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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
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.: 37-2022-00038519-CU-NP-CTL

[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.*)

1 ESPLANADE, LP, a California Limited  
2 Partnership; BEXAEW GP, LLC, a Delaware  
3 Limited Liability Company; BEXAEW  
4 PARKSIDE COURT, LP, a California Limited  
5 Partnership; BEXAEW THE HAVENS, LP, a  
6 California Limited Partnership; BRE-FMCA,  
7 LLC, a Delaware Limited Liability Company;  
8 COURTYARDS AT 65TH, L.P., a California  
9 Limited Partnership; EMC SPE, LLC, a Delaware  
10 Limited Liability Company; EMERALD POINTE  
11 APARTMENTS, LLC, a Delaware Limited  
12 Liability Company; ESSEX 500 FOLSOM, LLC,  
13 a Delaware Limited Liability Company; ESSEX  
14 ANAVIA, L.P., a California Limited Partnership;  
15 ESSEX BELLA VILLAGIO, L.P., a California  
16 Limited Partnership; ESSEX BELLERIVE, L.P., a  
17 California Limited Partnership; ESSEX  
18 BERKELEY 4TH STREET, L.P., a California  
19 Limited Partnership; ESSEX BEX III, LLC, a  
20 Delaware Limited Liability Company; ESSEX  
21 BEXAEW, LLC, a Delaware Limited Liability  
22 Company; ESSEX BLUFFS, L.P., a California  
23 Limited Partnership; ESSEX BRIARWOOD, L.P.,  
24 a California Limited Partnership; ESSEX  
25 BRIDGEPORT, L.P., a California Limited  
26 Partnership; ESSEX BUENA VISTA, LLC, a  
27 Delaware Limited Liability Company; ESSEX  
28 BUNKER HILL, L.P., a California Limited  
Partnership; ESSEX CADENCE GP, L.P., a  
Delaware Limited Partnership; ESSEX  
CADENCE OWNER, L.P., a California Limited  
Partnership; ESSEX CAL-WA, L.P., a California  
Limited Partnership; ESSEX CAMARILLO  
CORPORATION, a California Stock Corporation;  
ESSEX CAMARILLO, L.P., a California Limited  
Partnership; ESSEX CAMINO RUIZ  
APARTMENTS, L.P., a California Limited  
Partnership; ESSEX CANYON OAKS  
APARTMENTS, L.P., a California Limited  
Partnership; ESSEX CARLYLE, L.P., a California  
Limited Partnership; ESSEX CATALINA  
GARDENS, LLC, a Delaware Limited Liability  
Company; ESSEX CHESTNUT APARTMENTS,  
L.P., a California Limited Partnership; ESSEX  
CITY VIEW, L.P., a

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.

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**VENUE**

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

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

**PARTIES**

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

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

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

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

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  
17 77. Defendant ESSEX PORTFOLIO, L.P. is a California limited Partnership, which owns  
18 and operates an apartment complex with 132 units doing business as “Foothill Gardens” generally  
19 located at 1110 Harness Dr San Ramon, CA 94583 within Contra Costa County. Defendant ESSEX  
20 PORTFOLIO, 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 PORTFOLIO, L.P. operates in a partnership with  
23 Defendant ESSEX PROPERTY TRUST, INC.

24  
25 78. Defendant ESSEX FORM 15, L.P. is a California Limited Partnership, which owns and  
26 operates an apartment complex with 242 units doing business as “Form 15” generally located at 1450  
27 Market St San Diego, CA 92101 within San Diego County. Defendant ESSEX FORM 15, L.P. lists  
28 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 SAN MATEO, CA  
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

15 140. Defendant WESCO III BEX, LLC is a Delaware Limited Liability Company, which  
16 owns and operates an apartment complex with 75 units doing business as “Regency at Encino”  
17 generally located at 15506 Moorpark St Encino, CA 91436 within Los Angeles County. Defendant  
18 WESCO III BEX, 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 WESCO III BEX, LLC operates in a partnership with  
21 Defendant ESSEX JV, LLC.

22 141. Defendant ESSEX REGENCY ESCUELA, L.P. is a California Limited Partnership,  
23 which owns and operates an apartment complex with 142 units doing business as “Regency at  
24 Mountain View” generally located at 333 Escuela Avenue Mountain View, CA 94040 within Santa  
25 Clara County. Defendant ESSEX REGENCY ESCUELA, L.P. 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 REGENCY ESCUELA, L.P. operates in a partnership with Defendants WESCO III GP, LLC; ESSEX

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  
15 151. Defendant BEX PORTFOLIO, LLC is a Delaware Limited Liability Company, which  
16 owns and operates an apartment complex with 280 units doing business as “Solstice” generally located  
17 at 299 W. Washington Avenue Sunnyvale, CA 94086 within Santa Clara 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  
23 152. Defendant ESSEX PORTFOLIO, L.P. is a California Limited Partnership, which owns  
24 and operates an apartment complex with 492 units doing business as “Station Park Green - Phases I,  
25 II, III” generally located at 430 Station Park Circle, Suite 100. San Mateo, CA 94402 within San Mateo  
26 County. Defendant ESSEX PORTFOLIO, L.P. lists its business address as 1100 PARK PL STE 200  
27 SAN MATEO, CA 94403. Its registered agent for service of process is ANNE MORRISON located  
28 at 1100 PARK PLACE STE 200 SAN MATEO, CA 94403. Defendant ESSEX PORTFOLIO, L.P.  
operates in a partnership with Defendants ESSEX PROPERTY TRUST, INC.

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.

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

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

23 156. Defendant K-H PROPERTIES is a California Limited Partnership, which owns and  
24 operates an apartment complex with 121 units doing business as “The Avery” generally located at  
25 12005 Albers Street Los Angeles, CA 91607 within Los Angeles County. Defendant K-H  
26 PROPERTIES 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 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.

24 167. Defendant ESSEX LORRAINE, L.P. is a California Limited Partnership, which owns  
25 and operates an apartment complex with 83 units doing business as “The Henley I” generally located  
26 at 245 W Loraine St Glendale, CA 91202 within Los Angeles County. Defendant ESSEX LORRAINE,  
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 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 coporate 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 genreally 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

22 **GENERAL ALLEGATIONS**

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

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.”<sup>1</sup>

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

**FIRST CLAIM FOR RELIEF**

**Unlawful Retention of Residential Security Deposits**

**(California Civil Code § 1950.5)**

**(Against all Defendants)**

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

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

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

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

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

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

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

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

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**SECOND CLAIM FOR RELIEF**

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

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

**(Against All Defendants)**

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

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

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

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

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

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

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

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,

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

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

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

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

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

12. Any other relief that this Court deems just.

Dated: September 27, 2022

**HOGUE & BELONG**

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

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

  
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JIMMIE DAVIS PARKER, ESQ.

Attorneys for Plaintiffs

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**JURY DEMAND**

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

Dated: September 27, 2022

**HOGUE & BELONG**

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

**LAW OFFICE OF JIMMIE DAVIS PARKER,  
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\_\_\_\_\_  
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Attorneys for Plaintiffs



# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Essex Property Trust Unlawfully Withholds Security Deposits from California Tenants, Class Action Claims](#)

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