

**DEFENDANT \_\_\_\_\_'S COMBINED DISCOVERY REQUESTS  
CONSISTING OF THE FIRST COMBINED REQUEST FOR ADMISSIONS,  
THE FIRST COMBINED REQUEST FOR ANSWERS TO INTERROGATORIES,  
AND THE FIRST COMBINED REQUEST FOR PRODUCTION OF DOCUMENTS  
TO PLAINTIFF \_\_\_\_\_**

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COMES NOW Defendant \_\_\_\_\_ and for Defendant's combined discovery requests aforesaid, pursuant to Rules \_\_\_\_\_ of the \_\_\_\_\_ Rules of Civil Procedure, hereby serves these written requests, as follows:

**General Instructions**

Plaintiff's responses shall be due on or before thirty (30) days following service, at \_\_\_\_\_ on \_\_\_\_\_, or at a time and place mutually agreed upon beforehand by the parties.

**Detailed Instructions**

a. You are to respond separately to each request below in the space provided or by attaching additional sheets of paper clearly referenced to each numbered request.

b. You are to respond to each request for admissions as instructed, answering each related interrogatory as instructed, and producing a full, clear, and legible original and copies all related *documents* in the custody or possession or control of you as instructed, whether now in the custody or possession of a corporation, wholly or partially owned subsidiary, division, affiliated company, predecessor or successor in the business of yours, or assignors, and any of your counsel, agents, representatives, officers, directors, employees, partners, associates, investigators, and/or joint venturers, which documents you must retrieve and produce forthwith.

c. You are to provide a separate description and log with the name and date and subject matter of any and all *documents* that you refuse to allow to be inspected on the

grounds of privilege, stating the privilege claimed and the reason why, so that they can be appropriately identified and their production compelled with appropriate individual document references, including the name and job title or capacity of the author(s) or originator(s), the name and job title or capacity of every person who received the document as an addressee, the relationship between the author(s)/originator(s) and each person who received the document or a copy of it, the date of the document, the subject matter(s) addressed in the document, whether the document was transmitted in confidence, and if so what *indicia* on the document shows that to be the case, and a brief statement as to why, under the law, the document is thought to be protected by the attorney-client privilege.

d. The *documents* requested shall include, mean, and be defined without limitation as follows: any and all writings, documents, files, e-mails, drawings, graphs, charts, photographs, recordings, and other data sources and compilations from which information can be obtained and translated if necessary, and computer reports, databases, electronic mail, data, data compilations, social media, schedules, tables, charts and graphs, relating to the subject loans and to your claims in this action.

e. *Documents* therefore includes and means the originals and all copies of any and all tangible materials, whether handwritten, typed, printed, printed from computer memory, copied by whatever means, photographed, recorded, or produced or reproduced in any manner upon which is recorded any form of communication or statement, including letters of any alphabet and in any language, words, pictures, symbols, colors, sounds, or any combination of same.

f. *Documents* therefore includes and means, but is not limited to, books, records, letters, diaries, appointment books, calendars, billing records, time records, itineraries, telegrams, cablegrams, wires, memoranda, interoffice communications, facsimiles,

reports, notes, checks, letters of credit, negotiable instruments, deeds, drawings, charts, photographs, movies, tape recordings, computer disks and/or hardware, microfilm, microfiche, contracts, agreements, pleadings, motions, orders, judgments, travel reports and vouchers, expense reports and accounts and vouchers, financial ledgers and records, financial statements, worksheets, schedules, progress reports, bills, invoices, books of account, journals, files, tax returns of any nature, investigation reports, proposals, feasibility studies, estimates, environmental impact studies and reports, projections, press releases, complaints, property appraisals, title insurance policies, risk evaluations, leases, rental agreements, repair orders, maintenance records, settlement agreements, insurance policies, and personnel evaluations.

g. *Documents* therefore includes and means all forms and manifestations of electronically stored and/or retrieved electronic information, in all electronic media (hard drive, diskette, zip, DVD, CD, thumb drive or tape), including but not limited to e-mail or electronic mail. Material of this type must be produced formatted on 3 ½ inch diskette, high density IBM compatible format or DVD or CD or thumb drive or scanned version, clearly labeled as to the software product used to organize and manipulate the underlying data.

h. If any such requested documents have for any reason existed, but at the time of receipt of this request have been lost and/or destroyed, you are to so state, to describe each document so lost and/or destroyed, to state the approximate date of such loss and/or destruction, and to explain the causes, circumstances surrounding, and the witnesses to such loss or destruction to the fullest extent known to you.

**YOU MAY ANSWER IN THE SPACES PROVIDED OR ATTACH SEPARATE SHEETS**

**Combined Discovery Request No. 1**

**1a.** Admit that you paid no money for the mortgage loan that you are attempting to foreclose on in Civil No. 11-1-0168 at the time you claim you acquired the mortgage loan.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**1b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**1c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**1d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including transmittal evidence and bank receipts that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 2**

**2a.** Admit that you did not own and possess the original promissory note that you are attempting to foreclose on in Civil No. 11-1-0168 at the time you filed this lawsuit.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**2b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**2c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**2d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including transmittal evidence and bailee receipts that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 3**

**3a.** Admit that you knew that the mortgage loan that you are attempting to foreclose on in Civil No. 11-1-0168 was in default at the time you claim you purchased it.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**3b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**3c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**3d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including transmittal evidence that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 4**

**4a.** Admit that no one in your company and no employee of your present loan servicer has any firsthand personal knowledge of the complete record-keeping systems and procedures and software used of all prior loan servicers pertaining to the servicing of the loan that you are attempting to foreclose on in Civil No. 11-1-0168.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**4b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**4c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known, including the dates they visited the facilities of those prior loan servicers and at which locations.

**4d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including travel logs, travel receipts, an unprivileged parts of personnel records that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 5**

**5a.** Admit that the mortgage loan that you are attempting to foreclose on in Civil No. 11-1-0168 was or is being paid in full by nonrecourse insurance.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**5b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, or based upon only partial nonrecourse insurance, please explain immediately below in full the reasons why.

**5c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses of those and their employment capacities at present and telephone numbers, including of any such insurance companies to the fullest extent known.

**5d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including default and other insurance policies that support your above reasons, with the name and location and description of each policy, and the name and address of their custodian.



**Combined Discovery Request No. 6**

**6a.** Admit that the original promissory note and the mortgage that you are attempting to foreclose on in Civil No. 11-1-0168 were never deposited into your trust.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**6b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why, and when.

**6c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**6d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including transmittal evidence and custody receipts that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 7**

**7a.** Admit that your trust is inactive and not presently trading fractional shares of the mortgage that you are attempting to foreclose on in Civil No. 11-1-0168 on trading platforms in the United States and/or overseas.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**7b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**7c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**7d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including transactional records and profit and loss statements that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 8**

**8a.** Admit that you have no firsthand personal knowledge that a notice of default was ever sent to and received by all required parties pertaining to the mortgage loan that you are attempting to foreclose on in Civil No. 11-1-0168 prior to the time you filed this lawsuit.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**8b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**8c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**8d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including preparation and transmittal evidence that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 9**

**9a.** Admit that Fannie Mae or Freddie Mac or HUD each does not own and have never owned the promissory note that you are attempting to foreclose on in Civil No. 11-1-0168 at the time you filed this lawsuit.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**9b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why, charting historically who the legal owners of the mortgage loan have been from the loan's inception to today.

**9c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons and historical chart, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**9d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including transmittal evidence and assignments that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 10**

**10a.** Admit that you did not conduct any due diligence investigation of the creditworthiness of the borrower (or any guarantors) of the mortgage loan that you are attempting to foreclose on in Civil No. 11-1-0168 at the time you purchased it.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**10b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**10c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**10d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including credit reports, credit reviews, loan applications, and financial statements that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 11**

**11a.** Admit that you did not conduct any due diligence investigation of the market value of the subject real property that you are attempting to foreclose on in Civil No. 11-1-0168 at the time you purchased the mortgage loan.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**11b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**11c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**11d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including appraisals and brokers' opinions of value that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 12**

**12a.** Admit that you are involved as a dealer in the purchase and sale of securities in the form of interests in real property, from homeowners to investors, pertaining for instance to the subject real property that you are attempting to foreclose on in Civil No. 11-1-0168.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**12b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**12c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**12d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including transmittal evidence, certificates and licenses that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 13**

**13a.** Admit that if you are successful in foreclosing on the subject property in Civil No. 11-1-0168 that the property at auction will sell for less than true market value.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**13b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**13c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**13d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents that support your above reasons, with the name and location and description of each, and the name and address of their custodian.



**Combined Discovery Request No. 14**

**14a.** Admit that you are not licensed to do any kind of business in the State of Hawaii and that you have never paid any taxes of any sort to the State of Hawaii.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**14b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**14c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**14d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including the identity of all Hawaii licenses that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 15**

**15a.** Admit that there was no contractual provision in your securitized trust governing documents that specified you could purchase for your securitized trust the mortgage loan that you are attempting to foreclose on in Civil No. 11-1-0168 at the time you claim you acquired the mortgage loan.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**15b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**15c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**15d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including complete pooling and servicing or indenture type agreements that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 16**

**16a.** Admit that you have no title insurance on the subject property that you are attempting to foreclose on in Civil No. 11-1-0168 purchased at the time you claim you acquired the mortgage loan.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**16b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**16c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**16d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including policies and applications for policies that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 17**

**17a.** Admit that you have no capacity to enter into or to acquire mortgages, neither licensed for that purpose anywhere or otherwise legally formed or incorporated anywhere, including in the State of Hawaii.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**17b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**17c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**17d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below and produce all documents, including certificates or incorporation or good standing or license certificates that support your above reasons, with the name and location and description of each, and the name and address of their custodian.

**Combined Discovery Request No. 18**

**18a.** Admit that you and your loan servicer have no original documents or authentic copies of documents pertaining to you or your predecessors' creation and maintenance of the mortgage loan that you are attempting to foreclose on in Civil No. 11-1-0168.

ADMIT \_\_\_\_\_

DENY \_\_\_\_\_

**18b.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please explain immediately below in full the reasons why.

**18c.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please identify immediately below all of the witnesses, if any, you are aware of who you believe can testify in support of your above reasons, including their names and addresses and employment capacities at present and telephone numbers to the fullest extent known.

**18d.** If your answer above is other than an unequivocal and absolute admission, or is a denial, please specifically identify immediately below and produce all documents, including those that support your above reasons, with the name and location and description of each, and the name and address of their custodian for each of the 28 sub-requests listed below, including but not limited to:

(1) Copies of the employment and payroll histories and personnel files of all individuals mentioned in documents filed by you or to be filed by you in this action in support of your claims;

(2) Copies of all correspondence, emails, faxes, and other written or recorded oral communications of any kind pertaining to efforts by your predecessors or by you and/or your representatives and/or your agents and/or anyone authorized by you to negotiate and/or to sell or to assign your alleged promissory note and mortgage rights and/or to find buyers for the subject property you are intending to foreclose on in this action;

(3) The originals (for inspection) of all loan documents mentioned in papers filed by you in this action or intended to be filed by you in this action as they are kept in your files, i.e., promissory notes, allonges, mortgages, attorneys-in-fact designations and powers of attorney, assignments, security agreements, financing statements, extensions, default notices, fair debt collection practices act notices, and/or loan modification agreements;



(4) The originals (for inspection) of all title company recording instructions, including as to mortgages, attorneys-in-fact authorizations, and assignments pertaining to recorded documents exhibited in papers filed by you or intended to be filed by you in this action;

(5) Copies of all appraisals, including reviews thereof, as well as letters of instruction to the appraiser(s), the cost of the appraisals, and copies of all documents showing any review of the appraisals and approval of the particular appraisers pertaining to the subject loan;

(6) A copy of the "credit file" and all material contained therein - that is, that discrete file that contains the essential information on the subject loan, including (a) all financial statements provided as part of the loan transaction, including any bank analysis thereof, (b) all correspondence to and from the borrower, or guarantor, or any correspondence to any party relating to the loan; (c) copies of all credit memoranda relating to the loan, (d) copies of all analysis or evaluations of the loan, (e) copies of all credit information received regarding the loan, (f) copies of all loan approval requests or loan notifications as to the extension of credit, including all loan reports submitted to any loan committee(s) relating to the loan, (g) copies of all minutes of any loan committee(s) commenting or noting the loan, including any comments on required reserves to be maintained against the loan, for example, reserves that would be required to maintain and to set the allowance for loan and lease losses, (h) copies of any internal credit reviews as to the performance of the loan, and (i) copies of all documents that were prepared, when and if the loan were transferred to a loan collection department, including any action plan to collect the loan;

(7) A copy of the loan accounting record for the loan constituting the loan general ledger as prepared by each loan servicer showing the type of software utilized, all disbursements, payments, information on application of payments, i.e., to reduce principal or pay interest, and the amount of any loan reserve or reduction in the carrying value of the loan, both prepared internally and for purposes of litigation;

(8). A copy of all analyses of the loan including credit analysis, as well as credit rating, the number or grade of the credit rating of the loan, and information on the number of grades used in rating the loan, including definitions thereof, including how the loan ratings may have changed over time;

(9) A copy of any and all internal credit examinations that criticized the loan, if any, as well as a copy of all reports citing the loan that may have been made to loan committees or regulators, including as to maturity date extensions;

(10) The originals (for inspection) of all records and receipts showing how much was specifically paid for the loan and for all mortgage assignment separately and when and how by you and by all others since its inception;

(11) All documents pertaining to and explaining and embodying instruments and resolutions and affidavits pertaining to the notarization and powers of attorneys pertaining to all documents related to any transactions pertaining to the subject loan, including those of all securitized trusts and trustees associated with the loan;



(12) Copies of the front page and all relevant pages of the notary books evidencing the acknowledgement of signatures by signatory and date and address and proof of capacity pertaining to the recording of the acknowledged signatures on all documents filed pertaining to the subject mortgage loan;

(13) The originals (for inspection) and all copies of any documents that you claim entitle you to a legal or any equitable lien or interest of any sort pertaining to the subject mortgage loan, including the original promissory note and including by way of assignment, recorded or otherwise, on the real property that is the subject of this foreclosure action;

(14) The originals (for inspection) and all copies of any document evidencing that you or any of your predecessor trustees or trusts or lenders paid any money or anything of value for any legal or equitable interest of any sort at any time pertaining to the subject property;

(15) The originals (for inspection) and all copies of any document known to you pertaining to any legal or equitable lien or interest of any sort held by any other person or entity pertaining to the aforesaid property;

(16) The originals (for inspection) and all copies of any correspondence by and between (a) you and/or any representative of yours or any prior assignors of yours pertaining to the aforesaid property with (b) any of parties or any of their representatives;

(17) The originals (for inspection) and all copies of any and all general ledger mortgage loan history or payment histories in your possession or control pertaining to the subject property;

(18) The originals (for inspection) and copies of any and all documents related in any way to any loan modification applications in your possession pertaining to the aforesaid property;

(19) The originals (for inspection) and all copies of all of the documents pertaining to the "collateral file," consisting of, without limitation, the subject original promissory note, all riders, the original allonges, the mortgage, the mortgage assignments, and the loan general lender, the loan application, and all property appraisals, including all originals of same where applicable if in your possession or in the possession of any loan servicer of yours, plus all contracts you have pertaining to loan servicers and the subject loan and all contracts you have pertaining to all prior assignors and all prior assignees in the chain of ownership of the subject loan, and including all government agencies and Fannie Mae and Freddie Mac, plus all governmental and nongovernmental loan servicing guidelines pertaining to the servicing of the subject loan;



(20) All documents describing the creation and the regulatory approval provided for the creation of you and operation of you as a securitized trust, including your formation and your authorizing documents however entitled, including copies of all Security and Exchange Commission filings and recordations;

(21) All documents describing the timing and the ownership duration and current status of the subject mortgage loan by you and others since its inception;

(22) All documents identifying insurance companies, insurance premiums, premium payments, and insurance coverage, including insurance brochures and literature and policies pertaining to the subject property;

(23) All documents pertaining to any involvement whatsoever with you and Fannie Mae and/or Freddie Mac and/or Moody's and/or Standard and Poor's or any other rating service concerning the subject loan, the subject property, and/or other Defendants named in the subject foreclosure action;

(24) All documents pertaining to lawsuits filed against you involving claims of fraud against you by mortgagors or by investors or by beneficiaries or by state and/or federal regulators pertaining to your involvement in mortgage transactions of any sort, together with all documents evidencing sanctions and/or fines levied against you by regulators and/or courts;

(25) All documents evidencing the specific date(s) on which signatures on any allonges or endorsements or mortgage assignments or default notices or any other writings whether recorded or not, whether wet-inked or rubber-stamped, were affixed to documents that you are relying upon to prove your right to foreclose on the subject property, including any and all powers of attorney whether or not recorded;

(26). Copies of all documents you intend to use at any summary judgment or other dispositive hearing and/or at trial;

(27) Copies of any and all expert reports prepared for your use in this case or a description of any reports being prepared by your consultants or experts, including their resumes and a list of cases in court in which they have participated including the case names, jurisdiction, case numbers, dates, and results;



(28) Copies of all statements secured by you or by your attorneys or investigators from witnesses or potential witnesses that pertain in any way to the claims that you are making in this foreclosure case or to your defenses.

**VERIFICATION**

I, \_\_\_\_\_, DECLARE:

1. I am \_\_\_\_\_, and I make the within statements based on my own personal knowledge on behalf of the Plaintiff in his action.

2. The foregoing responses to Defendant's Request for Admissions within Defendant's First Combined Discovery Request are true and correct to the best of my personal knowledge and good faith belief.

3. The foregoing responses to Defendant's Request for Answers to Interrogatories within Defendant's First Combined Discovery Request are true and correct to the best of my personal knowledge and good faith belief.

4. The foregoing responses to Defendant's Request for Production of Documents within Defendant's First Combined Discovery Request are true and correct to the best of my personal knowledge and good faith belief.

I declare under penalty of perjury that the foregoing is true and correct. Signed on \_\_\_\_\_, at \_\_\_\_\_.

\_\_\_\_\_