ZILLOW GROUP

**VIA EMAIL:** JEnglert@TheOrlandoLawGroup.com

August 13, 2026

Jennifer Englert
The Orlando Law Group, PL
12301 Lake Underhill Rd., Suite 213
Orlando, Florida 32828

**RE: Data Delivery Demand Specifications – Jean Ann Scott LLC d/b/a Jean Scott Homes**

Dear Ms. Englert:

We are writing in response to your letter dated July 24, 2026, demanding the production of certain data related to your client Jean Ann Scott LLC d/b/a Jean Scott Homes and its affiliates ("JSH"). Zillow again declines your demand for the reasons stated in our March 11, 2026 correspondence.

At the outset, and before turning to your specific demands: given the undisputed background facts, Zillow believes that the claims in the draft complaint are meritless; a pleading based on those facts would be frivolous and could expose your client and your firm to sanctions if filed as drafted. Indeed, and as set forth in Zillow's prior correspondence, your client's own documented conduct defeats each count:

- October 15, 2025: FUB notified customers of the upcoming merger and resulting change to its Privacy Notice
- November 15, 2025: FUB's merger into Zillow, Inc. is completed and the updated Privacy Notice became effective
- November 16, 2025: JSH emailed Zillow CEO Jeremy Wacksman and FUB co-founder Dan Corkill, stating that JSH had deleted all data from its FUB account, and demanding confirmation that deleted data would not be used by Zillow/FUB
- December 2, 2025: JSH emailed Zillow Group Legal and FUB Customer Support, demanding deletion of all JSH account data from Zillow/FUB systems
- December 3, 2025: FUB responded to JSH, confirming that data had been deleted on Nov. 25, 2025, as requested by JSH
- December 3, 2025: JSH responded, acknowledging confirmation of the data deletion, and made certain information requests under the CCPA
- December 8, 2025: Zillow Group Legal responded to JSH, clarifying that CCPA applies only to CA-based consumers and requesting verification of JSH's residency, if available
- January 15, 2026: JSH requested a "complete SQL database dump" of all JSH data
- January 16, 2026: JSH sent Zillow/FUB a litigation preservation demand



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In summary, it was only after Zillow complied with JSH's deletion demand and confirmed in writing with your client that the accounts were closed and all data had been deleted that your client sought production of its metadata. Those facts preclude the alleged claims for damages that your client continues to threaten. Indeed, your client pleads the deletion demand in its own draft complaint (para 11) and pleads that it accepted a refund (paras 12-13). Because JSH ordered the destruction of the very data it now claims Zillow "confiscated," it cannot establish the unauthorized taking or use that its conversion, civil theft, and trade-secret counts each require.

In addition, we note that the Follow Up Boss Terms of Service contained the following notice regarding termination of a customer's FUB account:

> "You understand that any termination of your account may involve deletion of your Customer Data and any content, information or materials associated with your account from our databases. Zillow may, at its sole discretion, permit continued, limited access for Customers for a limited time after the conclusion of the term. If a Customer or its Authorized Users wishes to save or maintain any data, it is their sole obligation to download such data before the conclusion of the term."

FUB TOS, Section 13, https://www.followupboss.com/legal-pages/terms-of-service. Thus, your client was on notice that it was solely responsible for downloading or saving its data prior to closing its FUB account. Your client informed us that it had, in fact, successfully downloaded its data. Zillow had no responsibility to preserve or produce this data, even if JSH had not demanded its deletion, which in fact your client had done on several occasions, requesting "the immediate deletion of all data belonging to Jean Scott Homes (JSH), our team members, and our employees, currently stored or processed by Zillow Group through its acquisition of Follow Up Boss (FUB)," including "every note, call log, text message, email, attachment, timestamp, metadata entry, and behavioral data point connected to our account."

For those reasons and myriad others, your draft complaint is frivolous. If JSH insists on moving forward with filing a claim, Zillow will vigorously defend itself, including seeking fees and sanctions pursuant to Fla. Stat. sec. 57.105, and as permitted by law.

Sincerely,

Zillow Group Legal Department
legal@zillowgroup.com