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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON	I N D E X
IN AND FOR THE COUNTY OF KING	EXAMINATION PAGE
JANET REINER, a single)	BY MS. DAO:
woman,)	BY MS. MORRISON:
) Plaintiff,)	
)	EXHIBITS MARKED PAGE No. 1 Foreclosure Transmittal
-vs-) No. 11-2-02029-8	No. 1 Foreclosure Transmittal Package IndyMac 11
) NORTHWEST TRUSTEE SERVICES,)	
INC., a Washington)	No. 2 Appointment of Successor
corporation; ONE WEST BANK,)	Trustee 5/17/09
FSB, a federal savings bank;)	No. 3 Notice of Default 24 No. 4 Foreclosure Transmittal
MORTGAGE ELECTRONIC) REGISTRATION SYSTEMS,)	Package One West
INC., a Delaware corporation,)	
) Defendente)	No. 5 Screenshots re payment
Defendants.)	changes 27 No. 6 Supplemental Action by
	Written Consent
Deposition Upon Oral Examination	
of	No. 7 Action by Written Consent 39
0	No. 8 Amended Response and
YVONNE McELLIGOTT	Objections to Subpoena 46
1:00 p.m.	No. 9 Assignment of Deed of Trust
Tuesday, December 11, 2012	8/25/08
787 Maynard Avenue South	No. 10 Notice of Trustee's Sale
Seattle, Washington	10/26/07
	No. 11 Notice of Trustee's Sale
Cheryl Macdonald, RMR, CRR	4/10/09
Court Reporter	No. 12 Appointment of Successor
	Trustee 11/11/08
MOBURG SEATON & WATKINS (206)622-3110	MOBURG SEATON & WATKINS (206)622-3110
Page 2	Dago 4
	Page 4
A P P E A R A N C E S	I N D E X (Cont'd.)
FOR THE PLAINTIFF:	EXHIBITS MARKED PAGE
HA THU DAO	No. 13 Appointment of Successor Trustee 12/30/08 59
Attorney at Law GRAND CENTRAL LAW	Trustee 12/30/08 59
787 Maynard Avenue South	No. 14 Appointment of Successor
Seattle, Washington 98104	Trustee 11/13/08 59 No. 15 Declaration of Vonnie
youremylawer@gmail.com	McElligott
	No. 16 Beneficiary Declaration 63
FOR NORTHWEST TRUSTEE SERVICES:	No. 16 Beneficiary Declaration 63
HEIDI BUCK MORRISON	No. 17 Loss mitigation declaration 67
Attorney at Law	No. 18 Notice of Discontinuance of
ROUTH CRABTREE OLSEN 13555 SE 36th Street	Trustee's sale 6/21/11 76
Suite 300	No. 19 Notice of Discontinuance of
Bellevue, Washington 98006	Trustee's sale 8/18/09 77
hbuckmorrison@rcolegal.com	No. 20 Appointment of Successor
-	
-	Trustee 9/2/11
	Trustee 9/2/11
(via telephone)	No. 21 Assignment of Deed of Trust 9/13/10
	No. 21 Assignment of Deed of Trust
(via telephone) CHRISTOPHER J. KAYSER Attorney at Law LARKINS VACURA	No. 21 Assignment of Deed of Trust 9/13/10
(via telephone) CHRISTOPHER J. KAYSER Attorney at Law LARKINS VACURA 621 SW Morrison Street	No. 21 Assignment of Deed of Trust 9/13/10
(via telephone) CHRISTOPHER J. KAYSER Attorney at Law LARKINS VACURA 621 SW Morrison Street Suite 1450 Portland, Oregon 97205	No. 21 Assignment of Deed of Trust 9/13/10
(via telephone) CHRISTOPHER J. KAYSER Attorney at Law LARKINS VACURA 621 SW Morrison Street Suite 1450	No. 21 Assignment of Deed of Trust 9/13/10
(via telephone) CHRISTOPHER J. KAYSER Attorney at Law LARKINS VACURA 621 SW Morrison Street Suite 1450 Portland, Oregon 97205	No. 21 Assignment of Deed of Trust 9/13/10
Attorney at Law LARKINS VACURA 621 SW Morrison Street Suite 1450 Portland, Oregon 97205	No. 21 Assignment of Deed of Trust 9/13/10
(via telephone) CHRISTOPHER J. KAYSER Attorney at Law LARKINS VACURA 621 SW Morrison Street Suite 1450 Portland, Oregon 97205 cjkayser@larkinsvacura.com	No. 21 Assignment of Deed of Trust 9/13/10
(via telephone) CHRISTOPHER J. KAYSER Attorney at Law LARKINS VACURA 621 SW Morrison Street Suite 1450 Portland, Oregon 97205 cjkayser@larkinsvacura.com	 No. 21 Assignment of Deed of Trust 9/13/10
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1 (Pages 1 to 4)

Court Reporters Seattle, WA 98121

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1	MS. DAO: My name is Ha Dao and I'm the	1	A. Correct.
2	attorney for Janet Reiner. I just want to go through	2	Q. Okay. So I have a copy of that. Tell me
3	a few preliminary rules before a deposition.	3	about your profession with Northwest. What capacity
4	YVONNE McELLIGOTT, witness herein, having been first	4	are you employed by them?
	duly sworn by the Certified Court	5	A. I am a foreclosure team manager.
5	Reporter, deposed and said as	6	Q. And is that the only capacity or do you
	follows:	7	work under any other title?
б		8	A. The only other title I have is my signing
7	BY MS. DAO:	9	authority as assistant vice-president.
8	Q. So the rules are that I need you to answer	10	Q. So are you or are you not a vice-president
9	audibly and clearly. No nods, no uh-huhs.	11	for Northwest Trustee?
10 11	A. Okay.	12	A. I am not.
12	Q. And you are free to ask for a break. I just ask that you finish your answer to a question	13	Q. So the title is VP, vice-president?
13	before you take a break. Or if you need to confer		
14	with your attorney, with counsel, you can, but just	14 15	A. Assistant vice-president.
15	finish up your answer. I'm going to take a break in		Q. I'm sorry, assistant vice-president, but in
16	about an hour because we've got a lot of stuff, but	16	reality you don't own shares of the company?
17	it's going to be a quick break, so if you have parking	17	A. No, I do not.
18	or any other problems, let me know and I'll do my best	18	Q. You are not entitled to profits by the
19	to accommodate you. Okay.	19	company as a corporate officer?
20	State your full name and your address for	20	A. No, I am not. Correct.
21	the record, please.	21	Q. And can you tell me the purpose of this
22	A. Yvonne McElligott, 15014 Southeast 22nd	22	signing authority?
23	Street, Bellevue, Washington 98007.	23	A. Sign documents on behalf of the company.
24	Q. So, is your proper name "Vonnie"?	24	Q. And when did that resolution come into
25	A. My legal name is Yvonne.	25	being, if you remember?
	Page 6		Page 8
1	Page 6 Q. And how do you spell that?	1	Page 8 A. I don't recall.
1 2	Q. And how do you spell that?A. Y-V-O-N-N-E.	1 2	
	Q. And how do you spell that?		A. I don't recall.
2	Q. And how do you spell that?A. Y-V-O-N-N-E.	2	A. I don't recall.Q. Can you give me like a number? Months, years?A. (No response.)
2 3	Q. And how do you spell that?A. Y-V-O-N-N-E.Q. And you're not signing under that name?A. No, I am not.Q. Why is that?	2 3	A. I don't recall.Q. Can you give me like a number? Months, years?
2 3 4	Q. And how do you spell that?A. Y-V-O-N-N-E.Q. And you're not signing under that name?A. No, I am not.	2 3 4	A. I don't recall.Q. Can you give me like a number? Months, years?A. (No response.)
2 3 4 5	Q. And how do you spell that?A. Y-V-O-N-N-E.Q. And you're not signing under that name?A. No, I am not.Q. Why is that?	2 3 4 5	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you
2 3 4 5 6	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under 	2 3 4 5 6	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest?
2 3 4 5 6 7	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." 	2 3 4 5 6 7	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years.
2 3 4 5 6 7 8	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you 	2 3 4 5 6 7 8	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first
2 3 4 5 6 7 8 9	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? 	2 3 4 5 7 8 9	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest?
2 3 4 5 6 7 8 9 10	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? 	2 3 5 6 7 8 9 10	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position.
2 3 4 5 6 7 8 9 10 11	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. 	2 3 6 7 8 9 10 11	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some
2 3 4 5 6 7 8 9 10 11 12	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. A. Yes. 	2 3 6 7 8 9 10 11 12	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some promotions over the years?
2 3 4 5 6 7 8 9 10 11 12 13	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. A. Yes. Q. But you chose to sign as Vonnie because 	2 3 6 7 8 9 10 11 12 13	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some promotions over the years? A. I don't really think I've gotten
2 3 4 5 6 7 8 9 10 11 12 13 14	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. A. Yes. Q. But you chose to sign as Vonnie because there's a resolution? 	2 3 4 5 7 8 9 10 11 12 13 14	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some promotions over the years? A. I don't really think I've gotten promotions. It's pretty much been the same duty all
2 3 4 5 6 7 8 9 10 11 12 13 14 15	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. A. Yes. Q. But you chose to sign as Vonnie because there's a resolution? A. My signing authority is under Vonnie. 	2 3 4 5 7 8 9 10 11 12 13 14 15	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some promotions over the years? A. I don't really think I've gotten promotions. It's pretty much been the same duty all along.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. A. Yes. Q. But you chose to sign as Vonnie because there's a resolution? A. My signing authority is under Vonnie. Q. Your signing authority by who? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some promotions over the years? A. I don't really think I've gotten promotions. It's pretty much been the same duty all along. Q. So let's talk about the title that you have
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. A. Yes. Q. But you chose to sign as Vonnie because there's a resolution? A. My signing authority is under Vonnie. Q. Your signing authority by who? A. Northwest Trustee Services. Q. So you're saying that there is a document 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some promotions over the years? A. I don't really think I've gotten promotions. It's pretty much been the same duty all along. Q. So let's talk about the title that you have as a foreclosure team manager.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. A. Yes. Q. But you chose to sign as Vonnie because there's a resolution? A. My signing authority is under Vonnie. Q. Your signing authority by who? A. Northwest Trustee Services. 	2 3 4 5 7 8 9 10 11 12 13 14 15 16 17 18	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some promotions over the years? A. I don't really think I've gotten promotions. It's pretty much been the same duty all along. Q. So let's talk about the title that you have as a foreclosure team manager. A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. A. Yes. Q. But you chose to sign as Vonnie because there's a resolution? A. My signing authority is under Vonnie. Q. Your signing authority by who? A. Northwest Trustee Services. Q. So you're saying that there is a document that allows you to sign as representative or corporate 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some promotions over the years? A. I don't really think I've gotten promotions. It's pretty much been the same duty all along. Q. So let's talk about the title that you have as a foreclosure team manager. A. Yes. Q. Can you tell me what that entails?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. A. Yes. Q. But you chose to sign as Vonnie because there's a resolution? A. My signing authority is under Vonnie. Q. Your signing authority by who? A. Northwest Trustee Services. Q. So you're saying that there is a document that allows you to sign as representative or corporate officer of Northwest? A. Correct. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some promotions over the years? A. I don't really think I've gotten promotions. It's pretty much been the same duty all along. Q. So let's talk about the title that you have as a foreclosure team manager. A. Yes. Q. Can you tell me what that entails? A. I oversee a group of 10 people that process foreclosures for the state of Washington, Freddie Mac
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. A. Yes. Q. But you chose to sign as Vonnie because there's a resolution? A. My signing authority is under Vonnie. Q. Your signing authority by who? A. Northwest Trustee Services. Q. So you're saying that there is a document that allows you to sign as representative or corporate officer of Northwest? A. Correct. Q. And under that resolution your name is 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some promotions over the years? A. I don't really think I've gotten promotions. It's pretty much been the same duty all along. Q. So let's talk about the title that you have as a foreclosure team manager. A. Yes. Q. Can you tell me what that entails? A. I oversee a group of 10 people that process foreclosures for the state of Washington, Freddie Mac portfolio only.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. A. Yes. Q. But you chose to sign as Vonnie because there's a resolution? A. My signing authority is under Vonnie. Q. Your signing authority by who? A. Northwest Trustee Services. Q. So you're saying that there is a document that allows you to sign as representative or corporate officer of Northwest? A. Correct. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some promotions over the years? A. I don't really think I've gotten promotions. It's pretty much been the same duty all along. Q. So let's talk about the title that you have as a foreclosure team manager. A. Yes. Q. Can you tell me what that entails? A. I oversee a group of 10 people that process foreclosures for the state of Washington, Freddie Mac
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Q. And how do you spell that? A. Y-V-O-N-N-E. Q. And you're not signing under that name? A. No, I am not. Q. Why is that? A. It's my the resolution is under "Vonnie." Q. Okay. I guess my question is, have you ever signed your name as "Yvonne"? A. In what capacity? Q. In any capacity. A. Yes. Q. But you chose to sign as Vonnie because there's a resolution? A. My signing authority is under Vonnie. Q. Your signing authority by who? A. Northwest Trustee Services. Q. So you're saying that there is a document that allows you to sign as representative or corporate officer of Northwest? A. Correct. Q. And under that resolution your name is Vonnie McElligott? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. I don't recall. Q. Can you give me like a number? Months, years? A. (No response.) Q. Let me break it down. How long have you been employed by Northwest? A. Sixteen years. Q. And when was what was your first position with Northwest? A. I don't recall the name of the position. Q. Is it fair to say that you've gotten some promotions over the years? A. I don't really think I've gotten promotions. It's pretty much been the same duty all along. Q. So let's talk about the title that you have as a foreclosure team manager. A. Yes. Q. Can you tell me what that entails? A. I oversee a group of 10 people that process foreclosures for the state of Washington, Freddie Mac portfolio only?

2 (Pages 5 to 8)

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			-	
		Page 9		Page 11
1	A. I've a	lways been the team manager.	1	Q. So tell me how you got how Northwest got
2		ll me about your duties.	2	involved in the foreclosure of the Reiners' property.
3		responsible for communications with	3	A. The first foreclosure either one we
4		<i>w</i> of sales, the management of the team.	4	receive a referral from the servicer.
5	I oversee trai		5	Q. Do you remember when that was?
6		kind of training did you receive?	6	A. There was one in '09 and one in 2010.
7		ie just on-the-job training.	7	Q. Did you bring any of the '09
8		. And who is your supervisor?	8	A. Yes.
9		ently my immediate supervisor is Alan	9	Q. It's in here, okay.
10	Burton.	j j	10	A. (Nodding head.)
11	Q. What	is his title with the company?	11	Q. Do you mind going through it, and give me
12		eve "operations manager."	12	the '09 referral. And you handed me multiple pages
13		ou know who owns Northwest?	13	and titled "Foreclosure Transmittal Package, IndyMac
14	A. I don		14	Mortgage." Is that correct?
15	Q. You'	ve worked there for 16 years and you	15	A. Yes.
16	don't know?		16	MS. DAO: I'm going to have this marked and
17	A. That	is correct.	17	then I'll copy it.
18		don't know who the president is?	18	(Marked for identification Exhibit 1.)
19	A. I don	-	19	Q. I am looking at what has been marked as
20		ou know who Jeff Stenman is?	20	Exhibit 1, and I see here that it's a foreclosure
21	A. Yes.		21	transmittal package. Can you tell me what "FIS
22	Q. What	is he?	22	desktop" is?
23	-	the operations something over	23	A. I don't know what the acronym stands for.
24	Northwest.		24	Q. But do you know what is that a company?
25	Q. Do y	ou know who Steven Routh is?	25	Is that a vendor? What is it?
		Page 10		Page 12
1	A Ikno		1	
1		w who Stephen Routh is.	1	A. It is a vendor system. It's called we
2	Q. Steph	w who Stephen Routh is. en Routh, okay. And who is he?	2	A. It is a vendor system. It's called we refer to it as "desktop."
2 3	Q. Steph	w who Stephen Routh is.	2 3	A. It is a vendor system. It's called we refer to it as "desktop."Q. And that's a computer system? It's a
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Steph A. He is Olsen. Q. Does A. It is n Q. Does hands-on acti in the compar A. I don Q. Have anything with that you and y A. No. Q. Mr. S A. No. Q. Mr. S A. No. Q. Mr. R A. As fa Q. I am a hand, which i familiar with A. Yes, J Q. Did y	w who Stephen Routh is. en Routh, okay. And who is he? one of the owners of Routh Crabtree he have ownership in Northwest? ny understanding, yes. he have any hands-on experience vities with your foreclosure activities ny? t know. you seen him around the office doing regards to the foreclosure transactions your team are involved in? tenman is not a lawyer, is he? touth is? r as I know. asking you to focus on the case at nvolves Ms. Reiner's property. Are you the case? I guess. ou have the opportunity to review your rds before you came today?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. It is a vendor system. It's called we refer to it as "desktop." Q. And that's a computer system? It's a computerized system? What is your understanding? A. It's a system that gathers the lender puts information into it and then we have access to it to update it. Q. And do you get to it via the A. It's an Internet-based product. Q. And do you know who so this is a program. This is not an entity? A. I do not know. Q. You don't know. Do you see there that it's addressed to the law firm of Routh Crabtree? A. The way the lender set it up is most of them have it already set up under Routh Crabtree for years and years and years. It's always been that way, and then it automatically comes to the nonjudicial portion of that, which is Northwest Trustee Services. Q. So in the Reiners' case it also came by way of the law firm?

3 (Pages 9 to 12)

Moburg, Seaton & Watkins 206-622-3110 2033 Sixth Ave., Ste. 826

	Page 13		Page 15
1	Q. So how did you get this package?	1	Q. And we're talking about a computer screen?
2	A. It's automatically downloaded into	2	A. Yes.
3	Northwest Trustee Services' system.	3	Q. An e-mail system?
4	Q. And how is Northwest notified?	4	A. It's our program that we have. Maybe I
5	A. We have a notification queue and we receive	5	don't understand the question.
6	a a number that says that there are this many	6	Q. So you explain to me what the mechanics and
7	referrals in there.	7	what program is involved because, first of all, you
8	Q. Is that by way of e-mail or messages? I'm	8	said this was a third-party desktop?
9	not clear.	9	A. Yes.
10	A. It's automation. It's when a file gets	10	Q. And by way of access
11	downloaded it goes we call it a "ticker," and it	11	A. Automation, it comes into our system with
12	drops into a ticker so we know that there's a referral	12	Northwest Trustee Services as a referral.
13	available under that loan.	13	Q. And you have no idea who created the
14	Q. And who was responsible for downloading	14	system?
15	this particular package?	15	A. No, I don't.
16	A. I don't know.	16	Q. And you don't know before today you did
17	Q. So Exhibit 1 has the addressee as Routh	17	not know who FIS Foreclosure Solutions, Inc., is?
18	Crabtree?	18	A. I don't know who they are specifically, no.
19	A. (Nodding head.)	19	Q. So you take this referral, and then what
20	Q. Would you agree?	20	happened?
21	A. Yes.	21	A. We our file is open. We download the
22	Q. And then as far as where it came from, it	22	necessary documents that you have there.
23	says "FIS Foreclosure Solutions, Inc." Do you know	23	Q. So this all comes by way of automated
24	who that is?	24	Internet transmission; correct?
25	A. I don't, but I guess we now know what FIS	25	A. Yes.
	Page 14		Page 16
1	Page 14 stands for. No, I don't know.	1	Page 16 Q. You do not talk to a human being?
1 2		1 2	
	stands for. No, I don't know.		Q. You do not talk to a human being?
2	stands for. No, I don't know. Q. You never had any idea what this outfit is	2	Q. You do not talk to a human being?A. No, I do not.
2 3	stands for. No, I don't know.Q. You never had any idea what this outfit is that you are getting or you were getting information	2 3	Q. You do not talk to a human being?A. No, I do not.Q. You do not make any phone calls?
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2 3 4 5	stands for. No, I don't know.Q. You never had any idea what this outfit is that you are getting or you were getting information from?A. No, I don't.	2 3 4 5	 Q. You do not talk to a human being? A. No, I do not. Q. You do not make any phone calls? A. No, I do not. Q. Now, Exhibit 1 is the material that you
2 3 4 5 6	stands for. No, I don't know.Q. You never had any idea what this outfit is that you are getting or you were getting information from?A. No, I don't.Q. So tell me the mechanics. Do you go to a	2 3 4 5 6	 Q. You do not talk to a human being? A. No, I do not. Q. You do not make any phone calls? A. No, I do not. Q. Now, Exhibit 1 is the material that you relied upon to commence the foreclosure in the Reiners
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 stands for. No, I don't know. Q. You never had any idea what this outfit is that you are getting or you were getting information from? A. No, I don't. Q. So tell me the mechanics. Do you go to a computer? You sign on? How did you get this package for the referral? A. We sign into "desktop" and type in the referral and get the referral up. It's imaged information. And then we would download the image. Q. But how did you get notified that there was one coming from Reiners? A. In the information queue that we talked about earlier. It notifies us. We have an information thing that notifies us that there's a referral waiting for us. Q. But I guess physically speaking, there's a computer that you go to and you sign on to the website, and then you get the information? Or how does it notify you, I suppose, is what I'm trying to get at. How do you know that there is a referral coming in? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Q. You do not talk to a human being? A. No, I do not. Q. You do not make any phone calls? A. No, I do not. Q. Now, Exhibit 1 is the material that you relied upon to commence the foreclosure in the Reiners case? A. Yes. Q. And so I'm going to ask you to specifically go through the information here. So this is dated April 5, 2009? A. Yes. Q. Would that be the date? MR. KAYSER: Is this the package that Heidi produced earlier? MS. MORRISON: It is. MR. KAYSER: If you wouldn't mind these are Bates-stamped, aren't they? MS. MORRISON: Yes. MR. KAYSER: Would you mind just referring to the Bates number so I can follow along here? MS. DAO: Chris, can you announce yourself so you can be part of this for the court reporter?

4 (Pages 13 to 16)

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	Page 17		Page 19
1	break maybe we should I'm assuming I know who is	1	to be told who you're going to do the action in the
2	there, but not being there it would be helpful. This	2	name of if you don't already have it up here. I mean,
3	is Chris Kayser. I'm an attorney attending the	3	who are you going to foreclose in the name of.
4	deposition by phone. I'm the attorney for One West in	4	Q. And in this case you were directed to or
5	this matter.	5	Northwest was directed to foreclose in the name of
6	MS. MORRISON: I'm Heidi Buck Morrison, and	6	IndyMac?
7	I represent Northwest Trustee Services in this matter.	7	A. Yes.
8	MS. DAO: Ha Dao on behalf of the plaintiff	8	Q. Federal Bank?
9	here, Janet Reiner, who is with me.	9	A. FSB.
10	MS. MORRISON: And Vonnie McElligott, who	10	Q. Do you have any idea at the time let me
11	is the deponent, an employee of Northwest Trustee	11	back up and ask you this question: Were you involved
12	Services.	12	in opening the file at all?
13	MS. DAO: So the Bates stamp is down here,	13	A. I do not know.
14	VMD 1.	14	Q. So by me asking you questions regarding
15	MS. MORRISON: So it would be VMD 1.	15	Exhibit 1, are you speaking from your personal
16	MS. DAO: Through	16	knowledge, or are you guessing or are you you are
17	THE WITNESS: But I took them out of order.	17	familiar with Exhibit 1?
18	MS. DAO: Right.	18	A. Yes.
19	MS. MORRISON: So 1 through 2 and 10	19	Q. You've seen it before?
20	through 17.	20	A. Yes.
21	MS. DAO: You got it, Chris?	21	Q. And is it your testimony that Northwest
22	MR. KAYSER: Yeah. Thank you. Q. (By Ms. Dao) So let me go back to Exhibit	22	actually relied on Exhibit 1 to start the foreclosure
23 24	1. The information that you use from Exhibit 1, can	23 24	process on the Reiners' property? A. Yes.
24 25	you tell me what it means by "mortgage currently held	24	A. Tes.Q. Do you have any knowledge whether IndyMac
20	you ten me what it means by mongage currently held	20	Q. Do you have any knowledge whether indymac
	Page 18		Page 20
1	by" and "foreclosure should be in the name of"?	1	Federal Bank was in existence as of April 5, 2009?
2	MS. MORRISON: Object to the extent that	2	A. I don't understand the question.
3	you are asking her to make any sort of legal	3	Q. Do you have any knowledge whether IndyMac
4	conclusion.	4	Federal Bank, as an entity, existed on the date of
5	MS. DAO: I'm not asking her to make any	5	this transmittal?
6	legal conclusion. I'm just asking her her	6	A. Yes.
7	understanding. She just said that she relied on this	7	Q. What is
8	information.	8	A. Our foreclosure came and we are supposed to
9	So answer if you can.	9	foreclose in their name.
10	A. That we would do the foreclosure in the	10	Q. So that's all you did? You don't know for
11	name of IndyMac Federal Bank FSB.	11	a fact whether the entity was in existence at the
12	Q. And "mortgage currently held by," what is	12	time?
13	your understanding of that?	13	A. No. O Okay So you don't know. The ensurer is
14 15	A. I would assume they are the holder of the	14 15	Q. Okay. So you don't know. The answer is
15 16	note. Q. You assume?	16	you don't know? A. Correct.
17	A. (Nodding head.)	17	Q. And then after you get the transmittal
18	Q. You do not know for a fact?	18	let me just ask you this: Is it your understanding
19	A. I do not know for a fact.	19	that the transmittal come from IndyMac Federal Bank?
20	Q. And then also, the directive here is that	20	A. Yes.
21	you open the case or you open the foreclosure file?	21	Q. That's your understanding?
22	"Please open an 'action in the name of' issue in FIS	22	A. That is my understanding.
23	Process Management."	23	Q. And the directives here are from IndyMac
24	A. Oh, that's asking you to open a request.	24	Federal Bank?
21			
25	You open a name action in the name of. It's a request	25	A. Yes.

5 (Pages 17 to 20)

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	Page 21		Page 23
1	Q. What capacity are they to Northwest?	1	have to act as an agent for IndyMac Federal?
2	A. They are a servicer that sends referrals to	2	MS. MORRISON: Object to the extent that
3	our service.	3	you're asking her to form any sort of legal conclusion
4	Q. So is Northwest an agent of IndyMac Federal	4	or do legal analysis. She can answer to the extent
5	Bank?	5	that she knows.
6	A. We issue the notice of default as an agent.	6	A. Our notice of defaults have always been
7	Q. And when did you become the trustee for the	7	issued as an agent.
8	foreclosure purposes?	8	e e
° 9		9	Q. But you don't know of any document that
10	MS. MORRISON: Chris, you might want to put	10	evidences that relationship?
	yourself on mute.		A. No, I do not.
11	MR. KAYSER: Sorry about that. Were you	11	Q. Do you have any idea how Northwest Trustee
12	hearing the horns in the background?	12	gets paid as the agent for IndyMac Federal in this
13	MS. MORRISON: Yes.	13	case?
14	A. The appointment was a record 5-19 of '09.	14	A. Could you be more specific?
15	Q. And what document were you referring to	15	Q. Northwest Trustee gets compensated for
16	when you gave me that information?	16	A. We would invoice them.
17	A. Page 84.	17	Q. And to the best of your knowledge, were
18	(Marked for identification Exhibit 2.)	18	there invoices going to IndyMac Federal?
19	Q. This is VMD 84. It's the appointment of	19	A. We invoice when the file is closed. So we
20	successor trustee dated May 7, 2009?	20	would have invoiced them when we were told to close
21	A. Yes.	21	the file.
22	MS. MORRISON: Can I just ask a question?	22	Q. And in this case when did you close the
23	Did you refer to it based on the execution date or the	23	file?
24	recording date?	24	A. I don't have a specific date. At least
25	MS. DAO: The execution date.	25	nothing in here that gives me that.
	Page 22		Page 24
1	Page 22 THE WITNESS: I said the recording date is	1	Page 24 Q. In the stuff that in the material that
1 2	THE WITNESS: I said the recording date is	1 2	Q. In the stuff that in the material that
2	THE WITNESS: I said the recording date is right here (indicating).	1 2 3	Q. In the stuff that in the material that you brought today were there any invoices?
2 3	THE WITNESS: I said the recording date is right here (indicating). MS. DAO: Oh, okay.	2	Q. In the stuff that in the material that you brought today were there any invoices?A. No.
2 3 4	THE WITNESS: I said the recording date is right here (indicating). MS. DAO: Oh, okay. MS. MORRISON: It becomes effective as of	2 3	Q. In the stuff that in the material that you brought today were there any invoices?
2 3 4 5	THE WITNESS: I said the recording date is right here (indicating). MS. DAO: Oh, okay. MS. MORRISON: It becomes effective as of the recording date. That might make more sense to	2 3 4	Q. In the stuff that in the material that you brought today were there any invoices?A. No.Q. And how what is the basis of the invoice?
2 3 4	THE WITNESS: I said the recording date is right here (indicating). MS. DAO: Oh, okay. MS. MORRISON: It becomes effective as of the recording date. That might make more sense to refer to it based on the recording date.	2 3 4 5 6	 Q. In the stuff that in the material that you brought today were there any invoices? A. No. Q. And how what is the basis of the invoice? A. (No response.)
2 3 4 5 6 7	THE WITNESS: I said the recording date is right here (indicating). MS. DAO: Oh, okay. MS. MORRISON: It becomes effective as of the recording date. That might make more sense to refer to it based on the recording date. Q. (By Ms. Dao) What was the date that you	2 3 4 5	Q. In the stuff that in the material that you brought today were there any invoices?A. No.Q. And how what is the basis of the invoice?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 THE WITNESS: I said the recording date is right here (indicating). MS. DAO: Oh, okay. MS. MORRISON: It becomes effective as of the recording date. That might make more sense to refer to it based on the recording date. Q. (By Ms. Dao) What was the date that you referred to? A. I referred to this date. The 5-19-09 is the date it became of record. Q. Prior to that date, what was Northwest Trustee capacity? A. We issued the notice of default as an agent. Q. And then as of the recorded as of the recording of the appointment of successor trustee, what changed, if anything? A. We're of record as the trustee, the current trustee. Q. When you spoke of the agency relationship with the servicer in this case it's IndyMac Federal Bank is there a document that speaks of that 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. In the stuff that in the material that you brought today were there any invoices? A. No. Q. And how what is the basis of the invoice? A. (No response.) Q. Hourly rate? A. It's a flat fee. Q. What is that flat fee? A. I don't recall what it was on this actually, 508. Q. Five hundred eight dollars? A. Uh-huh. Q. What were you reading off of? A. The notice of default. Q. Let the record reflect that the witness was reading the notice of default dated April 7, 2009. A. Correct. Q. And the item that you referred to is listed on the notice of default as? A. Trustee fee. Q. Trustee's fee.

6 (Pages 21 to 24)

Moburg, Seaton & Watkins 206-622-3110 2033 Sixth Ave., Ste. 826

	Page 25		Page 27
1	Exhibit 3 and tell me the identification of the	1	Q. It's the same computer system?
2	beneficiary, if there is one.	2	A. It's the same vendor site, yes.
3	A. I don't see that specified.	3	Q. And you don't know for a fact whether they
4	Q. So did Exhibit 3 make it to Ms. Reiner,	4	changed name. You're just guessing?
5	meaning was it transmitted to her?	5	A. Correct.
6	A. Certified regular and posted to the	6	Q. Have you ever talked to anybody at Lender
7	property.	7	Processing Services or LPS?
8	Q. So through several methods?	8	A. Yes.
9	A. Correct.	9	Q. Do you recall their names?
10	Q. And is it your testimony that Exhibit 3	10	A. No.
11	did, in fact, get transmitted to her?	11	Q. Are you still talking to them today?
12	A. Yes.	12	A. Yes.
13	Q. And how do you know that?	13	Q. So you're still using the system with LPS?
14	A. I have an affidavit of mailing and an	14	A. Yes.
15	affidavit of posting.	15	Q. Now, in Exhibit 4, is it the same scenario
16	Q. Did you bring that with you?	16	where you receive the information via computer and
17	A. No.	17	automated information and not by way of mail or a
18	Q. And you also referred to another	18	human being calling you and telling you?
19	transmittal package in 2010?	19	A. Correct.
20	A. Yes.	20	Q. And again, did you rely on Exhibit 4 to
21	Q. Could you locate that for me?	21	process the foreclosure of the Reiners' property?
22	A. (Handing.)	22	A. Along with the screen shots, yes.
23	Q. This is VMD 92, 93, and then 96 through	23	MS. DAO: And so I'm going to have this
24	106. Let me ask you, were they these pages come	24	marked as 5.
25	together in the transmittal package because I notice	25	(Marked for identification Exhibit 5.)
	Page 26		Page 28
1		1	
1 2	Page 26 your Bates stamps are out of order. A. This comes as a referral and then these	1 2	Page 28 Q. Showing you 5, which you referred to as screen shots, can you explain to me what the screen
	your Bates stamps are out of order.		Q. Showing you 5, which you referred to as
2	your Bates stamps are out of order. A. This comes as a referral and then these	2	Q. Showing you 5, which you referred to as screen shots, can you explain to me what the screen
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2 3 4 5	your Bates stamps are out of order. A. This comes as a referral and then these come as screen shots, or screen prints (indicating). MS. MORRISON: Just let me say the order of the documents was based on how I gathered them.	2 3 4 5	Q. Showing you 5, which you referred to as screen shots, can you explain to me what the screen shots are?A. This particular one tells us if there were any payment changes. This one we use sorry, I
2 3 4 5 6	 your Bates stamps are out of order. A. This comes as a referral and then these come as screen shots, or screen prints (indicating). MS. MORRISON: Just let me say the order of the documents was based on how I gathered them. MS. DAO: Okay. All right. 	2 3 4 5 6	Q. Showing you 5, which you referred to as screen shots, can you explain to me what the screen shots are?A. This particular one tells us if there were any payment changes. This one we use sorry, I should be more specific. PCH 2 tells us about payment
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7 (Pages 25 to 28)

Moburg, Seaton & Watkins 206-622-3110 2033 Sixth Ave., Ste. 826

	Page 29		Page 31
1	you?	1	(indicating) is Routh Crabtree Olsen, but the referral
2	A. We look at MSA 1 to verify the investor.	2	always comes to Northwest.
3	Q. MAH 1?	3	Q. The access information, in order to get on
4	A. MAS 1.	4	to the system, do you have to log on?
5	Q. And you don't know the acronym either?	5	A. Yes.
6	A. I do not.	6	Q. And the access information was provided by
7	Q. And it refers to the investor?	7	who?
8	A. Correct.	8	A. LPS.
9	Q. And who is that?	9	Q. And so back in '09, who would provide that?
10	A. Federal Home Loan Mortgage Corp.	10	A. LP I'm assuming we've always I
11	Q. And that's also known as Freddie Mac?	11	don't know how long we've called it LPS. We always
12	A. Correct.	12	refer to it as "desktop."
13	Q. And let me just stop and ask you, what is	13	Q. And is it your understanding that either
14	an investor?	14	desktop desktop and LPS is one and the same?
15	MS. MORRISON: Objection to the extent that	15	A. I don't know.
16	you're asking her to make any sort of legal	16	Q. You don't know, okay. And this time, on
17	determination. She can answer to the extent she	17	this transmittal package, it has One West Bank?
18	knows.	18	A. Yes.
19	Q. What is your understanding of what an	19	Q. FSB?
20	investor is?	20	A. Correct.
21	A. They are the owner of the note.	21	Q. And what is your understanding in looking
22	Q. And in this case it's Freddie Mac?	22	at Exhibit 4 of the role of One West Bank?
23	A. Correct.	23	A. That they are the servicer.
24	Q. And what else do the screen shots reveal?	24	Q. Okay. And that's different than the note
25	A. We use the pay 4 screen because it gives	25	owner?
	Page 30		Page 32
1	payoff information, and we use the DLQ 1 screen	1	A. Correct.
2	because it gives us all of the default information.	2	Q. So One West would be the servicer and
3	And we use the pay 1 screen because it gives us	3	Freddie would be the owner?
4	additional addresses other than the property.		
5		4	A. Correct.
	Q. So you use the information as transmitted	4 5	A. Correct.Q. Is it your testimony the ownership that
6	Q. So you use the information as transmitted by LPS in order to prepare your foreclosure?		
6 7		5	Q. Is it your testimony the ownership that
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	Page 33		Page 35
1	that term referred to, is an equivalent of ownership?	1	entities as you can see. So you help me out. Who
2	A. Yes. That is my understanding.	2	pays the invoices?
3	Q. And so I'm asking you, in believing that,	3	A. One West would have paid our invoice.
4	what does it mean to you to have ownership by Freddie	4	Q. And then in 2009 who would have been the
5	Mac?	5	person or entity that paid the invoices submitted by
6	A. I don't have an answer for that.	6	Northwest?
7	Q. How did you form that belief, though? How	7	A. IndyMac would have paid our invoice.
8	did you arrive at the conclusion that Freddie Mac is	8	Q. You're guessing?
9	the owner?	9	A. I am.
10	A. That is how I have been advised.	10	Q. You don't have any invoices? You don't
11	Q. By whom?	11	have any payments?
12	A. By my counsel.	12	A. Correct.
13	Q. And who is that?	13	Q. Now, after you received the transmittal
14	A. Routh Crabtree Olsen.	14	package and the screen shots on Exhibit 4 and 5, do
15	Q. And that advice pertains to this case or	15	you receive updates as far as payments being made in
16	MS. MORRISON: Object to the extent that	16	the loan?
17	you're asking about attorney-client communications.	17	A. They would notify us if a payment was made
18	Those are privileged. I'm still going to put the	18	on the loan during the foreclosure process.
19	objection on the record.	19	Q. And what would these payments be, for
20	MS. DAO: It's not privileged because	20	example?
21	you're referring to a fact.	21	A. I don't know.
22	MS. MORRISON: So you don't have to reveal	22	Q. But you would be informed?
23	any communication between what you and your	23	A. Yes.
24	counsel. So to the extent she asks you to reveal	24	Q. In this case with the Reiners' property,
25	anything that you talked about with your counsel, you	25	were you informed of any kind of a loan modification
	D 24		
	Page 34		Page 36
1		1	
1 2	don't reveal that.	1 2	Page 36 process? A. I don't recall.
	don't reveal that. Q. Let me repeat the question. As far as your		process? A. I don't recall.
2	don't reveal that.Q. Let me repeat the question. As far as your understanding that Freddie Mac is the owner or that	2	process? A. I don't recall.
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2 3 4	don't reveal that. Q. Let me repeat the question. As far as your understanding that Freddie Mac is the owner or that Freddie Mac has ownership, that's what you've been	2 3 4	process?A. I don't recall.Q. Were you informed of any payments being made?
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	Page 37		Page 39
1	MS. DAO: So the most recent one is on top?	1	MS. DAO: I'm not making it as an exhibit.
2	MS. MORRISON: Correct.	2	I just asked for her to show it to me.
3	Q. All right. So it appears to me that the	3	MS. MORRISON: Okay.
4	stack of documents you have provided me here, VMD 167	4	THE WITNESS: (Handing.)
5	I don't know how many pages are here are	5	MS. DAO: So let it be reflected that Ms.
6	shareholder actions and minutes of special actions by	6	McElligott signs her name on the driver license on
7	the board of directors for the company. Or do you	7	Washington driver license as "Yvonne McElligott."
8	even know what it is?	8	Q. Have you ever been arrested or charged with
9	A. I only briefly looked at them.	9	a crime?
10	(Marked for identification Exhibit 6.)	10	A. No.
11	Q. Okay. All right. I'm going to show you	11	Q. Have you ever been sued?
12	Exhibit 6, which is entitled "Supplemental Action By	12	A. Not that I'm aware of.
13	Written Consent of the Board of Directors of Northwest		
14		13	Q. Never been sued for anything?
	Trustee Services." And it has a specimen of your	14	A. Not that I recall, no.
15	signature. I just want you to make sure that you see	15	Q. You've never been sued in your capacity as
16	that and tell me if that's correct.	16	an employee for Northwest Trustee?
17	A. Yes.	17	A. Not that I'm aware of.
18	Q. And for the date, can you tell me the date	18	(Marked for identification Exhibit 7.)
19	on that? It should be on the	19	Q. I'm going to show you what has been marked
20	A. April 26, 2011.	20	as Exhibit 7, and it's "Action By Written Consent of
21	Q. When you look at the specimen of your	21	Shareholder and Directors of Northwest Trustee
22	signature on there, is it in fact your signature or a	22	Services" as of March 1st, 2012.
23	copy of your signature?	23	And I will represent that apparently there
24	A. It would have been my original signature.	24	is a signature specimen of yours as well on this
25	Q. Original	25	document. Can you verify that for me?
	Page 38		Page 40
1	Page 38	1	Page 40
1	A. This is a copy.	1	A. Yes.
2	A. This is a copy.Q. But that is your signature?	2	A. Yes.Q. And in Exhibit 6, how did you sign your
2 3	A. This is a copy.Q. But that is your signature?A. Yes.	2 3	A. Yes.Q. And in Exhibit 6, how did you sign your name?
2 3 4	A. This is a copy.Q. But that is your signature?A. Yes.Q. And in that document you signed your name	2 3 4	A. Yes.Q. And in Exhibit 6, how did you sign your name?A. You mean that one (indicating)?
2 3 4 5	A. This is a copy.Q. But that is your signature?A. Yes.Q. And in that document you signed your name as "Yvonne McElligott." Is that correct?	2 3 4 5	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry,
2 3 4 5 6	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. 	2 3 4 5 6	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven.
2 3 4 5 6 7	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the 	2 3 4 5 6 7	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott."
2 3 4 5 6 7 8	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the 	2 3 4 5 6 7 8	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why?
2 3 4 5 6 7 8 9	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? 	2 3 4 5 6 7 8 9	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name.
2 3 4 5 6 7 8 9 10	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. 	2 3 4 5 6 7 8 9 10	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry?
2 3 4 5 6 7 8 9 10 11	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign 	2 3 4 5 6 7 8 9 10 11	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name.
2 3 4 5 6 7 8 9 10 11 12	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? 	2 3 4 5 6 7 8 9 10 11 12	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a
2 3 4 5 6 7 8 9 10 11 12 13	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? A. There is no reason. 	2 3 4 5 6 7 8 9 10 11 12 13	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a reason for you signing as "Yvonne McElligott" as
2 3 4 5 6 7 8 9 10 11 12 13 14	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? A. There is no reason. Q. Can I see your driver's license, please, so 	2 3 4 5 6 7 8 9 10 11 12 13 14	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a reason for you signing as "Yvonne McElligott" as opposed to "Vonnie McElligott"?
2 3 4 5 6 7 8 9 10 11 12 13 14 15	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? A. There is no reason. Q. Can I see your driver's license, please, so I can see what your signature looks like? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a reason for you signing as "Yvonne McElligott" as opposed to "Vonnie McElligott"? A. No.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? A. There is no reason. Q. Can I see your driver's license, please, so I can see what your signature looks like? MS. MORRISON: I'm just going to object. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a reason for you signing as "Yvonne McElligott" as opposed to "Vonnie McElligott"? A. No. Q. So when you do you recall signing the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? A. There is no reason. Q. Can I see your driver's license, please, so I can see what your signature looks like? MS. MORRISON: I'm just going to object. If you want her to do a signature here 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a reason for you signing as "Yvonne McElligott" as opposed to "Vonnie McElligott"? A. No. Q. So when you do you recall signing theputting placing your signature on that document?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? A. There is no reason. Q. Can I see your driver's license, please, so I can see what your signature looks like? MS. MORRISON: I'm just going to object. If you want her to do a signature here MS. DAO: No. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a reason for you signing as "Y vonne McElligott" as opposed to "Vonnie McElligott"? A. No. Q. So when you do you recall signing theputting placing your signature on that document? A. Specifically recall? I mean, it is my
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? A. There is no reason. Q. Can I see your driver's license, please, so I can see what your signature looks like? MS. MORRISON: I'm just going to object. If you want her to do a signature here MS. DAO: No. MS. MORRISON: she's happy to do that. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a reason for you signing as "Yvonne McElligott" as opposed to "Vonnie McElligott"? A. No. Q. So when you do you recall signing theputting placing your signature on that document? A. Specifically recall? I mean, it is my signature. I did sign it.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? A. There is no reason. Q. Can I see your driver's license, please, so I can see what your signature looks like? MS. MORRISON: I'm just going to object. If you want her to do a signature here MS. DAO: No. MS. MORRISON: she's happy to do that. MS. DAO: I want to see her signature on an 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a reason for you signing as "Yvonne McElligott" as opposed to "Vonnie McElligott"? A. No. Q. So when you do you recall signing theputting placing your signature on that document? A. Specifically recall? I mean, it is my signature. I did sign it. Q. So the title of assistant VP is pertaining
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? A. There is no reason. Q. Can I see your driver's license, please, so I can see what your signature looks like? MS. MORRISON: I'm just going to object. If you want her to do a signature here MS. DAO: No. MS. MORRISON: she's happy to do that. MS. DAO: I want to see her signature on an official document. I mean, there's no secret or 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a reason for you signing as "Yvonne McElligott" as opposed to "Vonnie McElligott"? A. No. Q. So when you do you recall signing theputting placing your signature on that document? A. Specifically recall? I mean, it is my signature. I did sign it. Q. So the title of assistant VP is pertaining to the authority to sign. You are not being
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? A. There is no reason. Q. Can I see your driver's license, please, so I can see what your signature looks like? MS. MORRISON: I'm just going to object. If you want her to do a signature here MS. DAO: No. MORRISON: she's happy to do that. MS. DAO: I want to see her signature on an official document. I mean, there's no secret or protection as to that. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a reason for you signing as "Yvonne McElligott" as opposed to "Vonnie McElligott"? A. No. Q. So when you do you recall signing theputting placing your signature on that document? A. Specifically recall? I mean, it is my signature. I did sign it. Q. So the title of assistant VP is pertaining to the authority to sign. You are not being compensated as an assistant VP?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? A. There is no reason. Q. Can I see your driver's license, please, so I can see what your signature looks like? MS. MORRISON: I'm just going to object. If you want her to do a signature here MS. DAO: No. MS. MORRISON: she's happy to do that. MS. DAO: I want to see her signature on an official document. I mean, there's no secret or protection as to that. MS. MORRISON: To the extent I don't 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a reason for you signing as "Yvonne McElligott" as opposed to "Vonnie McElligott"? A. No. Q. So when you do you recall signing theputting placing your signature on that document? A. Specifically recall? I mean, it is my signature. I did sign it. Q. So the title of assistant VP is pertaining to the authority to sign. You are not being compensated as an assistant VP? A. No.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. This is a copy. Q. But that is your signature? A. Yes. Q. And in that document you signed your name as "Yvonne McElligott." Is that correct? A. Yes, it is. Q. And so is it safe to assume that for the year of 2011 this is how you signed it under the authority of Northwest Trustee? A. No. Q. Is there a reason for why you didn't sign as your specimen? A. There is no reason. Q. Can I see your driver's license, please, so I can see what your signature looks like? MS. MORRISON: I'm just going to object. If you want her to do a signature here MS. DAO: No. MORRISON: she's happy to do that. MS. DAO: I want to see her signature on an official document. I mean, there's no secret or protection as to that. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. Yes. Q. And in Exhibit 6, how did you sign your name? A. You mean that one (indicating)? Q. I'm sorry, this one, seven. I'm sorry, seven. A. "Vonnie McElligott." Q. Is there a reason why? A. That's my name. Q. I'm sorry? A. That's my name. Q. No, no. I guess my question is, is there a reason for you signing as "Yvonne McElligott" as opposed to "Vonnie McElligott"? A. No. Q. So when you do you recall signing theputting placing your signature on that document? A. Specifically recall? I mean, it is my signature. I did sign it. Q. So the title of assistant VP is pertaining to the authority to sign. You are not being compensated as an assistant VP?

10 (Pages 37 to 40)

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Page 41Page 431A. Function?2A. Anything more than your day-to-day3A. No.4Q. Go to board meetings?5A. No.6Q. You's on their shares and matters of7corporate importance?8A. No.9Q. You's on their shares and matters of7C. Have you ever worked for them?8A. No.9Q. You's on their shares and matters of9C. Have you ever worked for them?9A. No.9Q. Have you ever worked for them?14Q. Were you ever acting as notary public?15A. Yes.16Q. For whom did you act as notary public?17A. Form systif.18Q. Did you work for a company at the time that19you were notary public?10A. Yes.21Q. Moho did you work for?22A. Northwest - whatever they might have been23Q. Moh did you work for?24Q. And did you wery work for?25Q. And did you work for Northwest Trustee?26A. Yes.27A. Yes.28Q. Not do you mean you don't know?29A. I don't know.20What do thit in conjunction or in20G. Not do thit in conjunction or in21G. How not sy scal to notarize39Signatures.30G. Do you recell whore, so use?31A. No.32O. Do you now kor to n				
2Q. Anything more than your day-to-day2Q. Do you?3A. No.3A. Yeah.4Q. Go to board meetings?4Q. Who are they?5A. No.5A. They're a named entity. I don't have any6Q. Vote on their shares and matters of67corporate importance?8A. No.9Q. You said that you supervise a team of 109Q. Have you ever worked for them?11A. Yes.8A. No.12Q. How many assistant VP's in your team?1A. T don't know what it says.13A. Yes.3G. Tm sory, what was your answer?14Q. Were you ever acting as notary public?14A. The third - I don't know.15A. Yes.5Q. My question is, dd you ever work for MERS?16Q. Did you work for a company at the time that19officer of MERS?17Q. Whot did you work for?2A. I don't know.28A. Notthwest - whatever they might have been1829Q. Whot did you use your notary seal to sign2A. I don't know.21G. Did you work for Northwest Trustee?3A. Treally can't.29Q. Did you do that in conjunction or in2A. Treally can't.20Q. Did you do that in conjunction or in3A. Treally can't.21G. Did you do that in conjunction or in4. I don't know what the resolutions say. I29A. I don't know what here solutions?321A. I don't know if J s		Page 41		Page 43
3 A. No. 3 A. Yeah. 4 Q. Go to board meetings? 5 A. No. 6 Q. Vote on their shares and matters of corporate importance? 6 4 Q. Who are they? 7 Q. Have you ever worked for them? 7 Q. Have you ever worked for them? 8 A. No. 9 Q. Have you ever worked for them? 9 Q. Yous aid that you supervise a team of 10 9 Q. Have you ever worked for them? 10 people? A. No. 9 Q. Have you ever worked for them? 11 A. Yes. 11 A. I don't know what it says. 12 12 Q. How may assistant VP's in your team? 13 Q. The sorry, what was your answer? 14 Q. Were you ever acting as notary public? 14 A. The third - 1 don't know. 13 you were notary public? A. I don't know. 14 14 14 Q. Whot did you work for? 14 14 14 14 15 Q. Whot did you work for? 14 14 14 14 16 15 Q. And did you work for? 14 14 16 16	1	A. Function?	1	A. Yes.
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5 A. No. 5 A. The tyre a named entity. I don't have any detail. 6 Q. Vote on their shares and matters of corporate importance? 9 Q. Have you ever worked for them? 8 A. No. 9 Q. You said that you supervise a team of 10 9 Q. Have you ever acted as a corporate officer 10 people? 1 A. Yes. 10 A. I don't know what the third party - 1 12 Q. How many assistant VP's in your team? 14 A. The third-1 don't know what the third party - 1 13 A. None. 13 Q. I'm sory, what was your answer? 14 14 Q. Were you ever acting as notary public? 14 A. The third-1 don't know. 15 14 Q. For whom did you act as notary public? 16 A. I don't know. 16 15 Q. Who did you work for a company at the time that any you remo notary public? 16 A. I don't know? 16 16 Q. Whot did you work for? 19 A. I don't know. 20 Q. What do you work know for MERS? 21 Q. Mot gong ago we could have had a time did in don. 22 A. I don't know. 22 22 A. I don't know. 23 A. I don't kno	4	O. Go to board meetings?	4	O. Who are they?
6 Q. Vote on their shares and matters of 7 corporate importance? 7 Corporate importance? A. No. 9 Q. You said that you supervise a team of 10 9 Q. Have you ever worked for them? 11 A. Yes. 11 A. Idon't know what the third party – 1 12 Q. How many assistant VP's in your team? 13 Q. If norw, what was your answer? 14 Q. Were you ever acting as notary public? A. The third -1 don't know. 15 A. Yes. 13 Q. If you work for MERS? 16 Q. For whom did you act as notary public? A. The third -1 don't know. 17 A. For myself. Q. Did you work for a company at the time that 18 Q. Did you work for? A. I don't know. 24 Q. Who did you work for? A. I don't know. 23 named. It was so long ago we could have had a Gon't know. 24 different name at that time. North Pacific. Q. What doy ou meany ou don't know? You 25 Q. And did you use you rotary seal to sign 25 26 A. I don't know what the resolutions say. I 23 27 A. I don't know what the resolution saw. I 23	5		5	
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24 Q. Do you know who Mortgage Electronic 24 sign on behalf of MERS?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 for the company? A. I used my notary seal to notarize signatures. Q. Did you do that in conjunction or in connection with your work for Northwest Trustee? A. Yes. Q. Do you remember the period of time that you did that? A. I don't. It was I think it ended in '05, '04 or, actually, it might have been earlier than that. It was before I got married, so '03, '02. Q. You're not sure? A. No, I'm not sure. Q. Do you recall whose signatures you notarized on behalf of Northwest Trustee? A. Not specifically, no. Q. Besides your job at Northwest Trustee, are you employed by anyone else? A. No. Q. During this period of time of this case, 2009, 2010, 2011, and 2012, were you ever employed by 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. The MERS third-party agreements. Q. What are those, if you can explain to me? A. I really can't. Q. So you don't know whether you signed on behalf of MERS? A. I don't know if I signed as a corporate officer, I believe you asked me. Q. Okay. But, so, let me ask you this: Did you sign anything on behalf of MERS? A. Yes. Q. What would it be? A. Assignments and appointments. No, not appointments. Assignments. Q. Assignments of deed of trust? A. Correct. Q. In foreclosure cases A. Yes. Q that Northwest Trustee is involved in? A. Yes. Q. Under what circumstances were you signing for MERS?
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25 Registration System, Inc. 18? 25 A. No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 for the company? A. I used my notary seal to notarize signatures. Q. Did you do that in conjunction or in connection with your work for Northwest Trustee? A. Yes. Q. Do you remember the period of time that you did that? A. I don't. It was I think it ended in '05, '04 or, actually, it might have been earlier than that. It was before I got married, so '03, '02. Q. You're not sure? A. No, I'm not sure. Q. Do you recall whose signatures you notarized on behalf of Northwest Trustee? A. Not specifically, no. Q. Besides your job at Northwest Trustee, are you employed by anyone else? A. No. Q. During this period of time of this case, 2009, 2010, 2011, and 2012, were you ever employed by another entity? A. No. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. The MERS third-party agreements. Q. What are those, if you can explain to me? A. I really can't. Q. So you don't know whether you signed on behalf of MERS? A. I don't know if I signed as a corporate officer, I believe you asked me. Q. Okay. But, so, let me ask you this: Did you sign anything on behalf of MERS? A. Yes. Q. What would it be? A. Assignments and appointments. No, not appointments. Assignments. Q. In foreclosure cases A. Yes. Q that Northwest Trustee is involved in? A. Yes. Q. Under what circumstances were you signing for MERS? A. When we had a third-party agreement. Q. Is there a third-party agreement for you to
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11 (Pages 41 to 44)

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	Page 45		Page 47
1	Q. That you know of?	1	Q. And are you so you reviewed it carefully
2	A. No, no longer.	2	with your counsel not with your counsel with Ms.
3	Q. "No longer," as in it was in the past?	3	Buck Morrison?
4	A. Correct.	4	A. Yes.
5	Q. Do you know when?	5	Q. And who prepared the document?
6	A. I don't have specific dates for you, no.	6	A. I don't know.
7	Q. Why were there occasions for you to sign on	7	MS. MORRISON: Object to the if you're
8	behalf of MERS when you did not work for them and	8	asking her to reveal anything that's protected by
9	you're not their corporate officer?	9	attorney-client privilege.
10	A. I don't know what I was with my signing	10	MS. DAO: Are you her attorney?
11 12	authority specifically. It's been years. I don't recall.	11 12	MS. MORRISON: Yes.
13		13	MS. DAO: Okay. Well, I just need to know
14	Q. So maybe I can get some of the documents and show you later. I asked you whether there is a	14	that. So, I'm just asking about the documents. I'm not going behind it.
15	written contract between Northwest Trustee and IndyMac	15	MS. MORRISON: I'm still going to put my
16	Federal Bank, and you said to the best of your	16	objection on the record.
17	knowledge no?	17	Q. My question is: Did you review the
18	A. I don't recall that question.	18	contents of Exhibit 8 with your lawyer?
19	Q. So let me ask you again. To the best of	19	A. Yes.
20	your knowledge, is there a written contract between	20	Q. And are you standing by these
21	Northwest Trustee and IndyMac Federal Bank	21	representations in Exhibit 8?
22	A. I don't know.	22	A. Yes.
23	Q in relation to the Reiner case?	23	Q. No change? This is the amended you're
24	A. I don't know.	24	standing by?
25	Q. Is there a contract between Northwest	25	A. (Nodding head.)
	Page 46		Page 48
1	Trustee and MERS?	1	Q. You have to say
2	A. Not that I'm aware of.	2	A. Yes. Sorry.
3	Q. Is there a contract between Northwest	3	MS. DAO: Thank you. This is a real long
4	Trustee and American Mortgage Network, Inc., who is	4	session, so I think I'm going to take 10-minutes
5	the original lender in this case?	5	break.
6	A. I have no idea.	6	(Off the record from 2:04 p.m. to 2:27
7	Q. You don't	7	p.m.)
8	A. I don't know.	8	Q. Ms. McElligott, before the break I was
9	Q. You don't know. What about a contract	9	asking as to whether you have signed on behalf of MERS
10	between Northwest Trustee and One West Bank?	10	before. And your answer was that you did it?
11	A. I don't know.		A. Yes.
12	Q. How about a contract with Federal Home	12 13	Q. But no longer?A. Correct.
13 14	Loans Corporation or Freddie Mac? A. I don't know.	14	A. Correct.Q. Can you tell me why?
15	(Marked for identification Exhibit 8.)	15	A. We no longer have signing authority to sign
16	Q. I am going to show you what has been marked	16	on behalf of MERS.
17	as Exhibit 8.	17	Q. Do you currently have authority to sign for
18	MS. DAO: And Chris, this is the amended	18	any other entity besides Northwest Trustee?
19	response and objection to subpoena duces tecum and	19	A. I have power of attorney to sign for two
20	subpoena for deposition.	20	other lenders.
21	MS. MORRISON: Which you do not have,	21	Q. Who are they?
22	Chris.	22	A. Bank of America and Wells Fargo.
23	Q. Ms. McElligott, did you have a chance to	23	Q. And I'm sorry, did you tell me the time
24	review the exhibit that I just handed you?	24	that you stopped signing for MERS?
25	A. Yes.	25	A. I did not.

12 (Pages 45 to 48)

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	Page 49		Page 51
1	Q. Do you know approximately the time?	1	Q. And you're referring to a document that's
2	A. I don't specifically know when.	2	not present here today?
3	Q. Do you recall how many of these assignments	3	A. Correct.
4	of deed of trust you've signed on behalf of MERS?	4	Q. Okay. And if you could locate that you can
5	A. No, I don't.	5	provide it to me. Is it your testimony that there's
6	MS. DAO: Have this marked.	6	such a document?
7	(Marked for identification Exhibit 9.)	7	A. Yes.
8	Q. I will show you the original certified	8	Q. The third party?
9	or the certified copy, I should say, not original.	9	A. Yes.
10	And I will represent to you that the Exhibit 9 as	10	Q. Okay. Your team deals with Freddie Mac
11	marked is a true and copy of that certified copy from	11	portfolio loans only?
12	the court.	12	A. Yes.
13	Can you take a look and tell me if that	13	(Marked for identification Exhibit 10.)
14	looks familiar to you?	14	Q. I'll show you 10, which is a copy of the
15	A. Yes.	15	certified copy. Can you take a look at 10 for me,
16	Q. And so in Exhibit 9 you did sign as	16	please, particularly on the last page where your
17	vice-president for MERS?	17	signature appears. Do you see that?
18	A. Yes.	18	A. Yes, I see that.
19	Q. Correct? Do you remember the circumstances	19	Q. The exhibit is a notice of trustee sales in
20	in which you signed as vice-president in this case for	20	another case unrelated. What is the effective date of
21	MERS?	21	the notice of trustee sales as you signed it?
22	A. I don't understand the question.	22	A. 7-22-07.
23	Q. Do you recall the circumstances that led	23	Q. Do you see the notary declaration down
24	you to sign as vice-president for MERS in that	24 25	below? A. Yes.
25	particular document?	25	A. Tes.
	Page 50		Page 52
1		1	
1 2	A. (No response.)	1 2	
			Q. What date is that?A. 7-19-07.
2	A. (No response.)Q. The reasons, the needs, who told you?	2	Q. What date is that?
2 3	A. (No response.)Q. The reasons, the needs, who told you?A. I assume that we would have signed on	2 3	Q. What date is that?A. 7-19-07.Q. Why is that? Can you explain?
2 3 4	A. (No response.)Q. The reasons, the needs, who told you?A. I assume that we would have signed onbehalf of MERS to assign out of MERS into Chase Home	2 3 4	 Q. What date is that? A. 7-19-07. Q. Why is that? Can you explain? A. The effective date just a second. Let
2 3 4 5	A. (No response.)Q. The reasons, the needs, who told you?A. I assume that we would have signed onbehalf of MERS to assign out of MERS into Chase HomeFinance, LLC.	2 3 4 5	 Q. What date is that? A. 7-19-07. Q. Why is that? Can you explain? A. The effective date just a second. Let me look. The effective date is 31 days after the
2 3 4 5 6	 A. (No response.) Q. The reasons, the needs, who told you? A. I assume that we would have signed on behalf of MERS to assign out of MERS into Chase Home Finance, LLC. Q. To get to sign it out of MERS, what do 	2 3 4 5 6	 Q. What date is that? A. 7-19-07. Q. Why is that? Can you explain? A. The effective date just a second. Let me look. The effective date is 31 days after the notice of default. So that would have been the date
2 3 4 5 6 7	 A. (No response.) Q. The reasons, the needs, who told you? A. I assume that we would have signed on behalf of MERS to assign out of MERS into Chase Home Finance, LLC. Q. To get to sign it out of MERS, what do you mean by that? 	2 3 4 5 6 7	 Q. What date is that? A. 7-19-07. Q. Why is that? Can you explain? A. The effective date just a second. Let me look. The effective date is 31 days after the notice of default. So that would have been the date that the document itself was effective.
2 3 4 5 6 7 8 9 10	 A. (No response.) Q. The reasons, the needs, who told you? A. I assume that we would have signed on behalf of MERS to assign out of MERS into Chase Home Finance, LLC. Q. To get to sign it out of MERS, what do you mean by that? A. To record an assignment publicly from MERS to Chase Finance. Q. To get the original deed out of MERS' name? 	2 3 4 5 6 7 8 9 10	 Q. What date is that? A. 7-19-07. Q. Why is that? Can you explain? A. The effective date just a second. Let me look. The effective date is 31 days after the notice of default. So that would have been the date that the document itself was effective. Q. But your signature was notarized on what day? A. July 19, '07.
2 3 4 5 6 7 8 9 10 11	 A. (No response.) Q. The reasons, the needs, who told you? A. I assume that we would have signed on behalf of MERS to assign out of MERS into Chase Home Finance, LLC. Q. To get to sign it out of MERS, what do you mean by that? A. To record an assignment publicly from MERS to Chase Finance. Q. To get the original deed out of MERS' name? A. To assign the beneficial interest, yes. 	2 3 4 5 6 7 8 9 10 11	 Q. What date is that? A. 7-19-07. Q. Why is that? Can you explain? A. The effective date just a second. Let me look. The effective date is 31 days after the notice of default. So that would have been the date that the document itself was effective. Q. But your signature was notarized on what day?
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2 3 4 5 6 7 8 9 10 11 12 13	 A. (No response.) Q. The reasons, the needs, who told you? A. I assume that we would have signed on behalf of MERS to assign out of MERS into Chase Home Finance, LLC. Q. To get to sign it out of MERS, what do you mean by that? A. To record an assignment publicly from MERS to Chase Finance. Q. To get the original deed out of MERS' name? A. To assign the beneficial interest, yes. Q. What is the beneficial interest? MS. MORRISON: Object to the extent you're 	2 3 4 5 6 7 8 9 10 11 12 13	 Q. What date is that? A. 7-19-07. Q. Why is that? Can you explain? A. The effective date just a second. Let me look. The effective date is 31 days after the notice of default. So that would have been the date that the document itself was effective. Q. But your signature was notarized on what day? A. July 19, '07. Q. Why does that not reflect your signing date? A. That is the date I signed this document.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15	 A. (No response.) Q. The reasons, the needs, who told you? A. I assume that we would have signed on behalf of MERS to assign out of MERS into Chase Home Finance, LLC. Q. To get to sign it out of MERS, what do you mean by that? A. To record an assignment publicly from MERS to Chase Finance. Q. To get the original deed out of MERS' name? A. To assign the beneficial interest, yes. Q. What is the beneficial interest? MS. MORRISON: Object to the extent you're asking her to form a legal conclusion. Q. You just told me that you signed to assign 	2 3 4 5 6 7 8 9 10 11 12 13 14 15	 Q. What date is that? A. 7-19-07. Q. Why is that? Can you explain? A. The effective date just a second. Let me look. The effective date is 31 days after the notice of default. So that would have been the date that the document itself was effective. Q. But your signature was notarized on what day? A. July 19, '07. Q. Why does that not reflect your signing date? A. That is the date I signed this document. Q. So you signed before a notary public with effective date ahead of time?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 A. (No response.) Q. The reasons, the needs, who told you? A. I assume that we would have signed on behalf of MERS to assign out of MERS into Chase Home Finance, LLC. Q. To get to sign it out of MERS, what do you mean by that? A. To record an assignment publicly from MERS to Chase Finance. Q. To get the original deed out of MERS' name? A. To assign the beneficial interest, yes. Q. What is the beneficial interest? MS. MORRISON: Object to the extent you're asking her to form a legal conclusion. Q. You just told me that you signed to assign the beneficial interest. I just want to know what 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 Q. What date is that? A. 7-19-07. Q. Why is that? Can you explain? A. The effective date just a second. Let me look. The effective date is 31 days after the notice of default. So that would have been the date that the document itself was effective. Q. But your signature was notarized on what day? A. July 19, '07. Q. Why does that not reflect your signing date? A. That is the date I signed this document. Q. So you signed before a notary public with effective date ahead of time? A. We drafted this document, and the document
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A. (No response.) Q. The reasons, the needs, who told you? A. I assume that we would have signed on behalf of MERS to assign out of MERS into Chase Home Finance, LLC. Q. To get to sign it out of MERS, what do you mean by that? A. To record an assignment publicly from MERS to Chase Finance. Q. To get the original deed out of MERS' name? A. To assign the beneficial interest, yes. Q. What is the beneficial interest? MS. MORRISON: Object to the extent you're asking her to form a legal conclusion. Q. You just told me that you signed to assign the beneficial interest. I just want to know what that interest is. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 Q. What date is that? A. 7-19-07. Q. Why is that? Can you explain? A. The effective date just a second. Let me look. The effective date is 31 days after the notice of default. So that would have been the date that the document itself was effective. Q. But your signature was notarized on what day? A. July 19, '07. Q. Why does that not reflect your signing date? A. That is the date I signed this document. Q. So you signed before a notary public with effective date ahead of time? A. We drafted this document, and the document does not go out until after its effective date. And I
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. (No response.) Q. The reasons, the needs, who told you? A. I assume that we would have signed on behalf of MERS to assign out of MERS into Chase Home Finance, LLC. Q. To get to sign it out of MERS, what do you mean by that? A. To record an assignment publicly from MERS to Chase Finance. Q. To get the original deed out of MERS' name? A. To assign the beneficial interest, yes. Q. What is the beneficial interest? MS. MORRISON: Object to the extent you're asking her to form a legal conclusion. Q. You just told me that you signed to assign the beneficial interest. I just want to know what that interest is. A. The beneficiary on the deed of trust. Q. And on Exhibit 9, do you believe that you have the authority to do that? A. I was advised I have the authority to do that. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. What date is that? A. 7-19-07. Q. Why is that? Can you explain? A. The effective date just a second. Let me look. The effective date is 31 days after the notice of default. So that would have been the date that the document itself was effective. Q. But your signature was notarized on what day? A. July 19, '07. Q. Why does that not reflect your signing date? A. That is the date I signed this document. Q. So you signed before a notary public with effective date ahead of time? A. We drafted this document, and the document does not go out until after its effective date. And I signed the document of our office until after that effective date. Q. Like what date would that be? A. The effective date?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. (No response.) Q. The reasons, the needs, who told you? A. I assume that we would have signed on behalf of MERS to assign out of MERS into Chase Home Finance, LLC. Q. To get to sign it out of MERS, what do you mean by that? A. To record an assignment publicly from MERS to Chase Finance. Q. To get the original deed out of MERS' name? A. To assign the beneficial interest, yes. Q. What is the beneficial interest? MS. MORRISON: Object to the extent you're asking her to form a legal conclusion. Q. You just told me that you signed to assign the beneficial interest. I just want to know what that interest is. A. The beneficiary on the deed of trust. Q. And on Exhibit 9, do you believe that you have the authority to do that? A. I was advised I have the authority to do that. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. What date is that? A. 7-19-07. Q. Why is that? Can you explain? A. The effective date just a second. Let me look. The effective date is 31 days after the notice of default. So that would have been the date that the document itself was effective. Q. But your signature was notarized on what day? A. July 19, '07. Q. Why does that not reflect your signing date? A. That is the date I signed this document. Q. So you signed before a notary public with effective date ahead of time? A. We drafted this document, and the document does not go out until after its effective date. And I signed the document of our office until after that effective date. Q. Like what date would that be? A. The effective date?

13 (Pages 49 to 52)

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	Page 53		Page 55
1	Q. Is that customarily done as far as the	1	A. Yes.
2	documents being prepared ahead of time?	2	Q in terms of preparing the documents?
3	A. No longer. Back then, yes.	3	A. Yes.
4	Q. Back when?	4	Q. Who in your team prepared these notices of
5	A. In '07.	5	trustee sales?
6	Q. And when did that practice end?	6	A. I don't know.
7	A. When volume became too high to be able to	7	Q. They just presented them to you to sign?
8	be that efficient.	8	A. Back then I don't know who would have
9	Q. So what would it show now? Is that your	9	prepared it.
10	signature? The effective date is the same date that	10	Q. Who does it now?
11	you sign?	11	A. I have three to five people who prepare
12	A. The effective date would be the date that	12	notices at this time.
13	the document was drafted. My signature would be	13	Q. And then in signing it, what do you do? Do
14	either that day or afterwards.	14	you review the information on the notice of trustee
15	Q. Now, when you sign, I presume that you sign	15	sales?
16	all this sitting in your office?	16	A. Briefly.
17	A. At my desk, yes.	17	Q. How briefly?
18	Q. And the notary public is someone who also works for Northwest Trustee?	18	A. Very briefly.
19		19	Q. Time-wise?
20	A. Correct.	20 21	A. A cursory look over the document with some
21 22	Q. Is she present in every document signing?A. Yes.	22	cross-checking against the system. Maybe three minutes.
22	A. Tes.Q. So tell me the mechanics of that. How do	22	
23	you guys do that?	24	Q. What do you look for when you do this cursory check?
25	A. I will either have a notary at my desk or I	25	A. Basic information, recording numbers,
23	A. I will clutch have a hotary at my desk of I	25	A. Dasie information, recording numbers,
	Page 54		Page 56
1	will be at my notary's desk.	1	assignment information, dates.
2	(Marked for identification Exhibit 11.)	2	Q. Dates of?
3	Q. This is 11, and it's a copy of the	3	A. Make sure there's the sale date is a
4	certified copy. And this is also a notice of trustee	4	legitimate date.
5	sales that was prepared by you, apparently. Would you	5	Q. What does that mean?
6	agree?	6	A. The sale date?
7	A. Prepared by me?	7	Q. Yeah. Legitimate as in?
8	Q. I don't know. Was it prepared by you?	8	A. As in someone didn't made sure they
9	A. I don't know.	9	changed the date, that the sale date is an accurate
10	Q. Was it signed by you?	10	date. That it's in the future. That there's a sale
11	A. Yes.	11	date in there at all.
12	Q. What is the effective date on the document?	12	Q. Okay. Thanks. I asked you the reason why
13	A. January 2 of '09.	13	your signature varies, and you said none. Or is there
14	Q. When was the notary declaration and	14	a reason for why you sign as "Yvonne" sometimes,
15	A. My signature and the notarization was the	15	"Vonnie" sometimes?
16 17	next day, January 3rd of '09. Ω	16	A. I always sign as "Vonnie" with the
17 19	Q. So in this particular situation the	17 18	exception of what you had in that one where I signed as "Yvonne."
18 19	effective date was before you signed? A. The effective date is usually the date of	18	Q. Do you sign differently when you sign in
20	the document itself or the date that it will be able	20	your capacity as an employee for Northwest?
20	to go out of our office. So this document was drawn	20	A. I always sign as "Vonnie" with that one
21	0	21	exception, that I'm aware of.
21 22	on the 2nd and I did not sign it until the next day		VANAURUL INGLINE (WAIV OF
22	on the 2nd, and I did not sign it until the next day.		-
22 23	Q. Is that one of the examples that you speak	23	Q. And when I ask you about your notary
22			-

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14 (Pages 53 to 56)

	Page 57		Page 59
1	A. '03, '04, '05 at the latest.	1	(Marked for identification Exhibit 13.)
2	(Marked for identification Exhibit 12.)	2	Q. Showing you 13, which again is a copy of
3	Q. Showing you No. 12, which I will represent	3	the certified copy. And 13 is an appointment of
4	to you, it's a copy of an appointment of successor	4	successor trustee again, Ms. McElligott. And you
5	trustee. Here's a certified copy. I'd like for you	5	notarized this document, did you not?
6	to look at the document. It shows that you notarized	6	A. Yes.
7	the signature of someone by the name of Lance E.	7	Q. And whose signature did you notarize?
8	Olsen?	8	A. Lance Olsen.
9	A. Correct.	9	Q. And do you recall specifically the
10	Q. Do you see that?	10	circumstances that led you to notarize for Mr. Olsen
11	A. Yes.	11	on this document?
12	Q. And it looks to me that this document was	12	A. No.
13	relating to your employment with Northwest Trustee.	13	Q. And then in this document Mr. Olsen was
14	Is that true?	14	acting as attorney in fact for yet another servicer?
15	A. I am notarizing there.	15	A. Correct.
16	Q. You're notarizing you were notarizing	16	Q. And who is that servicer?
17	the signature of someone who is not an employee of	17	A. CitiMortgage.
18	Northwest Trustee?	18	Q. And you notarized and signed your name
19	A. I don't know.	19	fully as "Yvonne McElligott"?
20	Q. Do you know who this person	20	A. Yes.
21	A. Lance Olsen, yes, I do.	21	Q. So it's not true that you were always
22	Q. And who is that?	22	signing as "Vonnie McElligott"?
23	A. Lance Olsen is the managing partner of	23	A. Correct.
24	Routh Crabtree Olsen.	24	(Marked for identification Exhibit 14.)
25	Q. So he's the lawyer at the firm?	25	Q. This is 14. And again, 14 is a copy of the
	Page 58		Page 60
	Page 58	_	Page 60
1	A. Yes.	1	certified copy. And in 14 you also notarized for
2	A. Yes.Q. And he signed as attorney in fact for	2	certified copy. And in 14 you also notarized for Mr. Olsen?
2 3	A. Yes.Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct?	2 3	certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did.
2 3 4	A. Yes.Q. And he signed as attorney in fact forCountrywide Home Loans; is that correct?A. Yes, he did.	2 3 4	certified copy. And in 14 you also notarized for Mr. Olsen?A. Yes, I did.Q. What's the date of your notary public?
2 3 4 5	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you 	2 3 4 5	certified copy. And in 14 you also notarized for Mr. Olsen?A. Yes, I did.Q. What's the date of your notary public?A. My notary public?
2 3 4 5 6	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? 	2 3 4 5 6	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for
2 3 4 5 6 7	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? A. Yes. 	2 3 4 5 6 7	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for him.
2 3 4 5 6 7 8	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? A. Yes. Q. And this was done in when? What time 	2 3 4 5 6 7 8	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for him. A. 11-13-08.
2 3 4 5 6 7 8 9	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? A. Yes. Q. And this was done in when? What time frame? 	2 3 4 5 6 7 8 9	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for him. A. 11-13-08. Q. And what capacity did Mr. Olsen act in this
2 3 4 5 6 7 8 9 10	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? A. Yes. Q. And this was done in when? What time frame? A. In '09. So I'm mistaken about my notary. 	2 3 4 5 6 7 8 9 10	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for him. A. 11-13-08. Q. And what capacity did Mr. Olsen act in this particular
2 3 4 5 6 7 8 9	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? A. Yes. Q. And this was done in when? What time frame? A. In '09. So I'm mistaken about my notary. MS. MORRISON: Can we go off the record for 	2 3 4 5 6 7 8 9	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for him. A. 11-13-08. Q. And what capacity did Mr. Olsen act in this particular A. Attorney in fact.
2 3 4 5 6 7 8 9 10 11	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? A. Yes. Q. And this was done in when? What time frame? A. In '09. So I'm mistaken about my notary. MS. MORRISON: Can we go off the record for one second? 	2 3 6 7 8 9 10 11	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for him. A. 11-13-08. Q. And what capacity did Mr. Olsen act in this particular A. Attorney in fact. Q. For who?
2 3 4 5 6 7 8 9 10 11 12	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? A. Yes. Q. And this was done in when? What time frame? A. In '09. So I'm mistaken about my notary. MS. MORRISON: Can we go off the record for one second? MS. DAO: Sure. 	2 3 4 5 6 7 8 9 10 11 12	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for him. A. 11-13-08. Q. And what capacity did Mr. Olsen act in this particular A. Attorney in fact. Q. For who? A. Countrywide Home Loans, Inc.
2 3 4 5 6 7 8 9 10 11 12 13	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? A. Yes. Q. And this was done in when? What time frame? A. In '09. So I'm mistaken about my notary. MS. MORRISON: Can we go off the record for one second? MS. DAO: Sure. (Discussion off the record.) 	2 3 4 5 6 7 8 9 10 11 12 13	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for him. A. 11-13-08. Q. And what capacity did Mr. Olsen act in this particular A. Attorney in fact. Q. For who? A. Countrywide Home Loans, Inc. (Marked for identification Exhibit 15.)
2 3 4 5 6 7 8 9 10 11 12 13 14	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? A. Yes. Q. And this was done in when? What time frame? A. In '09. So I'm mistaken about my notary. MS. MORRISON: Can we go off the record for one second? MS. DAO: Sure. 	2 3 4 5 6 7 8 9 10 11 12 13 14	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for him. A. 11-13-08. Q. And what capacity did Mr. Olsen act in this particular A. Attorney in fact. Q. For who? A. Countrywide Home Loans, Inc. (Marked for identification Exhibit 15.) Q. This is 15. Take a moment to review 15, in
2 3 4 5 6 7 8 9 10 11 12 13 14 15	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? A. Yes. Q. And this was done in when? What time frame? A. In '09. So I'm mistaken about my notary. MS. MORRISON: Can we go off the record for one second? MS. DAO: Sure. (Discussion off the record.) Q. So now that you have Exhibit 12 to jog your 	2 3 4 5 7 8 9 10 11 12 13 14 15	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for him. A. 11-13-08. Q. And what capacity did Mr. Olsen act in this particular A. Attorney in fact. Q. For who? A. Countrywide Home Loans, Inc. (Marked for identification Exhibit 15.)
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? A. Yes. Q. And this was done in when? What time frame? A. In '09. So I'm mistaken about my notary. MS. MORRISON: Can we go off the record for one second? MS. DAO: Sure. (Discussion off the record.) Q. So now that you have Exhibit 12 to jog your memory, you were, in fact, signing as a notary public 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for him. A. 11-13-08. Q. And what capacity did Mr. Olsen act in this particular A. Attorney in fact. Q. For who? A. Countrywide Home Loans, Inc. (Marked for identification Exhibit 15.) Q. This is 15. Take a moment to review 15, in which I will represent that it's your own declaration
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. Yes. Q. And he signed as attorney in fact for Countrywide Home Loans; is that correct? A. Yes, he did. Q. And the document was being returned to you after it recorded? A. Yes. Q. And this was done in when? What time frame? A. In '09. So I'm mistaken about my notary. MS. MORRISON: Can we go off the record for one second? MS. DAO: Sure. (Discussion off the record.) Q. So now that you have Exhibit 12 to jog your memory, you were, in fact, signing as a notary public in 2008? A. You are correct. Q. And your appointment as notary public was not expired was not expiring or was still in effect until 2009? A. Correct. Q. Do you recall notarizing for anyone other 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 certified copy. And in 14 you also notarized for Mr. Olsen? A. Yes, I did. Q. What's the date of your notary public? A. My notary public? Q. I'm sorry, the day that you notarized for him. A. 11-13-08. Q. And what capacity did Mr. Olsen act in this particular A. Attorney in fact. Q. For who? A. Countrywide Home Loans, Inc. (Marked for identification Exhibit 15.) Q. This is 15. Take a moment to review 15, in which I will represent that it's your own declaration in support of defendant Northwest Trustee's motion for summary judgment in this particular case. Are you familiar with the document? A. Not offhand, no. Q. Can you review it? A. I am. Okay. Q. All right. I'm going to ask you literally

15 (Pages 57 to 60)

Moburg, Seaton & Watkins 206-622-3110 2033 Sixth Ave., Ste. 826

	Page 61		Page 63
1	It says that you are, as of August 27,	1	would Northwest Trustee prepare a beneficiary
2	2012, the foreclosure team manager and assistant	2	declaration?
3	vice-president for Northwest Trustee. That's correct?	3	A. If the lender requested us to.
4	A. Yes.	4	Q. And again, lender is servicer?
5	Q. And that you made a declaration based on	5	A. Yes.
6	your own personal knowledge; is that correct?	6	Q. In this case did they in the Reiners'
7	A. Yes.	7	case, was there a request made by the servicer?
8	Q. In paragraph 2, where you declare that you	8	A. I don't know.
9	have personal knowledge of the procedures governing	9	(Marked for identification Exhibit 16.)
10	the creation and maintenance of Northwest Trustee's	10	MS. MORRISON: Do you need to clarify?
11	nonjudicial foreclosure records, what does Northwest	11	THE WITNESS: Yeah. There was a loss mit
12	Trustee create for nonjudicial foreclosures?	12	declaration. That's my clarification.
13	A. Notices of default, notices of trustee	13	Q. Can you pull that out?
14	sale. Sometimes we will generate the appointment for	14	A. (Complying.)
15	the lender to execute. It's client-specific. We	15	Q. Let me just show you 16 first. What is 16?
16	could generate their there's a couple of	16	A. That's the beneficiary declaration.
17	declarations we could generate for them.	17	Q. Did Northwest Trustee prepare it?
18	Q. Such as?	18	A. It does look like our template, yes.
19	A. Loss mit declaration, beneficiary's	19	Q. Who would prepare the beneficiary
20	declaration. We may be asked to draft an assignment.	20	declaration? And I mean by the team member, a person
21	Q. Assignment of deed of trust?	21	that you can identify either by title, by name.
22	A. Correct.	22	A. One of my assistants would have done it.
23	Q. What is a declaration of loss mit?	23	Q. And who are your assistants?
24	A. It is a declaration that they have complied	24	A. Specifically I don't know which one would
25	with the due diligence in regards to the Foreclosure	25	have done this.
	Page 62		Page 64
-	Page 62		Page 64
1	Fairness Act.	1	Q. How many assistants do you have?
2	Fairness Act. Q. Is there such a declaration in this case?	2	Q. How many assistants do you have?A. I have six.
2 3	Fairness Act.Q. Is there such a declaration in this case?A. No.	2 3	Q. How many assistants do you have?A. I have six.Q. Where, if you know, where do your
2 3 4	Fairness Act.Q. Is there such a declaration in this case?A. No.Q. Under what circumstances would Northwest	2 3 4	Q. How many assistants do you have?A. I have six.Q. Where, if you know, where do your assistants get their information to prepare the
2 3 4 5	Fairness Act.Q. Is there such a declaration in this case?A. No.Q. Under what circumstances would NorthwestTrustee prepare that declaration of loss mit?	2 3 4 5	Q. How many assistants do you have?A. I have six.Q. Where, if you know, where do your assistants get their information to prepare the beneficiary declaration?
2 3 4 5 6	Fairness Act.Q. Is there such a declaration in this case?A. No.Q. Under what circumstances would NorthwestTrustee prepare that declaration of loss mit?A. If it was after the date the statute took	2 3 4 5 6	 Q. How many assistants do you have? A. I have six. Q. Where, if you know, where do your assistants get their information to prepare the beneficiary declaration? A. It depends on some of them are we are
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2 3 4 5 6 7	 Fairness Act. Q. Is there such a declaration in this case? A. No. Q. Under what circumstances would Northwest Trustee prepare that declaration of loss mit? A. If it was after the date the statute took effect, and then the client asked us to. Q. When you said "client," is that 	2 3 4 5 6 7	 Q. How many assistants do you have? A. I have six. Q. Where, if you know, where do your assistants get their information to prepare the beneficiary declaration? A. It depends on some of them are we are previously instructed to upload or we are asked to do so at a later time, to prepare it and upload it to
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16 (Pages 61 to 64)

Moburg, Seaton & Watkins 206-622-3110 2033 Sixth Ave., Ste. 826

	Page 65		Page 67
1	information to designate beneficiary, there are two	1	A. Yes.
2	scenarios?	2	Q. Was there a beneficiary designation or
3	A. Correct.	3	beneficiary declaration at that time?
4	Q. The first one is and explain to me,	4	A. I don't believe so, no. Not that I'm aware
5	please.	5	of.
6	A. Actually, there might be three. The first	6	Q. So this would be the only beneficiary
7	one is if we are asked by them to know that we have to	7	declaration that exists for this case?
8	upload the document, we would draft the document and	8	A. Correct.
9	upload it to them for signature. The other scenario	9	(Marked for identification Exhibit 17.)
10	would be they need us to draft it, and they would tell	10	Q. This is Exhibit 17.
11	us at a later date, and there's a third scenario where	11	MS. MORRISON: I didn't get a copy of
12	they would just provide it already drafted themselves.	12	Exhibit 16.
13	Q. And in the Reiners' case you believed that	13	MS. DAO: I'm sorry.
14	it was that the template looks like it's a document	14	Q. 17 is I think you referred earlier as
15	that Northwest prepared?	15	the loss mit declaration?
16	A. Correct.	16	A. Correct.
17	Q. And who is designated as the beneficiary?	17	Q. Can you take a look at 17 and tell me
18	A. The beneficiary declaration is signed by	18	whether it was created by Northwest Trustee?
19	One West Bank FSB.	19	A. No, it was not.
20	Q. What date is that?	20	Q. How can you tell?
21	A. September 2nd of 2010, it looks like.	21	A. I can tell because it doesn't have any file
22	Q. And who signed it?	22 23	information on it, and this is not a part of our document (indicating).
23	A. Chamagne Williams.	23 24	
24 25	Q. Do you know who she is?A. No, I do not.	24	Q. The second page, you mean?A. Correct.
20	A. NO, I do liot.	23	A. Concer.
	Page 66		Page 68
1	Page 66 Q. Do you know how she came to sign the	1	Page 68 Q. What about the first page?
1 2		1 2	Q. What about the first page?A. The first page is standard based on the
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Q. Do you know how she came to sign the document? A. I do not. Q. Do you know the logistics on how you get it back signed like that? A. No. Q. So, again, if Northwest Trustee prepared the form, where does it go from there? A. We upload it as an image, backup to LPS, and then we wait for them to return it to us. Q. And in which format do they return? A. Specifically for them I don't know on this particular document. Q. Typically how do they get returned to you? A. It will either be imaged back into the system and sent back to us, or a hard copy will be received. Q. But in looking at the exhibit you don't know which way this went? A. No, I do not. Correct. Q. You testified that there were two that the first foreclosure, or the first referral, I should say, came from IndyMac Federal Bank? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Q. What about the first page? A. The first page is standard based on the statutory requirements. Q. And is that just one page, the loss mit declaration that you referred to? A. I don't know if, necessarily, it doesn't flow into two pages because of the signature page. Q. There is a signature page, you're saying? A. Yes. Q. But you don't believe that this is a part of that? A. No. I don't believe this is my templated form. Q. So if it's not your template where could it have come from? A. One West or IndyMac. This is a One West file (indicating). Q. And how did it come into Northwest possession? A. Specifically I do not know. It would have either been uploaded to LPS as an image or we would have received it through the mail. Q. So the declaration as to the beneficiary or

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	5 60		
	Page 69		Page 71
1	is not anything that your company does?	1	but if a hard copy comes in it's maintained in boxes
2	A. No.	2	and stored.
3	Q. And what does that pertain to, if you know?	3	Q. I'm moving on to paragraph 3. And here you
4	A. The Foreclosure Fairness requirements for	4	declined you've declared that you have reviewed the
5 6	due diligence. The details I do not know. It's a servicer requirement.	5 6	records that pertain to the Reiner nonjudicial foreclosure. And you refer to business records of
7	Q. And it's a requirement of the beneficiary?	7	Northwest Trustee which were made or maintained. In
8	A. (No response.)	8	this paragraph were you referring to the documents
9	Q. Or, is it your understanding, of the	9	that we were discussing, notice of default, notice of
10	servicer?	10	trustee sales?
11	A. One West should have been complying with	11	A. I would have reviewed the file at the time
12	the due diligence.	12	that I signed this, yes.
13	Q. Okay. I'm sorry. I asked, but I don't	13	Q. And then I want to go to the sentence that
14	know if I got the answer. How did this document,	14	starts with, "Any such document was prepared in the
15	Exhibit 17, come back to Northwest?	15	ordinary course of business of Northwest by a person
16	A. I don't know specifically on that document.	16	who had personal knowledge of the event being
17	It would have been either through the LPS imaging or	17	recorded, and had or has a business duty to record
18	through the mail.	18	accurately such event."
19	Q. And is there anywhere on in your file or	19	A. Where are you at?
20	record system maintained by Northwest that you can	20	Q. Second sentence of paragraph 3.
21	verify that?	21	A. Okay.
22	A. I might be able to look at how it came into	22	Q. "Any such document was prepared."
23	imaging to see for verification. It's possible.	23	A. I'm still not I don't even know where
24 25	Q. Is it with regard to Exhibit 17, when	24 25	you are still. It's all a run-on sentence. Oh, there
20	you get that loss mit declaration, do you or any of	20	we go. Is there a question?
	Page 70		Page 72
1	your team members take any action to verify the	1	
1 2	your team members take any action to verify the information as to whether it's true and correct?	1 2	Q. Yeah. I asked you to look at that sentence. Do you see it now?
			Q. Yeah. I asked you to look at that
2	information as to whether it's true and correct?A. No.Q. And let's go back to Exhibit 16 with	2	Q. Yeah. I asked you to look at that sentence. Do you see it now?A. Yes, I do see it now.Q. Who is this person that you're referring
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2 3 4 5 6	 information as to whether it's true and correct? A. No. Q. And let's go back to Exhibit 16 with regards to the beneficiary declaration. Upon receipt of the I'm sorry. Are there any steps that you or 	2 3 4 5 6	 Q. Yeah. I asked you to look at that sentence. Do you see it now? A. Yes, I do see it now. Q. Who is this person that you're referring to? A. Any such person.
2 3 4 5 6 7	 information as to whether it's true and correct? A. No. Q. And let's go back to Exhibit 16 with regards to the beneficiary declaration. Upon receipt of the I'm sorry. Are there any steps that you or your team members or anyone in Northwest Trustee that 	2 3 4 5 6 7	 Q. Yeah. I asked you to look at that sentence. Do you see it now? A. Yes, I do see it now. Q. Who is this person that you're referring to? A. Any such person. Q. Can you name any one of them for the
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	Page 73	Page 75
1	Q. And then I want you to go to the next	1 A. It would we would ask for backup
2	sentence that said "As to Northwest Trustee business	2 documentation, the reason. I mean, there's hundreds
3	records that consist of documents created by third	3 of different scenarios. And then we would evaluate
4	parties." Do you see that?	4 it. Perhaps seek our own counsel's advice.
5	A. Yes.	5 Q. Give me some examples. Someone calls and
6	Q. You declared that "Northwest Trustee relies	6 says that they need to have the sales postponed. What
7	on the accuracy of such records in conducting its	7 would you require?
8	business of nonjudicial foreclosures." Do you see	8 A. Depends on what the reason they're asking
9	that?	9 for the postponement to be done for.
10	A. I do.	10 Q. And do you does Northwest Trustee make
11	Q. That is your statement?	11 an independent evaluation of whether the sales could
12	A. Yes.	12 be postponed or not?
13	Q. How do you rely on the accuracy of records	13 A. We review the information.
14	being made by third parties?	14 Q. And then make your own decision or
15	A. Our posting company would provide us with	15 A. I don't make the decision.
16	an affidavit assuring us that they had posted the	16 Q. Who does?
17	property.	17A.Sometimes it might be the operations
18	Q. Who is the posting company?	18 manager. Sometimes it might be by advice of counse
19	A. FEI.	19 Q. Who is the operation manager?
20	Q. FEI?	20A.Either Jeff Stenman or Alan Burton.
21	A. FEI.	21 Q. There has been or there were several
22	Q. What does that stand for?	22 postponements in this case; are you aware?
23	A. Foreclosure Expediters, Inc.	A. Off the top of my head I don't recollect,
24 25	Q. And what does it verify?A. They go to the property, they post the	but I know there was a bankruptcy involved.
20	A. They go to the property, they post the	25 Q. Can you go through the records at all to
	Page 74	Page 76
1		
1 2	Page 74 notice on the property, and they take pictures to the effect of the notice being on the property, and	
	notice on the property, and they take pictures to the	1 ascertain for yourself the reasons why the sales were
2	notice on the property, and they take pictures to the effect of the notice being on the property, and	 ascertain for yourself the reasons why the sales were postponed?
2 3	notice on the property, and they take pictures to the effect of the notice being on the property, and provide us with an affidavit.	 ascertain for yourself the reasons why the sales were postponed? A. We brought documents up and into that
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 notice on the property, and they take pictures to the effect of the notice being on the property, and provide us with an affidavit. Q. You're referring only to documents about the properties, the physical property? A. As opposed to? Q. Documents generated by One West, documents generated by IndyMac Federal. A. These are documents created. Q. Right. A. By a third party. Q. Right. A. We rely on our referral as well. Q. How do you assure the accuracy of your referral is what I'm trying to get at? A. We rely on the information received Q. At face value? A to be accurate, yes. Q. And that's it? You don't do any independent verification? A. No, we do not. Q. From time to time, if the borrower or his or her attorney contacts Northwest Trustee and asks 	 ascertain for yourself the reasons why the sales were postponed? A. We brought documents up and into that induced me to prepare the notice of trustee sale. (Marked for identification Exhibit 18.) Q. 18 is a notice of discontinuance of trustee sales. What's the day of that, Ms. McElligott? A. June 21st of 2011. Q. By looking at that document does it jog your memory as to why the sales were discontinued? A. I believe it had to do with the pending action. We were asked to discontinue. Q. You were asked by whom? A. I do not know at this time. According to paragraph 14, received instructions from One West Bart to terminate the nonjudicial proceeding. Q. Was that document prepared by you? A. I don't know. Q. So what do you mean you don't know? A. I don't know if I pushed the button to generate the document.
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19 (Pages 73 to 76)

Moburg, Seaton & Watkins 206-622-3110 2033 Sixth Ave., Ste. 826

	Page 77		Page 79
1	Q. Pertaining to the statement that you just	1	A. I've never had that situation come about.
2	read off to me, is that your personal knowledge that	2	Q. But you just described one.
3	you stated there as far as One West requesting the	3	A. You asked me in generalities. In general,
4	discontinuance? Is that your personal knowledge when	4	I have received instructions from a servicer that are
5	you read the paragraph?	5	in conflict with the investor, but not in this
б	A. I signed yes. I signed an affidavit.	6	scenario.
7	Q. I'm sorry, that particular	7	Q. Right. Okay. That's fair enough. And the
8	A. We were instructed to discontinue the sale.	8	conflict would be that one of them wants to
9	Q. When you said you were, were you personally	9	discontinue and the other doesn't?
10	the person that received the directive?	10	A. No. That has never been an experience that
11	A. I don't know.	11	I have had.
12	Q. So you're simply going by what the document	12	Q. So you're just saying that hypothetically?
13	says. You don't have any independent recollection?	13	A. I'm saying that, in a general statement, I
14	A. I don't have any independent recollection.	14	have received instructions from a servicer that
15	(Marked for identification Exhibit 19 and	15	conflicts with the investor, but not about
16	20.)	16	discontinuing a sale.
17	Q. 19 is another notice of discontinuance of	17	Q. So what do you do in light of conflict
18	sale in this case. What is the date of that notice?	18	between these servicers and investors?
19	A. The document is dated August 14 of '09.	19	A. I try to work with them to figure out what
20	Q. You're aware of the circumstances that led	20	what's in the best interests of both of them.
21	to that discontinuance?	21	Q. So let me go on to paragraph 4 of your
22	A. We received close and bill instructions	22	declaration. Can you read that out loud for me?
23	from IndyMac.	23	A. (Reading) In February of 2007 plaintiff
24	Q. And did you as you look at that	24	executed a promissory note in the amount of \$260,000
25	document, do you know if you have brought the	25	in a favor of American Mortgage, Inc., lender. Lender
	Page 78		Page 80
1		1	
1 2	Page 78 instruction with you to the deposition from A. To close and bill the file?	1 2	endorsed the note to IndyMac FSB, which in turn
	instruction with you to the deposition from A. To close and bill the file?		
2	instruction with you to the deposition from	2	endorsed the note to IndyMac FSB, which in turn endorsed the note in blank. Copy of the note is
2 3	instruction with you to the deposition fromA. To close and bill the file?Q. Yes.	2 3	endorsed the note to IndyMac FSB, which in turn endorsed the note in blank. Copy of the note is attached hereto as Exhibit 1.
2 3 4	instruction with you to the deposition fromA. To close and bill the file?Q. Yes.A. No, we did not.	2 3 4	endorsed the note to IndyMac FSB, which in turn endorsed the note in blank. Copy of the note is attached hereto as Exhibit 1. Q. Were you around when Ms. Reiner executed a
2 3 4 5	 instruction with you to the deposition from A. To close and bill the file? Q. Yes. A. No, we did not. Q. Does that statement pertain to a physical 	2 3 4 5	endorsed the note to IndyMac FSB, which in turn endorsed the note in blank. Copy of the note is attached hereto as Exhibit 1. Q. Were you around when Ms. Reiner executed a promissory note?
2 3 4 5 6	 instruction with you to the deposition from A. To close and bill the file? Q. Yes. A. No, we did not. Q. Does that statement pertain to a physical document? 	2 3 4 5 6	endorsed the note to IndyMac FSB, which in turn endorsed the note in blank. Copy of the note is attached hereto as Exhibit 1. Q. Were you around when Ms. Reiner executed a promissory note? A. Around?
2 3 4 5 6 7	 instruction with you to the deposition from A. To close and bill the file? Q. Yes. A. No, we did not. Q. Does that statement pertain to a physical document? A. It would probably be a message that we 	2 3 4 5 6 7	 endorsed the note to IndyMac FSB, which in turn endorsed the note in blank. Copy of the note is attached hereto as Exhibit 1. Q. Were you around when Ms. Reiner executed a promissory note? A. Around? Q. To see her doing that physically.
2 3 4 5 6 7 8	 instruction with you to the deposition from A. To close and bill the file? Q. Yes. A. No, we did not. Q. Does that statement pertain to a physical document? A. It would probably be a message that we received. 	2 3 4 5 6 7 8	 endorsed the note to IndyMac FSB, which in turn endorsed the note in blank. Copy of the note is attached hereto as Exhibit 1. Q. Were you around when Ms. Reiner executed a promissory note? A. Around? Q. To see her doing that physically. A. No.
2 3 4 5 6 7 8 9	 instruction with you to the deposition from A. To close and bill the file? Q. Yes. A. No, we did not. Q. Does that statement pertain to a physical document? A. It would probably be a message that we received. Q. Via the LPS system? A. Correct. Q. And so is it fair to say that during both 	2 3 4 5 7 8 9	 endorsed the note to IndyMac FSB, which in turn endorsed the note in blank. Copy of the note is attached hereto as Exhibit 1. Q. Were you around when Ms. Reiner executed a promissory note? A. Around? Q. To see her doing that physically. A. No. Q. Were you working for the lender, American
2 3 4 5 6 7 8 9 10	 instruction with you to the deposition from A. To close and bill the file? Q. Yes. A. No, we did not. Q. Does that statement pertain to a physical document? A. It would probably be a message that we received. Q. Via the LPS system? A. Correct. Q. And so is it fair to say that during both as to the two discontinuances of sales, you got 	2 3 5 6 7 8 9 10	 endorsed the note to IndyMac FSB, which in turn endorsed the note in blank. Copy of the note is attached hereto as Exhibit 1. Q. Were you around when Ms. Reiner executed a promissory note? A. Around? Q. To see her doing that physically. A. No. Q. Were you working for the lender, American Mortgage Network, Inc., at the time in 2007? A. No. Q. Did you physically witness the fact or the
2 3 4 5 6 7 8 9 10 11	 instruction with you to the deposition from A. To close and bill the file? Q. Yes. A. No, we did not. Q. Does that statement pertain to a physical document? A. It would probably be a message that we received. Q. Via the LPS system? A. Correct. Q. And so is it fair to say that during both 	2 3 6 7 8 9 10 11	 endorsed the note to IndyMac FSB, which in turn endorsed the note in blank. Copy of the note is attached hereto as Exhibit 1. Q. Were you around when Ms. Reiner executed a promissory note? A. Around? Q. To see her doing that physically. A. No. Q. Were you working for the lender, American Mortgage Network, Inc., at the time in 2007? A. No.
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20 (Pages 77 to 80)

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	Page 81		Page 83
1	again?	1	thereafter due." Do you see that?
2	Q. The first part was that you were not	2	A. I do.
3	employed by	3	Q. Where did you where did you get the
4	A. Right.	4	information to say that in paragraph 6?
5	Q IndyMac Bank	5	A. We relied on the information received in
б	A. Correct.	6	the referral.
7	Q in 2007. You have no personal knowledge	7	Q. Which exactly? Which information are we
8	that the lender, American Mortgage Network, Inc., in	8	talking about?
9	fact, endorsed the note to IndyMac Bank?	9	A. The default date, the payment due date. In
10	A. Isn't there a copy?	10	the referral
11	Q. I'm just asking you for your personal	11	Q. I'm sorry, go ahead.
12	knowledge.	12	A. In the referral, in the exhibits, we can go
13	A. Define "personal knowledge."	13	back and find the
14	Q. Seeing, hearing, being in the same room,	14	Q. Yes, please.
15	knowing that that event occurred for a fact.	15	A. Exhibit 5.
16	A. No.	16	Q. Let me see that. So your source of that
17	Q. Going on to paragraph No. 5 where you said,	17	statement is the data or the information provided by
18	"To secure repayment of the note, plaintiff on or	18	the LPS system?
19	about February 2, 2007, constituted a deed of trust,	19 20	A. Yes.
20 21	which created a lien against the subject real property." Do you see that?	20	Q. You are not aware of whether she was in a loan modification when after November 1st, 2009?
21	A. Yes, I do.	21	A. No, I am not aware.
23	Q. And it refers to her home located at 4015	23	Q. You're not aware of whether or not she was
24	Cooper Point Road Northwest, Olympia. You were not	24	making any kind of a trial payments to One West?
25	there when she signed this deed of trust?	25	A. If she were making payments One West would
			The Trible were making payments one west would
	Page 82		Page 84
1	Page 82 A. No.	1	notify us.
1 2	A. No.Q. You do not know whether the deed of trust,	1 2	notify us. Q. But you don't have that information?
	A. No.Q. You do not know whether the deed of trust, in fact, created a lien against her home?		notify us. Q. But you don't have that information? A. No, I do not.
2 3 4	A. No.Q. You do not know whether the deed of trust, in fact, created a lien against her home?A. It's a public record.	2 3 4	notify us.Q. But you don't have that information?A. No, I do not.Q. Going on to paragraph No. 7, you indicated
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. No. Q. You do not know whether the deed of trust, in fact, created a lien against her home? A. It's a public record. Q. Public record of what? Of the deed of trust? A. Yes. Q. But you did not see her sign it? A. Correct. Q. You do not know whether the deed of trust whether it has a legal force of a lien against her home? A. It is a lien recorded against her home by public record. Q. And you're relying you're saying that based on the fact that the document appears on public records? A. Correct. Q. You do not know if it's contested whether that lien is valid or not? A. I do not know. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 notify us. Q. But you don't have that information? A. No, I do not. Q. Going on to paragraph No. 7, you indicated that "Following plaintiff's default One West directed Northwest Trustee to proceed with a nonjudicial foreclosure on the property." A. Yes. Q. In what capacity in what capacity did One West direct you to proceed with a nonjudicial foreclosure on the property? A. I'm not sure I understand the question. MS. DAO: What was the question? (Record read as requested.) Q. What were they, in directing you to proceed with a nonjudicial foreclosure? A. I'm not sure I understand your question. Q. Were they the beneficiary? A. As of that referral? I believe they were. Q. Paragraph No. 8. Moving on to 8 where you said, "As agent for One West Bank, Northwest Trustee
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. No. Q. You do not know whether the deed of trust, in fact, created a lien against her home? A. It's a public record. Q. Public record of what? Of the deed of trust? A. Yes. Q. But you did not see her sign it? A. Correct. Q. You do not know whether the deed of trust whether it has a legal force of a lien against her home? A. It is a lien recorded against her home by public record. Q. And you're relying you're saying that based on the fact that the document appears on public records? A. Correct. Q. You do not know if it's contested whether that lien is valid or not? A. I do not know. Q. And then on paragraph 6 you indicate that, 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 notify us. Q. But you don't have that information? A. No, I do not. Q. Going on to paragraph No. 7, you indicated that "Following plaintiff's default One West directed Northwest Trustee to proceed with a nonjudicial foreclosure on the property." A. Yes. Q. In what capacity in what capacity did One West direct you to proceed with a nonjudicial foreclosure on the property? A. I'm not sure I understand the question. MS. DAO: What was the question? (Record read as requested.) Q. What were they, in directing you to proceed with a nonjudicial foreclosure? A. I'm not sure I understand your question. Q. Were they the beneficiary? A. As of that referral? I believe they were. Q. Paragraph No. 8. Moving on to 8 where you said, "As agent for One West Bank, Northwest Trustee caused to be mailed and posted at the property a
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. No. Q. You do not know whether the deed of trust, in fact, created a lien against her home? A. It's a public record. Q. Public record of what? Of the deed of trust? A. Yes. Q. But you did not see her sign it? A. Correct. Q. You do not know whether the deed of trust whether it has a legal force of a lien against her home? A. It is a lien recorded against her home by public record. Q. And you're relying you're saying that based on the fact that the document appears on public records? A. Correct. Q. You do not know if it's contested whether that lien is valid or not? A. I do not know. Q. And then on paragraph 6 you indicate that, "According to information received from One West Bank, 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 notify us. Q. But you don't have that information? A. No, I do not. Q. Going on to paragraph No. 7, you indicated that "Following plaintiff's default One West directed Northwest Trustee to proceed with a nonjudicial foreclosure on the property." A. Yes. Q. In what capacity in what capacity did One West direct you to proceed with a nonjudicial foreclosure on the property? A. I'm not sure I understand the question. MS. DAO: What was the question? (Record read as requested.) Q. What were they, in directing you to proceed with a nonjudicial foreclosure? A. I'm not sure I understand your question. Q. Were they the beneficiary? A. as of that referral? I believe they were. Q. Paragraph No. 8. Moving on to 8 where you said, "As agent for One West Bank, Northwest Trustee caused to be mailed and posted at the property a notice of default on August 25, 2010."
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. No. Q. You do not know whether the deed of trust, in fact, created a lien against her home? A. It's a public record. Q. Public record of what? Of the deed of trust? A. Yes. Q. But you did not see her sign it? A. Correct. Q. You do not know whether the deed of trust whether it has a legal force of a lien against her home? A. It is a lien recorded against her home by public record. Q. And you're relying you're saying that based on the fact that the document appears on public records? A. Correct. Q. You do not know if it's contested whether that lien is valid or not? A. I do not know. Q. And then on paragraph 6 you indicate that, 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 notify us. Q. But you don't have that information? A. No, I do not. Q. Going on to paragraph No. 7, you indicated that "Following plaintiff's default One West directed Northwest Trustee to proceed with a nonjudicial foreclosure on the property." A. Yes. Q. In what capacity in what capacity did One West direct you to proceed with a nonjudicial foreclosure on the property? A. I'm not sure I understand the question. MS. DAO: What was the question? (Record read as requested.) Q. What were they, in directing you to proceed with a nonjudicial foreclosure? A. I'm not sure I understand your question. Q. What were they in directing you to proceed with a nonjudicial foreclosure? A. I'm not sure I understand your question. Q. Were they the beneficiary? A. As of that referral? I believe they were. Q. Paragraph No. 8. Moving on to 8 where you said, "As agent for One West Bank, Northwest Trustee caused to be mailed and posted at the property a

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	Page 85		Page 87
1	posting the notice of default was done as an agent for	1	recorded at a later date.
2	One West?	2	Q. Can you explain the circumstances in which
3	A. That is what that statement says, yes.	3	there were two recorded appointments of successor
4	Q. Is there anything different than acting as	4	trustee?
5	the trustee?	5	A. I can't. I know we did a new assignment,
6	A. I don't know.	6	and then they recorded another appointment afterwards
7	Q. In paragraph No. 9, you indicated that "On	7	which was unnecessary.
8	or about September 2nd, 2010 One West Bank executed,	8	Q. Okay. So let's clarify that. You said
9	and thereafter delivered, to Northwest Trustee a	9	there was a new recorded assignment?
10	signed declaration, the beneficiary declaration,	10	A. In the second foreclosure.
11	averring that One West Bank was the holder of the	11	Q. So this is Exhibit 20, and you pulled it
12 13	underlying note." Is that what you say? A. Yes.	12 13	out and showed it to me. What is that?
14	Q. What do you mean by that?	14	A. This is the second appointment done after
15	A. Our office received a beneficiary	15	the assignment. (Marked for identification Exhibit 21.)
16	declaration stating that One West Bank was the holder	16	Q. So I'm showing you what has been marked as
17	of the underlying note.	17	Exhibit 21, and you were referring to it as the second
18	Q. And by that do you mean Exhibit 16, the	18	assignment?
19	beneficiary declaration?	19	A. No. There was a second appointment.
20	A. Yes.	20	Q. Second appointment.
21	Q. Is that correct?	21	A. This is the first assignment.
22	A. Yes.	22	Q. Oh, okay. And which one did you say was
23	Q. And so that I can be clear, you're going	23	unnecessary?
24	strictly by that piece of paper provided to you by One	24	A. That appointment (indicating). We were
25	West?	25	already trustee.
	Page 86		Page 88
1	Page 86 A. Yes.	1	Page 88 Q. Now, can I have this is 21. 21 has a
1 2		1 2	
	A. Yes.		Q. Now, can I have this is 21. 21 has a
2	A. Yes.Q. And did you do anything else? Did	2	Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott."Do you see that?A. No.
2 3	A. Yes.Q. And did you do anything else? DidNorthwest Trustee do anything else to verify that information?A. No.	2 3	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's
2 3 4 5 6	A. Yes.Q. And did you do anything else? DidNorthwest Trustee do anything else to verify that information?A. No.Q. I want you to take a look at the remainder	2 3 4 5 6	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20.
2 3 4 5 6 7	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't 	2 3 4 5 6 7	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes.
2 3 4 5 6 7 8	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that 	2 3 4 5 6 7 8	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from
2 3 4 5 6 7 8 9	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that they're all true and accurate. 	2 3 4 5 6 7 8 9	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from your team prepared that document?
2 3 4 5 6 7 8 9 10	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that they're all true and accurate. A. I would say in paragraph 10 we were 	2 3 4 5 6 7 8 9 10	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from your team prepared that document? A. Yes.
2 3 4 5 6 7 8 9 10 11	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that they're all true and accurate. A. I would say in paragraph 10 we were actually appointed the trustee back in 2009. 	2 3 4 5 6 7 8 9 10 11	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from your team prepared that document? A. Yes. Q. And this is the one where you said it was
2 3 4 5 6 7 8 9 10 11 12	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that they're all true and accurate. A. I would say in paragraph 10 we were actually appointed the trustee back in 2009. Q. Okay. By who? 	2 3 4 5 6 7 8 9 10 11 12	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from your team prepared that document? A. Yes. Q. And this is the one where you said it was not necessary?
2 3 4 5 6 7 8 9 10 11 12 13	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that they're all true and accurate. A. I would say in paragraph 10 we were actually appointed the trustee back in 2009. Q. Okay. By who? A. IndyMac. 	2 3 4 5 6 7 8 9 10 11 12 13	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from your team prepared that document? A. Yes. Q. And this is the one where you said it was not necessary? A. Correct.
2 3 4 5 6 7 8 9 10 11 12 13 14	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that they're all true and accurate. A. I would say in paragraph 10 we were actually appointed the trustee back in 2009. Q. Okay. By who? A. IndyMac. Q. What date? 	2 3 4 5 6 7 8 9 10 11 12 13 14	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from your team prepared that document? A. Yes. Q. And this is the one where you said it was not necessary? A. Correct. Q. Do you recall the circumstances in which it
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that they're all true and accurate. A. I would say in paragraph 10 we were actually appointed the trustee back in 2009. Q. Okay. By who? A. IndyMac. Q. What date? A. That's what I was looking for. There's so many other documents here now. Q. Take your time. I'll let you have this in just a second. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from your team prepared that document? A. Yes. Q. And this is the one where you said it was not necessary? A. Correct. Q. Do you recall the circumstances in which it was prepared if it was unnecessary? A. I don't. I looked today earlier to see if we had been instructed to do it because it's possible that they instructed us to do it, but we don't have
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that they're all true and accurate. A. I would say in paragraph 10 we were actually appointed the trustee back in 2009. Q. Okay. By who? A. IndyMac. Q. What date? A. That's what I was looking for. There's so many other documents here now. Q. Take your time. I'll let you have this in just a second. MS. MORRISON: It was Exhibit 2. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from your team prepared that document? A. Yes. Q. And this is the one where you said it was not necessary? A. Correct. Q. Do you recall the circumstances in which it was prepared if it was unnecessary? A. I don't. I looked today earlier to see if we had been instructed to do it because it's possible that they instructed us to do it, but we don't have access to that record any more.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that they're all true and accurate. A. I would say in paragraph 10 we were actually appointed the trustee back in 2009. Q. Okay. By who? A. IndyMac. Q. What date? A. That's what I was looking for. There's so many other documents here now. Q. Take your time. I'll let you have this in just a second. MS. MORRISON: It was Exhibit 2. MS. DAO: Here (indicating). A. There we go. 5-7-09. Q. 5-7? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from your team prepared that document? A. Yes. Q. And this is the one where you said it was not necessary? A. Correct. Q. Do you recall the circumstances in which it was prepared if it was unnecessary? A. I don't. I looked today earlier to see if we had been instructed to do it because it's possible that they instructed us to do it, but we don't have access to that record any more. Q. What records are we talking about? A. In LPS. I don't have access to the LPS records any more to see if we were instructed to draft
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that they're all true and accurate. A. I would say in paragraph 10 we were actually appointed the trustee back in 2009. Q. Okay. By who? A. IndyMac. Q. What date? A. That's what I was looking for. There's so many other documents here now. Q. Take your time. I'll let you have this in just a second. MS. MORRISON: It was Exhibit 2. MS. DAO: Here (indicating). A. There we go. 5-7-09. Q. 5-7? A. Recorded on 5-19-09. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from your team prepared that document? A. Yes. Q. And this is the one where you said it was not necessary? A. Correct. Q. Do you recall the circumstances in which it was prepared if it was unnecessary? A. I don't. I looked today earlier to see if we had been instructed to do it because it's possible that they instructed us to do it, but we don't have access to that records are we talking about? A. In LPS. I don't have access to the LPS records any more to see if we just did so
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that they're all true and accurate. A. I would say in paragraph 10 we were actually appointed the trustee back in 2009. Q. Okay. By who? A. IndyMac. Q. What date? A. That's what I was looking for. There's so many other documents here now. Q. Take your time. I'll let you have this in just a second. MS. MORRISON: It was Exhibit 2. MS. DAO: Here (indicating). A. There we go. 5-7-09. Q. 5-7? A. Recorded on 5-19-09. Q. So, is paragraph No. 10 still true? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from your team prepared that document? A. Yes. Q. And this is the one where you said it was not necessary? A. Correct. Q. Do you recall the circumstances in which it was prepared if it was unnecessary? A. I don't. I looked today earlier to see if we had been instructed to do it because it's possible that they instructed us to do it, but we don't have access to that record any more. Q. What records are we talking about? A. In LPS. I don't have access to the LPS records any more to see if we just did so automatically.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. Yes. Q. And did you do anything else? Did Northwest Trustee do anything else to verify that information? A. No. Q. I want you to take a look at the remainder of your declaration and make sure that there isn't anything in there that you will dispute later, that they're all true and accurate. A. I would say in paragraph 10 we were actually appointed the trustee back in 2009. Q. Okay. By who? A. IndyMac. Q. What date? A. That's what I was looking for. There's so many other documents here now. Q. Take your time. I'll let you have this in just a second. MS. MORRISON: It was Exhibit 2. MS. DAO: Here (indicating). A. There we go. 5-7-09. Q. 5-7? A. Recorded on 5-19-09. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Q. Now, can I have this is 21. 21 has a legend "After recording return to Vonnie McElligott." Do you see that? A. No. Q. No? I'm sorry. This one. I'm sorry, it's actually 20. A. Yes. Q. Does that mean that you or somebody from your team prepared that document? A. Yes. Q. And this is the one where you said it was not necessary? A. Correct. Q. Do you recall the circumstances in which it was prepared if it was unnecessary? A. I don't. I looked today earlier to see if we had been instructed to do it because it's possible that they instructed us to do it, but we don't have access to that records are we talking about? A. In LPS. I don't have access to the LPS records any more to see if we just did so

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	Page 89		Page 91
1	any more?	1	already trustee?
2	A. I don't know. It's just we don't we	2	A. Correct.
3	can't access the account, I'm assuming, because	3	Q. Were you aware that LPS themselves was in
4	there's a pending action.	4	litigation?
5	Q. Such as?	5	A. No.
6	A. This.	6	MS. DAO: I'm going to take another short
7	Q. Oh, you mean because of this litigation	7	break.
8	you're not allowed to have access to LPS?	8	(Off the record from 3:41 p.m. to 3:58
9	A. That's the only thing I can think of. It's	9	p.m.)
10	we don't have access to documents any more.	10	MS. DAO: We're back.
11	Q. Beginning when?	11	Q. Ms. McElligott, I just want to ask you a
12	A. I don't know.	12	few questions about your activities as notary public.
13	Q. So today, before you came, you looked?	13	And the last time you did that was in 2008 and the
14	A. I looked to see if we had been instructed	14	seal was still in effect until 2009?
15	to draft the appointment.	15	A. Yes.
16	Q. So let me understand you correctly. Before	16	Q. Do you know where you kept your where
17	you came for deposition today you checked?	17	you last kept your notary seal? Do you know where it
18	A. Right.	18	is now?
19	Q. And you could not gain access to LPS?	19	A. I do not know where it is now. It used to
20	A. To the document images.	20	be in my desk drawer next to me in a locked cabinet.
21	Q. In this case or in all cases?	21	Q. At Northwest Trustee?
22	A. In this case.	22	A. Correct.
23	Q. And was there any message for you to know	23	Q. Did you maintain a log for your activities
24	why you don't have access?	24	as notary public?
25	A. No.	25	A. No.
	5		
	Page 90		Page 92
1	Page 90	1	Page 92 O Were you aware that there was a requirement
1	Q. You're guessing?	1	Q. Were you aware that there was a requirement
1 2 3	Q. You're guessing?A. I am.	1 2 3	
2	Q. You're guessing?A. I am.Q. So you have no idea whether access can be	2 3	Q. Were you aware that there was a requirement for you to do that?A. No.
2 3	Q. You're guessing?A. I am.	2	Q. Were you aware that there was a requirement for you to do that?A. No.Q. Did you have a bond covering your
2 3 4	Q. You're guessing?A. I am.Q. So you have no idea whether access can be gained again or if you would be without it for good?	2 3 4	Q. Were you aware that there was a requirement for you to do that?A. No.
2 3 4 5	Q. You're guessing?A. I am.Q. So you have no idea whether access can be gained again or if you would be without it for good? You don't know?	2 3 4 5	Q. Were you aware that there was a requirement for you to do that?A. No.Q. Did you have a bond covering your activities as notary public?A. I don't know.
2 3 4 5 6	 Q. You're guessing? A. I am. Q. So you have no idea whether access can be gained again or if you would be without it for good? You don't know? A. On this loan? 	2 3 4 5 6	Q. Were you aware that there was a requirement for you to do that?A. No.Q. Did you have a bond covering your activities as notary public?A. I don't know.
2 3 4 5 6 7	 Q. You're guessing? A. I am. Q. So you have no idea whether access can be gained again or if you would be without it for good? You don't know? A. On this loan? Q. Yes. 	2 3 4 5 6 7	 Q. Were you aware that there was a requirement for you to do that? A. No. Q. Did you have a bond covering your activities as notary public? A. I don't know. Q. Throughout all the documents that we have
2 3 4 5 6 7 8	 Q. You're guessing? A. I am. Q. So you have no idea whether access can be gained again or if you would be without it for good? You don't know? A. On this loan? Q. Yes. A. I don't know. 	2 3 4 5 6 7 8	 Q. Were you aware that there was a requirement for you to do that? A. No. Q. Did you have a bond covering your activities as notary public? A. I don't know. Q. Throughout all the documents that we have talked about, I do not see a notice of default for
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2 3 4 5 6 7 8 9 10 11	 Q. You're guessing? A. I am. Q. So you have no idea whether access can be gained again or if you would be without it for good? You don't know? A. On this loan? Q. Yes. A. I don't know. Q. In this case? A. I don't know. Q. And if you were to go back to LPS and have you have access, what would you have been able to obtain? 	2 3 4 5 6 7 8 9 10 11	 Q. Were you aware that there was a requirement for you to do that? A. No. Q. Did you have a bond covering your activities as notary public? A. I don't know. Q. Throughout all the documents that we have talked about, I do not see a notice of default for 2009 foreclosure. Do you recall? A. I don't have the packet of stuff any more. Q. Here's the rest of it (indicating).
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 Q. You're guessing? A. I am. Q. So you have no idea whether access can be gained again or if you would be without it for good? You don't know? A. On this loan? Q. Yes. A. I don't know. Q. In this case? A. I don't know. Q. And if you were to go back to LPS and have you have access, what would you have been able to obtain? A. I was trying to determine whether or not they instructed us to do a new appointment or if we just did it automatically. Q. What would be the circumstances where you 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 Q. Were you aware that there was a requirement for you to do that? A. No. Q. Did you have a bond covering your activities as notary public? A. I don't know. Q. Throughout all the documents that we have talked about, I do not see a notice of default for 2009 foreclosure. Do you recall? A. I don't have the packet of stuff any more. Q. Here's the rest of it (indicating). A. We looked through this. It was there. Out of order. Do you have it as an exhibit? I thought it was there. MS. MORRISON: I thought it was there. MS. DAO: Do you have a list of the documents you brought today?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 Q. You're guessing? A. I am. Q. So you have no idea whether access can be gained again or if you would be without it for good? You don't know? A. On this loan? Q. Yes. A. I don't know. Q. In this case? A. I don't know. Q. And if you were to go back to LPS and have you have access, what would you have been able to obtain? A. I was trying to determine whether or not they instructed us to do a new appointment or if we just did it automatically. Q. What would be the circumstances where you would do one automatically? A. I don't we were already trustee. There was no reason to do one. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 Q. Were you aware that there was a requirement for you to do that? A. No. Q. Did you have a bond covering your activities as notary public? A. I don't know. Q. Throughout all the documents that we have talked about, I do not see a notice of default for 2009 foreclosure. Do you recall? A. I don't have the packet of stuff any more. Q. Here's the rest of it (indicating). A. We looked through this. It was there. Out of order. Do you have it as an exhibit? I thought it was there. MS. MORRISON: I thought it was there. MS. MORRISON: I don't. Q. The only thing I have is the corporate resolution. And you separate that out; right?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. You're guessing? A. I am. Q. So you have no idea whether access can be gained again or if you would be without it for good? You don't know? A. On this loan? Q. Yes. A. I don't know. Q. In this case? A. I don't know. Q. And if you were to go back to LPS and have you have access, what would you have been able to obtain? A. I was trying to determine whether or not they instructed us to do a new appointment or if we just did it automatically. Q. What would be the circumstances where you would do one automatically? A. I don't we were already trustee. There was no reason to do one. Q. So you can't verify for me whether there was a directive for you to record a second one? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. Were you aware that there was a requirement for you to do that? A. No. Q. Did you have a bond covering your activities as notary public? A. I don't know. Q. Throughout all the documents that we have talked about, I do not see a notice of default for 2009 foreclosure. Do you recall? A. I don't have the packet of stuff any more. Q. Here's the rest of it (indicating). A. We looked through this. It was there. Out of order. Do you have it as an exhibit? I thought it was there. MS. MORRISON: I thought it was there. MS. MORRISON: I don't. Q. The only thing I have is the corporate resolution. And you separate that out; right? A. Right. I thought it was in a weird spot in there, but I
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Q. You're guessing? A. I am. Q. So you have no idea whether access can be gained again or if you would be without it for good? You don't know? A. On this loan? Q. Yes. A. I don't know. Q. In this case? A. I don't know. Q. And if you were to go back to LPS and have you have access, what would you have been able to obtain? A. I was trying to determine whether or not they instructed us to do a new appointment or if we just did it automatically. Q. What would be the circumstances where you would do one automatically? A. I don't we were already trustee. There was no reason to do one. Q. So you can't verify for me whether there was a directive for you to record a second one? A. Not at this time, no. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Q. Were you aware that there was a requirement for you to do that? A. No. Q. Did you have a bond covering your activities as notary public? A. I don't know. Q. Throughout all the documents that we have talked about, I do not see a notice of default for 2009 foreclosure. Do you recall? A. I don't have the packet of stuff any more. Q. Here's the rest of it (indicating). A. We looked through this. It was there. Out of order. Do you have it as an exhibit? I thought it was there. MS. MORRISON: I thought it was there. MS. DAO: Do you have a list of the documents you brought today? MS. MORRISON: I don't. Q. The only thing I have is the corporate resolution. And you separate that out; right? A. Right. I thought it was in a weird spot in there, but I Q. T'm sorry, I didn't see one.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. You're guessing? A. I am. Q. So you have no idea whether access can be gained again or if you would be without it for good? You don't know? A. On this loan? Q. Yes. A. I don't know. Q. In this case? A. I don't know. Q. And if you were to go back to LPS and have you have access, what would you have been able to obtain? A. I was trying to determine whether or not they instructed us to do a new appointment or if we just did it automatically. Q. What would be the circumstances where you would do one automatically? A. I don't we were already trustee. There was no reason to do one. Q. So you can't verify for me whether there was a directive for you to record a second one? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. Were you aware that there was a requirement for you to do that? A. No. Q. Did you have a bond covering your activities as notary public? A. I don't know. Q. Throughout all the documents that we have talked about, I do not see a notice of default for 2009 foreclosure. Do you recall? A. I don't have the packet of stuff any more. Q. Here's the rest of it (indicating). A. We looked through this. It was there. Out of order. Do you have it as an exhibit? I thought it was there. MS. MORRISON: I thought it was there. MS. MORRISON: I don't. Q. The only thing I have is the corporate resolution. And you separate that out; right? A. Right. I thought it was in a weird spot in there, but I

23 (Pages 89 to 92)

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	Page 93		Page 95
1	just it just didn't make it in. I could have sworn	1	A. Then I don't know what I would need from
2	it was.	2	her without knowing what the reason for the
3	A. (Handing). We looked at it.	3	postponement was.
4	Q. So that's Exhibit 3. Thank you. What was	4	Q. What are some of the common reasons coming
5	the reason for the foreclosure activity to cease in	5	from the borrower that you would postpone the sales?
6	2009 and resume in 2010?	6	A. That they were going to have funds.
7	A. We were told to close the 2009 file and	7	Usually they I mean, most of the time they don't
8	then we received a new referral in 2010.	8	give us a reason why they're calling. They just want
9	Q. And you don't recall what the reasons were	9	it postponed.
10	to close out the 2009 file?	10	Q. And you would not comply with that?
11	A. I don't know that we received a reason.	11	A. I would need a reason to bring to somebody
12	The presumption was that the account was reinstated	12	other than just the fact that they wanted a sale
13	because the next referral has a different default	13	postponement for no reason.
14	date.	14	Q. Do you recall at all, in recent days or
15	Q. When you talk about the history of payment	15	months, that you actually agreed to postpone a sales
16	that you receive alongside with the foreclosure	16	date on account of a borrower's calling you?
17	referral, did you ever get any loan payment histories	17	A. I don't recall anything recently. I mean,
18	from Freddie Mac?	18	a specific example to provide you, no, I don't have a
19	A. No.	19	specific example.
20	Q. Do you know if there were any mortgage	20	Q. Is it fair to say that if there is a
21	payments being made by to Freddie Mac?	21	request to postpone not coming from either the
22	A. No.	22	servicer or the investor, you would have to consult
23	Q. By the borrower? A. No.	23	with them?
24 25		24	A. Consult with?
20	Q. And then as far as your testimony that you	25	Q. The servicer or the investor.
	Page 94		Page 96
1	thought the second appointment of trustee was	1	A. I would want to do so, yes.
2	superfluous because you were already trustee is	2	Q. You would want to do so in every case?
3	that correct?	3	A. Yes.
4	A. Yes.	4	(Marked for identification Exhibit 22.)
5	Q. And does that mean once a trustee always a	5	Q. This is Exhibit 22, VMD 158. Can you tell
6	trustee or	6	me what it is?
7	A. Until another trustee is appointed.	7	A. This is a copy of the search results that
8	Q. Do you recall Ms. Reiner's contacting you	8	we do to check to see if a borrower is deceased.
9	by telephone and asking you to postpone sales date?	9	Q. And what do you use to check?
10	A. I do remember something to the effect about	10	A. Usually the Social Security number.
11	the bankruptcy filing and a call to that effect when I	11	Q. And in doing that check, you obtain her
12	looked over the notes. I didn't look over the detail.	12	Social Security number from her loan file?
13	Q. But you don't recall personally whether	13	A. From the screen shots.
14 15	you've talked to her on the phone?	14	Q. That was provided to you via the LPS
15 16	A. I don't recall personally. I do remember seeing a notation in the note system about her	15 16	A. Yes.
16 17	calling, but I don't recall	17	Q desktop system. (Marked for identification Exhibit 23.)
18	Q. Talking to her?	18	Q. This is Exhibit 23, which is a copy of the
19	A a personal conversation with her.	19	note. And you were referring to the note in your
20	Q. If she had if she had called you to	20	declaration, do you recall that, declaration in
20	postpone the sales date, what kind of information	20	support of summary judgment?
22	would you have needed from her?	22	A. This one (indicating)?
23	A. I would need what is the reason for the	23	Q. Yes.
24	postponement?	24	A. Yes.
25	Q. I don't know.	25	Q. I want you to go to the last page where
	-		

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1	there are two endorsements. Do you see that?	1	signature on that document.
2	A. Yes.	2	A. (Complying.)
3	Q. You don't have any personal knowledge on	3	Q. Do you see that signature?
4	how these endorsements were placed on the note?	4	A. Uh-huh.
5	A. No, I do not.	5	Q. What did you sign as?
б	Q. Do you know any of the individuals whose	6	A. "Yvonne Marie McElligott."
7	name appears there?	7	Q. So for that I'm going to need you to sign
8	A. No, I do not.	8	as such on this sheet of paper several times for me.
9	MS. DAO: That's all I have.	9	A. (Complying.)
10	MS. MORRISON: Just a few quick questions.	10	(Marked for identification Exhibit 25.)
11		11	Q. This is 25, and I will represent to you
12	EXAMINATION	12	that that is a true and correct copy of the certified
13	BY MS. MORRISON:	13	copy of the statutory warranty deed relating to your
14	Q. Vonnie, have you ever been named in a	14	own property. Would you agree?
15	lawsuit as "Vonnie McElligott" based on your	15	A. Yes.
16	employment with Northwest Trustee Services?	16	Q. And what did you sign as in
17	A. Yes.	17	A. Actually, no, I would not. I disagree.
18	Q. Have you ever signed a notice of trustee	18	Q. Tell me what it is.
19	sale for Northwest Trustee Services as "Yvonne	19	A. This is not my property.
20	McElligott"?	20	Q. Oh, I'm sorry. So whose property is it?
21	A. No.	21	A. This was my husband's property.
22	Q. You always sign as "Vonnie," correct?	22	Q. So the previous exhibit and this one do not
23	A. Correct.	23	pertain to your property. It's your husband's
24	Q. When you had your notary and you would sign	24	property?
25	documents as a notary public, were you signing those	25	A. Well, the previous exhibit
	Page 98		Page 100
1	documents in your capacity as an employee of Northwest	1	Q. Lot 28, Tanglewood Village?
2	Trustee Services under your understanding, or were you	2	A. Yeah. It's not my property any more.
3	signing them as an individual?	3	Q. But that is your signature?
4	A. My notary is an individual notary under	4	A. Yes.
5	Yvonne, my legal name.	5	Q. And what did you sign as?
6	Q. And your legal name is?	6	A. I'm not sure I understand the question.
7	A. Yvonne McElligott.	7	Q. I'm sorry, look at 25. What did you sign
8	MS. MORRISON: I have no other questions.	8	as?
9	MS. DAO: That brings up a subject matter.	9	A. You mean what is my name?
10	Do me a favor, Ms. McElligott. I need you to sign	10	Q. Yes.
11	your name several times, once as Vonnie McElligott and	11	A. Yvonne M. McElligott.
12		12	
	the other as Yvonne McElligott.		Q. So that is a variation from what we talked
13	THE WITNESS: (Complying.)	13	about in terms of how you sign. So I'm going to need
13 14	THE WITNESS: (Complying.) (Marked for identification Exhibit 24.)	13 14	about in terms of how you sign. So I'm going to need you to sign as Yvonne M. McElligott.
13 14 15	THE WITNESS: (Complying.) (Marked for identification Exhibit 24.) MS. DAO: Thank you very much for doing	13 14 15	about in terms of how you sign. So I'm going to need you to sign as Yvonne M. McElligott. A. (Complying.)
13 14 15 16	THE WITNESS: (Complying.) (Marked for identification Exhibit 24.)	13 14 15 16	about in terms of how you sign. So I'm going to need you to sign as Yvonne M. McElligott. A. (Complying.) (Marked for identification Exhibit 26.)
13 14 15 16 17	THE WITNESS: (Complying.) (Marked for identification Exhibit 24.) MS. DAO: Thank you very much for doing that.	13 14 15 16 17	 about in terms of how you sign. So I'm going to need you to sign as Yvonne M. McElligott. A. (Complying.) (Marked for identification Exhibit 26.) Q. Let me show you what has been marked as 26,
13 14 15 16 17 18	THE WITNESS: (Complying.) (Marked for identification Exhibit 24.) MS. DAO: Thank you very much for doing that. EXAMINATION	13 14 15 16 17 18	 about in terms of how you sign. So I'm going to need you to sign as Yvonne M. McElligott. A. (Complying.) (Marked for identification Exhibit 26.) Q. Let me show you what has been marked as 26, and I will represent to you that is a quit claim deed,
13 14 15 16 17 18 19	THE WITNESS: (Complying.) (Marked for identification Exhibit 24.) MS. DAO: Thank you very much for doing that. EXAMINATION BY MS. DAO:	13 14 15 16 17 18 19	about in terms of how you sign. So I'm going to need you to sign as Yvonne M. McElligott. A. (Complying.) (Marked for identification Exhibit 26.) Q. Let me show you what has been marked as 26, and I will represent to you that is a quit claim deed, true copy of a certified copy. And this quit claim
13 14 15 16 17 18 19 20	THE WITNESS: (Complying.) (Marked for identification Exhibit 24.) MS. DAO: Thank you very much for doing that. EXAMINATION BY MS. DAO: Q. I'm going to hand you what has been marked	13 14 15 16 17 18 19 20	about in terms of how you sign. So I'm going to need you to sign as Yvonne M. McElligott. A. (Complying.) (Marked for identification Exhibit 26.) Q. Let me show you what has been marked as 26, and I will represent to you that is a quit claim deed, true copy of a certified copy. And this quit claim deed was signed by you; correct?
13 14 15 16 17 18 19 20 21	THE WITNESS: (Complying.) (Marked for identification Exhibit 24.) MS. DAO: Thank you very much for doing that. EXAMINATION BY MS. DAO: Q. I'm going to hand you what has been marked as Exhibit 24, which I will represent to you, that is	13 14 15 16 17 18 19 20 21	about in terms of how you sign. So I'm going to need you to sign as Yvonne M. McElligott. A. (Complying.) (Marked for identification Exhibit 26.) Q. Let me show you what has been marked as 26, and I will represent to you that is a quit claim deed, true copy of a certified copy. And this quit claim deed was signed by you; correct? A. Yes.
13 14 15 16 17 18 19 20 21 22	THE WITNESS: (Complying.) (Marked for identification Exhibit 24.) MS. DAO: Thank you very much for doing that. EXAMINATION BY MS. DAO: Q. I'm going to hand you what has been marked as Exhibit 24, which I will represent to you, that is a copy of the certified copy of your deed of trust on	13 14 15 16 17 18 19 20 21 22	 about in terms of how you sign. So I'm going to need you to sign as Yvonne M. McElligott. A. (Complying.) (Marked for identification Exhibit 26.) Q. Let me show you what has been marked as 26, and I will represent to you that is a quit claim deed, true copy of a certified copy. And this quit claim deed was signed by you; correct? A. Yes. Q. On what date?
13 14 15 16 17 18 19 20 21 22 23	THE WITNESS: (Complying.) (Marked for identification Exhibit 24.) MS. DAO: Thank you very much for doing that. EXAMINATION BY MS. DAO: Q. I'm going to hand you what has been marked as Exhibit 24, which I will represent to you, that is a copy of the certified copy of your deed of trust on your own home.	13 14 15 16 17 18 19 20 21 22 23	 about in terms of how you sign. So I'm going to need you to sign as Yvonne M. McElligott. A. (Complying.) (Marked for identification Exhibit 26.) Q. Let me show you what has been marked as 26, and I will represent to you that is a quit claim deed, true copy of a certified copy. And this quit claim deed was signed by you; correct? A. Yes. Q. On what date? A. According to the document, January 13th,
13 14 15 16 17 18 19 20 21 22 23 24	THE WITNESS: (Complying.) (Marked for identification Exhibit 24.) MS. DAO: Thank you very much for doing that. EXAMINATION BY MS. DAO: Q. I'm going to hand you what has been marked as Exhibit 24, which I will represent to you, that is a copy of the certified copy of your deed of trust on your own home. A. Yes.	13 14 15 16 17 18 19 20 21 22 23 24	 about in terms of how you sign. So I'm going to need you to sign as Yvonne M. McElligott. A. (Complying.) (Marked for identification Exhibit 26.) Q. Let me show you what has been marked as 26, and I will represent to you that is a quit claim deed, true copy of a certified copy. And this quit claim deed was signed by you; correct? A. Yes. Q. On what date? A. According to the document, January 13th, 2010.
13 14 15 16 17 18 19 20 21 22 23	THE WITNESS: (Complying.) (Marked for identification Exhibit 24.) MS. DAO: Thank you very much for doing that. EXAMINATION BY MS. DAO: Q. I'm going to hand you what has been marked as Exhibit 24, which I will represent to you, that is a copy of the certified copy of your deed of trust on your own home.	13 14 15 16 17 18 19 20 21 22 23	 about in terms of how you sign. So I'm going to need you to sign as Yvonne M. McElligott. A. (Complying.) (Marked for identification Exhibit 26.) Q. Let me show you what has been marked as 26, and I will represent to you that is a quit claim deed, true copy of a certified copy. And this quit claim deed was signed by you; correct? A. Yes. Q. On what date? A. According to the document, January 13th,

25 (Pages 97 to 100)

Moburg, Seaton & Watkins 206-622-3110 2033 Sixth Ave., Ste. 826

Page 101 Page 103 1 A. Yes. 1 2 O. And thui is your signature? 3 3 A. Yes. 3 4 O. And you signed as "Yoone M. McElligott"? 5 5 A. Yes. Idid. 1 6 O. Just so Tracker. your maiden name is 1 7 Nave. 6 9 O. N.A-VE? 10 10 A. Gract. 10 11 O. As far as you can recall, did you ever sign 10 12 O. As far as you can recall, did you ever sign 10 13 Traste? 10 14 A. Pres. el did. 12 15 O. You mane was changed due to the murriage? 20 16 A. Yes. 20 17 Yes or no? 21 23 A. (Shaking bead). 21 24 CHERVI. MACDONALD, Court Reporter 2012 25 A. Idid not go to court and sough to 21 26 Yes or no? 23 27 Marked for identification Exhibits 27 - 30.) 3 38 I did not go to court o change my name. 1 26 CUTREVI. MACDONALD, Court Reporter 27 Marked for identification Exh				
2 0. And hat is your signature? 2 3 A. Yes. 3 4 0. And you signed as "Yoone M. McElligot"? 3 5 A. Yes. Idd. 5 6 0. Just so Im clear, your maiden name is what? 5 7 what? 6 8 A. Nave. 6 9 0. N-A-VF? 6 10 A. Correct. 10 11 Q. As far as you can recall, did you ever sign under your maiden name as an employee for Northwest imder your maiden name as an employee for Northwest imder your maiden name as an employee for Northwest imder you got married? 11 12 . Trustee? 11 13 Turstee? 11 14 A. Yes. 12 15 . Newl. May of 2004, 2005. 13 Dated this		Page 101	L	Page 103
2 Q. And that is your signature? 2 3 A. Yes. 3 4 Q. And you signed as "Yvome M. McElligott"? 4 5 A. Yes, Idd. 5 6 Q. Just so Im clear, your maiden name is what? 4 7 what? 6 8 A. Nave. 7 9 Q. N.A.V-E? 10 11 Q. As far as you can recall, did you ever sign under your maiden mame as an employse for Northwest to corrections, if any, as indicated by me on the corrections, if any, aso indicated by me on the corr	1	A. Yes.	1	DECLARATION
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4 Q. And you signed as "Yvonne M. McElligott"? 4 5 A. Yes. Idid. 5 6 Q. Just so Im clear, your maiden name is true and accurate, save and excert for changes and/or and excert for and excert fo	3			
5 A. Yes, Idid. 5 I declare under penatry of perjury that I 6 Q. Just so I'n clear, your maiden name is and accurate, save and except for changes and/or 8 A. Nave. 8 9 Q. N-A-V-E? 9 10 A. Correct. 10 11 Q. As for a syou can recall, did you ever sign 11 12 under your maiden name as an employee for Northwest 12 13 Trustee? 13 14 A. Terr at Idid. 14 15 A. Yes. 16 16 A. Yes. 16 17 Q. Approximately when did you get married? 17 18 A. Well, May of 2004, 2005. 19 19 Q. You or name was changed due to the marriage? 20 21 Q. You or name was changed due to the marriage? 21 23 A. (Shaking head.) 22 24 Q. Yes or no? 22 25 A. I did not go to court to change my name. 25 26 A. I did not go to court to change my name. 25 2 (Marked for identification Exhibits 27 - 30.)				
6 Q. Just so I'm clear, your maiden name is what? and accurate, save and except for changes and/or 7 what? and accurate, save and except for changes and/or 8 A. Nave. and accurate, save and except for changes and/or 9 Q. N-A-V-E? and accurate, save and except for changes and/or 10 A. Correct. 10 11 Q. As far as you can recall, did you ever sign under your maiden name as an employee for Northwest 11 12 under your maiden name as an employee for Northwest 12 13 Trustee? 13 14 A. Truster I did. 14 15 Q. It would have been before you got married? 14 16 A. Yes. 16 17 Q. Approximately when did you get married? 18 18 A. Well, May of 2004, 2005. 10 21 Q. You of and go in to court and sought to 21 22 A. I did not go to court to change my name. 22 23 A. I did not go to court to change my name. 21 2 G. Marked for identification Exhibits 27- 3 3 3.0.) 1 CER TIFICATE				I declare under penalty of periury that I
7 what? 7 and accurate, save and except for changes and/or 9 Q. N-A-V-E? 6 corrections, if any, as indicated by me on the 10 A. Correct. 10 11 Q. As far as you can recall, did you ever sign 10 12 under your maiden name as an employee for Northwest 12 13 Trustee? 13 14 A. Tim sure I did. 14 15 Q. Your and was changed due to the marriage? 14 16 A. Yes. 19 17 Q. Approximately when did you get married? 17 18 A. Well, May of 2004, 2005. 19 19 Q. Your and was changed due to the marriage? 20 21 Q. You did not go in to court and sought to 22 22 A. (Shaking head.) 24 24 Q. Yes or no? 24 25 A. I did not go to court to change my name. 25 26 MS. DAO: Thank you. That's all I have. 1 CERTIFICATE 2 (Marked for identification Exhibits 27 - 3) 30.) 3 STATE OF WASHINGTON) 4 10 <td></td> <td></td> <td></td> <td></td>				
8 A. Nave. 8 corrections, if any, as indicated by me on the 9 Q. N-A-V-E? 9 correction sheet hereof. 11 Q. As far as you can recall, did you ever sign 10 12 under your maiden mane as an employee for Northwest 11 13 Trustee? 13 14 A. Fm sure I did. 14 15 Q. It would have ben before you got married? 14 16 A. Yes. 16 17 Q. Approximately when did you get married? 18 18 Q. You ande was changed due to the marriage? 20 20 A. Yes. 20 21 A. Kishaking head.) 22 23 A. (Shaking head.) 24 24 Q. Yes or no? 23 25 A. I did not go to court to change my name. 25 26 CHERYL MACDONALD, Court Reporter 27 3 (0,) 4 4 (Deposition concluded at 4:14 p.m.) 5 5 COUNTY OF KING) 6 7 I, the undersigned Washington Certified Court 8 8				
9 Q. N-X-V-E? 9 correction sheet hereof. 10 A. Correct. 10 11 Q. As far as you can recall, did you ever sign under your maiden name as an employee for Northwest 11 12 Trustee? 12 14 A. Fm sure I did. 14 15 Q. It would have been before you got married? 15 16 A. Yes. 16 17 Q. Approximately when did you get married? 16 18 A. Well, May of 2004, 2005. 19 19 Q. You did not go in to court and sought to change your name? 20 23 A. (Shaking head.) 22 24 Q. Yes or no? 24 25 A. I did not go to court to change my name. 1 CERTIFICATE 2 MS. DAO: Thank you. That's all I have. (Marked for identification Exhibits 27- 330.) 3 STATE OF WASHINGTON) 4 (Deposition concluded at 4:14 p.m.) 5 COUNTY OF KING) 6 7 I, the undersinged Washington Certified Court 8 7 I. du under your marked and foregoing deposition 1 Consisting of Page 1 through 100 was taken				
10 A. Correct. 10 11 under your maiden name as an employee for Northwest 11 13 Trustee? 13 14 A. I'm sure I did. 15 15 Q. Approximately when did you get married? 16 16 A. Yes. 17 17 Q. Approximately when did you get married? 18 18 A. Well, May of 2004, 2005. 18 19 Q. Your name was changed due to the marriage? 20 20 A. Yes. 2012. 21 A. (Shaking head.) 24 25 A. I did not go to court to change my name. 2012. Page 102 Fage 102 Fage 102 Fage 104 1 MS. DAO: Thank you. That's all I have. 2 2 (Marked for identification Exhibits 27 - 3 30.) 3 4 (Deposition concluded at 4:14 p.m.) 5 5 5 COUNTY OF KING) 1 1 10 1 That the amexed and foregoing deposition 12 1 That the ama				
11 Q. As far as you can recall, did you ever sign 11 12 under your maiden name as an employee for Northwest 12 13 Trustee? 13 14 A. Pras. 14 15 Q. It would have been before you got married? 16 16 A. Yes. 16 17 Q. Approximately when did you get married? 17 18 A. Well, May of 2004, 2005. 18 19 Q. Your name was changed due to the marriage? 10 20 A. Yes. 2012. 21 Q. You did not go in to court and sought to 22 23 A. (Shaking head.) 24 24 Q. Yes or no? 24 25 A. I did not go to court to change my name. 25 CHERYL MACDONALD, Court Reporter Page 102 Page 102 Page 104 1 CERTIFICATE 2 (Marked for identification Exhibits 27-3 30.) 3 30.) STATE OF WASHINGTON) 4 (Deposition concluded at 4:14 p.m.) 5 <td< td=""><td></td><td>-</td><td></td><td>correction sheet hereor.</td></td<>		-		correction sheet hereor.
12 under your maiden name as an employee for Northwest 12 13 Trustec? 13 14 A. I'm sure I did. 14 15 Q. Ir would have been before you got married? 14 16 A. Yes. 15 17 Q. Approximately when did you get married? 16 18 A. Well, May of 2004, 2005. 18 19 Q. Your name was changed due to the marriage? 20 20 A. Yes. 20 21 A. Yes. 20 22 A. Shaking head.) 23 24 Q. Yes or no? 24 25 A. I did not go to court to change my name. 25 26 CHERYL MACDONALD, Court Reporter 27 3 30.) 24 1 MS. DAO: Thank you. That's all I have. 2 2 (Marked for identification Exhibits 27 - 3 3 30.) 5 COUNTY OF KNG) 6 7 I, the undersigned Washington Certified Court 7 B 9 24 10 0 9 11				
13 Trustee? 13 YVONNE McELLIGOTT 14 A. Fm sure I did. 14 15 Q. It would have been before you got married? 14 16 A. Yes. 16 17 Q. Approximately when did you get married? 18 18 A. Well, May of 2004, 2005. 18 19 Q. Your name was changed due to the marriage? 19 Dated thisday of, 20 You did not go in to court and sought to 22 23 23 A. (Shaking head.) 24 24 24 25 A. I did not go to court to change my name. 25 CHERYL MACDONALD, Court Reporter Page 102 Page 104 1 MS, DAO: Thank you. That's all I have. 1 C E R T I F I C A T E 2 (Marked for identification Exhibits 27 - 3 30.) 3 STATE OF WASHINGTON) 4 (Deposition concluded at 4:14 p.m.) 5 COUNTY OF KING) 6 7 I, the undersigned Washington Certified Court 8 Reporter, pursuant to RCW 5.28.010, authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify: 11 1				
14 A. I'm sure I did. 14 15 Q. I'w would have been before you got married? 14 16 A. Yes. 16 17 Q. Approximately when did you get married? 17 18 A. Well, May of 2004, 2005. 18 19 Q. Your name was changed due to the marriage? 18 20 A. Yes. 20 21 Q. You did not go in to court and sought to 21 22 23 A. (Shaking head.) 23 24 Q. Yes or no? 24 25 A. I did not go to court to change my name. 25 CHERYL MACDONALD, Court Reporter Page 102 Page 102 Page 104 1 MS. DAO: Thank you. That's all I have. 1 C E R TIFIC A T E 2 (Marked for identification Exhibits 27 - 3 30.) 3 STATE OF WASHINGTON) 4 (Deposition concluded at 4:14 p.m.) 5 COUNTY OF KING) 6 7 I. the undersigned Washington Certified Court 8 Reporter, pursuant to RCW 5.28.010, authorized to administer or oths and affirmations in and for the State of Washington, do herepy certify:				WYONNE M-ELLICOTT
15 Q. It would have been before you got married? 15 16 A. Yes. 16 17 Q. Approximately when did you get married? 18 18 A. Well, May of 2004, 2005. 18 19 Q. Your name was changed due to the marriage? 19 Dated thisday of, 20 A. Yes. 2012. 21 21 Q. You did not go in to court and sought to 22 23 A. (Shaking head.) 23 24 Q. Yes or no? 24 25 A. I did not go to court to change my name. 25 Page 102 Page 102 Page 102 1 MS. DAO: Thank you. That's all I have. 1 (Marked for identification Exhibits 27- 3 STATE OF WASHINGTON) 3 (Deposition concluded at 4:14 p.m.) 5 COUNTY OF KING) 6 7 I, the undersigned Washington Certified Court 8 7 10 11 That the anexed and foregoing deposition 12 0 9 administer oats and affirmatious in and for the State 16				Y VONNE MCELLIGUT I
16 A. Yes. 16 17 Q. Approximately when did you get married? 17 18 A. Well, May of 2004, 2005. 19 19 Q. Your name was changed due to the marriage? 19 20 A. Yes. 19 21 Q. You did not go in to court and sought to 2012. 22 23 A. (Shaking head.) 24 24 Q. Yes or no? 23 25 A. I did not go to court to change my name. 25 Page 102 Page 102 Page 102 Page 102 Page 104 1 MS. DAO: Thank you. That's all 1 have. 1 2 COUNTY OF KING 3 3 STATE OF WASHINGTON 4 4 (Deposition concluded at 4:14 p.m.) 5 5 COUNTY OF KING 6 7 I. the undersigned Washington Certified Court 8 8 Reporter, pursuant to RCW 5:28.010, authorized to a dminister coaths and affirmations in and for the State or of Washington, do hereby certify: 11 11 11 11				
17 Q. Approximately when did you get married? 17 18 A. Well, May of 2004, 2005. 18 19 Q. Your name was changed due to the marriage? 20 20 A. Yes. 20 21 Q. You did not go in to court and sought to 21 22 change your name? 23 23 A. (Shaking head.) 23 24 Q. Yes or no? 24 25 A. I did not go to court to change my name. 26 Page 102 Page 102 Page 104 1 MS. DAO: Thank you. That's all I have. 1 CERTIFICATE 2 (Marked for identification Exhibits 27- 3 30.) 4) ss. 5 COUNTY OF KING) 4) ss. COUNTY OF KING 6 7 I, the undersigned Washington Certified Court Reporter, pursuant to RCW 5.28.010, authorized to administer oaths and affirmations in and for the State of Washington, do hereby cerify: 11 11 That hannexed and foregoing deposition 12 1 That enamexed and foregoing to coyntiny to examine, read and sign after the same was transcrib		••••		
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19 Q. Your name was changed due to the marriage? 19 Dated thisday of, 2012. 20 A. Yes. 2012. 2012. 21 Q. You did not go in to court and sought to 21 22 change your name? 23 23 A. (Shaking head.) 23 24 Q. Yes or no? 24 25 A. I did not go to court to change my name. 25 Page 102 Page 102 Page 104 1 MS. DAO: Thank you. That's all I have. 1 CERTIFICATE 2 (Marked for identification Exhibits 27-3 30.) 3 STATE OF WASHINGTON) 4 (Deposition concluded at 4:14 p.m.) 4)ss. 5 5 COUNTY OF KING) 6 7 I, the undersigned Washington Certified Court 8 administer oaths and affirmations in and for the State of Washington, do hereby certify: 11 That the annexed and foregoing deposition 12 consisting of Page 1 through 100 was taken 12 13 stenographically before me and reduced to a typed 16 14 format	17			
20A. Yes.202012.21Q. You did not go in to court and sought to change your name?212123A. (Shaking head.)2324Q. Yes or no?2325A. I did not go to court to change my name.25Page 102Page 102Page 1041MS. DAO: Thank you. That's all I have.2(Marked for identification Exhibits 27 - 3 30.)34(Deposition concluded at 4:14 p.m.)1C E R T I F I C A T E563STATE OF WASHINGTON)4(Deposition concluded at 4:14 p.m.)5COUNTY OF KING)6667I, the undersigned Washington Certified Court8Reporter, pursuant to RCW 5:28.010, authorized to administer oaths and affirmations in and for the State100Washington, do hereby certify:1111That the annexed and forcegoing deposition1213stenographically before me and reduced to a typed14141415I further certify that according to CR 30(e) the witness was given the opportunity to examine, read and sign after the same was transcribed, unless indicated191I further certify that all objections made at the under manner of taking the deposition, or to the conduct of any party, have been noted by me upon said deposition; 2313242425	18			
21 Q. You did not go in to court and sought to 21 22 change your name? 22 23 A. (Shaking head.) 24 24 Q. Yes or no? 24 25 A. I did not go to court to change my name. 24 Page 102 Page 102 Page 104 1 MS. DAO: Thank you. That's all I have. 1 C E R T I FI C A T E 2 (Marked for identification Exhibits 27 - 30.) 3 STATE OF WASHINGTON) 3 4 (Deposition concluded at 4:14 p.m.) 4)ss. 5 COUNTY OF KING) 6 7 I, the undersigned Washington Certified Court 8 Reporter, pursuant to RCW 5:28.010, authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify: 11 That the annexed and foregoing deposition 12 consisting of Page 1 through 100 was taken 13 14 14 format under my direction; 11 That the annexed and foregoing to cold through 100 was taken 14 14 14 format under my direction; 1 1 15 If urther certify that according to CR 30(e) t	19	Q. Your name was changed due to the marriage?		-
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23 A. (Shaking head.) 23 24 Q. Yes or no? 24 25 A. I did not go to court to change my name. 23 24 Q. Yes or no? 24 25 A. I did not go to court to change my name. 24 26 CHERYL MACDONALD, Court Reporter 1 MS. DAO: Thank you. That's all I have. 1 2 (Marked for identification Exhibits 27 - 3 3 30.) 4 (Deposition concluded at 4:14 p.m.) 5 6 7 I, the undersigned Washington Certified Court 8 Reporter, pursuant to RCW 5:28:010, authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify: 11 That the annexed and foregoing deposition 12 consisting of Page 1 through 100 was taken 13 13 stengaraphically before me and reduced to a typed 14 14 16 17 15 I further certify that according to CR 30(e) the 14 14 17 15 16 17 16 18 19 17 19 11	21	Q. You did not go in to court and sought to	21	
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25A. I did not go to court to change my name.25CHERYL MACDONALD, Court ReporterPage 1021MS. DAO: Thank you. That's all I have.1CERTIFICATE2(Marked for identification Exhibits 27 -330.)4(Deposition concluded at 4:14 p.m.)1CUNTY OF KING5671, the undersigned Washington Certified Court899671, the undersigned Washington Certified Court889967101That the annexed and foregoing deposition121That the annexed and foregoing deposition1313stenographically before me and reduced to a typed14161615I further certify that according to CR 30(e) the1616witness was given the opportunity to examine, read and171If urber certify that all objections made at the1819120212121233123312432	23	A. (Shaking head.)	23	
Page 102Page 1041MS. DAO: Thank you. That's all I have.1CERTIFICATE2(Marked for identification Exhibits 27 -330.)3330.)3STATE OF WASHINGTON)44(Deposition concluded at 4:14 p.m.)4) ss.5COUNTY OF KING)677I, the undersigned Washington Certified Court88Reporter, pursuant to RCW 5:28.010, authorized to99administer oaths and affirmations in and for the State1010That the annexed and foregoing deposition1211That the annexed and foregoing deposition1212consisting of Page 1 through 100 was taken1313stenographically before me and reduced to a typed1416in the rectify that according to CR 30(e) the1616in the rectify that all objections made at the191further certify that all objections or the212223232424	24	Q. Yes or no?	24	
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2(Marked for identification Exhibits 27 - 30.)2330.)34(Deposition concluded at 4:14 p.m.)455COUNTY OF KING6671, the undersigned Washington Certified Court889696107111012101311141215111612171318131914191619161017151516161716181719161017121113131417151516161716181719161916202021212222232324242424		Page 102	2	Page 104
2(Marked for identification Exhibits 27 - 30.)2 3330.)3STATE OF WASHINGTON)4(Deposition concluded at 4:14 p.m.)4) ss.55COUNTY OF KING)66671, the undersigned Washington Certified Court88Reporter, pursuant to RCW 5.28.010, authorized to administer oaths and affirmations in and for the State1010of Washington, do hereby certify:1111That the annexed and foregoing deposition consisting of Page 1 through 100 was taken1313stenographically before me and reduced to a typed1414format under my direction;1515I further certify that according to CR 30(e) the witness was given the opportunity to examine, read and sign after the same was transcribed, unless indicated1819I further certify that all objections made at the time of said examination to my qualifications or the amaner of taking the deposition, or to the conduct of any party, have been noted by me upon said deposition;232424employee of any such attorney or counsel, and that I	1	MS DAO: Thank you That's all I have		CERTIFICATE
330.)3STATE OF WASHINGTON)4(Deposition concluded at 4:14 p.m.)4) ss.5COUNTY OF KING)66677I, the undersigned Washington Certified Court88Reporter, pursuant to RCW 5.28.010, authorized to90administer oaths and affirmations in and for the State1010of Washington, do hereby certify:1111That the annexed and foregoing deposition1212consisting of Page 1 through 100 was taken1313stenographically before me and reduced to a typed1414format under my direction;1515I further certify that according to CR 30(e) the1616witness was given the opportunity to examine, read and17sign after the same was transcribed, unless indicated18in the record that the review was waived;19I further certify that all objections made at the202021222223232424				CERTIFICATE
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24 employee of any such attorney or counsel, and that I	11 12 13 14 15 16 17 18 19 20 21		11 12 13 14 15 16 17 18 19 20 21	of Washington, do hereby certify: That the annexed and foregoing deposition consisting of Page 1 through 100 was taken stenographically before me and reduced to a typed format under my direction; I further certify that according to CR 30(e) the witness was given the opportunity to examine, read and sign after the same was transcribed, unless indicated in the record that the review was waived; I further certify that all objections made at the time of said examination to my qualifications or the manner of taking the deposition, or to the conduct of
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25 am not financially interested in said action or the	11 12 13 14 15 16 17 18 19 20 21 22 23		11 12 13 14 15 16 17 18 19 20 21 22	of Washington, do hereby certify: That the annexed and foregoing deposition consisting of Page 1 through 100 was taken stenographically before me and reduced to a typed format under my direction; I further certify that according to CR 30(e) the witness was given the opportunity to examine, read and sign after the same was transcribed, unless indicated in the record that the review was waived; I further certify that all objections made at the time of said examination to my qualifications or the manner of taking the deposition, or to the conduct of any party, have been noted by me upon said deposition; I further certify that I am not a relative or
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26 (Pages 101 to 104)

Moburg, Seaton & Watkins 206-622-3110 2033 Sixth Ave., Ste. 826

	Page 105	Page	107
1	outcome thereof;	JANET REINER,	
2	I further certify that the witness before) Plaintiff,) NO. 11-2-02029-8	
3	examination was by me duly sworn to testify to the) vs.) NOTICE OF READINESS	
4	truth, the whole truth and nothing but the truth;) OF DEPOSITION FOR NORTHWEST TRUSTEE SERVICE) READING AND SIGNING	
5	I further certify that the deposition, as) Defendant.)	
6	transcribed, is a full, true and correct transcript of) TO: Yvonne McElligott)	
7	the testimony, including questions and answers, and	c/o Heidi Buck Morrison 13555 SE 36th St. #300	
8	all objections, motions, and exceptions of counsel	Bellevue, WA 98006	
9	made and taken at the time of foregoing examination	NOTICE IS HEREBY GIVEN that the transcript of your	
10	and was prepared pursuant to Washington Administrative	deposition given in the above entitled cause is ready	
11	Code 308-14-135, the transcript preparation format	for your reading and signing at MOBURG SEATON &	
12	guideline;	WATKINS, 2033 Sixth Avenue, Suite 826, Seattle,	
13	I further certify that I am sealing the	Washington 98121. You must, within thirty (30) days	
14	deposition in an envelope with the title of the above	from the date of this notice, read and sign the	
15	cause and the name of the witness visible, and I am	deposition or state in writing your reason for refusal	
16	delivering the same to the appropriate authority;	to sign, or state in writing the fact that you waive	
17		your right to sign; failing to do so, signature shall	
18	IN WITNESS WHEREOF, I have hereunto set my hand,	be deemed for all purposes waived, and your deposition	
19	and affixed my official seal this 31st day of	will be sent to the ordering party for retention until	
20	December 2012.	time of trial.	
21	Chiryl Macdread Swar	DATED at Seattle, Washington this December 31, 2012.	
22	Certified Court Reporter No. 2498	CC: Ha Dao By: CHERYL MACDONALD, CCR	
23	in and for the State of	Moburg Seaton & Watkins	
24	Washington, residing at Shoreline,	2033 Sixth Avenue, Suite 826 Seattle, Washington 98101	
25	Washington.	206-622-3110 FAX 206-343-2272 MOBURG SEATON & WATKINS (206)622-3110	
	Page 106	Page	108
	MOBURG SEATON & WATKINS	1	
	COURT REPORTERS	1	
	2033 SIXTH AVENUE, SUITE 826	2 3	
	SEATTLE, WA 98121	4	
	206-622-3110	5	
	PLEASE MAKE ALL CHANGES OR CORRECTIONS ON THIS SHEET,	6	
	SHOWING PAGE, LINE, AND REASON, IF ANY. SIGN THIS	7	
	SHEET, SIGN THE ACCOMPANYING SIGNATURE SHEET AND RETURN AS PER INSTRUCTIONS IN COVER LETTER.	8	
	RETURN AS FER INSTRUCTIONS IN COVER LETTER.	9	
	PAGE LINE CORRECTION AND REASON	10	
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	DEDORTED CHEDNE MACDONALD	24	
	REPORTER: CHERYL MACDONALD	25	
	REPORTER: CHERYL MACDONALD	25	

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27 (Pages 105 to 108)