

TEN EVIDENTIARY OBJECTIONS TO THE ADMISSIBILITY OF BUSINESS RECORDS AS AN EXCEPTION TO THE HEARSAY RULE IN FORECLOSURE LITIGATION

- 1. Object to the admission into evidence of business records that were not made at or near the time, or not transmitted by someone at the time with personal firsthand knowledge;**
- 2. Object to the admission into evidence of business records not kept in the ordinary course of the business activity;**
- 3. Object to the admission into evidence of business records not made as a regular practice of that business activity;**
- 4. Object to the admission into evidence of business records not supported by testimony based on firsthand personal knowledge;**
- 5. Object to the admission into evidence of business records where the chain of ownership or title is broken, thus void;**
- 6. Object to the admission into evidence of business records not disclosed in response to prior requests for discovery;**
- 7. Object to the admission into evidence of business records that are contradicted by other business records;**
- 8. Object to the admission into evidence of business records containing signatures by unauthorized representatives;**
- 9. Object to the admission into evidence of business records that are incomplete;
and**
- 10. Object to the admission into evidence of business records the product of fraud in the factum or fraud in the inducement.**