

30 ADVANCE TECHNIQUES FOR DEFEATING SUMMARY JUDGMENTS

1. The TILA-rescission-no-two-notices defense
2. The invalid-default-notice defense
3. The follow-the-money defense
4. The lack-of-personal-knowledge defense
5. The anti-custodian-of-records defense
6. The inadequate-general-ledger defense.
7. The general-ledger-default-notice-contradiction defense
8. The lack-of-adequate-personal-service defense
9. The unlicensed-lender defense
10. The intervening-lender's-bankruptcy defense
11. The missing-power-of-attorney defense
12. The invalid-notarization defense
13. The non-existent-entity defense
14. The second-language-adhesion defense
15. The TILA-material-mistake defense
16. The statute-of-limitations defense
17. The FIRREA (Financial Institutions Reform, Recovery, and Enforcement Act of 1989)-FDIC-fraud defense
18. The FHA-HUD-Reverse-Mortgage regulatory defense
19. The ownership-at-inception defense
20. The insurance-without-recourse-payment defense

21. The anticipatory-breach defense
22. The dual-tracking-loan modification defense
23. The unproven-lost-note defense
24. The failure-to-prosecute-laches defense
25. The false-promissory-note defense
26. The servicemembers-exemption defense
27. The tenant-standing defense
28. The robo-signer-recording-office defense
29. The escrow-bait-and-switch defense
30. The usury-unconscionability defense

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