within Ventura
7 County. Defendant ESSEX CAMINO RUIZ APARTMENTS, L.P. lists its business address as 1100
8 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE
9 MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX
10 CAMINO RUIZ APARTMENTS, L.P. operates in a partnership with Defendants EMC SPE, LLC;
11 ESSEX MANAGEMENT CORPORATION.

12 51. Defendant ESSEX CANYON OAKS APARTMENTS, L.P. is a California Limited
13 Partnership, which owns and operates an apartment complex with 250 units doing business as “Canyon
14 Oaks” generally located at 1 Amberstone Ln San Ramon, CA 94582 within Contra Costa County.
15 Defendant ESSEX CANYON OAKS APARTMENTS, L.P. lists its business address as 1100 PARK
16 PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE
17 MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX
18 CANYON OAKS APARTMENTS, L.P. operates in a partnership with Defendants ESSEX SPE, LLC;
19 ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

20 52. Defendant WESTERN-SEVEN TREES INVESTORS, is a California Limited
21 Partnership, which owns and operates an apartment complex with 102 units doing business as “Capri
22 at Sunny Hills” generally located at 2341 Daphne Pl Fullerton, CA 92833 within Orange County.
23 Defendant WESTERN-SEVEN TREES INVESTORS, lists its business address as 1100 PARK PL
24 STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON
25 located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant WESTERN-SEVEN
26 TREES INVESTORS, operates in a partnership with Defendants ESSEX MANAGEMENT
27 CORPORATION.
28

1 53. Defendant BRE-FMCA, LLC is a Delaware Limited Liability Company, which owns
2 and operates an apartment complex with 348 units doing business as “Carmel Creek” generally located
3 at 11724 Carmel Creek Road San Diego, CA 92130 within San Diego County. Defendant BRE-FMCA,
4 LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
5 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
6 MATEO, CA 94403. Defendant BRE-FMCA, LLC operates in a partnership with Defendant BEX
7 PORTFOLIO, LLC.

8 54. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
9 owns and operates an apartment complex with 356 units doing business as “Carmel Landing” generally
10 located at 11505 Windcrest Lane San Diego, CA 92128 within San Diego County. Defendant BEX
11 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
12 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
13 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
14 Defendants ESSEX PORTFOLIO, L.P.

15 55. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
16 owns and operates an apartment complex with 246 units doing business as “Carmel Summit” generally
17 located at 11795 Stoney Peak Drive San Diego, CA 92128 within San Diego County. Defendant BEX
18 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
19 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
20 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
21 Defendant ESSEX PORTFOLIO, L.P.

22 56. Defendant ESSEX CATALINA GARDENS, LLC is a Delaware Limited Liability
23 Company, which owns and operates an apartment complex with 128 units doing business as “Catalina
24 Gardens” generally located at 333 South Catalina Street Los Angeles, CA 90020 within Los Angeles
25 County. Defendant ESSEX CATALINA GARDENS, LLC lists its business address as 1100 PARK
26 PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE
27 MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX
28

1 CATALINA GARDENS, LLC operates in a partnership with Defendant ESSEX PORTFOLIO, L.P.

2 57. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
3 and operates an apartment complex with 239 units doing business as “CBC and The Sweeps” generally
4 located at 6721 El Colegio Rd Goleta, CA 93117 within Santa Barbara County. Defendant ESSEX
5 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
6 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
7 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
8 Defendant ESSEX PROPERTY TRUST, INC.

9 58. Defendant ESSEX BLUFFS, L.P., is a California Limited Partnership, which owns and
10 operates an apartment complex with 224 units doing business as “CentrePointe” generally located at
11 6540 Friars Rd San Diego, CA 92108 within San Diego County. Defendant ESSEX BLUFFS, L.P.,
12 lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent
13 for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO,
14 CA 94403. Defendant ESSEX BLUFFS, L.P., operates in a partnership with Defendants ESSEX SPE,
15 LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

16 59. Defendant NEW CENTURY TOWERS, LLC is a Delaware Limited Liability
17 Company, which owns and operates an apartment complex with 376 units doing business as “Century
18 Towers” generally located at 1729 N. First Street San Jose, CA 95112 within Santa Clara County.
19 Defendant NEW CENTURY TOWERS, LLC lists its business address as 1100 PARK PL STE 200
20 SAN MATEO, CA 94403. Its registered agent for service of process is NATIONAL REGISTERED
21 AGENTS, INC. located at 330 N BRAND BLVD STE 700 GLENDALE, CA 91203. Defendant NEW
22 CENTURY TOWERS, LLC operates in a partnership with Defendants ESSEX PORTFOLIO, L.P.

23 60. Defendant ESSEX CHESTNUT APARTMENTS, L.P. is a California Limited
24 Partnership, which owns and operates an apartment complex with 96 units doing business as “Chestnut
25 Street Apartments” generally located at 143 Chestnut St Santa Cruz, CA 95060 within Santa Cruz
26 County. Defendant ESSEX CHESTNUT APARTMENTS, L.P. lists its business address as 1100
27 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE
28

1 MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX
2 CHESTNUT APARTMENTS, L.P. operates in a partnership with Defendants ESSEX SPE, LLC;
3 ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

4 61. Defendant WESCO IV, LLC is a Delaware Limited Liability Company, which owns
5 and operates an apartment complex with 192 units doing business as “City Centre” generally located
6 at 22800 Meridian Drive Hayward, CA 94541 within Alameda County. Defendant WESCO IV, LLC
7 lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent
8 for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO,
9 CA 94403. Defendant WESCO IV, LLC operates in a partnership with Defendant ESSEX WESCO
10 IV LLC.

11 62. Defendant ESSEX CITY VIEW, L.P. is a California Limited Partnership, which owns
12 and operates an apartment complex with 572 units doing business as “City View” generally located at
13 25200 Carlos Bee Blvd. Hayward, CA 94542 within Alameda County. Defendant ESSEX CITY
14 VIEW, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its
15 registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200
16 SAN MATEO, CA 94403. Defendant ESSEX CITY VIEW, L.P. operates in a partnership with
17 Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

18 63. Defendant ESSEX DUBLIN OWNER, L.P. is a California Limited Partnership, which
19 owns and operates an apartment complex with 309 units doing business as “Connolly Station” generally
20 located at 7550 St Patrick Way Dublin, CA 94568 within Alameda County. Defendant ESSEX
21 DUBLIN OWNER, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
22 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
23 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX DUBLIN OWNER, L.P. operates in
24 a partnership with Defendants ESSEX DUBLIN GP, L.P.; and ESSEX MANAGEMENT
25 CORPORATION.
26

27 64. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
28 owns and operates an apartment complex with 308 units doing business as “Cortesia” generally located

1 at 29752 Melinda Road Rancho Santa Margarita, 92688 within Orange County. Defendant BEX
2 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
3 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
4 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
5 Defendant ESSEX PORTFOLIO, L.P.

6 65. Defendant ESSEX JMS ACQUISITION, L.P. is a California Limited Partnership,
7 which owns and operates an apartment complex with 180 units doing business as “Country Villas”
8 generally located at 283 Douglas Dr Oceanside, CA 92058 within San Diego County. Defendant
9 ESSEX JMS ACQUISITION, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO,
10 CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
11 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX JMS ACQUISITION, L.P. operates
12 in a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX
13 PROPERTY TRUST, INC.

14 66. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
15 owns and operates an apartment complex with 400 units doing business as “Crow Canyon” generally
16 located at 1700 Promontory Terrace San Ramon, CA 94583 within Contra Costa County. Defendant
17 BEX PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
18 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
19 PLACE STE 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a
20 partnership with Defendants ESSEX PORTFOLIO, L.P.

21 67. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
22 owns and operates an apartment complex with 171 units doing business as “Deer Valley” generally
23 located at 2500 Deer Valley Road San Rafael, CA 94903 within Marin County. Defendant BEX
24 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
25 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
26 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
27 Defendant ESSEX PORTFOLIO, L.P.
28

1 68. Defendant EMERALD POINTE APARTMENTS, LLC is a Delaware Limited Liability
2 Company, which owns and operates an apartment complex with 160 units doing business as “Emerald
3 Pointe” generally located at 2840 S. Diamond Bar Blvd Diamond Bar, CA 91765 within Los Angeles
4 County. Defendant EMERALD POINTE APARTMENTS, LLC lists its business address as 1100
5 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE
6 MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant
7 EMERALD POINTE APARTMENTS, LLC operates in a partnership with Defendants BEX
8 PORTFOLIO, LLC.

9 69. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
10 and operates an apartment complex with 144 units doing business as “Emerson Valley Village”
11 generally located at 12000 Riverside Drive Los Angeles, CA 91607 within Los Angeles County.
12 Defendant ESSEX PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN
13 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
14 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates
15 in a partnership with Defendant ESSEX PROPERTY TRUST, INC.

16 70. Defendant ESSEX EMERYVILLE OWNER, L.P. is a California Limited Partnership,
17 which owns and operates an apartment complex with 190 units doing business as “Emme” generally
18 located at 6350 Christie Ave Emeryville, CA 94608 within Alameda County. Defendant ESSEX
19 EMERYVILLE OWNER, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO,
20 CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
21 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX EMERYVILLE OWNER, L.P.
22 operates in a partnership with Defendants ESSEX EMERYVILLE GP, L.P.; and ESSEX
23 MANAGEMENT CORPORATION.

24 71. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
25 and operates an apartment complex with 183 units doing business as “Enso” generally located at 175
26 Baypointe Parkway San Jose, CA 95134 within Santa Clara County. Defendant ESSEX PORTFOLIO,
27 L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
28

1 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
2 MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with Defendant
3 ESSEX PROPERTY TRUST, INC.

4 72. Defendant ESSEX CADENCE OWNER, L.P. is a California Limited Partnership,
5 which owns and operates an apartment complex with 769 units doing business as “Epic” generally
6 located at 600 Epic Way San Jose, CA 95134 within Santa Clara County. Defendant ESSEX
7 CADENCE OWNER, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
8 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
9 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX CADENCE OWNER, L.P. operates
10 in a partnership with Defendant ESSEX CADENCE GP, L.P.; and ESSEX MANAGEMENT
11 CORPORATION.

12 73. Defendant ESSEX ESPLANADE, L.P. is a California Limited Partnership, which owns
13 and operates an apartment complex with 278 units doing business as “Esplanade” generally located at
14 350 E. Taylor St San Jose, CA 95112 within Santa Clara County. Defendant ESSEX ESPLANADE,
15 L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
16 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
17 MATEO, CA 94403. Defendant ESSEX ESPLANADE, L.P. operates in a partnership with Defendants
18 ESSEX NBN SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

19 74. Defendant BEXAEW ESPLANADE, LP is a California Limited Partnership, which
20 owns and operates an apartment complex with 616 units doing business as “Esplanade” generally
21 located at 10201 Camino Ruiz Ste 182-183, San Diego, CA 92126 within San Deigo County.
22 Defendant BEXAEW ESPLANADE, LP lists its business address as 1100 PARK PL STE 200 SAN
23 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
24 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant BEXAEW ESPLANADE, LP operates
25 in a partnership with Defendants BEXAEW GP, LLC; ESSEX BEXAEW, LLC; and ESSEX
26 PORTFOLIO, L.P.

27 75. Defendant ESSEX SKYLINE, L.P. is a California Limited Partnership, which owns and
28

1 operates an apartment complex with 350 units doing business as “Essex Skyline” generally located at
2 15 MacArthur Pl Santa Ana, CA 92707 within Orange County. Defendant ESSEX SKYLINE, L.P.
3 lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent
4 for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO,
5 CA 94403. Defendant ESSEX SKYLINE, L.P. operates in a partnership with Defendants ESSEX SPE,
6 LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

7
8 76. Defendant FAIRHAVEN APARTMENT FUND, LTD. is a California Limited
9 Partnership, which owns and operates an apartment complex with 164 units doing business as
10 “Fairhaven Apartments” generally located at 1300 East Fairhaven Santa Ana, CA 92705 within Orange
11 County. Defendant FAIRHAVEN APARTMENT FUND, LTD. lists its business address as 1100
12 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE
13 MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant
14 FAIRHAVEN APARTMENT FUND, LTD. operates in a partnership with Defendant ESSEX
15 MANAGEMENT CORPORATION.

16 77. Defendant ESSEX PORTFOLIO, L.P. is a California limited Partnership, which owns
17 and operates an apartment complex with 132 units doing business as “Foothill Gardens” generally
18 located at 1110 Harness Dr San Ramon, CA 94583 within Contra Costa County. Defendant ESSEX
19 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
20 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
21 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
22 Defendant ESSEX PROPERTY TRUST, INC.

23 78. Defendant ESSEX FORM 15, L.P. is a California Limited Partnership, which owns and
24 operates an apartment complex with 242 units doing business as “Form 15” generally located at 1450
25 Market St San Diego, CA 92101 within San Diego County. Defendant ESSEX FORM 15, L.P. lists
26 its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for
27 service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA
28 94403. Defendant ESSEX FORM 15, L.P. operates in a partnership with Defendants ESSEX SPE,

1 LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

2 79. Defendant BEX FMCA, LLC is a Delaware Limited Liability Company, which owns
3 and operates an apartment complex with 490 units doing business as “Foster's Landing” generally
4 located at 700 Bounty Drive Foster City, CA 94404 within San Mateo County. Defendant BEX FMCA,
5 LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
6 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
7 MATEO, CA 94403. Defendant BEX FMCA, LLC operates in a partnership with Defendant ESSEX
8 PORTFOLIO, L.P.

9 80. Defendant ESSEX FOUNTAIN PARK APARTMENTS, L.P. is a California Limited
10 Partnership, which owns and operates an apartment complex with 705 units doing business as
11 “Fountain Park” generally located at 13141 Fountain Park Dr Playa Vista, CA 90094 within Los
12 Angeles County. Defendant ESSEX FOUNTAIN PARK APARTMENTS, L.P. lists its business
13 address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of
14 process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.
15 Defendant ESSEX FOUNTAIN PARK APARTMENTS, L.P. operates in a partnership with
16 Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

17 81. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
18 and operates an apartment complex with 226 units doing business as “Fountains at River Oaks”
19 generally located at 373 River Oaks Circle San Jose, CA 95134 within Santa Clara County. Defendant
20 ESSEX PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
21 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
22 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a
23 partnership with Defendants ESSEX PROPERTY TRUST, INC.

24 82. Defendant ESSEX BERKELEY 4TH STREET, L.P. is a California Limited
25 Partnership, which owns and operates an apartment complex with 171 units doing business as “Fourth
26 & U” generally located at 2020 Fourth St Berkeley, CA 94710 within Alameda County. Defendant
27 ESSEX BERKELEY 4TH STREET, L.P. lists its business address as 1100 PARK PL STE 200 SAN
28

1 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
2 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX BERKELEY 4TH STREET,
3 L.P. operates in a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and
4 ESSEX PROPERTY TRUST, INC.

5 83. Defendant ESSEX FOX PLAZA, L.P. is a California Limited Partnership, which owns
6 and operates an apartment complex with 445 units doing business as “Fox Plaza” generally located at
7 1390 Market St Ste 107 San Francisco, CA 94102 within San Francisco County. Defendant ESSEX
8 FOX PLAZA, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
9 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
10 200 SAN MATEO, CA 94403. Defendant ESSEX FOX PLAZA, L.P. operates in a partnership with
11 Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

12 84. Defendant ESSEX GAS COMPANY LOFTS, L.P. is a California Limited Partnership,
13 which owns and operates an apartment complex with 251 units doing business as “Gas Company Lofts”
14 generally located at 810 South Flower Street Los Angeles, CA 90017 within Los Angeles County.
15 Defendant ESSEX GAS COMPANY LOFTS, L.P. lists its business address as 1100 PARK PL STE
16 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON
17 located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX GAS
18 COMPANY LOFTS, L.P. operates in a partnership with Defendants WESCO III GP, LLC; ESSEX
19 WESCO III, L.P.; and ESSEX MANAGEMENT CORPORATION.

20 85. Defendant ESSEX HAVER HILL, L.P. is a California Limited Partnership, which owns
21 and operates an apartment complex with 264 units doing business as “Haver Hill” generally located at
22 3100 East Yorba Linda Boulevard Fullerton, CA 92831 within Orange County. Defendant ESSEX
23 HAVER HILL, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
24 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
25 200 SAN MATEO, CA 94403. Defendant ESSEX HAVER HILL, L.P. operates in a partnership with
26 Defendants WESCO III GP, LLC; ESSEX WESCO III, L.P.; and ESSEX MANAGEMENT
27 CORPORATION.
28

1 86. Defendant WESTERN RIVIERA INVESTORS is a California Limited Partnership,
2 which owns and operates an apartment complex with 255 units doing business as “Highridge” generally
3 located at 28125 Peacock Ridge Dr Rancho Palos Verdes, CA 90275 within Los Angeles County.
4 Defendant WESTERN RIVIERA INVESTORS lists its business address as 1100 PARK PL STE 200
5 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located
6 at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant WESTERN RIVIERA
7 INVESTORS operates in a partnership with Defendants ESSEX MANAGEMENT CORPORATION.

8 87. Defendant ESSEX HILLCREST PARK, L.P. is a California Limited Partnership, which
9 owns and operates an apartment complex with 608 units doing business as “Hillcrest Park” generally
10 located at 1800 W Hillcrest Dr Newbury Park, CA 91320 within Ventura County. Defendant ESSEX
11 HILLCREST PARK, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
12 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
13 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX HILLCREST PARK, L.P. operates
14 in a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX
15 PROPERTY TRUST, INC.

16 88. Defendant ESSEX HILLSBOROUGH PARK, L.P. is a California Limited Partnership,
17 which owns and operates an apartment complex with 235 units doing business as “Hillsborough Park”
18 generally located at 1501 S Beach Blvd La Habra, CA 90631 within Orange County. Defendant
19 ESSEX HILLSBOROUGH PARK, L.P. lists its business address as 1100 PARK PL STE 200 SAN
20 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
21 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX HILLSBOROUGH PARK,
22 L.P. operates in a partnership with Defendants BEX II GP, LLC.

23 89. Defendant ESSEX HILLSDALE GARDEN APARTMENTS, L.P. is a California
24 Limited Partnership, which owns and operates an apartment complex with 697 units doing business as
25 “Hillsdale Garden” generally located at 3500 Edison St San Mateo, CA 94403 within San Mateo
26 County. Defendant ESSEX HILLSDALE GARDEN APARTMENTS, L.P. lists its business address
27 as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is
28

1 ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant
2 ESSEX HILLSDALE GARDEN APARTMENTS, L.P. operates in a partnership with Defendants
3 ESSEX HGA, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

4 90. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
5 and operates an apartment complex with 108 units doing business as “Hope Ranch” generally located
6 at 3999 Via Lucero Santa Barbara, CA 93110 within Santa Barbara County. Defendant ESSEX
7 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
8 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
9 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
10 Defendants ESSEX PROPERTY TRUST, INC.

11 91. Defendant ESSEX HUNTINGTON BREAKERS, L.P. is a California Limited
12 Partnership, which owns and operates an apartment complex with 342 units doing business as
13 “Huntington Breakers” generally located at 21270 Beach Blvd Huntington Beach, CA 92648 within
14 Orange County. Defendant ESSEX HUNTINGTON BREAKERS, L.P. lists its business address as
15 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is
16 ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant
17 ESSEX HUNTINGTON BREAKERS, L.P. operates in a partnership with Defendants ESSEX SPE,
18 LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

19 92. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
20 owns and operates an apartment complex with 150 units doing business as “Lafayette Highlands”
21 generally located at 1076 Carol Lane Lafayette, CA 94549 within Contra Costa County. Defendant
22 BEX PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
23 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
24 PLACE STE 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a
25 partnership with Defendants ESSEX PORTFOLIO, L.P.

26 93. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
27 owns and operates an apartment complex with 308 units doing business as “Lakeshore Landing”
28

1 generally located at 2717 South Norfolk Street San Mateo, CA 94403 within San Mateo County.
2 Defendant BEX PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN
3 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
4 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in
5 a partnership with Defendants ESSEX PORTFOLIO, L.P.

6 94. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
7 and operates an apartment complex with 336 units doing business as “Lawrence Station” generally
8 located at 1271 Lawrence Station Road Sunnyvale, CA 94089 within Santa Clara County. Defendant
9 ESSEX PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
10 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
11 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a
12 partnership with Defendants ESSEX PROPERTY TRUST, INC.

13 95. Defendant ESSEX LE PARC, L.P. is a California Limited Partnership, which owns and
14 operates an apartment complex with 140 units doing business as “Le Parc” generally located at 440 N
15 Winchester Blvd Santa Clara, CA 95050 within Santa Clara County. Defendant ESSEX LE PARC,
16 L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
17 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
18 MATEO, CA 94403. Defendant ESSEX LE PARC, L.P. operates in a partnership with Defendants
19 ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

20 96. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
21 and operates an apartment complex with 118 units doing business as “Lofts at Pinehurst, The” generally
22 located at 1021 Scandia Ave Ventura, CA 93004 within Ventura County. Defendant ESSEX
23 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
24 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
25 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
26 Defendants ESSEX PROPERTY TRUST, INC.

27 97. Defendant WESTERN MOUNTAIN VIEW II INVESTORS, is a California Limited
28

1 Partnership, which owns and operates an apartment complex with 156 units doing business as
2 “Magnolia Square” generally located at 107 S Mary Ave Sunnyvale, CA 94086 within Santa Clara
3 County. Defendant WESTERN MOUNTAIN VIEW II INVESTORS, lists its business address as 1100
4 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE
5 MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant
6 WESTERN MOUNTAIN VIEW II INVESTORS, operates in a partnership with Defendants ESSEX
7 MANAGEMENT CORPORATION

8 98. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
9 and operates an apartment complex with 60 units doing business as “Marbella” generally located at
10 600 S Detroit St Los Angeles, CA 90036 within Los Angeles County. Defendant ESSEX
11 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
12 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
13 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
14 Defendants ESSEX PROPERTY TRUST, INC.

15 99. Defendant ESSEX MARBRISA LONG BEACH, L.P. is a California Limited
16 Partnership, which owns and operates an apartment complex with 202 units doing business as
17 “Marbrisa” generally located at 1809 Termino Ave Long Beach, CA 90815 within Los Angeles
18 County. Defendant ESSEX MARBRISA LONG BEACH, L.P. lists its business address as 1100 PARK
19 PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE
20 MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX
21 MARBRISA LONG BEACH, L.P. operates in a partnership with Defendants ESSEX SPE, LLC;
22 ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

23 100. Defendant ESSEX MARINA CITY CLUB, L.P. is a California Limited Partnership,
24 which owns and operates an apartment complex with 101 units doing business as “Marina City Club”
25 generally located at 4333 Admiralty Way Ste 10 Marina Del Rey, CA 90292 within Los Angeles
26 County. Defendant ESSEX MARINA CITY CLUB, L.P. lists its business address as 1100 PARK PL
27 STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON
28

1 located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX MARINA
2 CITY CLUB, L.P. operates in a partnership with Defendants ESSEX MCC, LLC; ESSEX
3 PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

4 101. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
5 and operates an apartment complex with 292 units doing business as “Marina Cove” generally located
6 at 3480 Granada Ave Santa Clara, CA 95051 within Santa Clara County. Defendant ESSEX
7 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
8 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
9 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
10 Defendants ESSEX PROPERTY TRUST, INC.

11 102. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
12 and operates an apartment complex with 105 units doing business as “Mariner's Place” generally
13 located at 711 S B Street Ste 110 Oxnard, CA 93030 within Ventura County. Defendant ESSEX
14 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
15 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
16 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
17 Defendants ESSEX PROPERTY TRUST, INC.

18 103. Defendant JAPANTOWN ASSOCIATES LLC is a Delaware Limited Liability
19 Company, which owns and operates an apartment complex with 166 units doing business as “Marquis”
20 generally located at 817 N 10th St San Jose, CA 95112 within Santa Clara County. Defendant
21 JAPANTOWN ASSOCIATES LLC lists its business address as 1100 PARK PL STE 200 SAN
22 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
23 PARK PLACE STE 200 SAN MATEO, CA 94403.

24 104. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
25 and operates an apartment complex with 360 units doing business as “MB 360” generally located at
26 1200 4th Street San Francisco, CA 94158 within San Francisco County. Defendant ESSEX
27 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
28

1 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
2 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
3 Defendants ESSEX PROPERTY TRUST, INC.

4 105. Defendant ESSEX MEADOWOOD, L.P. is a California Limited Partnership, which
5 owns and operates an apartment complex with 320 units doing business as “Meadowood” generally
6 located at 1733 Cochran St Simi Valley, CA 93065 within Ventura County. Defendant ESSEX
7 MEADOWOOD, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
8 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
9 200 SAN MATEO, CA 94403. Defendant ESSEX MEADOWOOD, L.P. operates in a partnership
10 with Defendants BEX II GP, LLC.

11 106. Defendant ESSEX MERIDIAN, LLC is a Delaware Limited Liability Company, which
12 owns and operates an apartment complex with 218 units doing business as “Meridian at Midtown”
13 generally located at 1432 West San Carlos Street San Jose, CA 95126 within Santa Clara County.
14 Defendant ESSEX MERIDIAN, LLC lists its business address as 1100 PARK PL STE 200 SAN
15 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
16 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX MERIDIAN, LLC operates in
17 a partnership with Defendants ESSEX WESCO V, LLC.

18 107. Defendant ESSEX JMS ACQUISITION, L.P. is a California Limited Partnership,
19 which owns and operates an apartment complex with 133 units doing business as “Mesa Village”
20 generally located at 5265 Clairemont Mesa Blvd Clairemont, CA 92117 within San Diego County.
21 Defendant ESSEX JMS ACQUISITION, L.P. lists its business address as 1100 PARK PL STE 200
22 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located
23 at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX JMS ACQUISITION,
24 L.P. operates in a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and
25 ESSEX PROPERTY TRUST, INC.

26 108. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
27 and operates an apartment complex with 400 units doing business as “Mill Creek at Windermere”
28

1 generally located at 2100 Waterstone Pl San Ramon, CA 94582 within Contra Costa County.
2 Defendant ESSEX PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN
3 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
4 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates
5 in a partnership with Defendants ESSEX PROPERTY TRUST, INC.

6 109. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
7 and operates an apartment complex with 103 units doing business as “Mio” generally located at 688
8 N. 7th St San Jose, CA 95112 within Santa Clara County. Defendant ESSEX PORTFOLIO, L.P. lists
9 its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for
10 service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA
11 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with Defendants ESSEX
12 PROPERTY TRUST, INC.

13 110. Defendant ESSEX CAL-WA, L.P. is a California Limited Partnership, which owns and
14 operates an apartment complex with 354 units doing business as “Mira Monte” generally located at
15 10360 Maya Linda Rd Mira Mesa, CA 92126 within San Diego County. Defendant ESSEX CAL-
16 WA, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
17 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
18 MATEO, CA 94403. Defendant ESSEX CAL-WA, L.P. operates in a partnership with Defendants
19 ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

20 111. Defendant ESSEX MIRABELLA MARINA APARTMENTS, L.P. is a California
21 Limited Partnership, which owns and operates an apartment complex with 188 units doing business as
22 “Mirabella” generally located at 13701 Marina Point Dr. Marina Del Rey, CA 90292 within Los
23 Angeles County. Defendant ESSEX MIRABELLA MARINA APARTMENTS, L.P. lists its business
24 address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of
25 process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.
26 Defendant ESSEX MIRABELLA MARINA APARTMENTS, L.P. operates in a partnership with
27 Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.
28

1 112. Defendant ESSEX CAL-WA, L.P. is a California Limited Partnership, which owns and
2 operates an apartment complex with 282 units doing business as “Mission Hills” generally located at
3 264 Rancho del Oro Drive Oceanside, CA 92057 within San Diego County. Defendant ESSEX CAL-
4 WA, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
5 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
6 MATEO, CA 94403. Defendant ESSEX CAL-WA, L.P. operates in a partnership with Defendants
7 ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

8 113. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
9 owns and operates an apartment complex with 453 units doing business as “Mission Peaks” generally
10 located at 1401 Red Hawk Circle Fremont, CA 94538 within Alameda County. Defendant BEX
11 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
12 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
13 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
14 Defendants ESSEX PORTFOLIO, L.P.

15 114. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
16 owns and operates an apartment complex with 336 units doing business as “Mission Peaks II” generally
17 located at 39451 Gallaudet Drive Fremont, CA 94538 within Alameda County. Defendant BEX
18 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
19 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
20 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
21 Defendants ESSEX PORTFOLIO, L.P.

22 115. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
23 owns and operates an apartment complex with 472 units doing business as “Montanosa” generally
24 located at 11012 Camino Playa Carmel San Diego, CA 92124 within San Diego County. Defendant
25 BEX PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
26 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
27 PLACE STE 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a
28

1 partnership with Defendants ESSEX PORTFOLIO, L.P.

2 116. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
3 and operates an apartment complex with 390 units doing business as “Montclair” generally located at
4 450 N Mathilda Ave Sunnyvale, CA 94085 within Santa Clara County. Defendant ESSEX
5 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
6 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
7 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
8 Defendants ESSEX PROPERTY TRUST, INC.

9 117. Defendant PINE GROVE APARTMENT FUND, LTD. is a California Limited
10 Partnership, which owns and operates an apartment complex with 124 units doing business as “Montejo
11 Apartments” generally located at 12901 Dale St Garden Grove, CA 92841 within Orange County.
12 Defendant PINE GROVE APARTMENT FUND, LTD. lists its business address as 1100 PARK PL
13 STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON
14 located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant PINE GROVE
15 APARTMENT FUND, LTD. operates in a partnership with Defendants ESSEX MANAGEMENT
16 CORPORATION.

17 118. Defendant ESSEX MONTEREY VILLAS, L.P. is a California Limited Partnership,
18 which owns and operates an apartment complex with 122 units doing business as “Monterey Villas”
19 generally located at 1018 Kelp Ln Oxnard, CA 93035 within Ventura County. Defendant ESSEX
20 MONTEREY VILLAS, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
21 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
22 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX MONTEREY VILLAS, L.P. operates
23 in a partnership with Defendants ESSEX MONTEREY VILLAS, LLC; ESSEX PORTFOLIO, L.P.;
24 and ESSEX PROPERTY TRUST, INC.

25 119. Defendant ESSEX NOHO APARTMENTS, L.P. is a California Limited Partnership,
26 which owns and operates an apartment complex with 152 units doing business as “Muse” generally
27 located at 5251 Vineland Ave North Hollywood, CA 91601 within Los Angeles County. Defendant
28

1 ESSEX NOHO APARTMENTS, L.P. lists its business address as 1100 PARK PL STE 200 SAN
2 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
3 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX NOHO APARTMENTS, L.P.
4 operates in a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX
5 PROPERTY TRUST, INC.

6 120. Defendant SANTA CLARA SQUARE, LLC is a California Limited Liability
7 Company, which owns and operates an apartment complex with 476 units doing business as “Mylo”
8 generally located at 3710 El Camino Real Santa Clara, CA 95051 within Santa Clara County.
9 Defendant SANTA CLARA SQUARE, LLC lists its business address as 1100 PARK PL STE 200
10 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located
11 at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant SANTA CLARA SQUARE,
12 LLC operates in a partnership with Defendants ESSEX PORTFOLIO, L.P.

13 121. Defendant ESSEX PE LOFTS, L.P. is a California Limited Partnership, which owns
14 and operates an apartment complex with 314 units doing business as “Pacific Electric Lofts” generally
15 located at 610 S. Main Street Los Angeles, CA 90014 within Los Angeles County. Defendant ESSEX
16 PE LOFTS, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its
17 registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200
18 SAN MATEO, CA 94403. Defendant ESSEX PE LOFTS, L.P. operates in a partnership with
19 Defendants WESCO GP, LLC; ESSEX WESCO, L.P.; and ESSEX MANAGEMENT
20 CORPORATION.
21

22 122. Defendant GBR PALMA SORRENTO LLC is a Delaware Limited Liability Company,
23 which owns and operates an apartment complex with 1100 units doing business as “Palm Valley”
24 generally located at 250 Palm Valley Blvd San Jose, CA 95123 within Santa Clara County. Defendant
25 GBR PALMA SORRENTO LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO,
26 CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
27 PLACE STE 200 SAN MATEO, CA 94403. Defendant GBR PALMA SORRENTO LLC operates in
28 a partnership with Defendants PALM VALLEY ROLL-UP LLC.

1 123. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
2 and operates an apartment complex with 301 units doing business as “Paragon Apartments” generally
3 located at 3700 Beacon Avenue Fremont, CA 94538 within Alameda County. Defendant ESSEX
4 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
5 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
6 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
7 Defendants ESSEX PROPERTY TRUST, INC.

8 124. Defendant ESSEX PARK CATALINA, L.P. is a California Limited Partnership, which
9 owns and operates an apartment complex with 90 units doing business as “Park Catalina” generally
10 located at 690 S. Catalina Street Los Angeles, CA 90005 within Los Angeles County. Defendant
11 ESSEX PARK CATALINA, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO,
12 CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
13 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX PARK CATALINA, L.P. operates in
14 a partnership with Defendants ESSEX MANAGEMENT CORPORATION; and EMC SPE, LLC.

15 125. Defendant ESSEX COCHRAN, L.P. is a California Limited Partnership, which owns
16 and operates an apartment complex with 60 units doing business as “Park Place” generally located at
17 400 S. Detroit St Los Angeles, CA 90036 within Los Angeles County. Defendant ESSEX COCHRAN,
18 L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
19 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
20 MATEO, CA 94403. Defendant ESSEX COCHRAN, L.P. operates in a partnership with Defendants
21 ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

22 126. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
23 owns and operates an apartment complex with 320 units doing business as “Park Viridian” generally
24 located at 1515 E Katella Avenue Anaheim, CA 92805 within Orange County. Defendant BEX
25 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
26 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
27 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
28

1 Defendants ESSEX PORTFOLIO, L.P.

2 127. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
3 and operates an apartment complex with 126 units doing business as “Park West” generally located at
4 1201 Funston Ave San Francisco, CA 94122 within San Francisco County. Defendant ESSEX
5 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
6 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
7 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
8 Defendants ESSEX PROPERTY TRUST, INC.

9 128. Defendant BEXAEW PARKSIDE COURT, LP is a California Limited Partnership,
10 which owns and operates an apartment complex with 210 units doing business as “Parkside Court”
11 generally located at 4200 West 1st Street Santa Ana, CA 92703 within Orange County. Defendant
12 BEXAEW PARKSIDE COURT, LP lists its business address as 1100 PARK PL STE 200 SAN
13 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
14 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant BEXAEW PARKSIDE COURT, LP
15 operates in a partnership with Defendants BEXAEW GP, LLC; ESSEX BEXAEW, LLC; and ESSEX
16 PROPERTY TRUST, INC.
17

18 129. Defendant MONARCH BUENA VISTA BORROWER, LLC is a Delaware Limited
19 Liability Company, which owns and operates an apartment complex with 179 units doing business as
20 “Passage Buena Vista” generally located at 740 Paseo Buena Vista Vista, CA 92084 within San Diego
21 County. Defendant MONARCH BUENA VISTA BORROWER, LLC lists its business address as
22 1100 PARK PLACE, SUITE 200 SAN MATEO, CA 94403. Its registered agent for service of process
23 is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant
24 MONARCH BUENA VISTA BORROWER, LLC operates in a partnership with Defendants ESSEX
25 BUENA VISTA, LLC

26 130. Defendant SP/P CHANNEL POINT, L.L.C. is a Delaware Limited Liability Company,
27 which owns and operates an apartment complex with 296 units doing business as “Pathways at Bixby
28 Village” generally located at 5980 Bixby Village Dr Long Beach, CA 90803 within Los Angeles

1 County. Defendant SP/P CHANNEL POINT, L.L.C. lists its business address as 801 GRAND AVE
2 DES MOINES, IA 50392. Its registered agent for service of process is C T CORPORATION SYSTEM
3 located at 330 N BRAND BLVD STE 700 GLENDALE, CA 91203.

4 131. Defendant GR BLOCK B LLC is a Delaware Limited Liability Company, which owns
5 and operates an apartment complex with 269 units doing business as “Patina at Midtown” generally
6 located at 355 Sunol St San Jose, CA 95126 within Santa Clara County. Defendant GR BLOCK B
7 LLC lists its business address as 1100 PARK PLACE, SUITE 200 SAN MATEO, CA 94403. Its
8 registered agent for service of process is MICHAEL R. VAN EVERY located at 84 W. SANTA
9 CLARA STREET, SUITE 600 SAN JOSE, CA 95113. Defendant GR BLOCK B LLC operates in a
10 partnership with Defendants ESSEX PORTFOLIO, L.P.

11 132. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
12 and operates an apartment complex with 28 units doing business as “Pinehurst” generally located at
13 3980 Telegraph Rd Ventura, CA 93003 within Ventura County. Defendant ESSEX PORTFOLIO, L.P.
14 lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent
15 for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO,
16 CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with Defendants ESSEX
17 PROPERTY TRUST, INC.

18 133. Defendant BRE-FMCA, LLC is a Delaware Limited Liability Company, which owns
19 and operates an apartment complex with 192 units doing business as “Pinnacle at Fullerton” generally
20 located at 229 East Commonwealth Ave Fullerton, CA 92832 within Orange County. Defendant BRE-
21 FMCA, LLC lists its business address as 1100 PARK PLACE, SUITE 200 SAN MATEO, CA 94403.
22 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
23 200 SAN MATEO, CA 94403. Defendant BRE-FMCA, LLC operates in a partnership with
24 Defendants BEX PORTFOLIO, LLC.

25 134. Defendant BRE-FMCA, LLC is a Delaware Limited Liability Company, which owns
26 and operates an apartment complex with 253 units doing business as “Pinnacle at MacArthur Place”
27 generally located at 31 E. MacArthur Crescent Santa Ana, CA 92707 within Orange County.
28

1 Defendant BRE-FMCA, LLC lists its business address as 1100 PARK PLACE, SUITE 200 SAN
2 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
3 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant BRE-FMCA, LLC operates in a
4 partnership with Defendants BEX PORTFOLIO, LLC.

5 135. Defendant BRE-FMCA, LLC is a Delaware Limited Liability Company, which owns
6 and operates an apartment complex with 364 units doing business as “Pinnacle at Otay Ranch I & II”
7 generally located at 1310 Santa Rita Drive Chula Vista, CA 91913 within San Diego County.
8 Defendant BRE-FMCA, LLC lists its business address as 1100 PARK PLACE, SUITE 200 SAN
9 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
10 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant BRE-FMCA, LLC operates in a
11 partnership with Defendants BEX PORTFOLIO, LLC.

12 136. Defendant BRE-FMCA, LLC is a Delaware Limited Liability Company, which owns
13 and operates an apartment complex with 362 units doing business as “Pinnacle at Talega” generally
14 located at 120 Calle Amistad San Clemente, CA 92673 within Orange County. Defendant BRE-
15 FMCA, LLC lists its business address as 1100 PARK PLACE, SUITE 200 SAN MATEO, CA 94403.
16 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
17 200 SAN MATEO, CA 94403. Defendant BRE-FMCA, LLC operates in a partnership with
18 Defendants BEX PORTFOLIO, LLC.

19 137. Defendant ESSEX THE POINTE, L.P. is a California Limited Partnership, which owns
20 and operates an apartment complex with 116 units doing business as “Pointe at Cupertino” generally
21 located at 19920 Olivewood St Cupertino, CA 95014 within Santa Clara County. Defendant ESSEX
22 THE POINTE, L.P. lists its business address as 1100 PARK PLACE, SUITE 200 SAN MATEO, CA
23 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
24 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX THE POINTE, L.P. operates in a
25 partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY
26 TRUST, INC.

27 138. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
28

1 owns and operates an apartment complex with 264 units doing business as “Radius” generally located
2 at 620 Veterans Blvd. Redwood City, CA 94063 within San Mateo County. Defendant BEX
3 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
4 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
5 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
6 Defendants ESSEX PORTFOLIO, L.P.

7 139. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
8 owns and operates an apartment complex with 100 units doing business as “Reed Square” generally
9 located at 1070 Reed Avenue Sunnyvale, CA 94086 within Santa Clara County. Defendant BEX
10 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
11 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
12 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
13 Defendants ESSEX PORTFOLIO, L.P.

14 140. Defendant WESCO III BEX, LLC is a Delaware Limited Liability Company, which
15 owns and operates an apartment complex with 75 units doing business as “Regency at Encino”
16 generally located at 15506 Moorpark St Encino, CA 91436 within Los Angeles County. Defendant
17 WESCO III BEX, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
18 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
19 200 SAN MATEO, CA 94403. Defendant WESCO III BEX, LLC operates in a partnership with
20 Defendant ESSEX JV, LLC.

21 141. Defendant ESSEX REGENCY ESCUELA, L.P. is a California Limited Partnership,
22 which owns and operates an apartment complex with 142 units doing business as “Regency at
23 Mountain View” generally located at 333 Escuela Avenue Mountain View, CA 94040 within Santa
24 Clara County. Defendant ESSEX REGENCY ESCUELA, L.P. lists its business address as 1100 PARK
25 PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE
26 MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX
27 REGENCY ESCUELA, L.P. operates in a partnership with Defendants WESCO III GP, LLC; ESSEX
28

1 WESCO III, L.P.; and ESSEX MANAGEMENT CORPORATION.

2 142. Defendant WESCO III BEX, LLC is a Delaware Limited Liability Company, which
3 owns and operates an apartment complex with 116 units doing business as “Regency Palm Court”
4 generally located at 914 S. Wilton Place Los Angeles, CA 90019 within Los Angeles County.
5 Defendant WESCO III BEX, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO,
6 CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
7 PLACE STE 200 SAN MATEO, CA 94403. Defendant WESCO III BEX, LLC operates in a
8 partnership with Defendants ESSEX JV, LLC.

9 143. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
10 owns and operates an apartment complex with 460 units doing business as “Renaissance at Uptown
11 Orange” generally located at 3063 W Chapman Avenue Orange, CA 92868 within Orange County.
12 Defendant BEX PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN
13 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
14 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in
15 a partnership with Defendant ESSEX PORTFOLIO, L.P.

16 144. Defendant ESSEX WARNER CENTER, L.P. is a California Limited Partnership,
17 which owns and operates an apartment complex with 438 units doing business as “Reveal” generally
18 located at 21201 Kittridge St Woodland Hills, CA 91303 within Los Angeles County. Defendant
19 ESSEX WARNER CENTER, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO,
20 CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
21 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX WARNER CENTER, L.P. operates
22 in a partnership with Defendants ESSEX WESCO, L.P.; ESSEX MANAGEMENT CORPORATION.

23 145. Defendant ESSEX RILEY SQUARE, L.P. is a California Limited Partnership, which
24 owns and operates an apartment complex with 156 units doing business as “Riley Square” generally
25 located at 3707 Poinciana Drive Santa Clara, CA 95051 within Santa Clara County. Defendant ESSEX
26 RILEY SQUARE, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
27 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
28

1 200 SAN MATEO, CA 94403. Defendant ESSEX RILEY SQUARE, L.P. operates in a partnership
2 with Defendants WESCO GP, LLC; ESSEX WESCO, L.P.; and ESSEX MANAGEMENT
3 CORPORATION.

4 146. Defendant PPC SAGE LLC is a Delaware Limited Liability Company, which owns and
5 operates an apartment complex with 230 units doing business as “Sage at Cupertino” generally located
6 at 175 Calvert Drive San Jose, CA 95014 within Santa Clara County. Defendant PPC SAGE LLC lists
7 its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for
8 service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA
9 94403. Defendant PPC SAGE LLC operates in a partnership with Defendant PPC SAGE
10 APARTMENTS MANAGER II LLC.

11 147. Defendant RICHMOND ESSEX, L.P. is a California Limited Partnership, which owns
12 and operates an apartment complex with 432 units doing business as “San Marcos” generally located
13 at 2601 Hilltop Dr Richmond, CA 94806 within Contra Costa County. Defendant RICHMOND
14 ESSEX, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its
15 registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200
16 SAN MATEO, CA 94403. Defendant RICHMOND ESSEX, L.P. operates in a partnership with
17 Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

18 148. Defendant ESSEX SANTEE COURT, L.P. is a California Limited Partnership, which
19 owns and operates an apartment complex with 165 units doing business as “Santee Court” generally
20 located at 716 S Los Angeles St Ste B Los Angeles, CA 90014 within Los Angeles County. Defendant
21 ESSEX SANTEE COURT, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO,
22 CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
23 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX SANTEE COURT, L.P. operates in
24 a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX
25 PROPERTY TRUST, INC.

26 149. Defendant ESSEX JMS ACQUISITION, L.P. is a California Limited Partnership,
27 which owns and operates an apartment complex with 172 units doing business as “Shadow Point”
28

1 generally located at 9830 Dale Ave Spring Valley, CA 91977 within San Diego County. Defendant
2 ESSEX JMS ACQUISITION, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO,
3 CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
4 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX JMS ACQUISITION, L.P. operates
5 in a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX
6 PROPERTY TRUST, INC.

7
8 150. Defendant GR BLOCK C LLC is a Delaware Limited Liability Company, which owns
9 and operates an apartment complex with 268 units doing business as “Silver” generally located at 333
10 Sunol Street San Jose, CA 95126 within Santa Clara County. Defendant GR BLOCK C LLC lists its
11 business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service
12 of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.
13 Defendant GR BLOCK C LLC operates in a partnership with Defendant ESSEX PORTFOLIO, L.P.;

14 151. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
15 owns and operates an apartment complex with 280 units doing business as “Solstice” generally located
16 at 299 W. Washington Avenue Sunnyvale, CA 94086 within Santa Clara County. Defendant BEX
17 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
18 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
19 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
20 Defendants ESSEX PORTFOLIO, L.P.

21 152. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
22 and operates an apartment complex with 492 units doing business as “Station Park Green - Phases I,
23 II, III” generally located at 430 Station Park Circle, Suite 100. San Mateo, CA 94402 within San Mateo
24 County. Defendant ESSEX PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200
25 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located
26 at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P.
27 operates in a partnership with Defendants ESSEX PROPERTY TRUST, INC.

28 153. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns

1 and operates an apartment complex with 200 units doing business as “Stevenson Place” generally
2 located at 4141 Stevenson Blvd Fremont, CA 94538 within Alameda County. Defendant ESSEX
3 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
4 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
5 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
6 Defendants ESSEX PROPERTY TRUST, INC.

7
8 154. Defendant ESSEX SUMMERHILL PARK, L.P. is a California Limited Partnership,
9 which owns and operates an apartment complex with 100 units doing business as “Summerhill Park”
10 generally located at 972 Corte Madera Ave Sunnyvale, CA 94085 within Santa Clara County.
11 Defendant ESSEX SUMMERHILL PARK, L.P. lists its business address as 1100 PARK PL STE 200
12 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located
13 at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX SUMMERHILL
14 PARK, L.P. operates in a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.;
15 and ESSEX PROPERTY TRUST, INC.

16
17 155. Defendant ESSEX JMS ACQUISITION, L.P. is a California Limited Partnership,
18 which owns and operates an apartment complex with 300 units doing business as “Summit Park”
19 generally located at 8563 Lake Murray Blvd San Diego, CA 92119 within San Diego County.
20 Defendant ESSEX JMS ACQUISITION, L.P. lists its business address as 1100 PARK PL STE 200
21 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located
22 at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX JMS ACQUISITION,
23 L.P. operates in a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and
24 ESSEX PROPERTY TRUST, INC.

25
26 156. Defendant K-H PROPERTIES is a California Limited Partnership, which owns and
27 operates an apartment complex with 121 units doing business as “The Avery” generally located at
28 12005 Albers Street Los Angeles, CA 91607 within Los Angeles County. Defendant K-H
PROPERTIES lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its
registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200

1 SAN MATEO, CA 94403. Defendant K-H PROPERTIES operates in a partnership with Defendants
2 ESSEX MANAGEMENT CORPORATION.

3 157. Defendant ESSEX KINGS ROAD, L.P. is a California Limited Partnership, which owns
4 and operates an apartment complex with 196 units doing business as “The Blake LA” generally located
5 at 733 N Kings Rd Los Angeles, CA 90069 within Los Angeles County. Defendant ESSEX KINGS
6 ROAD, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its
7 registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200
8 SAN MATEO, CA 94403. Defendant ESSEX KINGS ROAD, L.P. operates in a partnership with
9 Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

10 158. Defendant ESSEX CARLYLE, L.P. is a California Limited Partnership, which owns
11 and operates an apartment complex with 132 units doing business as “The Carlyle” generally located
12 at 2909 Nieman Blvd San Jose, CA 95148 within Santa Clara County. Defendant ESSEX CARLYLE,
13 L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
14 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
15 MATEO, CA 94403. Defendant ESSEX CARLYLE, L.P. operates in a partnership with Defendants
16 BEX II GP, LLC; and ESSEX PROPERTY TRUST, INC.

17 159. Defendant ESSEX THE COMMONS, L.P. is a California Limited Partnership, which
18 owns and operates an apartment complex with 264 units doing business as “The Commons” generally
19 located at 275 Union Ave Campbell, CA 95008 within Santa Clara County. Defendant ESSEX THE
20 COMMONS, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its
21 registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200
22 SAN MATEO, CA 94403. Defendant ESSEX THE COMMONS, L.P. operates in a partnership with
23 Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

24 160. Defendant COURTYARDS AT 65TH, L.P. is a California Limited Partnership, which
25 owns and operates an apartment complex with 331 units doing business as “The Courtyards at 65th
26 Street” generally located at 1465 65th St Emeryville, CA 94608 within Alameda County. Defendant
27 COURTYARDS AT 65TH, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO,
28

1 CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
2 PLACE STE 200 SAN MATEO, CA 94403. Defendant COURTYARDS AT 65TH, L.P. operates in
3 a partnership with Defendants ESSEX WESCO V, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX
4 PROPERTY TRUST, INC.

5 161. Defendant SANTA MONICA AFFORDABLE PARTNERS, L.P. is a California
6 Limited Partnership, which owns and operates an apartment complex with 184 units doing business as
7 “The Dylan” generally located at 7111 Santa Monica Blvd West Hollywood, CA 90046 within Los
8 Angeles County. Defendant SANTA MONICA AFFORDABLE PARTNERS, L.P. lists its business
9 address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of
10 process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.
11 Defendant SANTA MONICA AFFORDABLE PARTNERS, L.P. operates in a partnership with
12 Defendants MONARCH ESSEX SCRIPPS, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX
13 PROPERTY TRUST, INC.
14

15 162. Defendant WESCO IV, LLC is a Delaware Limited Liability Company, which owns
16 and operates an apartment complex with 234 units doing business as “The Fairways at Westridge”
17 generally located at 25343 Silver Aspen Way Valencia, CA 91381 within Los Angeles County.
18 Defendant WESCO IV, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
19 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
20 PLACE STE 200 SAN MATEO, CA 94403. Defendant WESCO IV, LLC operates in a partnership
21 with Defendants ESSEX WESCO IV LLC.

22 163. Defendant ESSEX PLEASANTON OWNER, L.P. is a California Limited Partnership,
23 which owns and operates an apartment complex with 506 units doing business as “The Galloway”
24 generally located at 4863 Willow Road Pleasanton, CA 94588 within Alameda County. Defendant
25 ESSEX PLEASANTON OWNER, L.P. lists its business address as 1100 PARK PL STE 200 SAN
26 MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100
27 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX PLEASANTON OWNER,
28 L.P. operates in a partnership with Defendants ESSEX PLEASANTON GP, L.P.; and ESSEX

1 MANAGEMENT CORPORATION.

2 164. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
3 and operates an apartment complex with 243 units doing business as “The Grand” generally located at
4 100 Grand Ave Oakland, CA 94612 within Alameda County. Defendant ESSEX PORTFOLIO, L.P.
5 lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent
6 for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO,
7 CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with Defendant ESSEX
8 PROPERTY TRUST, INC.

9 165. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
10 and operates an apartment complex with 292 units doing business as “The Hallie” generally located at
11 280 E Del Mar Blvd Pasadena, CA 91101 within Los Angeles County. Defendant ESSEX
12 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
13 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
14 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
15 Defendants ESSEX PROPERTY TRUST, INC.

16 166. Defendant BEXAEW THE HAVENS, LP is a California Limited Partnership, which
17 owns and operates an apartment complex with 440 units doing business as “The Havens” generally
18 located at 10441 Slater Ave Fountain Valley, CA 92708 within Orange County. Defendant BEXAEW
19 THE HAVENS, LP lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
20 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
21 200 SAN MATEO, CA 94403. Defendant BEXAEW THE HAVENS, LP operates in a partnership
22 with Defendants BEXAEW GP, LLC; ESSEX BEXAEW, LLC; and ESSEX PROPERTY TRUST,
23 INC.
24

25 167. Defendant ESSEX LORRAINE, L.P. is a California Limited Partnership, which owns
26 and operates an apartment complex with 83 units doing business as “The Henley I” generally located
27 at 245 W Loraine St Glendale, CA 91202 within Los Angeles County. Defendant ESSEX LORRAINE,
28 L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered

1 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
2 MATEO, CA 94403. Defendant ESSEX LORRAINE, L.P. operates in a partnership with Defendants
3 ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

4 168. Defendant ESSEX COLUMBUS, L.P. is a California Limited Partnership, which owns
5 and operates an apartment complex with 132 units doing business as “The Henley II” generally located
6 at 1136 N. Columbus Glendale, CA 91202 within Los Angeles County. Defendant ESSEX
7 COLUMBUS, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
8 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
9 200 SAN MATEO, CA 94403. Defendant ESSEX COLUMBUS, L.P. operates in a partnership with
10 Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

11 169. Defendant ESSEX HUNTINGTON ON EDINGER, L.P. is a California Limited
12 Partnership, which owns and operates an apartment complex with 276 units doing business as “The
13 Huntington” generally located at 8400 Edinger Avenue Huntington Beach, CA 92647 within Orange
14 County. Defendant ESSEX HUNTINGTON ON EDINGER, L.P. lists its business address as 1100
15 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE
16 MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX
17 HUNTINGTON ON EDINGER, L.P. operates in a partnership with Defendants ESSEX SPE, LLC;
18 ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

19 170. Defendant ESSEX MONARCH LA BREA APARTMENTS, L.P. is a California
20 Limited Partnership, which owns and operates an apartment complex with 187 units doing business as
21 “The Huxley” generally located at 1234 N La Brea Avenue West Hollywood, CA 90038 within Los
22 Angeles County. Defendant ESSEX MONARCH LA BREA APARTMENTS, L.P. lists its business
23 address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent for service of
24 process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.
25 Defendant ESSEX MONARCH LA BREA APARTMENTS, L.P. operates in a partnership with
26 Defendants MONARCH ESSEX SCRIPPS GP, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX
27 PROPERTY TRUST, INC.
28

1 171. Defendant BEX FMCA, LLC is a Delaware Limited Liability Company, which owns
2 and operates an apartment complex with 282 units doing business as “The Landing at Jack London
3 Square” generally located at 101 Embarcadero West Oakland, CA 94607 within Alameda County.
4 Defendant BEX FMCA, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
5 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
6 PLACE STE 200 SAN MATEO, CA 94403. Defendant BEX FMCA, LLC operates in a partnership
7 with Defendants ESSEX PORTFOLIO, L.P.

8 172. Defendant BRE-FMCA, LLC is a Delaware Limited Liability Company, which owns
9 and operates an apartment complex with 460 units doing business as “The Palms at Laguna Niguel”
10 generally located at 28188 Moulton Pkwy Laguna Niguel, CA 92677 within Orange County.
11 Defendant BRE-FMCA, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
12 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
13 PLACE STE 200 SAN MATEO, CA 94403.

14 173. Defendant ESSEX REXFORD, LLC is a Delaware Limited Liability Company, which
15 owns and operates an apartment complex with 203 units doing business as “The Rexford” generally
16 located at 3400 Country Drive Fremont, CA 94538 within Alameda County. Defendant ESSEX
17 REXFORD, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its
18 registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200
19 SAN MATEO, CA 94403. Defendant ESSEX REXFORD, LLC operates in a partnership with
20 Defendants WESCO IV, LLC.

21 174. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
22 and operates an apartment complex with 188 units doing business as “The Stuart” generally located at
23 3360 East Foothill Boulevard Pasadena, CA 91107 within Los Angeles County. Defendant ESSEX
24 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
25 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
26 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
27 Defendants ESSEX PROPERTY TRUST, INC.
28

1 175. Defendant ESSEX TOLUCA LAKE, L.P. is a California Limited Partnership, which
2 owns and operates an apartment complex with 145 units doing business as “The Village at Toluca
3 Lake” generally located at 211 N Valley St Burbank, CA 91505 within Los Angeles County. Defendant
4 ESSEX TOLUCA LAKE, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO,
5 CA 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
6 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX TOLUCA LAKE, L.P. operates in a
7 partnership with Defendants BEX III GP, LLC; ESSEX BEX III, LLC; and ESSEX PROPERTY
8 TRUST, INC.

9 176. Defendant WESCO IV, LLC is a Delaware Limited Liability Company, which owns
10 and operates an apartment complex with 220 units doing business as “The Vistas of West Hills”
11 generally located at 24015 Copper Hill Drive Valencia, CA 91354 within Los Angeles County.
12 Defendant WESCO IV, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
13 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
14 PLACE STE 200 SAN MATEO, CA 94403. Defendant WESCO IV, LLC operates in a partnership
15 with Defendant ESSEX WESCO IV LLC
16

17 177. Defendant ESSEX WATERFORD, L.P. is a California Limited Partnership, which
18 owns and operates an apartment complex with 238 units doing business as “The Waterford” generally
19 located at 1700 N 1st St San Jose, CA 95112 within Santa Clara County. Defendant ESSEX
20 WATERFORD, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
21 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
22 200 SAN MATEO, CA 94403. Defendant ESSEX WATERFORD, L.P. operates in a partnership with
23 Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

24 178. Defendant ESSEX THE WOODS, L.P. is a California Limited Partnership, which owns
25 and operates an apartment complex with 160 units doing business as “The Woods” generally located
26 at 40640 High St Fremont, CA 94538 within Alameda County. Defendant ESSEX THE WOODS, L.P.
27 lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered agent
28 for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO,

1 CA 94403. Defendant ESSEX THE WOODS, L.P. operates in a partnership with Defendants WESCO
2 GP, LLC; ESSEX WESCO, L.P.; and ESSEX MANAGEMENT CORPORATION.

3 179. Defendant ESSEX TIERRA VISTA, L.P. is a California Limited Partnership, which
4 owns and operates an apartment complex with 404 units doing business as “Tierra Vista” generally
5 located at 1750 Montevina Circle Oxnard, CA 93030 within Ventura County. Defendant ESSEX
6 TIERRA VISTA, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
7 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
8 200 SAN MATEO, CA 94403. Defendant ESSEX TIERRA VISTA, L.P. operates in a partnership
9 with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST,
10 INC.

11 180. Defendant ESSEX TIFFANY COURT, LLC is a Delaware Limited Liability Company,
12 which owns and operates an apartment complex with 101 units doing business as “Tiffany Court”
13 generally located at 616 Masselin Avenue Los Angeles, CA 90036 within Los Angeles County.
14 Defendant ESSEX TIFFANY COURT, LLC lists its business address as 1100 PARK PL STE 200
15 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located
16 at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX TIFFANY COURT,
17 LLC operates in a partnership with Defendants ESSEX PORTFOLIO, L.P.

18 181. Defendant ESSEX TOWNSHIP, L.P. is a California Limited Partnership, which owns
19 and operates an apartment complex with 132 units doing business as “Township” generally located at
20 333 Main St Redwood City, CA 94063 within San Mateo County. Defendant ESSEX TOWNSHIP,
21 L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
22 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
23 MATEO, CA 94403. Defendant ESSEX TOWNSHIP, L.P. operates in a partnership with Defendants
24 WESCO GP, LLC; ESSEX WESCO, L.P.; and ESSEX MANAGEMENT CORPORATION.

25 182. Defendant BAYPORT SERRANO ASSOCIATES, L.P. is a California Limited
26 Partnership, which owns and operates an apartment complex with 132 units doing business as “Trabuco
27 Villas” generally located at 25381 Mosswood Way Lake Forest, CA 92630 within Orange County.
28

1 Defendant BAYPORT SERRANO ASSOCIATES, L.P. lists its business address as 17320 RED HILL
2 AVE SUITE 300 IRVINE, CA 92614. Its registered agent for service of process is JOEL KEW located
3 at 3090 PULLMAN ST COSTA MESA, CA 92626. Defendant BAYPORT SERRANO
4 ASSOCIATES, L.P. operates in a partnership with Defendants WCP SERRANO, INC.

5 183. Defendant VALLEY PARK APARTMENTS, LTD. is a California Limited Partnership,
6 which owns and operates an apartment complex with 160 units doing business as “Valley Park”
7 generally located at 17300 Euclid Street Fountain Valley, CA 92708 within Orange County. Defendant
8 VALLEY PARK APARTMENTS, LTD. lists its business address as 1100 PARK PLACE, SUITE 200
9 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located
10 at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant VALLEY PARK
11 APARTMENTS, LTD. operates in a partnership with Defendants ESSEX MANAGEMENT
12 CORPORATION.

13 184. Defendant WESCO IV, LLC is a Delaware Limited Liability Company, which owns
14 and operates an apartment complex with 282 units doing business as “Verandas” generally located at
15 33 Union Square Union City, CA 94587 within Alameda County. Defendant WESCO IV, LLC lists
16 its business address as 1100 PARK PLACE, SUITE 200 SAN MATEO, CA 94403. Its registered agent
17 for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO,
18 CA 94403. Defendant WESCO IV, LLC operates in a partnership with Defendants ESSEX WESCO
19 IV LLC.

20 185. Defendant ESSEX JAYSAC TASMAN, L.P. is a California Limited Partnership, which
21 owns and operates an apartment complex with 284 units doing business as “Via” generally located at
22 621 Tasman Dr Sunnyvale, CA 94089 within Santa Clara County. Defendant ESSEX JAYSAC
23 TASMAN, L.P. lists its business address as 1100 PARK PLACE, SUITE 200 SAN MATEO, CA
24 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
25 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX JAYSAC TASMAN, L.P. operates in
26 a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX
27 PROPERTY TRUST, INC.
28

1 186. Defendant VILLA ANGELINA APARTMENT FUND, LTD. is a California Limited
2 Partnership, which owns and operates an apartment complex with 256 units doing business as “Villa
3 Angelina” generally located at 201 E Chapman Ave Placentia, CA 92870 within Orange County.
4 Defendant VILLA ANGELINA APARTMENT FUND, LTD. lists its business address as 1100 PARK
5 PLACE, SUITE 200 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE
6 MORRISON located at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant VILLA
7 ANGELINA APARTMENT FUND, LTD. operates in a partnership with Defendants ESSEX
8 MANAGEMENT CORPORATION.

9 187. Defendant BRE-FMCA, LLC is a Delaware Limited Liability Company, which owns
10 and operates an apartment complex with 270 units doing business as “Villa Granada” generally located
11 at 3595 Granada Avenue Santa Clara, CA 95051 within Santa Clara County. Defendant BRE-FMCA,
12 LLC lists its business address as 1100 PARK PLACE, SUITE 200 SAN MATEO, CA 94403. Its
13 registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200
14 SAN MATEO, CA 94403.

15 188. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
16 owns and operates an apartment complex with 272 units doing business as “Villa Siena” generally
17 located at 1250 Adams Avenue Costa Mesa, CA 92626 within Orange County. Defendant BEX
18 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
19 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
20 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
21 Defendants ESSEX PORTFOLIO, L.P.

22 189. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which
23 owns and operates an apartment complex with 272 units doing business as “Village Green” generally
24 located at 901 South Idaho Street La Habra, CA 90631 within Orange County. Defendant BEX
25 PORTFOLIO, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
26 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
27 200 SAN MATEO, CA 94403. Defendant BEX PORTFOLIO, LLC operates in a partnership with
28

1 Defendants ESSEX PORTFOLIO, L.P.

2 190. Defendant ESSEX VISTA BELVEDERE, L.P. is a California Limited Partnership,
3 which owns and operates an apartment complex with 76 units doing business as “Vista Belvedere”
4 generally located at 65 Red Hill Cir Tiburon, CA 94920 within Marin County. Defendant ESSEX
5 VISTA BELVEDERE, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
6 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
7 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX VISTA BELVEDERE, L.P. operates
8 in a partnership with Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX
9 PROPERTY TRUST, INC.

10 191. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
11 and operates an apartment complex with 200 units doing business as “Wallace on Sunset” generally
12 located at 6240 West Sunset Blvd Los Angeles, CA 90028 within Los Angeles County. Defendant
13 ESSEX PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA
14 94403. Its registered agent for service of process is ANNE MORRISON located at 1100 PARK
15 PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a
16 partnership with Defendant ESSEX PROPERTY TRUST, INC.

17 192. Defendant ESSEX CAL-WA, L.P. is a California Limited Partnership, which owns and
18 operates an apartment complex with 163 units doing business as “Walnut Heights” generally located
19 at 20700 San Jose Hills Rd Walnut, CA 91789 within Los Angeles County. Defendant ESSEX CAL-
20 WA, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
21 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
22 MATEO, CA 94403. Defendant ESSEX CAL-WA, L.P. operates in a partnership with Defendants
23 ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

24 193. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
25 and operates an apartment complex with 508 units doing business as “Willow Lake” generally located
26 at 1331 Lakeshore Circle San Jose, CA 95131 within Santa Clara County. Defendant ESSEX
27 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
28

1 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
2 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
3 Defendants ESSEX PROPERTY TRUST, INC.

4 194. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns
5 and operates an apartment complex with 478 units doing business as “Wilshire La Brea” generally
6 located at 5200 Wilshire Blvd Los Angeles, CA 90036 within Los Angeles County. Defendant ESSEX
7 PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
8 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
9 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P. operates in a partnership with
10 Defendants ESSEX PROPERTY TRUST, INC.

11 195. Defendant ESSEX WILSHIRE, L.P. is a California Limited Partnership, which owns
12 and operates an apartment complex with 149 units doing business as “Wilshire Promenade” generally
13 located at 141 W Wilshire Ave Fullerton, CA 92832 within Orange County. Defendant ESSEX
14 WILSHIRE, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its
15 registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200
16 SAN MATEO, CA 94403. Defendant ESSEX WILSHIRE, L.P. operates in a partnership with
17 Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

18 196. Defendant WESCO III BEX, LLC is a Delaware Limited Liability Company, which
19 owns and operates an apartment complex with 58 units doing business as “Windsor Court” generally
20 located at 900 South Irolo Street Los Angeles, CA 90006 within Los Angeles County. Defendant
21 WESCO III BEX, LLC lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403.
22 Its registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE
23 200 SAN MATEO, CA 94403. Defendant WESCO III BEX, LLC operates in a partnership with
24 Defendants ESSEX JV, LLC.

25 197. Defendant ESSEX COCHRAN, L.P. is a California Limited Partnership, which owns
26 and operates an apartment complex with 95 units doing business as “Windsor Court” generally located
27 at 401 S Detroit Street Los Angeles, CA 90036 within Los Angeles County. Defendant ESSEX
28

1 COCHRAN, L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its
2 registered agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200
3 SAN MATEO, CA 94403. Defendant ESSEX COCHRAN, L.P. operates in a partnership with
4 Defendants ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

5 198. Defendant ESSEX CAL-WA, L.P. is a California Limited Partnership, which owns and
6 operates an apartment complex with 216 units doing business as “Windsor Ridge” generally located at
7 829 E Evelyn Ave Sunnyvale, CA 94086 within Santa Clara County. Defendant ESSEX CAL-WA,
8 L.P. lists its business address as 1100 PARK PL STE 200 SAN MATEO, CA 94403. Its registered
9 agent for service of process is ANNE MORRISON located at 1100 PARK PLACE STE 200 SAN
10 MATEO, CA 94403. Defendant ESSEX CAL-WA, L.P. operates in a partnership with Defendants
11 ESSEX SPE, LLC; ESSEX PORTFOLIO, L.P.; and ESSEX PROPERTY TRUST, INC.

12 199. Defendant NEWPORT BEACH NORTH LLC is a Delaware Limited Liability
13 Company, which owns and operates an apartment complex with 145 units doing business as “Woodside
14 Village” generally located at 675 Providence Ave Ventura, CA 93004 within Ventura County.
15 Defendant NEWPORT BEACH NORTH LLC lists its business address as 1100 PARK PL STE 200
16 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located
17 at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant NEWPORT BEACH NORTH
18 LLC operates in a partnership with Defendants ESSEX PORTFOLIO, L.P.

19 200. In addition to the above, upon information and belief, Defendant ESSEX owns and
20 operates the following additional California properties under a similar corporate structure as outline
21 above for each APARTMENT COMPLEX. Once the exact corporate ownership is confirmed, this
22 Complaint will be amended to properly describe the precise corporate ownership, management and
23 control structure of these additional APARTMENT COMPLEXES.

- 24 • Allure at Scripps Ranch generally located at 10776 Scripps Ranch Blvd. San Diego
25 California 92131
- 26 • The Barkley generally located at 2400 E. Lincoln Ave. Anaheim, California.
- 27 • Cochran Apartments in Los Angeles generally located at 442 S Cochran Ave, Los Angeles,
28

1 CA 90036.

- 2 • Santee Village in Los Angeles generally located at 738 S. Los Angeles, Suite 5. Los
- 3 Angeles, CA .
- 4 • Twin Creeks Apartments in San Ramon, California generally located at 1110 Harness Dr.
- 5 San Ramon, California 94583.
- 6 • Fairway Apartments at Big Canyon in Newport Beach, California generally located at 1
- 7 Pine Valley Lane, Newport Beach, California 92660.
- 8 • Magnolia Lane Apartments in Santa Clara, California generally located at 113 S Mary Ave
- 9 Sunnyvale, CA 94086.

10 201. The following Defendants have been identified above as in partnership with the

11 ENTITY DEFENDANTS. These following PARTNER DEFENDANTS are also owned and operated

12 by Defendant ESSEX.

13

14 202. Defendant Essex SPE, LLC is a partner of one of the ENTITY DEFENDANTS in

15 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex SPE,

16 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100

17 PARK PLACE STE 200 SAN MATEO, CA 94403.

18 203. Defendant Essex Portfolio, L.P is a partner of one of the ENTITY DEFENDANTS in

19 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex Portfolio,

20 L.P is a California Limited Partnership. Its registered agent is ANNE MORRISON 1100 PARK

21 PLACE STE 200 SAN MATEO, CA 94403.

22 204. Defendant Essex Property Trust, Inc is a partner of one of the ENTITY DEFENDANTS

23 in ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex

24 Property Trust, Inc is a Maryland Stock Corporation. Its registered agent is ANNE MORRISON 1100

25 PARK PLACE STE 200 SAN MATEO, CA 94403.

26 205. Defendant Essex Wesco V, LLC is a partner of one of the ENTITY DEFENDANTS in

27 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex Wesco

28 V, LLC is a California Limited Liability Company. Its registered agent is ANNE MORRISON 1100

1 PARK PLACE STE 200 SAN MATEO, CA 94403.

2 206. Defendant Essex 500 Folsom, LLC is a partner of one of the ENTITY DEFENDANTS
3 in ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex 500
4 Folsom, LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON
5 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

6 207. Defendant Essex Management Corporation is a partner of one of the ENTITY
7 DEFENDANTS in ownership in one of the APARTMENT COMPLEXES as described above.
8 Defendant Essex Management Corporation is a California Stock Corporation. Its registered agent is
9 ANNE MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

10 208. Defendant Essex Gateway Management, LLC is a partner of one of the ENTITY
11 DEFENDANTS in ownership in one of the APARTMENT COMPLEXES as described above.
12 Defendant Essex Gateway Management, LLC is a California Limited Liability Company. Its registered
13 agent is ANNE MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

14 209. Defendant Wesco GP, LLC is a partner of one of the ENTITY DEFENDANTS in
15 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Wesco GP,
16 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
17 PARK PLACE STE 200 SAN MATEO, CA 94403.

18 210. Defendant Essex Wesco, L.P. is a partner of one of the ENTITY DEFENDANTS in
19 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex Wesco,
20 L.P. is a California Limited Partnership. Its registered agent is ANNE MORRISON 1100 PARK
21 PLACE STE 200 SAN MATEO, CA 94403.

22 211. Defendant BEX II GP, LLC is a partner of one of the ENTITY DEFENDANTS in
23 ownership in one of the APARTMENT COMPLEXES as described above. Defendant BEX II GP,
24 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
25 PARK PLACE STE 200 SAN MATEO, CA 94403.

26 212. Defendant Essex Wesco IV, LLC is a partner of one of the ENTITY DEFENDANTS in
27 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex Wesco
28

1 IV, LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
2 PARK PLACE STE 200 SAN MATEO, CA 94403.

3 213. Defendant Essex Camarillo Corporation is a partner of one of the ENTITY
4 DEFENDANTS in ownership in one of the APARTMENT COMPLEXES as described above.
5 Defendant Essex Camarillo Corporation is a California Stock Corporation. Its registered agent is
6 ANNE MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

7 214. Defendant Essex Dublin GP, L.P. is a partner of one of the ENTITY DEFENDANTS
8 in ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex Dublin
9 GP, L.P. is a Delaware Limited Partnership. Its registered agent is ANNE MORRISON 1100 PARK
10 PLACE STE 200 SAN MATEO, CA 94403.

11 215. Defendant Essex Emeryville GP, L.P. is a partner of one of the ENTITY
12 DEFENDANTS in ownership in one of the APARTMENT COMPLEXES as described above.
13 Defendant Essex Emeryville GP, L.P. is a Delaware Limited Partnership. Its registered agent is ANNE
14 MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

15 216. Defendant Essex NBN SPE, LLC is a partner of one of the ENTITY DEFENDANTS
16 in ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex NBN
17 SPE, LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
18 PARK PLACE STE 200 SAN MATEO, CA 94403.

19 217. Defendant BEXAEW GP, LLC is a partner of one of the ENTITY DEFENDANTS in
20 ownership in one of the APARTMENT COMPLEXES as described above. Defendant BEXAEW GP,
21 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
22 PARK PLACE STE 200 SAN MATEO, CA 94403.

23 218. Defendant Essex BEXAEW, LLC is a partner of one of the ENTITY DEFENDANTS
24 in ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex
25 BEXAEW, LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON
26 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

27 219. Defendant Wesco III GP, LLC is a partner of one of the ENTITY DEFENDANTS in
28

1 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Wesco III GP,
2 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
3 PARK PLACE STE 200 SAN MATEO, CA 94403.

4 220. Defendant Essex Wesco III, L.P. is a partner of one of the ENTITY DEFENDANTS in
5 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex Wesco
6 III, L.P. is a California Limited Partnership. Its registered agent is ANNE MORRISON 1100 PARK
7 PLACE STE 200 SAN MATEO, CA 94403.

8 221. Defendant Wesco III GP, LLC is a partner of one of the ENTITY DEFENDANTS in
9 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Wesco III GP,
10 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
11 PARK PLACE STE 200 SAN MATEO, CA 94403.

12 222. Defendant Essex Wesco III, L.P. is a partner of one of the ENTITY DEFENDANTS in
13 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex Wesco
14 III, L.P. is a California Limited Partnership. Its registered agent is ANNE MORRISON 1100 PARK
15 PLACE STE 200 SAN MATEO, CA 94403.

16 223. Defendant BEX II GP, LLC is a partner of one of the ENTITY DEFENDANTS in
17 ownership in one of the APARTMENT COMPLEXES as described above. Defendant BEX II GP,
18 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
19 PARK PLACE STE 200 SAN MATEO, CA 94403.

20 224. Defendant Essex HGA, LLC is a partner of one of the ENTITY DEFENDANTS in
21 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex HGA,
22 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
23 PARK PLACE STE 200 SAN MATEO, CA 94403.

24 225. Defendant Essex MCC, LLC is a partner of one of the ENTITY DEFENDANTS in
25 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex MCC,
26 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
27 PARK PLACE STE 200 SAN MATEO, CA 94403.
28

1 226. Defendant Essex Wesco V, LLC is a partner of one of the ENTITY DEFENDANTS in
2 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex
3 Wesco V, LLC is a California Limited Liability Company. Its registered agent is ANNE
4 MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

5 227. Defendant Essex Monterey Villas, LLC is a partner of one of the ENTITY
6 DEFENDANTS in ownership in one of the APARTMENT COMPLEXES as described above.
7 Defendant Essex Monterey Villas, LLC is a Delaware Limited Liability Company. Its registered
8 agent is ANNE MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

9 228. Defendant Wesco GP, LLC is a partner of one of the ENTITY DEFENDANTS in
10 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Wesco GP,
11 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
12 PARK PLACE STE 200 SAN MATEO, CA 94403.

13 229. Defendant Essex Wesco, L.P. is a partner of one of the ENTITY DEFENDANTS in
14 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex Wesco,
15 L.P. is a California Limited Partnership. Its registered agent is ANNE MORRISON 1100 PARK
16 PLACE STE 200 SAN MATEO, CA 94403.

17 230. Defendant PALM VALLEY ROLL-UP LLC is a partner of one of the ENTITY
18 DEFENDANTS in ownership in one of the APARTMENT COMPLEXES as described above.
19 Defendant PALM VALLEY ROLL-UP LLC is a Delaware Limited Liability Company. Its registered
20 agent is ANNE MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

21 231. Defendant EMC SPE, LLC is a partner of one of the ENTITY DEFENDANTS in
22 ownership in one of the APARTMENT COMPLEXES as described above. Defendant EMC SPE, LLC
23 is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100 PARK
24 PLACE STE 200 SAN MATEO, CA 94403.

25 232. Defendant BEXAEW GP, LLC is a partner of one of the ENTITY DEFENDANTS in
26 ownership in one of the APARTMENT COMPLEXES as described above. Defendant BEXAEW GP,
27 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
28

1 PARK PLACE STE 200 SAN MATEO, CA 94403.

2 233. Defendant Essex BEXAEW, LLC is a partner of one of the ENTITY DEFENDANTS
3 in ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex
4 BEXAEW, LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON
5 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

6 234. Defendant Essex Buena Vista, LLC is a partner of one of the ENTITY DEFENDANTS
7 in ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex Buena
8 Vista, LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
9 PARK PLACE STE 200 SAN MATEO, CA 94403.

10 235. Defendant BEX PORTFOLIO, LLC is a partner of one of the ENTITY DEFENDANTS
11 in ownership in one of the APARTMENT COMPLEXES as described above. Defendant BEX
12 PORTFOLIO, LLC is a Delaware Limited Liability Company. Its registered agent is ANNE
13 MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

14 236. Defendant Essex JV, LLC is a partner of one of the ENTITY DEFENDANTS in
15 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex JV, LLC
16 is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100 PARK
17 PLACE STE 200 SAN MATEO, CA 94403.

18 237. Defendant PPC SAGE APARTMENTS MANAGER II LLC is a partner of one of the
19 ENTITY DEFENDANTS in ownership in one of the APARTMENT COMPLEXES as described
20 above. Defendant PPC SAGE APARTMENTS MANAGER II LLC is a Delaware Limited Liability
21 Company. Its registered agent is ANNE MORRISON 1100 PARK PLACE STE 200 SAN MATEO,
22 CA 94403.

23 238. Defendant BEX II GP, LLC is a partner of one of the ENTITY DEFENDANTS in
24 ownership in one of the APARTMENT COMPLEXES as described above. Defendant BEX II GP,
25 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
26 PARK PLACE STE 200 SAN MATEO, CA 94403.

27 239. Defendant ESSEX Wesco V, LLC is a partner of one of the ENTITY DEFENDANTS
28

1 in ownership in one of the APARTMENT COMPLEXES as described above. Defendant
2 ESSEX Wesco V, LLC is a California Limited Liability Company. Its registered agent is ANNE
3 MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

4 240. Defendant MONARCH ESSEX SCRIPPS, LLC is a partner of one of the
5 ENTITY DEFENDANTS in ownership in one of the APARTMENT COMPLEXES as
6 described above. Defendant MONARCH ESSEX SCRIPPS, LLC is a Delaware Limited
7 Liability Company. Its registered agent is ANNE MORRISON 1100 PARK PLACE STE 200 SAN
8 MATEO, CA 94403.

9 241. Defendant ESSEX WESCO IV LLC is a partner of one of the ENTITY
10 DEFENDANTS in ownership in one of the APARTMENT COMPLEXES as described above.
11 Defendant ESSEX WESCO IV LLC is a Delaware Limited Liability Company. Its
12 registered agent is ANNE MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

13 242. Defendant Essex Pleasanton GP, L.P. is a partner of one of the
14 ENTITY DEFENDANTS in ownership in one of the APARTMENT COMPLEXES as
15 described above. Defendant Essex Pleasanton GP, L.P. is a Delaware Limited Partnership. Its
16 registered agent is ANNE MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

17 243. Defendant Essex BEXAEW, LLC is a partner of one of the ENTITY DEFENDANTS
18 in ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex
19 BEXAEW, LLC is a Delaware Limited Liability Company. Its registered agent is ANNE
20 MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

21 244. Defendant MONARCH ESSEX SCRIPPS GP, LLC is a partner of one of the
22 ENTITY DEFENDANTS in ownership in one of the APARTMENT COMPLEXES as
23 described above. Defendant MONARCH ESSEX SCRIPPS GP, LLC is a Delaware Limited
24 Liability Company. Its registered agent is ANNE MORRISON 1100 PARK PLACE STE 200 SAN
25 MATEO, CA 94403.

26 245. Defendant Wesco IV, LLC is a partner of one of the ENTITY DEFENDANTS
27 in ownership in one of the APARTMENT COMPLEXES as described above. Defendant Wesco IV,
28 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
PARK PLACE STE 200 SAN MATEO, CA 94403.

1 246. Defendant BEX III GP, LLC is a partner of one of the ENTITY DEFENDANTS in
2 ownership in one of the APARTMENT COMPLEXES as described above. Defendant BEX III GP,
3 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
4 PARK PLACE STE 200 SAN MATEO, CA 94403.

5 247. Defendant Essex BEX III, LLC is a partner of one of the ENTITY DEFENDANTS in
6 ownership in one of the APARTMENT COMPLEXES as described above. Defendant Essex BEX III,
7 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100 PARK
8 PLACE STE 200 SAN MATEO, CA 94403.

9 248. Defendant ESSEX WESCO IV LLC is a partner of one of the ENTITY DEFENDANTS
10 in ownership in one of the APARTMENT COMPLEXES as described above. Defendant ESSEX
11 WESCO IV LLC is a Delaware Limited Liability Company. Its registered agent is ANNE
12 MORRISON 1100 PARK PLACE STE 200 SAN MATEO, CA 94403.

13 249. Defendant ESSEX JV, LLC is a partner of one of the ENTITY DEFENDANTS in
14 ownership in one of the APARTMENT COMPLEXES as described above. Defendant ESSEX JV,
15 LLC is a Delaware Limited Liability Company. Its registered agent is ANNE MORRISON 1100
16 PARK PLACE STE 200 SAN MATEO, CA 94403.

17 250. ESSEX and its TITLE HOLDER conspirators, in bad faith, retain residential security
18 deposits from its former tenants in violation of California law which forms the gravamen of the instant
19 suit. Pursuant to design, ESSEX has centralized security deposit administration of the APARTMENT
20 COMPLEXES by tasking the umbrella entity, ESSEX PROPERTY TRUST, INC, with developing and
21 administering security deposit policies and practices uniformly across all ENTITY DEFENDANT
22 properties. As such, ESSEX PROPERTY TRUST, INC exclusively manages properties that it owns
23 through the ENTITY DEFENDANTS, and all ENTITY DEFENDANTS are exclusively managed by
24 ESSEX PROPERTY TRUST.

25 251. All of the above-identified 193 ENTITY DEFENDANTS, and their ESSEX related
26 partners, along with Defendant ESSEX and the ROE defendants are collectively referred to herein as
27 “Defendants.”
28

1 252. Upon information and belief, 100% of the putative plaintiffs resided in California at the
2 time their cause of action accrued, more than two-thirds of the putative plaintiffs continue to reside in
3 California, all injuries complained of herein occurred within California, and all defendants own
4 property which is the subject of this litigation, in California and primarily, if not exclusively, do
5 business within California.

6 253. Upon information and belief, each defendant identified herein has uniformity of
7 employees, offices, officers, management, ownership, and legal representation with each other
8 defendant, all for the ultimate benefit of ESSEX resulting in a unified enterprise.

9 254. Plaintiffs are informed and believe and thereupon aver that Defendants have
10 substantially identical officers and directors as all other Defendants; use the same offices and business
11 locations as all other Defendants; employ the same employees and attorneys as all other Defendants;
12 are in the same business and venture, for the benefit of the same ultimate shareholders and members,
13 as all other Defendants; do not maintain arm's-length relationships with all other Defendants; and share
14 and provide labor, services, capital, revenue, real estate and/or management services with/for all other
15 Defendants.

16 255. Plaintiffs are informed and believe and thereupon aver that DOES 1 through 100 are
17 other natural persons, corporations, limited-liability companies, general partnerships, limited
18 partnerships, limited-liability partnerships, trusts, unincorporated associations, and/or other entities of
19 any kind or character who have incurred liability to Plaintiffs (and/or to one or more members of the
20 Plaintiff Class) in relation to the transactions and/or occurrences that are the subject of this Complaint,
21 or who have any interest in the subject of this Complaint.

22 256. Except as may be described here, Plaintiffs are yet uninformed of the true names,
23 capacities and nature and extent of participation in the course of conduct alleged here of the persons
24 sued as DOES 1 through 100 inclusive, and Plaintiffs are yet uninformed of the nature and extent of
25 any interest that the persons sued as DOES 1 through 100 inclusive may have in the subject of the
26 Complaint. Plaintiffs therefore sues these defendants by fictitious names. Plaintiffs will amend this
27 Complaint to allege the true names and capacities of the DOE defendants when ascertained.
28

1 257. Upon information and belief, each of the Defendants named here, including DOES 1-
2 100 and their alter-egos, are joint-tortfeasors, in joint-enterprise, co-conspirators, and acting within the
3 scope of their agency and within their actual and apparent authority to conduct themselves in the
4 manner herein complained.

5 258. Upon information and belief, each of the Defendants named here, including DOES 1-
6 100 and their alter-egos, acted as an owner, principal, agent, employer, employee, joint-employer, joint-
7 venturer, franchisor, franchisee, shareholder, director, member, co-conspirator, shell, conduit, master,
8 or partner of each other, and at all times were acting within the scope and course and in pursuance of
9 his, her or its agency, employment, joint-employment, joint-venture, franchise, partnership, common
10 and joint-enterprise, or actual or apparent authority in concert with each other.

11 259. Upon information and belief, each of the Defendants named here, including DOES 1 -
12 100 and their alter-egos, are individually, jointly and severally liable to Plaintiffs and the Plaintiff class
13 because each Defendant directly or indirectly, or through an agent or employee, actually, proximately
14 and vicariously caused injury to Plaintiffs as described here.

15 260. Upon information and belief, the acts and omissions of each of the Defendants named
16 here, including DOES 1 - 100 and their alter-egos, contributed to the acts and omissions of each other
17 Defendant in proximately causing the complaints, injuries, and damages alleged. Defendants approved
18 of, condoned, and/or otherwise ratified each of the acts or omissions complained of. And Defendants
19 aided and abetted the acts and omissions of each other Defendant, including DOES 1 -100 and their
20 alter-egos, in proximately causing the complaints, injuries, and damages alleged.
21

GENERAL ALLEGATIONS

22 261. ESSEX is a real estate development, acquisition, holding, and property management
23 conglomerate that has formed approximately 250 different entities to finance, purchase, build, hold,
24 and manage its expansive empire of residential apartment complexes in the United States including the
25 193 APARTMENT COMPLEXES with approximately 50,000 units located in California as identified
26 above. As ultimate beneficiary of 193 residential complexes in California, ESSEX not only realizes
27 rental income from tens of thousands of their tenants, but also from their standard operating procedures,
28

1 practices and policies of retaining the security deposits of its former tenants in bad faith, by fraudulently
2 charging former tenants amounts against, over and above their security deposits for unsubstantiated
3 work, work not necessary, work not performed and/or not the obligation of the departing tenant under
4 California law.

5 262. Defendants unlawfully retain former tenants' security deposits via a standard practice
6 and policy of billing former tenants for normal wear and tear; and charging former tenants fees for
7 labor and services that were not performed, not required, and moreover not substantiated as required
8 under California law. These excessive, unsubstantiated, unwarranted, unenforceable, unlawful and/or
9 fraudulent charges, and the subsequent withholding of security deposits from these former tenants and
10 the efforts to collect these charges over and above the security deposits, form the gravamen of the
11 Complaint.

12 263. Defendants' unreasonable, excessive, unlawful, unenforceable and/or unsubstantiated
13 charges made against former tenants' security deposits often exceed the amount of the deposit held by
14 Defendants. When this occurs, Defendants cause a bill, and sometimes a collections notice, to be sent
15 to former tenants, knowing that the monies claimed are based upon fraudulent, unreasonable, excessive,
16 unlawful, unenforceable and/or unsubstantiated move-out charges. This conduct has resulted in
17 damages to former tenants both through the collection of such amounts and by the reporting of such
18 alleged debts to third parties, defaming former tenants, damaging their credit and impairing their ability
19 to rent other apartments.
20

21 264. Civil Code section 1950.5(g)(1) provides that, no later than 21 calendar days after the
22 tenant vacates the premises, the landlord "shall furnish the tenant, by personal delivery or by first-class
23 mail, postage prepaid, a copy of an itemized statement indicating the basis for, and the amount of, any
24 security received and the disposition of the security, and shall return any remaining portion of the
25 security to the tenant."

26 265. Civil Code section 1950.5(g)(2)(B) provides that the landlord must also include copies
27 of documents substantiating the charges incurred and deducted by the landlord to repair or clean the
28 premises; specifically, the "landlord shall provide the tenant a copy of the bill, invoice, or receipt

1 supplied by the person or entity performing the work.”¹

2 266. Civil Code section 1950.5(g)(2)(A) provides: “If the landlord or landlord's employee
3 did the work, the itemized statement shall reasonably describe the work performed. The itemized
4 statement shall include the time spent and the reasonable hourly rate charged.” ESSEX’s itemizations
5 and other documentation sent to former tenants, referred to as “Move-out Statements,” by universal,
6 standard operating procedure and policy do not satisfy any of the requirements as set forth in section
7 1950.5(g)(2).

8 267. ESSEX’s standard policies, operating procedures and practices for the administration
9 of its former tenants’ security deposits uniformly and systematically violate Civil Code section
10 1950.5(g)(2). ESSEX, as a matter of standard policy and practice, does not send bills, receipts, or
11 invoices from the third-party vendors it alleges performed work on the vacated premises. Additionally,
12 ESSEX, as a matter of standard policy and practice does not describe the work allegedly performed on
13 the vacated leasehold in the manner required by code and instead uses unlawfully vague descriptions
14 – a uniform practice designed to obfuscate the work, if any, performed on a leasehold, who performed
15 the work, and the cost and/or manhours of the work with the intention of wrongfully maximizing
16 security deposit retention. By uniform and standard operating procedure, it is impossible to determine,
17 in contravention of law, if the work ESSEX allegedly performed on the leasehold was performed by a
18 vendor or an in-house employee.
19

20 268. Plaintiffs ALEXIS NORMAN and NICOLETTE COCHRAN are former tenants of
21 Defendants, formerly residing at one of Defendants’ properties generally doing business as Form 15
22 and located at 1450 Market St #104, San Diego, CA 92101. Plaintiffs ALEXIS NORMAN and
23 NICOLETTE COCHRAN leased an apartment from ESSEX beginning on approximately April 20,
24 2021. Their lease with ESSEX required a security deposit of approximately \$300.00 upon move-in.
25 Plaintiffs NORMAN & COCHRAN vacated their leased premises at the Form 15 Apartments on or
26 about March 13, 2022. They never received any substantiated itemized statement regarding the
27

28 ¹ The “receipt requirement” of Civ. Code § 1950.5(g)(2) is excepted only when deductions for cleaning and repairs combined do not exceed \$125.00.

1 disposition of their security deposit at that time, nor did they receive any such substantiated statement
2 within 21 days after vacating. Instead, they received a Preliminary Move Out Statement from
3 Defendants on or about March 21, 2022, which purported to deduct from their security deposit, among
4 other things: \$280.00 for “Carpet Cleaning;” \$385.75 for “Apartment Paint & Supplies;” \$312.93 for
5 “Blind Replacement.” However, Defendants produced only one vendor receipt for this work –
6 specifically for the Blind Replacement and nothing else. Defendants did not produce any vendor
7 receipts or any statement describing the work, hours worked, and hourly rate charged for the Carpet
8 Cleaning or the Apartment Painting & Supplies. Then, after the Plaintiffs complained to Defendants
9 about the unsubstantiated charges on their Preliminary Move Out Statement, on or about June 22, 2022,
10 Defendants issued to Plaintiffs a revised move out statement entitled Summary of Move Our Charges.
11 However, this Summary of Move Out Charges still purported to deduct from Plaintiffs’ security deposit
12 \$280.00 for “Carpet Cleaning” and \$385.75 for “Painting”. And, as with the Preliminary Move Out
13 Statement, the Summary of Move Out Charges likewise did not include any vendor receipts and did
14 not include any description of the work, hours worked, and hourly rate applied to the work. To date,
15 Defendants have never produced to Plaintiffs any vendor receipts for the alleged carpet cleaning and
16 painting. Nor have they produced any statement of the work performed, the hours of work, and the
17 hourly rate for the work performed allegedly cleaning the carpet and painting.
18

19 269. The Civil Code sets forth requirements for the treatment of security deposits upon
20 termination of a residential lease, *inter alia*, section 1950.5(b) provides that a landlord may only use a
21 security deposit to satisfy charges against a former tenant for: (1) rent in arrears; (2) repairs exclusive
22 of wear and tear; (3) cleaning required to bring the leasehold back to the condition it was in when the
23 tenant accepted the tenancy; and (4) “to remedy future defaults by the tenant in any obligation under
24 the rental agreement to restore, replace, or return personal property or appurtenances” if provided for
25 in the lease.

26 270. Section 1950.5(g)(1) requires that the balance of security deposits and an itemization
27 of their disposition must be provided to the departing tenant within 21 days of vacating the leasehold.

28 271. Section 1950.5(g)(2) describes the substantiation required to be sent to former tenants

1 for charges levied against security deposits – a reasonable description of work performed by employees
2 including hours worked and hourly rate charged; and, for work by vendors, copies of invoices and
3 receipts from the vendors who performed work.

4 272. Section 1950.5(m) provides that no portion of a security deposit may be deemed non-
5 refundable by operation of the lease.

6 273. Defendants in this action systematically, uniformly, and in bad faith have violated the
7 Civil Code to the detriment of thousands of Californians over many years by charging for repairs,
8 replacement, and cleaning that were never done; a practice obscured by intentionally failing to itemize
9 and substantiate repairs, replacement and cleaning by code, if they were done. As such, these former
10 California tenants of Defendants have each been deprived of some or all of their security deposits which
11 Defendants were legally obligated to return to its tenants at the conclusion of their respective leases.
12

13 CLASS ACTION ALLEGATIONS

14 274. Plaintiffs re-allege and incorporate by reference the allegations of all preceding
15 paragraphs.
16

17 275. Plaintiffs bring this action as a class action pursuant to California Civil Code of
18 Procedure § 382 on behalf of themselves and all other similarly situated persons in the Classes, which
19 are composed of and defined as follows, excepting only individuals against whom or in whose favor a
20 final judgment has already been rendered with respect to the defendant(s):

21 276. **Unsubstantiated-Charges Class:** All former residents of Defendants’ properties
22 whose leaseholds terminated between September 27, 2018 to present, and who had at least \$125 of
23 their security deposit retained for cleaning, repairs and/or replacements combined (the “Plaintiff
24 Class.”).

25 277. Plaintiffs reserve the right to amend this Class and to add any number of subclasses.
26 The Court should permit this action to be maintained as a class action pursuant to California Code of
27 Civil Procedure section 382 because:

28 a. **Numerosity:** The Plaintiff Class is so numerous that the individual joinder of all

1 members is impracticable. Plaintiffs are informed and believe that there are more than
2 100,000 class members in total and a sufficiently numerous amount in the proposed
3 class.

4 b. **Common Questions Predominate:** Common questions of law and fact exist as to all
5 members of the class that predominate over any questions that affect only individual
6 members. These common questions of law and fact include:

- 7 1. Whether Defendants enacted policies or engaged in a pattern and
8 practice in violation of Civil Code section 1950.5(g)(1) of failing to
9 provide itemized statements detailing charges for repairs or cleaning
10 deducted from security deposits of its former tenants within 21 days of
11 move out.
- 12 2. Whether Defendants enacted policies or engaged in a pattern and
13 practice of failing to provide copies of vendor-supplied bills, receipts or
14 invoices for repairs or cleaning deducted from security deposits of its
15 former tenants within 21 days of move out.
- 16 3. Whether Defendants' uniform security deposit itemizations satisfy the
17 requirements for any alleged "employee performed work" on vacated
18 leaseholds under Civil Code section 1950.5(g)(2)(A).
- 19 4. Whether Defendants' uniform security deposit itemizations satisfy the
20 requirements for any alleged "vendor performed work" on vacated
21 leaseholds under Civil Code section 1950.5(g)(2).
- 22 5. Whether Defendants, by operation of law, are barred from seeking
23 recovery for amounts which could legitimately have been charged at
24 move out due to their systematic and bad faith violation of Civil Code
25 section 1950.5 and other equitable or statutory provisions of law.
- 26 6. Whether any and all Defendants are liable to each former tenant who is
27 a class member for punitive and/or treble damages for bad-faith retention
28

1 of security deposits under Civil Code section 1950.5(l).

2 7. Whether *Granberry v. Islay Investments* 9 Cal. 4th 738 mandates that the
3 Defendant return all of the security deposit retained from the Plaintiff
4 Class for its uniform violation of Civil Code section 1950.5.

5 8. The appropriate measure of class-wide legal and/or equitable relief.

6 c. **Typicality:** Plaintiffs' claims are typical of those of the Plaintiff Class. Plaintiff and all
7 Plaintiff Class members sustained injuries and damages arising from Defendants' common
8 policies, practices and course of conduct, and those injuries and damages were caused
9 directly by the Defendants' wrongful conduct in violation of law as alleged.

10 d. **Adequacy of Representation:** Plaintiffs will fairly and adequately protect the interest
11 of the members of the Plaintiff Class. Plaintiff has no interests adverse to the interests of
12 absent class members. Plaintiff has retained counsel adequate to prosecute the case for the
13 entire class.

14 e. **Superiority:** A class action is superior to other available means for the fair and efficient
15 adjudication of this controversy since individual joinder of all members of the class is
16 impracticable; class action treatment will permit a large number of similarly situated
17 persons to prosecute their common claims in a single forum simultaneously, efficiently, and
18 without the unnecessary duplication of effort and expense that numerous individual actions
19 would engender. Furthermore, because Defendants are expected to contend that any
20 individual's damages may be relatively small, the expense and burden of individual
21 litigation make it difficult or impossible for individual class members to redress the wrongs
22 done to them, while an important public interest will be served by addressing the matter as
23 a class action. The cost to the judicial system of individual adjudication would be substantial
24 and present the potential for inconsistent or contradictory judgments. In addition, individual
25 actions give Defendants too many opportunities to take advantage of unrepresented tenants
26 at a summary proceeding without access to substantial discovery, as discovery is not
27 available in small claims court.
28

1 278. Plaintiffs are unaware of any difficulties that are likely to be encountered in the
2 management of this action that would preclude its maintenance as a class action.

3
4 **FIRST CLAIM FOR RELIEF**

5 **Unlawful Retention of Residential Security Deposits**

6 **(California Civil Code § 1950.5)**

7 **(Against all Defendants)**

8
9 279. Plaintiffs re-allege and incorporate by reference the allegations of all preceding
10 paragraphs.

11 280. This cause of action is brought against Defendants on behalf of Plaintiffs and the
12 Plaintiff Class.

13 281. Defendants charged unsubstantiated cleaning, repair, replacement, and/or painting fees
14 to Plaintiffs and the Plaintiff Class upon the termination of their leasehold and deducted these charges
15 from their security deposits.

16 282. Defendants did not provide a copy of an itemized statement indicating the basis for, and
17 the amount of, any security received and the disposition of the security within 21 days of Plaintiffs'
18 and the Plaintiff Class vacating the respective leased premises owned and managed by Defendants.

19 283. Defendants did not provide the requisite substantiation of the charges against Plaintiffs'
20 and the Plaintiff Class's security deposits as required under Civil Code section 1950.5(g)(2).

21 284. Defendants, as a result of these charges, unlawfully retained some or all of Plaintiffs'
22 and the Plaintiff Class's security deposits.

23 285. Defendants engaged in the above-described misconduct in bad faith.

24 286. As a direct and proximate cause of Defendants' conduct, Plaintiffs and the Plaintiff
25 Class suffered damages.

26 ///

27 ///

28 ///

1 **SECOND CLAIM FOR RELIEF**

2 **Restitution as a Remedy for “Unfair Competition”**

3 **(California Business and Professions Code §§ 17200, *et seq.*)**

4 **(Against All Defendants)**

5 287. Plaintiffs re-allege and incorporate by reference the allegations of all preceding
6 paragraphs.

7 288. This cause of action is brought against Defendants on behalf of Plaintiffs and the
8 Plaintiff Class.

9 289. Pursuant to section 17200 of the California Business and Professions Code, “any
10 unlawful, unfair or fraudulent business act or practice” constitutes “unfair competition.”

11 290. The violations of the California Civil Code and other wrongdoing alleged herein
12 constitute unlawful, unfair and/or fraudulent business acts and practices, and therefore “unfair
13 competition,” for the purposes of section 17200 of the California Business and Professions Code.
14 Among other violations, Defendants’ collections and attempted collections of amounts over and above
15 a retained security deposit are unlawful, all entitling Plaintiffs and the Plaintiff Class to restitution
16 under the UCL.

17 291. Likewise, Defendants’ deduction from the Plaintiffs’ and the Plaintiff Class’s respective
18 security deposits without timely providing Plaintiffs and the Class legally competent itemized
19 descriptions of the repairs, replacement or cleaning purportedly performed by Defendants constitutes
20 an unlawful, unfair and/or fraudulent business practice. And Defendants’ deduction from the Plaintiffs’
21 and the Plaintiff Class’s respective security deposits without timely providing Plaintiffs and the Class
22 third party vendor invoices for all repairs, replacement or cleaning purportedly performed by third party
23 vendors constitutes an unlawful, unfair and/or fraudulent business practice.

24 292. Plaintiffs and the Plaintiff Class have suffered financial injury in fact and have lost
25 money and/or property as a result of such unfair competition.

26 293. The facts set forth establish that the Plaintiffs and the members of the Plaintiff Class are
27 entitled to judgment over and against Defendants and all of them, jointly and severally, awarding
28

1 restitution to the Plaintiffs and the Plaintiff Class of all monies acquired by means of the described
2 unfair competition, including wrongfully withheld security deposits and associated penalties.

3 294. Plaintiffs and the Plaintiff Class are further entitled to declaratory and injunctive relief
4 determining the rights and obligations in dispute among the Parties and an order mandating Defendants
5 adhere to the mandates of law with respect to their security deposit accounting practices.
6

7 **PRAYER FOR RELIEF**

8 WHEREFORE, Plaintiffs, on behalf of themselves and other members of Plaintiff Class, pray:

- 9
- 10 1. For actual damages sustained by Plaintiffs and the Plaintiff Class members, including but not
11 limited to, unlawfully retained security deposits; any amounts paid to Defendants over and
12 above what was retained of their respective security deposits for unreasonable and
13 unsubstantiated charges at move-out; plus any other amounts collected from Class members in
14 connection with their leasehold termination for purported repairs, replacements, painting, carpet
15 replacement or cleaning, accelerated rent, rental concession charge-backs, and any other
16 charges collected in violation of law.
 - 17 2. For return of the entirety of all Plaintiffs' and the Plaintiff Class's security deposits retained by
18 Defendants;
 - 19 3. For penalties available pursuant to Civil Code section 1950.5(l);
 - 20 4. For penalties available pursuant to Civil Code section 3345;
 - 21 5. For restitution for violation of Business and Professions Code sections 17200 *et seq.*;
 - 22 6. For pre-judgment interest;
 - 23 7. For attorney's fees and expenses recoverable under law, including, without limitation, Code of
24 Civil Procedure 1021.5;
 - 25 8. For costs, including class action notice and administration expenses;
 - 26 9. For injunctive relief against Defendants' conduct, including an injunction:
 - 27 a. Requiring Defendants to issue proper itemizations of security deposits as required by
28 Civil Code section 1950.5 within the time prescribed by law.
 - b. Requiring Defendants to provide a third-party documentation for every cleaning,

1 replacement, and repair charges consistent with the provisions of Civil Code §
2 1950.5(g)(2);

3 c. Prohibiting Defendants from charging any fees against residential security deposits
4 other than the charges specifically authorized by Civil Code section 1950.5(b); and

5 d. To declare all alleged outstanding balances owed by class members invalid and prohibit
6 collection thereupon.

7 10. For declaratory relief, declaring that outstanding balances alleged owed by the Plaintiff Class
8 members are extinguished by operation of this suit;

9 11. For all other appropriate declaratory and equitable relief; and

10 12. Any other relief that this Court deems just.

11 Dated: September 27, 2022

HOGUE & BELONG

12 By: Tyler J. Belong
13 JEFFREY L. HOGUE, ESQ.
14 TYLER J. BELONG, ESQ.

15
16 **LAW OFFICE OF JIMMIE DAVIS PARKER,
APC**

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18 _____
JIMMIE DAVIS PARKER, ESQ.

19 Attorneys for Plaintiffs
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1 **JURY DEMAND**

2 Plaintiffs and ROES 1 through 100, individually and on behalf of the other members of the
3 Plaintiff Class, hereby demand trial by jury of all issues triable by a jury, pursuant to applicable law,
4 including, but not necessarily limited to Article I, ¶16 of the California Constitution, and/or § 592 of
5 the California Code of Civil Procedure.
6

7 Dated: September 27, 2022

HOGUE & BELONG

8 By: Tyler J. Belong
9 JEFFREY L. HOGUE, ESQ.
TYLER J. BELONG, ESQ.

10
11 **LAW OFFICE OF JIMMIE DAVIS PARKER,**
12 **APC**

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14 _____
JIMMIE DAVIS PARKER, ESQ.

15 Attorneys for Plaintiffs
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