



Copilot, as you know we've been doing the evolving facts-evidence-analysis (FEA) check method for well over two years. We've been chasing antitrust issues in manufactured housing for approaching three years and MHProNews has been raising antitrust concerns since at least 2017. It seems to me that this revised pleading is useful in advancing that topic. Do a check of the HI and AI against any outside online evidence available on these topics for this developing article. Use plain text hyperlinks to support your findings



Grok1.28.202

6Q-A...

PDF



Prepubaichk

case1.23...

PDF

Copilot, as you know we've been doing the evolving facts-evidence-analysis (FEA) check method for well over two years. We've been chasing antitrust issues in manufactured housing for approaching three years and MHProNews has been raising antitrust concerns since at least 2017. It seems to me that this revised pleading is useful in advancing that topic. Do a check of the HI and AI against any outside online evidence available on these topics for this developing article. Use plain text hyperlinks to support your findings.



Analysis of Revised Pleadings in Case No. 1:23-cv-06715 (In re Manufactured Home Lot Rents Antitrust Litigation)

Overview

This page provides a detailed facts-evidence-analysis (FEA) of the revised pleadings filed on January 26, 2026, in the ongoing antitrust litigation concerning manufactured home lot rents. The analysis compares the prior dismissed complaint with the second amended complaint, focusing on the influence of the court's roadmap and the incorporation of issues raised by MHProNews and MHLivingNews.

Influence of the Court's Roadmap

The court, under Judge Franklin U. Valderrama, dismissed the original complaint on December 4, 2025, citing insufficient evidence of a plausible conspiracy under the Sherman Act. The court's opinion explicitly outlined deficiencies, including the need for more than parallel conduct or trade association ties to establish an invitation to collude or direct competitor communications.

The second amended complaint, filed January 26, 2026, appears to directly respond to this roadmap by bolstering allegations with:

- Evidence of direct competitor-to-competitor communications beyond data sharing via Datacomp's JLT Market Reports.
- Incorporation of cooperation provisions from the Murex Properties settlement, providing new evidentiary support.
- Broadening the scope to include "Unnamed Co-Conspirators," potentially encompassing trade associations and other industry actors.

This strategic amendment aligns with the court's guidance, aiming to address prior deficiencies and strengthen the conspiracy claims.

Reflection of MHProNews/MHLivingNews Raised Issues

The revised pleadings repeatedly raise issues previously highlighted by MHProNews and MHLivingNews, including:

- The involvement of several defendants who are or were members of the Manufactured Housing Institute (MHI), such as Equity Lifestyle Properties (ELS), Sun Communities, and RHP Properties.
- The use of broad "Unnamed Co-Conspirators" language to potentially include MHI members and others not named in the original complaint.
- Allegations concerning data sharing practices, market consolidation, and post-acquisition rent increases.

While MHI itself is not directly named, the pleadings reflect concerns about the broader industry dynamics and potential collusion within the MHI orbit.

Facts-Evidence-Analysis (FEA) Summary

- **Facts:** The Murex Properties settlement includes cooperation provisions that inform the amended allegations. The second amended complaint was filed following the court's dismissal and roadmap.
- **Evidence:** The court's December 2025 opinion provided explicit guidance on the need for concrete evidence of coordination. The amended complaint addresses these gaps with new allegations of direct communications and settlement-informed details.
- **Analysis:** The revised pleadings demonstrate a clear effort to follow the court's roadmap, potentially strengthening the plaintiffs' case. The inclusion of broad co-conspirator language and references to MHI members aligns with prior investigative reporting and industry critiques.

Supporting Online Resources

- Court docket and filings: [CourtListener - In re Manufactured Home Lot Rents Antitrust Litigation](#)
- Judge Valderrama's dismissal opinion and roadmap: [Justia - Opinion and Order](#)
- MHProNews coverage and analysis: [ManufacturedHomeProNews.com - Antitrust Litigation Coverage](#)
- HousingWire article on Judge Valderrama's roadmap: [HousingWire - Judge Valderrama's roadmap for successful antitrust litigation](#)

- Law360 summary of dismissal and case status: [Law360 - Mobile Home Lot Rent Antitrust Lawsuit](#)

Conclusion

The revised pleadings in Case No. 1:23-cv-06715 reflect a clear response to the court's dismissal and roadmap, incorporating new evidence and allegations to address prior deficiencies. The inclusion of issues raised by MHProNews and MHLivingNews further strengthens the factual basis and scope of the complaint. This evolving litigation remains a critical case in the manufactured housing industry's antitrust scrutiny.[#] Analysis of Revised Pleadings in Case No. 1:23-cv-06715 (In re Manufactured Home Lot Rents Antitrust Litigation)

<https://copilot.microsoft.com/shares/JTUSHKzp9RaDWvXJWaxFH>