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MORTGAGE RESOLUTION SERVICING, LLC ("MRS") V JP MORGAN CHASE ("JPMC") 15-00293



In its enthusiasm to obtain consumer relief credit pursuant to its multibillion dollar settlements with the United States Department of Justice, JPMorgan Chase released first and second mortgage liens securing mortgage loans that the bank had sold to investors several years earlier. These loans were retained in a secret system of records known as the RCV1 data. JPMorgan Chase was not properly servicing the loans pursuant to their legal obligations. Among the mortgage liens that JPMorgan Chase released to satisfy the \$4.2

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billion consumer relief obligation under the National Mortgage Settlement were loans transferred to investors, Mortgage Resolution Servicing, LLC ("MRS") & Aon Partners, Inc. (S&A), and 1st Fidelity Loan Servicing, LLC (1st Fidelity). Of course, once the borrowers received notification from JPMorgan Chase that their mortgages had been released, they stopped paying debt service to these entities. MRS, S&A and 1st Fidelity have sued JPMorgan Chase in federal court in New York for breach of contract, fraud and civil RICO. In addition, one of the principals of these entities, Larry Schneider, has sued JPMorgan Chase as relator under the False Claims Act, in federal court in Washington, D.C. The government has declined to proceed with the case and Mr. Schneider is proceeding with the case himself. In both the FCA case in Washington and the RICO case in New York, JPMorgan Chase is represented by Covington & Burling LLP, the law firm in which Eric Holder now practices. This is convenient because, if there is any question about what the intent of the Department of Justice was in entering into the settlements with JPMorgan Chase, Mr. Holder can provide the answer.

First Amended Complaint

Plaintiffs vs JPMC Notice Of Removal

Council Of Defendants Letter To Judge Swain

Initial Conference Order By Judge Swain

Motion To Admit Kristin E. Hucel as Lac Vice

Plaintiffs Rico Case Statement Pursuant To The Initial Conference Order

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The Second Amended Complaint: Jury Trial Demanded

Preliminary Pre-Trial Statement

Order Of Reference To Judge Magistrate
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Pre-Trial Scheduling Order

Defendants' Memorandum of Law

Notice of Defendants' Motion To Dismiss Plaintiffs' Second Amended Complaint

Notice of Defendants' Motion To File Under Seal

Memorandum Of Law In Support Of Defendants' Motion To File Under Seal

Declaration Of Michael M. Maya

Proposed Sealing Order

Notice of Defendants' Motion To Transfer Venue To The United States District Court For The District Of Columbia

Defendants' Memorandum Of Law In Support Of Their Motion To Transfer Venue To United States District Court For The District Of Columbia

Declaration Of Partrick M. Boyle

The Second Amended Complaint: Jury Trial Demanded

Motion To Transfer Venue

Memorandum In Support Of Motion To Transfer Venue

Civil Docket For Case #: 1:14-cv-01047-RMC
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Exhibit P: Proposed Order

Order Permitting The Filing Of A Third Amended Complaint

Plaintiffs' Memorandum In Opposition To Defendants' Motion To Transfer Venue
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Order Extending Time For Filing Of A Third Amended Complaint

Motion To Transfer: Oral Argument Requested

Third Amended complaint: Jury Trial Requested

Defendants' Reply To Plaintiffs' Opposition To Defendants' Motion To Transfer Venue

Memorandum and Order From James C. Francis IV, United States Magistrate Judge

Defendants' Memorandum Of Law In Support Of Their Motion To Dismiss Counts Four Through Nine of Plaintiffs' Third Amended Complaint

Plaintiffs' Memorandum Of Law In Opposition To Defendants' Motion To Dismiss Counts Four Through Nine Of The Plaintiffs' Third Amended Complaint

Declaration Of Helen Davis Chaitman On Penalties Of Perjury on 12/07/2015

Memorandum Opinion And Order

Request Of The Court To Extend Discovery Dates

Amended Pre-Trial Scheduling Order

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Memorandum and Order On The Motion To Transfer



Exhibit C: Email Between Schneider and Solomon Regarding Due Payments

Exhibit F: Redacted Email Between Solomon and Schneider Claiming Fault
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Plaintiffs' Memorandum Of Law In Support Of Motion To Compel And Define Scope Of Discovery

Declaration Of Helen Davis Chaitman In Support Of Plaintiffs' Motion To Compel And Define Scope Of Discovery

Order On Motion To Compel Discovery By James C. Francis IV, United States Magistrate Judge

Motion for Protective Order

Defendants' Memorandum Of Law In Opposition To Plaintiffs' Motion To Compel And Define Scope Of Discovery And In Support Of Defendants' Cross-Motion For Protective Order

Declaration Of Christian I. Pistilli

Declaration Of Phil Verdelho

Declaration Of Michael J. Zeeb

Plaintiffs' Reply Memorandum Of Law In Further Support Of Motion To Compel And DEFINE SCOPE OF Discovery And In Opposition To Defendants' Cross Motion For A Protective Order

Reply Declaration of Helen Davis Chaitman

Memo In Opposition To Draft Motion To Dismiss: Exhibit A

Relators' Memorandum In Opposition To Defendants' Motion To Dismiss Relators' Second Amended Complaint
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Defendants' Reply Memorandum Of Law In Support Of Their Cross-Motion For Protective Order

Memo Endorsed: Request That Court Takes Certain Portion Of Defendants' Reply Memorandum Of Law

Memorandum and Order By James C. Francis VI Regarding Purchased, Residential Mortgage Loans

Defendants' Memorandum Of Law In Support Of Their Motion For Protective Order

Plaintiffs' Memorandum Of Law In Opposition To Defendants' Motion For A Protective Order

Declaration Of Helen Davis Chaitman On Penalties Of Perjury on 08/12/2016

Defendants' Reply Memorandum Of Law In Support Of Their Motion For Protective Order

Memorandum And Order To Dismiss Counts Four Through Nine Of The Operative Third Amended Complaint

Fourth Amended Complaint

Plaintiffs' Amended Rico Case Statement

Declaration of Christian Pistilli

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