

CAUSE NO. CC-17-06253-C

UNITED DEVELOPMENT FUNDING, L.P.,	§	IN THE COUNTY COURT
A DELAWARE LIMITED PARTNERSHIP;	§	
UNITED DEVELOPMENT FUNDING II,	§	
L.P., A DELAWARE LIMITED	§	
PARTNERSHIP; UNITED DEVELOPMENT	§	
FUNDING III, L.P., A DELAWARE	§	
LIMITED PARTNERSHIP; UNITED	§	
DEVELOPMENT FUNDING IV, A	§	
MARYLAND REAL ESTATE	§	
INVESTMENT TRUST; UNITED	§	
DEVELOPMENT FUNDING INCOME	§	
FUND V, A MARYLAND REAL ESTATE	§	
INVESTMENT TRUST; UNITED	§	
MORTGAGE TRUST, A MARYLAND	§	
REAL STATE INVESTMENT TRUST;	§	
UNITED DEVELOPMENT FUNDING	§	AT LAW NO. 3
LAND OPPORTUNITY FUND, L.P., A	§	
DELAWARE LIMITED PARTNERSHIP;	§	
UNITED DEVELOPMENT FUNDING	§	
LAND OPPORTUNITY FUND	§	
INVESTORS, L.L.C., A DELAWARE	§	
LIMITED LIABILITY COMPANY	§	

Plaintiffs,

v.

J. KYLE BASS; HAYMAN CAPITAL
MANAGEMENT, L.P.; HAYMAN
OFFSHORE MANAGEMENT, INC.;
HAYMAN CAPITAL MASTER FUND, L.P.;
HAYMAN CAPITAL PARTNERS, L.P.;
HAYMAN CAPITAL OFFSHORE
PARTNERS, L.P.; HAYMAN
INVESTMENTS, LLC

Defendants.

DALLAS COUNTY, TEXAS

**DECLARATION OF IAN E. BROWNING IN SUPPORT OF PLAINTIFFS’
OPPOSITION TO DEFENDANTS’ MOTION FOR ENTRY OF ORDER ON
DEFENDANTS’ SECOND MOTION TO COMPEL (SEC DOCUMENTS)**

I, Ian E. Browning, declare and state under penalty of perjury:

1. I am over eighteen years of age. I have never been convicted of a felony or a crime of moral turpitude. I am of sound mind, and I am fully competent to make this declaration. I make this declaration of my own personal knowledge, except to the extent otherwise stated.
2. I am an attorney for plaintiffs United Development Funding, L.P., et al. (collectively, “Plaintiffs” or “UDF”), and I am submitting this declaration in support of Plaintiffs’ Opposition to Defendants’ Motion for Entry of Order on Defendants’ Second Motion to Compel (SEC Documents) (“Motion”).
3. On July 13, 2021, the Court held a hearing on Defendants’ Second Motion to Compel Production of Documents Regarding Government Investigations of UDF (“Second Motion to Compel”). Attached hereto as Exhibit A is a true and correct copy of excerpts from the Reporter’s transcript of the July 13, 2021 hearing on Defendants’ Second Motion to Compel.
4. Following the July 13 hearing on Defendants’ Second Motion to Compel, the parties conferred in an effort to agree to a reasonable order, as directed by the Court. Between July 16, 2021 and August 16, 2021, the parties exchanged drafts and edits on proposed orders. On August 16, 2021, UDF’s counsel sent Defendants’ counsel a revised draft proposed order that accepted some, but not all, of Defendants’ proposed edits. A true and correct copy of the foregoing proposed order is attached hereto as Exhibit B. Defendants did not offer any further revisions to the proposed order attached as Exhibit B, and filed the Motion on August 20, 2021. Absent unforeseen technical delays or new requirements ordered by the Court, as set forth in Exhibit B, UDF will produce the documents identified in paragraph 1 (the SEC Production) by September 15, 2021, and will produce the documents identified in paragraphs 2-5 of Exhibit B by August 30, 2021 (to the extent those documents are in UDF’s possession, custody or control).
5. Following the July 13 hearing on Defendants’ Second Motion to Compel, UDF’s counsel began to collect, review, and prepare the SEC Production and the other documents set forth in the draft proposed order for production to Defendants. Beginning on July 16, UDF’s counsel in this action began working with UDF’s regulatory counsel to identify UDF’s SEC document productions, ascertain their scope, and identify any potential issues (such as the existence of tax returns and tax information in the productions). UDF’s counsel also worked to collect the other materials listed in paragraphs 2-5 of the draft proposed order. During this process, UDF’s counsel confirmed that UDF had produced both personal (individual) W-2 forms, as well as entity tax filings, and communications with federal tax authorities. In addition, UDF’s counsel learned that neither UDF nor its regulatory counsel received copies of exhibits to any transcripts of testimony before the SEC.

6. After identifying the documents UDF produced to the SEC, UDF's counsel worked with its vendor and document review team to load the data for review. The SEC Production contains over 111,000 documents (including more than 35,000 emails), and is estimated to be over 900,000 pages total.
7. Due to volume and time constraints, UDF's counsel devised targeted searches to identify information that may require redaction or withholding: (1) personal identifying information (e.g., social security numbers, personal email addresses, and personal telephone numbers); (2) personal financial information (e.g., personal financial statements, compensation information, and records of distributions); (3) and tax filings. UDF's review of the aforementioned searches is nearing completion, and once redactions are implemented (which UDF anticipates completing next week), UDF will begin processing the SEC Production for production to Defendants. Due to the volume of the SEC Production, UDF's vendor estimates it will take approximately 1.5 weeks just to process the SEC Production and perform necessary quality control.
8. UDF plans to withhold or redact the following information from the SEC Production: (1) tax returns (and other tax filings), and communications with tax authorities; (2) personal identifying information (e.g., social security numbers, personal email addresses, and personal phone numbers), and (3) personal financial information (e.g., personal financial statements, compensation information, and records of distributions).
9. Defendants have produced less than 22,000 documents in this case to date, totaling 79,321 pages.
10. Both Defendants and UDF have redacted documents they have produced in this case on non-privilege grounds, including information they deemed sensitive and/or irrelevant. Because Defendants have refused to remotely tailor their discovery, forcing UDF to produce entire sets of files and emails, UDF has necessarily had to make redactions according to a proper protocol for information unrelated to this case, privileged information, and private financial information that is swept up by these vast, overbroad productions. UDF understands that in the course of this project, there can be questions or issues that come up regarding redactions. The parties set up a specific protocol to address those questions. Defendants have utilized that protocol, sending voluminous lists of documents with redactions it had questions on, and UDF has responded to all such inquiries in a timely manner.
11. Attached hereto as Exhibit C is a true and correct copy of an email from Defendants' counsel dated April 6, 2021, in which Defendants' counsel identifies the basis for redactions on various documents produced by Defendants in this action.
12. Following the July 13 hearing, UDF's counsel informed Defendants' counsel that UDF did not intend to include SEC bates numbering on the documents included

in the SEC Production when UDF produced the documents to Defendants. In response, Defendants' counsel demanded that UDF include the SEC bates numbering on the SEC Production. UDF informed Defendants' counsel that UDF declined to produce the SEC Production with SEC bates numbering because doing so would likely result in prejudice to UDF, and UDF could provide Defendants with the same information in electronic document metadata.

13. Attached hereto as Exhibit D is an exemplar document showing what a document would look like if produced with both: (1) bates numbers and confidentiality language included when the document was initially produced to the SEC; and (2) bates numbers and confidentiality language used in this action.
14. If the Court orders UDF to include SEC bates numbering on the SEC Production, it will likely delay the SEC Production by at least two weeks, as UDF will have to transfer redactions and document coding onto new production images, and re-start production processing.

JURAT:

“My name is Ian E. Browning, my date of birth is October 12, 1983, and my office address is Lubin Olson & Niewiadomski LLP, 600 Montgomery Street, 14th Floor, San Francisco, California. I declare under penalty of perjury that the foregoing is true and correct.”

Executed on the 27th day of August 2021 in San Francisco, California.



Ian E. Browning

EXHIBIT A

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REPORTER'S RECORD

VOLUME 1 OF 1

TRIAL COURT CAUSE NO. 17-06253-C

UNITED DEVELOPMENT FUNDING, L.P,	(IN THE COUNTY COURT
et al,	(
	(
Plaintiff,	(
	(
VS	(AT LAW NO. 3
	(
J. KYLE BASS, et al,	(
	(
Defendants.	(DALLAS COUNTY, TEXAS

MOTION TO COMPEL HEARING

On the 13th day of July, 2021, the following proceedings came on to be heard in the above-entitled and numbered cause before the Honorable Ted M. Akin, Judge presiding, held in Dallas, Dallas County, Texas:

Proceedings reported by machine shorthand.

1 Mr. Bellinger and ask him an easy way.

2 MR. SOMMER: I can certainly ask. I understand
3 the concept.

4 THE COURT: I'm inclined to grant his motion,
5 but somewhat limited. In other words, I don't want to
6 just do in it a blanket to furnish all this and put you
7 all to all of this additional work without giving -- I
8 want him to get the material he's entitled to and needs
9 to have. I think that has pretty well been determined
10 here. I would like you to come up with an order that's
11 reasonable.

12 MR. TILLOTSON: Yes, Your Honor.

13 THE COURT: And then if it's not reasonable, I
14 want to hear about it. And I'm not going to do anything
15 that's unreasonable.

16 MR. TILLOTSON: Yes, Your Honor. Of course.

17 THE COURT: And, Mr. Sommer, do you have any
18 input?

19 MR. SOMMER: No, Your Honor. I just think that
20 Your Honor's idea of perhaps we get them some information
21 in stages, that we start getting them some information
22 will help provide some basis for further concrete
23 discussion of what else is needed once they have some
24 initial production. And, you know, it helps in terms of
25 they might get certain things and say, We have that and

1 now we need this, as opposed to theoretically talking
2 about it.

3 THE COURT: Mrs. Cirrangle, you seem to be more
4 knowledgeable or the most knowledgeable lawyer with
5 respect to all of the documents. Is that -- are you the
6 one or Mr. Sommer is the one that Mr. Tillotson should be
7 visiting with, with respect to this matter?

8 MR. SOMMER: I think we can all talk. Jon and I
9 have participated in all the meet and confers. I only
10 missed on so we can both be involved in that.

11 THE COURT: Good. And when can all this take
12 place?

13 MR. SOMMER: We can...

14 MR. TILLOTSON: Propose a date this week, and we
15 can make it work.

16 MR. SOMMER: I was just going TO SAY I think we
17 do need at least a day or two to investigate a little bit
18 what's out there so THAT we can provide a little better
19 understanding of what we might be able to get.

20 MR. TILLOTSON: How about Friday, Jonathan?
21 Does that work?

22 MS. CIRRRANGLE: I have Mr. (inaudible)
23 deposition at 8 a.m., but it should be finished -- it
24 would have to be in the afternoon.

25 MR. TILLOTSON: Okay.

1 MR. SOMMER: In the afternoon, yes.

2 MR. TILLOTSON: Propose a time Friday afternoon,
3 and we'll make it work.

4 MS. CIRRRANGLE: Can we contact you after
5 Mr. Rosa's deposition? Austin or one of you will be on
6 that, I assume.

7 MR. TILLOTSON: Yeah. Let's just plan Friday
8 afternoon, and we'll figure out the time.

9 MR. SOMMER: Yeah, maybe a break after that and
10 I can get on the phone.

11 MR. TILLOTSON: All right, Your Honor. We'll
12 submit a proposed order. We'll have a meet and confer on
13 these other issues.

14 THE COURT: I would like the order, whatever you
15 submit to me, I want either Mrs. Cirrrangle or Mr. Sommer
16 to sign off. Both of you sign off approved as to form
17 and content.

18 MR. TILLOTSON: Yes, Your Honor.

19 THE COURT: So we have no misunderstandings.

20 MR. TILLOTSON: Of course.

21 THE COURT: Anything further?

22 MR. TILLOTSON: Not right now Your Honor.

23 THE COURT: Thank you very much. I appreciate
24 it.

25 (End of proceedings)

1 STATE OF TEXAS)

2 COUNTY OF DALLAS)

3 I, Janet E. Wright, Official Court Reporter in and
4 for the County Court of Dallas County, Texas, County
5 Court at Law Number Three, State of Texas, do hereby
6 certify that to the best of my ability the above and
7 foregoing contains a true and correct transcription of
8 all portions of evidence and proceedings requested in
9 writing to be included in the Reporter's Record, in the
10 above-styled and -numbered cause, all of which occurred
11 in open court or in chambers and were reported by me.

12 I further certify that this Reporter's Record of
13 the proceedings truly and correctly reflects the
14 exhibits, if any, admitted by the respective parties.

15 I further certify that the total cost for the
16 preparation of this Reporter's Record is \$1,236.00 and
17 was paid by Mr. de la Garza and Mr. Tillotson.

18 WITNESS MY OFFICIAL HAND this the 14th day of
19 July, 2021.

20 /s/ Janet E. Wright

21 JANET E. WRIGHT, Texas CSR #1532
22 Expiration Date: 7/31/22
23 Official Court Reporter
24 County Court-at-Law No. 3
25 600 Commerce Street, Suite 585
Dallas, Texas 75202
214/653-7831

EXHIBIT B

CAUSE NO. CC-17-06253-C

UNITED DEVELOPMENT
FUNDING, L.P., *et al.*,
Plaintiffs,

v.

J. KYLE BASS, *et al.*,
Defendants.

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IN THE COUNTY COURT

AT LAW NO. 3

DALLAS COUNTY, TEXAS

ORDER REGARDING DEFENDANTS' SECOND
MOTION TO COMPEL

On July 13, 2021, came to be heard Defendants' Second Motion to Compel (the "Motion"). Having considered the Motion, all briefs and responses in support thereof, and in opposition thereto, all exhibits submitted therewith, and the arguments of counsel and the evidence presented at the hearing, the Motion is hereby GRANTED as set forth below.

It is ORDERED that Plaintiffs (or "UDF") shall produce the following:

1. All documents provided by Plaintiffs to the Securities and Exchange Commission (the "SEC") from April 1, 2014, to the present (whether submitted voluntarily or in response to any SEC request or

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ORDER REGARDING DEFENDANTS' SECOND
MOTION TO COMPEL

PAGE 1 OF 1

subpoena) in connection with or as part of the SEC investigation that commenced in April 2014, including the “approximately 890,000 pages of documents [produced] to the SEC” referred to in “Plaintiffs’ Opposition to Defendants’ ‘Second’ and ‘Third’ Motions to Compel.” Consistent with the parties’ Rule 11 Agreement, Plaintiffs may remove tax returns or tax information related to any person or entity, and personal financial information or other private records of any individual person that were part of Plaintiffs’ production to the SEC.

2. Any order of investigation, whether formal or informal, for the SEC investigation that commenced in April 2014;

3. Any “Wells Notices” issued to Plaintiffs by the SEC and the Plaintiffs’ submissions to the SEC in response to the Wells Notices;

4. Copies of transcripts of any testimony or interviews taken or conducted by the SEC in connection with its investigation that have been received by Plaintiffs, including any exhibits to the transcripts;

5. Copies of grand jury subpoenas received by Plaintiffs, with the name of any natural person to be redacted.

IT IS FURTHER ORDERED that, after Defendants review the above production, the parties shall meet and confer regarding any

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additional potential production that Defendants believe is appropriate with reference to the Motion.

It is FURTHER ORDERED that Plaintiffs comply with paragraphs 2 through 5 of this Order on or before August 30, 2021 and paragraph 1 of this Order on or before September 15, 2021.

It is so **ORDERED**.

Date

The Honorable
Ted Akin

EXHIBIT C

From: [Austen Irrobali](#)
To: [Cirangle, Ellen](#)
Cc: [Sommer, Jonathan](#); [Browning, Ian E.](#); [Linda Stahl](#); [Jeff Tillotson](#); [Patrick Carew](#); [Enrique Ramirez](#); [Jon Patton](#); [Ben Nabors](#)
Subject: Re: Hayman production
Date: Tuesday, April 6, 2021 1:23:52 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.jpg](#)

Ellen –

We have reviewed the emails you identified below. Per my agreement with Jon, please see the explanation below. As an overarching note, apparently the practice was at one point that if any member of an email family contained relevant information the entire family was produced with redactions. As you can see below, that explains the lion's share of the documents you identified.

- March 16 Email:
 - Hayman0053991: parent email in which we redacted information that is irrelevant but was produced because one attachment mentions UDF.
 - Hayman0053992: attachment to Hayman0053991 but is irrelevant to this lawsuit.
 - Hayman0054014: attachment to Hayman0053991 but is irrelevant to this lawsuit.
 - Hayman0054118: it looks like this is the last page of an attachment to Hayman0053991 that begins on Hayman0054114 but is irrelevant save the information on page 4 (Hayman0054117).
 - Hayman0054177: attachment to Hayman0053991 but is irrelevant to this lawsuit
 - Hayman0054225: it looks like this is the last page of an attachment to Hayman0053991 that begins on Hayman0054177 but is irrelevant to this lawsuit.
 - Hayman0054500: attachment to Hayman0054497 but is irrelevant to this lawsuit .
 - Hayman0054501: attachment to Hayman0054497 but is irrelevant to this lawsuit.
 - Hayman0054565: attachment to Hayman0054497 but is irrelevant to this lawsuit.
 - Hayman0054583: attachment to Hayman0054497 but is irrelevant to this lawsuit.
 - Hayman0054641: attachment to Hayman0054497 but is irrelevant to this lawsuit.
- March 26 Email:
 - Hayman0009264: redacted irrelevant Hayman trade information. It appears the redaction extends over the UDF information, however, so I will get you this document with a more appropriate redaction.
 - Hayman0009278: redacted non-UDF related information irrelevant to this lawsuit.
 - Hayman0009543: redacted non-UDF related information irrelevant to this lawsuit.
 - Hayman0013246: redacted specific trade information
 - Hayman0015099: redacted non-UDF information unrelated to this lawsuit.
 - Hayman0017754: redacted non-UDF information unrelated to this lawsuit.
 - Hayman0017758: redacted non-UDF information unrelated to this lawsuit.
 - Hayman0019418: redacted non-UDF information unrelated to this lawsuit.
 - Hayman0019430: redacted non-UDF information unrelated to this lawsuit.
 - Hayman0020402: redacted non-UDF information unrelated to this lawsuit.
 - Hayman0020523: redacted non-UDF information unrelated to this lawsuit.
 - Hayman0027359: redacted non-UDF information unrelated to this lawsuit.

- Hayman0027362: redacted non-UDF information unrelated to this lawsuit.
- Hayman0027363: redacted non-UDF information unrelated to this lawsuit.
- Hayman0030965: redacted non-UDF information unrelated to this lawsuit.
- Hayman0031693: redacted for privileged per privilege log (PRIV2518).
- Hayman0037450: redacted for privileged per privilege log (PRIV2518).
- Hayman0045187: redacted non-UDF information unrelated to this lawsuit.
- Hayman0046803: redacted non-UDF information unrelated to this lawsuit.
- Hayman0051011: redacted non-UDF information unrelated to this lawsuit or discussing attorney communications.
- March 29 Email:
 - Mackinac0001475: this document is identified as PRIV02105 on Defendants' Second Amended Combined Privilege Log. Thank you for bringing it to our attention.

Austen Irrobali

Tillotson Law

Mobile: (915) 861-1765

Direct: (214) 382-3044

Main: (214) 382-3041

Email: airrobali@tillotsonlaw.com

Website: www.tillotsonlaw.com

Address: 1807 Ross Ave. Suite 325, Dallas, Texas 75201



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Website: www.tillotsonlaw.com

Address: 1807 Ross Ave. Suite 325, Dallas, Texas 75201



From: "Cirangle, Ellen" <ecirangle@lubinolson.com>

Date: Monday, March 29, 2021 at 12:58 PM

To: Austen Irrobali <airrobali@tillotsonlaw.com>, Jeff Tillotson <jtillotson@tillotsonlaw.com>, Patrick Carew <pcarew@kilpatricktownsend.com>

Cc: "Sommer, Jonathan" <JSommer@lubinolson.com>, "Browning, Ian E." <ibrowning@lubinolson.com>, Linda Stahl <lstahl@carterarnett.com>

Subject: RE: Hayman production

Austen: additionally, the attached document was produced by a third party. The bottom of the email string is an email from Parker Lewis, which discusses an attachment he is sending, but it was not in the third party production. I cannot find this email or the attachment in your production. Can you please provide? Thanks.

From: Austen Irrobali <airrobali@tillotsonlaw.com>
Sent: Friday, March 26, 2021 4:56 PM
To: Cirangle, Ellen <ecirangle@lubinolson.com>; Jeff Tillotson <jtillotson@tillotsonlaw.com>; Patrick Carew <pcarew@kilpatricktownsend.com>
Cc: Sommer, Jonathan <JSommer@lubinolson.com>; Browning, Ian E. <ibrowning@lubinolson.com>; Linda Stahl <lstahl@carterarnett.com>
Subject: Re: Hayman production

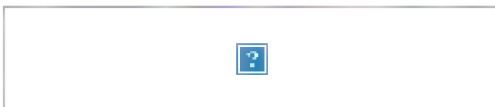
Ellen –

I just got out of a deposition that's gone all day and will get back to you on this Monday.

Austen

Austen Irrobali

Tillotson Law
Mobile: (915) 861-1765
Direct: (214) 382-3044
Main: (214) 382-3041
Email: airrobali@tillotsonlaw.com
Website: www.tillotsonlaw.com
Address: 1807 Ross Ave. Suite 325, Dallas, Texas 75201



From: "Cirangle, Ellen" <ecirangle@lubinolson.com>
Date: Friday, March 26, 2021 at 5:08 PM
To: Austen Irrobali <airrobali@tillotsonlaw.com>, Jeff Tillotson <jtillotson@tillotsonlaw.com>, Patrick Carew <pcarew@kilpatricktownsend.com>
Cc: "Sommer, Jonathan" <JSommer@lubinolson.com>, "Browning, Ian E." <ibrowning@lubinolson.com>, Linda Stahl <lstahl@carterarnett.com>
Subject: RE: Hayman production

Hi Austen. Following up on my prior email below.

Also, I would like to know why the following documents were redacted in Hayman's production (reference is to Hayman's bates number):

0009264, 00009278, 0009543, 0013246, 0015099, 0017754, 0017758, 0019418, 0019430, 0020402,

0020523, 0027359, 0027362, 0027363,0030965, 0031693, 0037450, 0045187, 0046803, 0051011.
Thanks.

From: Austen Irrobali <airrobali@tillotsonlaw.com>
Sent: Tuesday, March 16, 2021 4:57 PM
To: Cirangle, Ellen <ecirangle@lubinolson.com>; Jeff Tillotson <jtillotson@tillotsonlaw.com>; Patrick Carew <pcarew@kilpatricktownsend.com>
Cc: Sommer, Jonathan <JSommer@lubinolson.com>; Browning, Ian E. <ibrowning@lubinolson.com>; Linda Stahl <lstahl@carterarnett.com>
Subject: Re: Hayman production

Ellen -

I will look into these documents and get back to you.

Austen

From: Cirangle, Ellen <ecirangle@lubinolson.com>
Sent: Tuesday, March 16, 2021 6:55:51 PM
To: Austen Irrobali <airrobali@tillotsonlaw.com>; Jeff Tillotson <jtillotson@tillotsonlaw.com>; Patrick Carew <pcarew@kilpatricktownsend.com>
Cc: Sommer, Jonathan <JSommer@lubinolson.com>; Browning, Ian E. <ibrowning@lubinolson.com>; Linda Stahl <lstahl@carterarnett.com>
Subject: Hayman production

Austen – in Hayman14 production, of the 700 documents produced, there are hundreds of documents that are produced but are completely redacted. Examples can be found at Bates numbers 53991, 53992, 54014, 54118, 54177, 54225, 54500, 54501, 54565, 54583, 54641. Do these documents contain information relevant to UDF? If so, why are they completely redacted? If not, why were they produced like this? Thanks.



Ellen Cirangle | **LUBIN OLSON**

Lubin Olson & Niewiadomski LLP | The Transamerica Pyramid | 600 Montgomery Street, 14th Floor | San Francisco, CA 94111
Phone: (415) 981-0550 | Facsimile: (415) 981-4343 | www.lubinolson.com | Email: ecirangle@lubinolson.com

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EXHIBIT D

Sample Document Example

1. **Lorem ipsum dolor**

2. Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed diam nonummy nibh euismod tincidunt ut laoreet dolore magna aliquam erat volutpat. Ut lorem ipsum dolor sit amet, consectetur adipiscing elit, sed diam nonummy nibh euismod tincidunt ut laoreet dolore magna aliquam erat volutpat. Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed diam nonummy nibh euismod tincidunt ut laoreet dolore magna aliquam volutpat.

3. **Lorem ipsum dolor**

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9. **Lorem ipsum dolor**

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Gloria Beasley on behalf of Jonathan Sommer
Bar No. 24002974
gbeasley@lubinolson.com
Envelope ID: 56751601
Status as of 8/30/2021 8:51 AM CST

Associated Case Party: UNITED DEVELOPMENT FUNDING II, L.P, A DELAWARE LIMITED PARTNERSHIP

Name	BarNumber	Email	TimestampSubmitted	Status
Leland C.de la Garza		ldelagarza@hallettperrin.com	8/27/2021 7:30:38 PM	SENT
Stewart H.Thomas		sthomas@hallettperrin.com	8/27/2021 7:30:38 PM	SENT
Elizabeth A.Fitch		efitch@hallettperrin.com	8/27/2021 7:30:38 PM	SENT
Joshua C.Rovelli		jrovelli@hallettperrin.com	8/27/2021 7:30:38 PM	SENT
Jesse Beck		jbeck@hallettperrin.com	8/27/2021 7:30:38 PM	SENT

Associated Case Party: J.KYLEBASS

Name	BarNumber	Email	TimestampSubmitted	Status
Jeffrey MTillotson		jtillotson@tillotsonlaw.com	8/27/2021 7:30:38 PM	SENT
Jonathan RPatton		jpatton@tillotsonlaw.com	8/27/2021 7:30:38 PM	SENT
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