

1 IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
2 IN AND FOR DUVAL COUNTY, FLORIDA
3 CIVIL DIVISION
4 CASE NO.: 16-2009-CA-016234-MA

4 BAYVIEW LOAN SERVICES, LLC,

5 Plaintiff,

6 vs.

7 CYNTHIA LEE COREY
8 a/k/a CYNTHIA L. COREY, et al,

8 Defendant.

9 _____ /

10

11

12

DEPOSITION OF: ERIKA LANCE

13

TAKEN: Pursuant to Notice by
14 Counsel for Defendant

15 DATE:

June 2, 2010

16 TIME:

11:28 a.m. to 12:38 p.m.

17 LOCATION:

Nationwide Title Clearing
2100 Alt. 19 North
18 Palm Harbor, Florida 34683

19 REPORTED BY:

Brooke Wharton
Notary Public
State of Florida at Large

21

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23

24

MAXA ENTERPRISES, INC.
1275 Cleveland Street
Clearwater, Florida 33755
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7
 8
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1 THEREUPON

2 ERIKA LANCE,

3 a witness herein, having been duly sworn was examined

4 and testified upon her oath as follows:

5 THE WITNESS: Yes.

6 DIRECT EXAMINATION

7 BY MS. DRYSDALE::

8 Q Ms. Lance, could you please state your full name

9 and your business address for the record?

10 A Yes. Erika Lynn Lance, 2100 Alternate 19 North,

11 Palm Harbor, Florida 34683.

12 Q And what business is located at that address?

13 A Nationwide Title Clearing, Incorporated.

14 Q And your title presently?

15 A The senior vice president for administration.

16 Q Okay. We introduced ourselves prior to taking

17 the deposition, but just so you'll be hopefully a little

18 more comfortable, we're -- I'm going to be asking you a

19 series of questions. If you don't understand a question I

20 ask, please ask me to rephrase it, and I'll be glad to do so

21 because if you answer it, I'll assume that you understood

22 it.

23 You'll need to answer out loud for the court

24 reporter so she -- because she can't take down nods or uh-uh

25 or uh-huh's. If you need to take a break at any time,

1 please let us know, and we'll be glad to do so.

2 A Okay.

3 Q Have you ever had your deposition taken before?

4 A Yes.

5 Q How many times?

6 A Three.

7 Q Were those related to your position at Nationwide
8 Title Clearing?

9 A Yes.

10 Q When were you last deposed?

11 A About three years ago.

12 Q And what was the purpose of that deposition?

13 A It had to do with human resource cases.

14 Q All three had to do with human resource cases?

15 A Yes.

16 Q And were these -- just generally, I don't want to
17 get into the details, but generally people who were employed
18 by Nationwide Title Clearing who were let go?

19 A No. They had to do with workmen's compensation.

20 Q All three?

21 A Yeah.

22 Q Okay. And how long have you been an employee of
23 Nationwide Title Clearing?

24 A About six and a half years.

25 Q Have you always held the title senior vice

1 president --

2 A No.

3 Q -- of administration?

4 A No.

5 Q What -- how long have you held that title?

6 A About four -- four years, four and half years.

7 Q Prior to that, what was your title?

8 A Vice president of establishment.

9 Q And prior to that?

10 A No, that was it.

11 Q Okay. When did you start working at Nationwide?

12 A January 22nd, 2004.

13 Q And when you were hired as vice president of

14 establishment, what -- what were your duties?

15 A I was over the human resource division that also

16 contains the mailroom.

17 Q So what would you do on a day-to-day basis?

18 A Hire, fire, benefits, employee interactions,

19 staffing, investigations, ran the mailroom directly, which

20 had, at that time, 35 staff in it.

21 Q Is that similar to what some -- is sometimes

22 called human relations?

23 A It's part of it. Human resources is one

24 department of what -- that division.

25 Q It was -- and was the division the establishment

1 division?

2 A Division, yeah. Our organization is laid out in
3 divisions. You can't see the -- the organizing board behind
4 me on tape, but it's laid out by division. So there are
5 departments in each division. So each division usually has
6 three or four departments in it.

7 That one had the actual, like, department of
8 personnel, which would be what you'd consider standard human
9 resources, the mailroom, and then it also had security and
10 investigations and stuff like that.

11 Q Did you bring a -- a map similar to the one
12 that's behind us with you today?

13 A No.

14 Q Okay. And you're presently -- so when -- when
15 did you switch from vice president of establishment to
16 senior vice president of administration?

17 A It was around May 2005.

18 Q And what -- are your day-to-day duties the same
19 today as they were in May 2005?

20 A No. They grow and expand, of course, as an
21 organization grows and expands.

22 Q Okay. What -- what did you -- what were you
23 doing in May of 2005 on a day-to-day basis?

24 A Well, I'm -- I'm over the legal area also. I --
25 at that time, I was over IT. I'm no longer over our IT

1 area. It mainly had the division I spoke of earlier
2 underneath it and legal and stuff. Since then, I've also
3 taken on client relations as a division.

4 Q When you say you're over the legal department,
5 what -- what sort of operations is the legal department
6 involved in?

7 A Well, any legal notifications that we get or
8 questions. We have, of course, attorneys that handle
9 various aspects of things, but I -- most of the legal
10 questions that we get or like title companies having things
11 or attorneys and stuff are things that we can handle
12 in-house.

13 Q So are you an attorney?

14 A No, I'm not.

15 Q What type of educational training did you have
16 prior to being hired by Nationwide Title Clearing?

17 A Do you just want, like, whether I went to high
18 school or college, that kind of thing?

19 Q High school, college.

20 A I went to high school. I got a GED actually.

21 Q And then you started working after that?

22 A I was actually working previous to that. I
23 started working at 14.

24 Q Okay. What was your previous employer most
25 recent to Nationwide Title Clearing?

1 A Consumer Sales Solutions.

2 Q What type of business is that?

3 A Telemarketing.

4 Q Did that company have anything to do with
5 mortgages, deeds?

6 A Not at all. They were gas and energy. I ran
7 their human resources area.

8 Q Have you had any particular -- any specific
9 training to -- for your present position as senior vice
10 president?

11 A Six and a half years of working at this company,
12 yes.

13 Q Okay. Have you been required to take any title
14 courses, real estate title courses?

15 A No. They're not required for this position.

16 Q Do any of the other employees of Nationwide Title
17 Clearing, are they required to take any type of title, real
18 estate title courses?

19 A No, because most real estate title courses don't
20 actually apply to what we do here on our side.

21 Q Okay. Why -- why don't you give me a broad
22 description then of what you do at Nationwide?

23 A We do the paperwork for mortgage companies. Most
24 especially we do Assignments of Mortgage, Lien Releases, and
25 document retrieval and research.

1 Q So that's Assignments, lien retrieval?

2 A Lien Releases.

3 Q Releases.

4 A And document retrieval and research.

5 Q Does the research not involve title research?

6 A It can involve title research, but most title
7 courses have to do with the front end or being a realtor or
8 doing closings. And everything we do, is after a closing --

9 Q Okay.

10 A -- paperwork-wise.

11 Q So the people that work at Nationwide Title
12 Clearing prepare Assignments; is that correct?

13 A That is one of the functions that we do here.

14 Q Okay. And you -- they also prepare Lien
15 Releases?

16 A Yes.

17 Q Document retrieval, I'm not sure I understand
18 that term.

19 A Banks and mortgage companies can require certain
20 documents be in files usually referred to as a collateral
21 file, which usually has a -- like a certified copy of the
22 mortgage or the original mortgage, title policy, note,
23 et cetera. So sometimes we can do projects where we go and
24 retrieve copies of Assignments or mortgages or title
25 policies so they can fill out their file.

1 Q Is -- is that service requested when a bank or a
2 mortgage company or other institution finds that they have
3 documents that are missing in their collateral file?

4 A It could be requested for any number of reasons.
5 It's just a request they make of us to go do that.

6 Q And if the documents are not in the collateral
7 file, where generally are you -- do you find the documents?

8 A We've used the county websites and title
9 companies depending on the document we're looking for. If
10 we're looking for a recorded copy of a mortgage or an
11 Assignment modification or something like that, we go
12 directly to the county, usually getting a plain paper copy
13 or certified, depending on what's required.

14 If it's a title policy, we usually use the title
15 agents or the, you know, the various levels of company just
16 depending on what we need to or if we have to get a
17 replacement.

18 Q What about if it's -- do you -- are you ever
19 asked to retrieve original notes?

20 A You can't retrieve original notes. They -- if
21 they're not in the file, there's a separate procedure that
22 a bank has to do in order to resolve that issue.

23 Q And that's not something that National --
24 Nationwide is involved in?

25 A No.

1 Q You also indicated that you -- Nationwide
2 performs the research. What type of research?

3 A That -- that's the research I'm talking about.
4 We can also do lien position searches and lien status
5 searches and stuff like that.

6 Q So it -- it sounds like --

7 A -- searches.

8 Q It sounds like most of the document retrieval is
9 obtaining documents that are of public record; is that
10 correct?

11 A Oh, yeah. Or if -- there's some clients we work
12 for where they have us do the collection of the documents
13 after the closing, like from the title agent. After they
14 get them recorded, we get the originals back from them and
15 forward them on to their investors, not notes but original
16 mortgages and title policies.

17 Q Who usually makes those requests?

18 A That would be our client. It depends on what
19 service they have us sign up for -- they sign us -- they
20 sign up with us for. Sorry.

21 Q So is that generally an originating lender
22 requesting documents for an investor?

23 A It -- yeah. It just -- it's usually the bank
24 that wrote the mortgage or purchased the mortgage.

25 Q Do you have any -- does Nationwide have any of

1 its own computer platforms for purposes of obtaining these
2 types of documents for its document retrieval program?

3 A I don't quite understand the question.

4 Q Is it -- are there any computer programs
5 internally involved in doing the document retrieval?

6 A Yes.

7 Q What's the name of the system?

8 A It's an oracle-based system.

9 Q Does it have a name?

10 A No.

11 Q I'm showing you a document asking you if you
12 recognize this. It's a copy of a complaint filed in Bayview
13 Loan Services, LLC, versus Cynthia Lee Corey.

14 Do you recognize that document?

15 A No.

16 Q Is this the first time that you've seen this
17 document?

18 A Yes.

19 Q Okay. If you will look through the document, do
20 you recognize any Nationwide documents attached to the
21 complaint?

22 A No.

23 Q Okay. I'm going to show you another document,
24 second amended notice of taking deposition ducus tecum.

25 Do you recognize that document?

1 A Yes.

2 Q And when was the first time you -- you saw this
3 document?

4 A I had it faxed to me a few days ago. It was -- I
5 received it on May 28th.

6 Q And did you do anything to prepare for your
7 deposition today?

8 A Yes.

9 Q What did you do?

10 A I retrieved the -- the -- some of the documents
11 that are listed on the back that I was able to obtain.

12 Q Okay. Anything else?

13 A No.

14 Q All right. And we'll go through your documents
15 in just a few minutes, but I had some other questions to
16 ask.

17 A Okay.

18 MS. DRYSDALE: And we'll mark that as
19 Defendant's 1.

20 (Defendant's Exhibit Number 1 was marked for
21 identification.)

22 Q (By Ms. Drysdale) I'm showing you a copy of
23 another document asking you if you recognize this document?

24 A Yes.

25 Q It's an Assignment of Mortgage?

1 A Yes.

2 Q Is this a document that was prepared by

3 Nationwide?

4 A Yes.

5 MS. DRYSDALE: I'd like to mark that as

6 Defendant's 2.

7 (Defendant's Exhibit Number 2 was marked for

8 identification.)

9 Q (By Ms. Drysdale) So for purposes of the clarity

10 of record, I'll -- I'm going to refer to this as the Corey

11 Assignment.

12 A Okay.

13 Q And just looking at the document, if you look at

14 the very top left hand corner, it says, "When recorded,

15 return to CitiMortgage"; is that correct?

16 A Yes.

17 Q But -- and that is C/O NTC. Is that Nationwide?

18 A Yes.

19 Q Why is the document returned to Nationwide?

20 A One of the service -- the service that we did for

21 CitiMortgage had to do with the recording and the tracking

22 of Assignments. So we sent it to record at the county, and

23 then we have that so that it gets returned to us so we could

24 mark that it came back recorded image the document.

25 Q And when you say image it, you place it in -- in

1 a computer program?

2 A I do. In this particular case, this is an
3 electronically recorded Assignment which means that it was
4 sent via electronic recording and returned to us that way.

5 Q Is that inputted -- after it's recorded, is that
6 inputted into the oracle-based system that you referred to
7 earlier? You said you were imaging the documents?

8 A Yeah. I do image the documents. To answer your
9 question, we have an image repository where we keep track of
10 the documents being imaged.

11 Q Uh-huh.

12 A It's -- I don't understand the question about the
13 input. Do you mean just do we save a copy of the recorded
14 image?

15 Q Correct.

16 A Yes.

17 Q And is that in the image repository?

18 A Uh-huh.

19 Q Is there a name for that system?

20 A No.

21 Q You just call it the image repository?

22 A It's just where we keep our images. It's image
23 storing.

24 Q What is -- what type of system is that?

25 A It's a SAN.

1 Q Is that S-A?

2 A -N.

3 Q -N.

4 A And that is the extent of what I know about it.

5 It is called a SAN. It's a type of machine that keeps large

6 quantities of images so. . .

7 Q Do you know what S-A-N stands for?

8 A No idea.

9 Q Okay. So in this particular instance,

10 CitiMortgage was NTC's client?

11 A Uh-huh.

12 Q And they contacted you to prepare an Assignment

13 of Mortgage; is that correct?

14 A They contacted us to prepare a group of

15 Assignments. It wasn't just one.

16 Q How many is -- let me start all over with that

17 one.

18 In this instance, how many did they ask you -- or

19 did they send over at one time?

20 A I don't have that number.

21 Q Would it be -- and I'm not asking you to guess,

22 but if you do have a ballpark, would it have been dozens or

23 hundreds?

24 A Hundreds to thousands but I don't know in this

25 particular case how many.

1 Q So -- I'm sorry.

2 A I was going to say we've done over a hundred
3 thousand Assignments so. . .

4 Q So anywhere from a hundred -- from hundreds to a
5 hundred thousand, they would send a request?

6 A They send them in groupings.

7 Q And when you say "they send them in groupings,"
8 that's requests for Assignments of Mortgages --

9 A Yes.

10 Q -- in groupings? Okay.

11 Right underneath the portion we just read,
12 there's a -- a CMI L number.

13 A Uh-huh.

14 Q Do you -- can you explain that number?

15 A That's a CitiMortgage loan number, and the one
16 underneath is the assignee loan number.

17 Q And in this instance, do you know who the
18 assignee is?

19 A Bayview.

20 Q Just under that, on the Corey Assignment that
21 we've marked as Exhibit 2 --

22 A Uh-huh.

23 Q -- there's an effective date. How -- how is the
24 effective date selected?

25 A It's given to us by the client.

1 Q So it's given to you by CitiMortgage?

2 A Uh-huh.

3 Q Is it given to you -- is -- is every Assignment
4 in that batch given the same effective date?

5 A Usually. It's usually because it's a transfer of
6 a grouping of loans from one entity to another.

7 Q So that is -- is that also the date that the
8 batch is transferred to Nationwide?

9 A No. We could prepare Assignments in advance of a
10 transfer date so that they're ready to be sent to record on
11 the transfer date is usually how it's done.

12 Q In anticipation of a transfer?

13 A No. Usually banks know that they're buying and
14 selling groups of loans to each other --

15 Q Uh-huh.

16 A -- and so based on whatever agreement they have
17 and what actions have to transpire previous to that, they
18 could tell us that, say, "x" loans, these 100 loans are
19 going to change hands on this date. They'll give us the
20 information so they can be ready and prepared to go out the
21 door on that date to go to recording.

22 Q And just below that, we have the title,

23 "Assignment of Mortgage: For good and valuable
24 consideration."

25 Are you -- do you have the information as to the

1 consideration paid for this particular mortgage?

2 A Nope.

3 Q Do you know who does have that information?

4 A I would assume CitiMortgage and Bayview.

5 Q But you're not certain?

6 A No.

7 Q And then we have "CitiMortgage as successor in
8 interest by merger to CitiFinancial Mortgage Company, Inc.,"
9 whose address is 1000 Technology Drive in O'Fallon,
10 Missouri --

11 A Uh-huh.

12 Q -- assigning a mortgage together with a note to
13 Bayview Loan Services; is that correct?

14 A Yes.

15 Q Is this typically how Assignments of -- or
16 transfer of notes occur through Assignment of Mortgage?

17 MS. PARSONS: Objection. You still have to
18 answer.

19 THE WITNESS: I still have to answer?

20 MS. PARSONS: If you know the answer.

21 THE WITNESS: Yeah. I'm sorry. Sorry.

22 MS. PARSONS: I just do it for the record, just
23 so you know.

24 THE WITNESS: Okay. Got it.

25 A To answer your question, on this particular case,

1 I don't know what occurred on it because I was not part of
2 the -- the sale or of the agreement between Bayview and
3 Citi. We were hired specifically to do Assignments.

4 Normally, this is an action recording at the
5 county to indicate a sale has taken place or a transfer of
6 loans has taken place from one entity to another.

7 Q (By Ms. Drysdale) So I'm not sure that -- that
8 answered the question that I was asking.

9 This document is apparently assigning a note?

10 A Yes.

11 Q Is that correct?

12 A Yes.

13 Q And is it your understanding that that's
14 generally how notes are transferred through Assignments?

15 A I'm trying to figure out how to answer this
16 question. It is my understanding that notes are transferred
17 through a sale agreement between mortgage entities. They
18 record Assignments to put on the record who the current
19 beneficiary is for that note and loan, that mortgage.

20 The -- the Assignment itself is not the, to my
21 understanding, the actual sale of the loan. Does that make
22 sense?

23 Q Yes, ma'am.

24 A Okay. So that's why I'm saying this is to
25 indicate that that event occurred and to record it at the

1 county recorder's office as having occurred.

2 Q And you said that you were not part of these or
3 privy to the details of the sale from CitiMortgage to
4 Bayview; is that correct?

5 A Correct.

6 Q That you were just asked to prepare a document?

7 A Prepare Assignments, yes.

8 Q Okay. Further down, still on the left hand side,
9 we see the signature of Bryan Bly as vice president?

10 A Yes.

11 Q And is Bryan Bly someone who you supervise?

12 A Directly, no.

13 Q But he is an employee of Nationwide Title
14 Clearing?

15 A Correct.

16 Q Who is his supervisor?

17 A Elsa McKinnon.

18 Q Could you spell that, please?

19 A E-L-S-A M-C-K-I-N-N-O-N.

20 Q When you and I spoke earlier, you indicated
21 that -- that you might be a better person to provide
22 information about this Assignment than Mr. Bly; do you
23 recall that?

24 A Yes.

25 Q And -- and why did you think that you rather than

1 his supervisor could be explain what --

2 A Because the questions that you were asking in
3 your affidavit did not just have to do with him signing the
4 direct document. You -- the questions pertained also to our
5 overall procedure and our connection with CitiMortgage,
6 which are questions that he can't answer.

7 Q So then let's talk a little about what Mr. Bly --
8 what he actually does in executing an Assignment of
9 Mortgage. Can you go through that process with me?

10 A Yeah. He is what we refer to as a signer. He is
11 somebody at Nationwide who is designated to execute
12 documents.

13 Q So just can you give me a general idea of what
14 his -- his day-to-day activities would be?

15 A He signs and notarizes documents.

16 Q So when he comes in in the morning, he sat -- he
17 sits at his desk, and that's pretty much all he does all
18 day?

19 A Yes.

20 Q Is sign and notarize documents?

21 A Yes.

22 Q Assignments of Mortgage?

23 A Assignments of Mortgage, Lien Releases.

24 Q Does he actually research any of the information
25 contained in the Assignment of Mortgage?

1 A No.

2 Q No?

3 A No.

4 Q About how many documents, including Assignments
5 of Mortgage, would he sign in the average day?

6 A A couple thousand.

7 Q And -- and this -- is he permanently employed?

8 Well, let me ask that question in a different way.

9 Is his -- his employer -- his present employer

10 and business address is Nationwide Title at 2100 Alt. 19

11 North; is that correct?

12 A Yeah. He's presently a full-time employee with

13 Nationwide Title Clearing.

14 Q Okay. In the assign -- the Corey Assignment of

15 Mortgage, he lists his address as 10000 [sic] Technology

16 Drive, O'Fallon, Missouri.

17 Why is that particular address used?

18 A That has to do with the question on how Bryan Bly

19 can sign as a vice president as well.

20 Q Okay.

21 A So the answer to that question has to do with a

22 corporate resolution.

23 Q Do you have that document with you?

24 A Yes.

25 Q May I take a look at that?

1 A Uh-huh. I only brought one copy of this, so if
2 we need more, you'll have to let me know.

3 THE WITNESS: Do we need to get another copy for
4 you before we do this?

5 MS. PARSONS: Probably.

6 THE WITNESS: Can we pause for one second?

7 (A brief recess was taken at 11:54 a.m.)

8 THE WITNESS: This is a copy of the Corporate
9 Resolution signed by the board of directors of
10 CitiMortgage, and it appoints Nationwide Title
11 Clearing, "are appointed as assistant secretaries and
12 vice presidents of the corporation."

13 MS. DRYSDALE: Okay. So we will mark this as --
14 this Joint Consent of the Executive Committee as
15 Defendant's 3.

16 (Defendant's Exhibit Number 3 was marked for
17 identification.)

18 Q (By Ms. Drysdale) Do you still have a copy in
19 front of you?

20 A I do, yes.

21 Q Okay. Do we have or is there located at
22 Nationwide Title Clearing the minutes of the meeting of the
23 executive committee of the board of directors when this
24 consent was created?

25 A No, it's not required.

1 Q It's not required?

2 A No.

3 Q And is that -- that's what your -- your legal
4 department --

5 A Correct.

6 Q Okay. Do you know how they decided to name these
7 employees listed on the consent as assistant secretaries and
8 vice presidents of the corporation?

9 A Generally, we -- we provide them a list of the
10 employees that we'd like them to list.

11 Q Do you know how the -- they're -- because they're
12 basically being designated as officers of the corporation.
13 Do you know why that particular designation was chosen?

14 A You -- you have to name them as officers in order
15 to sign documents in certain counties. They're only
16 designated as officers in regards to the actual signing of
17 the documents. That's -- that's their limitation. If you
18 read the entire document, that's what it limits them to.

19 Q So they are -- they are nominated in these
20 positions for the -- I guess, for the sole purpose of
21 processing releases and Assignments; is that correct?

22 A Correct.

23 Q Do you know if this -- I guess it's the "Further
24 Resolved" paragraph, relates to the public trustee of the
25 city and county of Denver, Colorado? Do you know what

1 that --

2 A Yeah. For a period of time, Colorado required
3 that for people signing documents. They no longer require
4 it. It's actually been removed from current corporate
5 resolutions, which is something that particular county
6 required be included on our corporate resolution for a time
7 period.

8 Q Do you have a copy of the indemnity agreement?

9 A No. I did not bring that with me.

10 Q But that's something that is in possession of
11 Nationwide?

12 A Yes.

13 Q And so when Mr. Bly is executing the couple
14 thousand of Assignments a day, that is the extent of his --
15 that's the extent of his duties as vice president?

16 A Uh-huh -- yes, sorry, or assistant secretary. It
17 just depends on what's required at the county. He could be
18 listed as either or.

19 Q So does Nationwide have a chart of all the
20 counties in Florida to know whether or not Mr. Bly is
21 supposed to be a vice president or assistant secretary?

22 A We have a list of all the counties in the entire
23 United States that tells us that.

24 Q So Mr. Bly executes Assignments of Mortgage to be
25 recorded all over the United States?

1 A And Lien Releases.

2 Q And Lien Releases.

3 Does he hold that position as vice president for
4 any other companies other than CitiMortgage?

5 A Yes.

6 Q What other companies?

7 A There are many, and I don't know if I can just
8 release all of the names of them.

9 Q Okay.

10 A But for all of our clients where we sign, he is
11 listed as one of the signers.

12 Q Previously you said that the consent of the
13 executive committee was the reason for the -- the address
14 being listed as a 1000 Technology Drive.

15 Could you expound upon that?

16 A Yeah. He's acting as the capacity as the vice
17 president for that company, and that is the address of that
18 company.

19 Q So he's not physically located in Missouri? He
20 just --

21 A No. He's physically located in Florida.

22 Q He just lists that as his address for purposes of
23 this Assignment of Mortgage?

24 A Correct.

25 Q And who is Christopher Jones?

1 A Christopher Jones is an employee of Nationwide
2 Title Clearing.

3 Q And what are his day-to-day duties?

4 A He also works in the processing area. One of the
5 duties he has is he is one of our signers and one of our
6 notaries.

7 Q Does Mr. Bly also work in the processing
8 department?

9 A That's the department, yeah.

10 Q Is Mr. Bly also a notary?

11 A Yes.

12 Q Down at the bottom of the Corey Assignment it
13 says that the document was prepared by Jessica Fretwell?

14 A Yes.

15 Q Do you know Ms. Fretwell?

16 A Yes.

17 Q And is she also an employee of Nationwide?

18 A Yes, she is.

19 Q And what is her job description?

20 A She works in our quality control division.

21 Q What are her day-to-day responsibilities?

22 A How to do with the establishment of the forms and
23 the county requirements.

24 Q When you say "the establishment of the forms,"
25 what do you mean by that?

1 A This form is -- each form that we have is set up
2 for the county. They have margin requirements, what has to
3 be on it, like how many witnesses, who has to sign it, that
4 sort of thing. So she established the actual form that the
5 information that our enterers key in, gets fed into.

6 Q Did she prepare this document? And I'm referring
7 to the Corey Assignment.

8 A She prepared the form, and it printed out with
9 the information with -- from our data enterers.

10 Q So who generated the Corey Assignment, the actual
11 physical piece of paper?

12 A It came out of our printing area.

13 Q Did -- was a person responsible for that, or is
14 that something that's automated?

15 A It's automated.

16 Q And what is the name of the automated system that
17 creates the actual Assignments?

18 A Planat Press.

19 Q Can you spell that for me?

20 A P-L-A-N-A-T P-R-E-S-S.

21 Q And where does Planat Press get the information
22 needed to create the documents?

23 A The form is created in Planat Press as I
24 described by Jessica Fretwell in the quality control area.
25 They create the form that the document -- the information is

1 fed in to, and our data enterers will enter the information.
2 It gets quality control checked, and once it's verified, it
3 then gets printed.

4 Q So a human enters the specifics, the dates and
5 the names of the entities?

6 A Yeah.

7 Q And the name of the signer?

8 A Yeah. And in this particular case, that document
9 did not get printed off as I explained earlier. That's an
10 electronic recording.

11 Q So this -- the document, the Corey Assignment,
12 was never a physical piece of paper that was manually
13 signed; is that correct?

14 A That is correct.

15 Q Okay. So Mr. Bly didn't actually sign the Corey
16 Assignment; is that correct?

17 A Well, he didn't physically sign it, but he --
18 that meets with the standards for electronic document
19 recording.

20 Q Okay. Are you referring to a specific state or
21 federal law?

22 A This -- no. Specific counties across the nation
23 have started setting it up, so part of like going more green
24 and not having as much paperwork that you can electronically
25 record documents. They have different settings anywhere

1 from just feeding them information to feeding them like a
2 PDF or TIF version of the document that gets recorded, that
3 they record in their imaging bank, stamped electronically,
4 and then send back to us as having been recorded once it's
5 verified on their side. That document was one of those.

6 Q Yes, ma'am. I understand how it was recorded
7 electronically. I'm just trying to -- to determine whether
8 or not Mr. Bly actually signed a physical document or if
9 a -- his signature was created by Planat Press.

10 A The signature was included by Planat Press
11 because that document was never printed out.

12 Q So did Mr. Bly review the document before it was
13 sent for electronic recording?

14 A No.

15 Q So -- and I'm now -- I continue to refer to the
16 Corey Assignment.

17 Mr. Bly never saw the Corey Assignment prior to
18 it being recorded; is that correct?

19 A Correct.

20 Q Is there any way he has of checking to see what
21 documents are being recorded that contained his signature?

22 A Yes.

23 Q And how does he do that?

24 A He can run a report that would tell him which
25 documents. In this particular case, he could then look up

1 and view the documents if he wanted to.

2 Q Is that something he does at the end of every
3 day?

4 A No.

5 Q Is that something he does at all?

6 A I'm not sure.

7 Q Is a part of his job description to review the
8 documents that he -- that contain his electronic signature?

9 A No. It's a part of somebody else's
10 responsibility.

11 Q And so somebody else checks all of the electronic
12 signatures at the end of the day?

13 A No. They check them before they go out for
14 recordation to make sure that the form is correct. It's a
15 document inspector.

16 Q Okay. Do you know who the -- is there anything
17 on the Corey Assignment that would identify who the document
18 inspector was?

19 A No.

20 Q About how long -- how long does that process
21 take? Let's say Nationwide received a request from
22 CitiMortgage to generate a -- 2,000 Assignments, how long
23 would it take from the time that request was made until you
24 had 2,000 Assignments like the Corey Assignment
25 electronically filed?

1 A Well, the way you asked that question, it doesn't
2 work that way. Depending on where we can electronically
3 record and depending on whether or not we have clean files
4 in which to data enter if we need further information.
5 Generally, just say hypothetically we have perfect files and
6 we were recording them all in Duval County, Florida and we
7 were electronically recording them, maybe ten days at the
8 most.

9 Q Uh-huh.

10 A That's if everything was, like, perfect
11 alignment, if that makes sense, not --

12 Q When you say "perfect files," what do you mean by
13 that?

14 A In order for us to enter the information on this
15 file, we have to be supplied copies of documentation --

16 Q Uh-huh.

17 A -- such as the mortgage and any Assignment of
18 record, depending on if that's required, which I do not
19 believe it is in Florida, but I'm not a hundred percent sure
20 of that.

21 So we would have to be supplied the -- they give
22 us an electronic download of the Assignments they want. We
23 verify the images usually that they give us versus the
24 download and enter in the appropriate information off of
25 those documents to create the Assignment of Mortgage.

1 Q Do you mean like if they give you an image of a
2 mortgage, you'd check the public records to make that --
3 sure that image is correct? Is that what you mean?

4 A No, no. If it's a recorded mortgage, it usually
5 has a recording stamp, so we don't verify that that's
6 correct. We verify that, okay, if they said Bob Smith, the
7 loan was \$100,000 on this date, we make sure -- and for this
8 property address, that that mortgage is the mortgage that
9 we're looking at.

10 Q So do you also prepare Affidavits as well or just
11 Assignments of Mortgage?

12 A No. We can also prepare a Lost Assignment
13 Affidavit.

14 Q Uh-huh. Under what circumstances do you do that?

15 A Normally they're only prepared when say, for
16 instance, we're doing a Lien Release and then -- or an
17 Assignment and the company that the Assignment -- like
18 there's a break in what's called the "chain of title" and
19 the Assignment cannot be gotten because a company's out of
20 business.

21 Like more so in the last couple of years due to
22 our industry, there are a lot more companies where you can't
23 go get the Assignment signed.

24 Q Uh-huh.

25 A We have a service that does that, where we go

1 find old companies to sign Assignments, to get them back.
2 But if they cannot be found or the lenders out of business,
3 you'd want to do a Loss of Assignment Affidavit indicating
4 that it was not included in the collateral file and that the
5 lender is out of business.

6 Q Do you prepare those Affidavits for filing in
7 Florida?

8 A I don't know if Florida is an L.A. state. I know
9 Florida has gotten more strict recently regarding that in
10 regards to foreclosure and stuff like that.

11 Q Okay. Just to go back to make sure that I
12 understand, I thought that previously you mentioned that
13 Mr. Bly signs a couple of thousands of Assignments and
14 releases a day?

15 A Yes.

16 Q So is there another group of documents where he
17 is actually physically signing?

18 A Yes.

19 Q Okay. So we have two groups: One group that he
20 physically signs and then some that -- where his signature
21 is just electronically generated?

22 A Correct.

23 Q But with the Corey Assignment, you're saying this
24 one was electronically generated?

25 A Correct.

1 Q And how can you tell that this -- that the Corey
2 Assignment was electronically generated?

3 A Because I looked it up before I came in here to
4 see how it was recorded, and it's in what we refer to as an
5 E-record, which is an electronically recorded document.

6 Q So you -- if it's E-recorded, it means it was
7 that it was generated by computer?

8 A Uh-huh.

9 Q And it was not actually signed?

10 A It was not actually physically signed, yes.

11 Q Okay.

12 A Those signatures are counted as signatures for
13 electronic recording.

14 Q I'm showing you a copy of another Assignment of
15 Mortgage.

16 Do you recognize that document?

17 MS. PARSONS: I'm going to object to this as it's
18 irrelevant to this case. It has to do with a
19 completely different mortgage.

20 THE WITNESS: And a completely different client.

21 Q (By Ms. Drysdale) Do you recognize the document?

22 A Yes.

23 Q I -- I just noticed that the signature was very
24 different on this Assignment of Mortgage.

25 A Yes.

1 Q And I'm going to call this the M-E-S-S-I-C-A
2 Assignment.

3 Do you know why the signature was so different?

4 A Yes. Our signers have the ability -- one of
5 things we track is they two different site signatures. They
6 can have the long form signature, which is what you see on
7 the electronically recorded document, and they can also have
8 shorthand signatures.

9 Q Can you describe the difference between the two
10 for me?

11 A Generally, depending on the volume of loans that
12 we are executing documents for, the shortened signature
13 works to push the documents, to get more of them executed.
14 But we keep on record the file -- the names that they -- the
15 signatures that they sign under, like they have in their
16 employee file a record of their longhand and shorthand
17 signature.

18 Q So would Exhibit 4, he actually -- Mr. Bly
19 actually did sign this one?

20 A He signed this one.

21 MS. DRYSDALE: Okay. That's 4.

22 (Defendant's Exhibit Number 4 was marked for
23 identification.)

24 MS. PARSONS: I'm going to object that being
25 entered into evidence for the record.

1 Q (By Ms. Drysdale) And how long has Mr. Bly been
2 working at Nationwide?

3 A He's been employed for over seven years.

4 Q Has -- has he been a signer that whole time?

5 A Yes.

6 Q What about Crystal Moore? She -- is she also a
7 signer?

8 A She is also a signer and a notary.

9 Q And a notary.

10 And her practices are the same as you've
11 described with Mr. Bly as far as how she -- what her daily
12 duties are in executing documents?

13 A Yes.

14 Can I ask why you're asking about Crystal Moore
15 because her name's not on any of the documentation regarding
16 this.

17 Q I just saw her name on the Consent of the
18 Executive Committee we marked as 3.

19 A Uh-huh.

20 Q So are all of the names on Exhibit 3, the Joint
21 Consent, are they all signers?

22 A You mean is their job duty?

23 Q Yes, ma'am.

24 A No. See, I'm even listed on there.

25 Q So you are listed on here as a -- an assistant

1 secretary and vice president. Do you have other duties?

2 A For Citi?

3 MS. PARSONS: Objection.

4 Q (By Ms. Drysdale) That's the way I understand it.

5 Maybe I misunderstand Exhibit 3.

6 A I think you do.

7 Q Okay. Can you --

8 A Yeah.

9 Q Can you describe the list of names for me?

10 A The list of names are employees of Nationwide
11 Title Clearing that we give to them to -- to have them
12 authorize them to be signers as vice presidents or assistant
13 secretaries. The list is generated to insure that depending
14 on the volume of loans that have to be executed we have
15 enough employees in Nationwide to execute all of those
16 documents. Included in there, are people who have other
17 capacities at NTC, but in the time of overload, could go
18 assist in that particular area.

19 Q So the people who are listed on Exhibit 3 are
20 people who could act as vice presidents or assistant
21 secretaries, but each of these persons are full-time
22 employees of Nationwide; is that correct?

23 A Correct.

24 Q Okay. In that -- the Assignment of Mortgage,
25 particularly the Corey Assignment of Mortgage, lists the

1 note. Does Nationwide ever have possession of the original
2 notes?

3 A For Assignments of Mortgage?

4 Q Yes.

5 A No.

6 Q What other types of responsibilities does Mr. Bly
7 have as a vice president?

8 A That is it. It's solely for the execution of
9 documents as listed in Defense Exhibit 3.

10 Q And is he accountable for the accuracy of the
11 documents that he signs?

12 A To whom?

13 Q To either Nationwide or to the -- to the company
14 for which he is a vice president at CitiMortgage.

15 A No. Nationwide's responsible for the accuracy of
16 the documents.

17 Q So in his position as vice president, he doesn't
18 have any responsibility under the Joint Consent of the
19 Executive Committee for the accuracy of the documents he
20 executes?

21 A No. All he's responsible for is signing them.

22 Q Is there any sort of -- did Assignments Mr. Bly
23 have to undergo any sort of screening process or training to
24 become a vice president or assistant secretary of
25 CitiMortgage?

1 A No.

2 Q Does he have any special qualifications to be a
3 vice president or assistant secretary?

4 A In the capacity of signing the documents?

5 Q Yes, ma'am.

6 A No.

7 Q And does he have any -- does he communicate with
8 anyone at CitiMortgage relating to his responsibilities as
9 vice president or assistant secretary?

10 A No.

11 Q So does he have any guidelines provided to him by
12 CitiMortgage, Inc., relating to his executed -- execution of
13 his duties as vice president or assistant secretary?

14 A The guidelines that are provided are provided via
15 Nationwide Title Clearing since his only capacity is as --
16 as a signer for them. He has no other capacity.

17 Q So he doesn't have any other duties as -- with
18 Citi?

19 A None.

20 Q Doesn't receive any compensation?

21 A None.

22 Q He doesn't have to attend board meetings or any
23 other types of meetings with Citi?

24 A No. It actually says that literally the only
25 capacity he works on -- and that's under the second "Further

1 Resolve," the only capacity he does is as a signer of the
2 documents.

3 Q Okay. And I believe that it says that he
4 executed any and all --

5 (Brief interruption in proceedings.)

6 A I'm sorry. What was the question?

7 Q And he is authorized to execute documents
8 required in connection with processing releases and
9 Assignments; is that correct?

10 A Yeah.

11 Q Does he have to complete any sort of reports to
12 Citi?

13 A No.

14 Q Do you in your capacity as vice president or
15 secretary?

16 A Do I have to give any reports to Citi?

17 Q Correct.

18 A Not personally, no.

19 Q Okay. But I guess somebody at Nationwide needs
20 to?

21 A We send them reports on the progress of the
22 completion of the projects they give us.

23 Q I noticed in -- in this particular situation the
24 note was transferred after the loan was in default.

25 Do you know if that's the -- the normal course of

1 business for these -- these mortgages to be transferred
2 after they're in default?

3 A I have no idea.

4 Q Is that not the type of information that you'll
5 have to review prior to -- to preparing the documents?

6 A No, we don't.

7 Q And you -- I think you mentioned that you have
8 a -- a title company at Nationwide; is that correct?

9 A No.

10 Q There is no title company?

11 A There is no title company at Nationwide.

12 Q Okay. And who does the -- is there any title
13 work done prior to the -- the preparation of the Assignments
14 of Mortgage?

15 A Not by Nationwide Title Clearing.

16 Q Who -- do you know if anybody else does any title
17 work?

18 A No, I don't know.

19 Q What is Release Link?

20 A Release Link is our website that our release
21 clients use.

22 Q Can you describe that for me?

23 A It allows them to enter and process their Lien
24 Releases, and also resolve their -- any exceptions that they
25 have, problem files they have.

1 Q So the -- the Release Link is the program through
2 which you prepare the releases?

3 A No. It's a program that our clients are able to
4 enter information to prepare releases.

5 Q Is that a secure database?

6 A Yes.

7 Q And who has access to enter information?

8 A Only our clients. They actually control their
9 own users.

10 Q Is -- does the -- so that -- that's sort of a
11 counterpart to the Planat Press; is that correct?

12 A No. Planat Press is a document generation
13 platform.

14 Q Okay.

15 A That's used behind the scenes. Release Link is a
16 website.

17 Q Is there a similar website for the preparation of
18 the Assignments of Mortgage?

19 A Not at this time.

20 Q Is that something that you're working on?

21 A Yes.

22 Q Also there's a -- is there a department,
23 foreclosure collateral management?

24 A There is a -- yes.

25 Q Is that a service that -- that Nationwide

1 provides?

2 A To one client, yes, which is not Citi.

3 Q Not Citi.

4 About how many people working at Nationwide have
5 the same position as Mr. Bly as a signer?

6 A Full-time?

7 Q Yes.

8 A Three.

9 Q And then you -- when you say "full-time," you
10 mean some of these other folks that are on Exhibit 3 fill in
11 when there's a lot of work to do?

12 A Yeah, when there's higher volume.

13 Q Do you-all -- are you-all also corporate
14 representatives for Bayview?

15 A Corporate representative. Do we have a corporate
16 resolution for Bayview?

17 Q Yes.

18 A I would have to verify. We have, at one time,
19 had a corporate resolution for Bayview.

20 Q Do you ever transfer mortgages into trusts?

21 A No.

22 Q And could you describe the mortgage foreclosure
23 technology platform?

24 A We don't have a mortgage foreclosure technology
25 platform.

1 Q And going back to the Corey Assignment, showing
2 you again -- this is Exhibit 2, the Corey Assignment, shows
3 Mr. Jones notarizing the document.

4 As I understand, Mr. Bly's signature was created
5 by Planat Press; is that correct?

6 A Uh-huh.

7 Q So was Mr. Jones' signature also created by
8 Planat Press as the notary?

9 A Yes.

10 Q Okay. And had Mr. Bly actually manually signed
11 the Assignment of Mortgage? How -- what's the process by
12 which that would be notarized?

13 A What do you mean? He would sign the document,
14 and then it would get notarized after he signed it.

15 Q How does that process work? Does he sign, you
16 said like 1,000 documents, and then they get sent to --

17 A It depends on how many are in a -- each batch.
18 But he would sign a batch of documents, and then he would
19 take them over to whoever the notary is that's signing for
20 him.

21 Q So they're located in -- in -- physically in
22 different parts of the facility?

23 A No. They're in very close proximity to each
24 other. They're in the same cubicle area.

25 Q Okay.

1 A Yeah.

2 Q And -- but they're taken over from Mr. Bly to
3 Mr. Jones in batch?

4 A In that -- if that hypothetically was signed that
5 way, yes, that's how that would have occurred.

6 Q Did you bring any other documents today pursuant
7 to the notice?

8 A I brought you what I refer to as a flow chart on
9 how we process Assignments so you could understand how that
10 occurs.

11 Q Thank you.

12 A Yeah.

13 THE WITNESS: Those are colored copies, so one of
14 those will have to go that way if it's entered in
15 because that's all I have.

16 MS. DRYSDALE: And we'll mark this as 5.

17 (Defendant's Exhibit Number 5 was marked for
18 identification.)

19 Q (By Ms. Drysdale) Okay. I'm looking at your
20 flow chart that you've put together, and starting at the
21 upper left hand corner we have "Client." And then it looks
22 like we have heading right a couple of -- it looks like
23 pictures of CPU's --

24 A Uh-huh.

25 Q -- is that correct?

1 Can you describe what these are?

2 A That's -- I think graphically this was from my
3 marketing person. This is what we would send to a client to
4 see how our flow chart goes. It's just indicating there's
5 an electronic. If you look at the bubbles that are listed
6 on it, it indicates that electronic loan information to
7 NTC's IT department and how it can be sent.

8 Q Uh-huh.

9 A The other alternate route that doesn't have the
10 CPU says the client can ship loan files to NTC, or we can go
11 on-site and capture them.

12 Q What is -- what system is this with the CPU's
13 where information is obtained -- is sent by the client to --

14 A FTP, CDs, or hard drives or e-mails, secure
15 e-mail.

16 Q Okay.

17 A It says right there in the box.

18 Q I see. So if you could just briefly describe the
19 chart. I think that would probably make it --

20 A Okay. This is just indicating -- the first part
21 indicates that we can receive electronic or physical files
22 from the client. They go into our data entry area.
23 Depending on if there's an exception or a problem with the
24 file, it shows how it resolves it, but just data entry.

25 Then it goes to our quality control department.

1 As you can see, if you look all the way on the left, it
2 indicates the electronic recording line that I was telling
3 you about, but then skips the print -- printing and
4 processing departments.

5 So it would go electronic recording. It goes to
6 scanning, and then we scan the documents. And they can
7 either get electronically sent, or sometimes the clients
8 require them to be physically sent to themselves or their
9 assignee.

10 But if it goes the physical route, it ends up
11 being printed out, goes into processing, and then it goes to
12 our signing department. Our document inspector quality
13 control checks them. It goes to our checks area, to our
14 mailroom, out to recording, and then when it comes back, it
15 gets logged in and scanned.

16 Q Okay. In two different sections, whether the
17 documents are provided to you -- or the requests are sent to
18 you electronically or by physical document, you've got a
19 quality control.

20 What -- what is -- specifically what is the
21 quality control looking for?

22 A The quality control is after our data entry
23 stuff, not whether or when we receive the files. Is that
24 what you're talking about?

25 Q Yes.

1 A It just looks to make sure that the information
2 that was being entered is actually correct and that we're
3 assigning the correct loan and that the correct information
4 is on the Assignment to assign the loan, like the recording
5 information, the borrower's name, the address if that's
6 needed, any Assignment chains if needed, legal descriptions.

7 Q Now, is that something that is done based on
8 internal research or based upon the documents provided to
9 you by the client?

10 A It can be either or. If the -- if a client does
11 not give us enough documentation, then they have the option
12 of either providing or -- or we can go research it at the
13 county level.

14 Q And you said sometimes you find missing
15 Assignments in that process?

16 A It's possible to find a broken Assignment chain.

17 Q And what happens at that point?

18 A We ask the client how they want to resolve it,
19 and they can either resolve it by -- if sometimes they say,
20 oh, we can get that Assignment or they ask us to go get the
21 Assignment that's missing.

22 Q And how -- can you describe the process by which
23 you would go and obtain the Assignment?

24 A Well, we find out who it was -- went to, where
25 the break is, who needs to sign it, and we contact that

1 lender if it's possible. They usually research on their
2 side to verify that that was -- that Assignment is correct,
3 and then we either generate an Assignment for them or they
4 will generate an Assignment to us.

5 Q But you said sometimes the companies are no
6 longer available?

7 A Yeah. It's -- if a company's out of business and
8 you can't -- sometimes even if they're out of business, you
9 can contact an officer of that company and have them sign
10 the document anyway.

11 But hypothetically, if they're totally gone, you
12 can't find them anywhere, then we report that back to the
13 client, and they can make the determination at that time if
14 they want to do a Loss Assignment Affidavit. And that is
15 also depending on whether the county will take a Loss
16 Assignment Affidavit. Some counties won't.

17 Q What happens if the county won't take the Loss
18 Assignment Affidavit?

19 A They have to do what is called a "Quiet Title,"
20 and I -- that's all I know about that.

21 Q Okay.

22 A It's just a procedure called Quiet Title.

23 Q Did you have any other documents with you today?

24 A No, I don't.

25 Q I thought there was one other document that you

1 copied earlier.

2 A No.

3 Q Okay.

4 MS. DRYSDALE: Did you have any questions that
5 you wanted to ask?

6 MS. PARSONS: Just a couple.

7 MS. DRYSDALE: Yeah. Because I was thinking if I
8 could take a break that I might be able to just look
9 while you're asking the questions and --

10 MS. PARSONS: Okay. I'll just take a couple
11 questions. I'll give this back to you.

12 THE WITNESS: Okay. Do you want a -- I don't
13 think that actually got entered into evidence, did it?

14 MS. DRYSDALE: I think we marked it as 5, it just
15 hasn't been --

16 MS. PARSONS: Doesn't have a sticker on it.

17 THE COURT REPORTER: I didn't -- can we go off
18 the record for a minute?

19 MS. DRYSDALE: Sure.

20 (A brief off-the-record discussion was held.)

21 CROSS-EXAMINATION

22 BY MS. PARSONS:

23 Q Back to the Assignments of Mortgages
24 specifically, you stated the color chart -- and previously I
25 believe that there is a quality control department, correct?

1 A Yes. There's a quality control division.

2 Q A whole division?

3 A Yes.

4 Q Okay. So every Assignment that gets prepared in
5 this company goes through the quality control division?

6 A Yes.

7 Q How many individuals do you have working in that
8 division?

9 A There are, I believe, nine.

10 Q Nine. So someone specifically goes through and
11 looks at the Assignment of Mortgage that was prepared by
12 you, looks at the mortgage, whether it's in hand or on the
13 internet as far as obtaining it from the client's website,
14 to double check that all of the information is correct?

15 A Yeah. They actually -- what they do is there's
16 two different steps. There's one where they review the
17 actual entry, and they do that based off of a review sheet
18 that indicates what are the required fields for that state
19 and county. And then they look at the images that were
20 provided to us or if it's a physical file, but I can say in
21 the last couple of years we do not really have physical
22 files in the buildings anymore.

23 And then the next step is after they've approved
24 the actual what was entered, it goes through the processing,
25 and then it goes through a second quality control check for

1 the document inspector. Then that's the person that
2 physically looks at the document to make sure it's got all
3 the stamps and signers and if like a legal needed to be
4 attached to it or a cover sheet or something like that.

5 Q Okay. So they're reviewing for two things: One,
6 that it come complies with the county requirements --

7 A Uh-huh.

8 Q -- and two, that it contains all of the proper
9 information as far as borrower's name, legal description,
10 that kind of thing?

11 A Uh-huh.

12 MS. PARSONS: Okay. I think that's all I have.

13 MS. DRYSDALE: I have one more question.

14 REDIRECT EXAMINATION

15 BY MS. DRYSDALE:

16 Q Is Mr. Bly, is he also a notary?

17 A Yes. You asked me that previously.

18 MS. DRYSDALE: I don't have anything further.

19 MS. PARSONS: I don't think I do either. Okay.

20 We're done.

21 THE COURT REPORTER: Reading and signing?

22 MS. PARSONS: This is where you get a chance
23 because of the fact that this is now testimony, this
24 could be potentially brought into court. You have the
25 opportunity to get a copy of it and read it physically

1 to make sure you answered everything in proper -- the
2 way you wanted to and what you meant to say came out
3 properly.

4 THE WITNESS: Okay.

5 MS. PARSONS: Or you can just sign and let it go.
6 You don't have to read it.

7 THE WITNESS: No. I'd rather get a copy.

8 (The deposition was concluded at 12:28 p.m.)

9 * * *

10 I hereby certify that I have read and examined the
11 foregoing transcript, and the same is a true record of the
12 testimony given by me unless otherwise noted.

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ERIKA LANCE DATE

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1 SIGNATURE PAGE/ERRATA SHEET

2 WITNESS: ERIKA LANCE

3 CASE REFERENCE: BAYVIEW LOAN SERVICES, LLC vs. CYNTHIA LEE
COREY a/k/a CYNTHIA L. COREY, et al

4 CASE NUMBER: 16-2009-CA-016234-MA

5 DATE: June 2, 2010

6 After you have read your transcript, please note
7 any errors in transcription on this page. Do not mark on
8 the transcript itself. Please sign and date this sheet as
9 indicated below. If additional lines are required for
corrections, attach additional sheets. If no corrections,
please indicate "None."

10 _____

11 PAGE	LINE	ERROR OR AMENDMENT	REASON
12	_____	_____	_____
13	_____	_____	_____
14	_____	_____	_____
15	_____	_____	_____
16	_____	_____	_____
17	_____	_____	_____
18	_____	_____	_____
19	_____	_____	_____

20 Under penalties of perjury, I declare that I have
21 read the foregoing transcript, and I subscribe to its
accuracy, to include the corrections or amendments noted
above or hereto attached.

22 _____
ERIKA LANCE DATE

23 *Original to: LYNN DRYSDALE, Esquire
24 126 West Adams Street, Jacksonville, Florida 32202
25 *Copy to: DANIELLE PARSONS, Esquire
900 Pine Island Rd., Suite 400, Plantation, Florida 33324

1 CERTIFICATE OF REPORTER

2 STATE OF FLORIDA)

3 COUNTY OF PINELLAS)

4

5 I, BROOKE WHARTON, Court Reporter, certify that I
6 was authorized to and did stenographically report the
7 deposition of ERIKA LANCE; that a review of the transcript
8 was requested; and that the transcript, pages 1 through 58,
9 inclusive, is a true and complete record of my stenographic
10 notes.

8

9 I further certify that I am not a relative,
10 employee, attorney, or counsel of any of the parties, nor am
11 I a relative or employee of any of the parties' attorney or
12 counsel connected with the action, nor am I financially
13 interested in the action.

11

12 BROOKE WHARTON
13 Court Reporter

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1 CERTIFICATE OF OATH

2 STATE OF FLORIDA)

3 COUNTY OF PINELLAS)

4 I, the undersigned authority, certify that
5 ERIKA LANCE personally appeared before me and was duly
6 sworn.

7 WITNESS my hand and official seal this 14th day
8 of June, 2010.

9 _____
10 BROOKE WHARTON
11 Notary Public
12 State of Florida
13 My Commission No.: DD846093
14 Expires: December 16, 2012
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