THE ORLANDO LAW GROUP, PL
A Private Law Firm

12301 Lake Underhill Road, Suite 213
Orlando, Florida 32828

Tel: 407.512.4394
Fax: 407.955.4654

jenglert@theorlandolawgroup.com

July 24, 2026

VIA E-Mail: legal@zillowgroup.com

Zillow Group Legal Department
1301 Second Avenue, Floor 36
Seattle, WA 98101

Re: Data Delivery Demand Specifications

Dear Sir/Ma'am,

As you are aware, this firm represents Jean Ann Scott LLC d/b/a Jean Scott Homes and its affiliates (hereinafter referred to as "Jean Scott Homes"). We are writing after your unsatisfactory correspondence of March 11, 2026. As a result, we have drafted the attached lawsuit which we are prepared to file and serve if we cannot reach a satisfactory resolution to our client's dispute with your company.

We assert that Zillow Group, Inc. operates as a Communications Common Carrier (or Communications Carrier) and is subject to record retention laws under the Federal Communications Act (e.g., 47 CFR Sec. 42.6) and the Florida Security of Communications Act (Fla. Stat. Ch. 934).

Furthermore, Zillow is under a duty to preserve all data due to the ongoing class-action litigation in Taylor v. Zillow, Inc. (Case No. 2:25-cv-01818-JLR, W.D. Wash.) That case involves allegations that Zillow improperly monitored and reviewed agent-client communications within the Follow Up Boss platform to enforce illegal steering practices. In that proceeding, Aarti Reddy has sworn under oath that Zillow is fully complying with its evidence preservation obligations. Because our client's claims arise from the exact same platform and involve Zillow's unauthorized access to those communications, Zillow's preservation obligations extend directly to our client's data.

In order to avoid suit being filed in this matter, Jean Scott Homes must have its Intellectual Property returned as it had demanded on multiple occasions. The specific format required for the return of the data is attached.

Further, Jean Scott Homes' business has been damaged by the improper withholding of its Intellectual Property and has had to retain legal counsel to get its IP returned. As such Jean Scott Homes seeking $250,000 in damages plus attorney's fees.

Upon the return of Jean Scott Homes' Intellectual Property — in strict accordance with the attached specifications — and payment of the requested compensation, our client will consider this matter fully resolved and will forgo filing the attached lawsuit.

Deadlines:

Zillow must deliver a Preliminary Production Sample within 30 days of this demand, and the complete production within 30 days of our validation of the sample.

Scope:

The complete Jean Scott Homes tenant dataset bounded by our tenant ID, including all necessary schemas/dictionaries, while excluding cross-tenant and Zillow enterprise data. Copying this data does not conflict with Zillow's existing retention obligations.

1. Relational Database
    a. Format: Standard SQL dump (PostgreSQL, MySQL, MariaDB, or SQLite) and JSON for any NoSQL data.
    b. Completeness: Must include all tables, rows, fields, and system metadata (active, hidden, and soft-deleted).
    c. Inclusions: Explicitly includes all AI-generated call transcripts, summaries, and associated metadata.
    d. Prohibited: Data may NOT be flattened into CSV/Excel files, or delivered piecemeal/paginated.

2. Binary Media
    a. Format: All media (call recordings, voicemails, MMS, uploaded documents) in native format without downsampling.
    b. Integrity: Must retain original system-generated filenames, UUIDs, and folder hierarchies.
    c. Mapping: Must include a Media Manifest File explicitly mapping every binary file to its corresponding database record. No orphaned files.

3. Delivery & Verification
    a. Transfer: Secure download link of a unified archive (ZIP/TAR.GZ), unencrypted or with keys provided. Must remain active for 30+ days.
    b. Verification: Zillow must provide cryptographic hashes (e.g., SHA-256) for all archive files.

4. Preliminary Production Sample
        i. Must include 100 representative "Stage: Closed" Consumer contact records (from 2024-2025) complete with all associated database rows, binary media, and AI transcripts, to validate formatting and relational integrity before full production.

Please respond within fifteen business days or we will assume we need to move forward with the suit. I look forward to hearing from you.

Sincerely,



Jennifer A. Englert, Esquire

JAE: afg