ZILLOW GROUP

VIA EMAIL: JEnglert@TheOrlandoLawGroup.com

March 11, 2026

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

RE: Jean Scott Homes's Demand for Return of Property

Dear Ms. Englert:

We are writing in response to your letter dated February 23, 2026, regarding Jean Ann Scott LLC d/b/a Jean Scott Homes and its affiliates ("Jean Scott Homes"). We hope the information and timeline below will help clarify the facts with regard to your client's concerns.

Zillow, Inc. ("Zillow") is an online marketplace that connects buyers to local real estate agents. Zillow does not have its own agents, rather it relies on its relationships with local agents to provide real estate services to buyers who browse on Zillow.com.

Follow Up Boss ("FUB") is a customer relationship management ("CRM") software that allows agents to communicate with buyers during their home buying journey and track their readiness and progress toward buying a home. Zillow acquired FUB in 2023 and operated it as a separate business until 2025.

On or about October 15, 2025, FUB began displaying a banner in the FUB web platform (and a pop-up in the mobile app) that notified customers: "Follow Up Boss is now operating as a brand of Zillow, Inc. See our updated FUB Terms of Service, Zillow Privacy Notice, and FUB Addendum, effective November 15, 2025." FUB also posted Frequently Asked Questions on its website addressing the policy changes and FUB's Support team was available to answer inbound customer questions about the changes. One of the FAQs specifically addressed what steps customers could take if they wanted to opt out of the new changes: "**Can I opt out of these privacy policy changes?** If you do not agree to the new Terms of Service and Privacy Notice, you can cancel your Follow Up Boss subscription before November 15, 2025. You can download your data before closing your account, and if your account wasn't closed for policy or payment issues, you can email support within 30 days for help retrieving your contact list."

Despite the clear communication and 30-day advance notice of the policy changes, FUB/Zillow did not receive any communication from Jean Scott Homes until November 16, 2026. On that date, Mr. Scott, on behalf of Jean Scott Homes, sent an email to Zillow's CEO Jeremy Wacksman and FUB's co-founder Dan Corkill, objecting to the policy changes and stating: "we have deleted all data from our Follow Up Boss account, including call logs, text messages, emails, attachments,

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and notes. We request written confirmation that deleted data will not be processed, analyzed, retained, or used in any system…"

In response to Mr. Scott's demand, FUB undertook steps to close Jean Scott Homes's account and delete the account data from FUB's systems. On December 2, 2026, Mr. Scott sent an email to the Zillow Group Legal team and FUB Support, again demanding deletion of Jean Scott Homes's FUB account data. On December 3, 2026, a support manager from FUB responded and confirmed in writing that the Jean Scott Homes account had been closed and all data had been deleted on November 25, 2025, in accordance with Mr. Scott's written request. Mr. Scott then sent a response making a demand for certain information about FUB's data collection pursuant to the California Consumer Privacy Act ("CCPA"). On December 8, 2026, Zillow Group Legal responded to Mr. Scott, explaining that the CCPA extends data subject access rights only to California consumers. This is also reflected in FUB's Privacy Notice[1], which states in relevant part:

> **7. Your State Privacy Rights**
>
> If you are a Customer and a resident of California, you have the right to:
>
> - Request access to the personal information we have collected about you;
> - Request deletion or correction of your personal information;
> - Opt out of the sale or sharing of your personal information; and
> - Not be discriminated against for exercising your rights.

Mr. Scott is a resident of Florida and Jean Scott Homes is licensed in Florida. After this exchange, Zillow and FUB considered the matter resolved.

However, on January 15, 2026, FUB Support received a phone call from Mr. Scott, requesting access to certain metadata and call records concerning his previously closed FUB account. After the phone call, Mr. Scott sent an email to FUB Support outlining his requests for metadata and call recordings concerning the closed Jean Scott Homes account. FUB Support escalated this matter to management and Zillow Group Legal. On January 16, 2026, Mr. Scott sent an email to a FUB Support manager and Zillow Group Legal, again outlining his requests. On January 21, 2026, Zillow Group Legal responded to Mr. Scott, reminding him that he had demanded his account data be deleted in November 2025, including all backups and call logs, which we had complied with and confirmed in writing. Therefore, there was no data remaining in his account that we could provide. Mr. Scott was seemingly frustrated by this response and made certain legal threats. Zillow Group Legal responded, reiterating that there was nothing more we could provide at this time and wishing the Jean Scott Homes luck with its new CRM provider.

While we regret that Jean Scott Homes chose to close its FUB account and move its CRM to another service provider, we respectfully disagree with the legal claims made your demand letter of February 23, 2026. Jean Scott Homes's claims are predicated on mischaracterizations of

[1] https://www.followupboss.com/legal-pages/privacy-notice

Zillow/FUB's actions with regard to the privacy notice changes and the commercial relationship between Jean Scott Homes and FUB.

First, FUB/Zillow were free to make changes to their Privacy Notice and Terms Of Use at any time by providing adequate notice to consumers. There's no dispute that Zillow and FUB gave customers 30-days' written notice before the PN and TOS changes went into effect, allowing customers ample time to review the new policies and decide whether to continue their CRM accounts. There was no "bait and switch" or inducement to continue the relationship with FUB. Jean Scott Homes's remedy, if it did not wish to agree to the new terms, was to change service providers, which it ultimately elected to do.

Second, Jean Scott Homes predicates its unfair and deceptive practices claims on the allegation that Zillow is unfairly competing with Jean Scott Homes's brokerage. As explained above, Zillow is an online real estate marketplace that does not have its own real estate agents. Zillow is not a competitor of Jean Scott Homes or of any other local brokerage. Rather, Zillow partners with local real estate brokerages to connect them with buyers looking to purchase homes in their area. As such, Jean Scott Homes's unfair and deceptive trade practices claims are baseless.

Third, Zillow is unable to provide the data requested by Jean Scott Homes for the simple reason that Mr. Scott previously demanded that Zillow delete that data; Zillow did so and therefore is no longer in possession of the data Jean Scott Homes seeks.

We hope that this explanation will provide resolution to your client. If you have any questions or need further clarification, please contact us.

Sincerely,

Zillow Group Legal Department
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