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8 Attorney for Plaintiffs

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF LOS ANGELES**

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PLAINTIFFS,

vs.

**PLAINTIFF'S FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO SPECIALIZED LOAN SERVICING,
LLC**

SPECIALIZED LOAN SERVICING, LLC;
MTC FINANCIAL INC., DBA TRUSTEE
CORPS; U.S. BANK NATIONAL
ASSOCIATION AS INDENTURE
TRUSTEE, ON BEHALF OF THE
HOLDERS OF THE TERWIN MORTGAGE
TRUST 2007-QHL1 ASSET-BACKED
SECURITIES, SERIES 2007-QHL1,
WITHOUT RECOURSE; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC.;; ALL PERSONS UNKNOWN,
CLAIMING ANY LEGAL OR EQUITABLE
RIGHT, TITLE, ESTATE, LIEN, OR
INTEREST IN THE PROPERTY
DESCRIBED IN THE COMPLAINT
ADVERSE TO PLAINTIFFS' TITLE, OR
ANY CLOUD ON PLAINTIFFS' TITLE
THERE TO; and DOES 1-20, INCLUSIVE,

DEFENDANTS.

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

2 PROPOUNDING PARTY: PLAINTIFF

3 RESPONDING PARTY: DEFENDANT SPECIALIZED LOAN SERVICING,
4 LLC.

5 Plaintiff (“Plaintiff”) hereby requests that Defendant SPECIALIZED LOAN
6 SERVICING, LLC (“Defendant” or “YOU”) produce the following items, papers, documents
7 and materials now in YOUR possession or under YOUR control and to permit the reproduction
8 of the originals thereof (or copies if the originals cannot be produced) pursuant to CCP Section
9 2031.010 et seq. The items hereinafter requested shall be produced at 10:00 a.m., on, at 620 N.
10 Brand Blvd., Ste. 405, Glendale, CA 91203.

11 **INSTRUCTIONS FOR COMPLIANCE WITH THIS REQUEST**

12 A. As used throughout this set of requests, the term “writing” refers to papers,
13 books, records, files, letters, memoranda, contracts, invoices, change orders, photostatic copies,
14 magnetic or electrical impulse or any other form of communication is recorded or reproduced
15 and includes anything covered by Section 250 of the California Evidence Code.

16 B. The term “document” or “documents” shall mean all written or graphic materials,
17 however produced or reproduced, in your actual or constructive possession, care, custody or
18 control or of any of the officers, directors, representatives, members, agents or employees of
19 their related corporations, enumerated under “documents requested,” including but not limited to
20 files, letters, contracts, agreements, telegrams, memoranda, notes, reports, applications,
21 correspondence, sound recordings or tapes of any conversation or meeting or conference,
22 minutes of meetings, handwritten memorandums or notes, interoffice communications,
23 summaries, logs, or any other printed, typewritten or handwritten material of any nature similar
24 to the foregoing, however denominated, including all drafts and carbon or photographic copies
25 of any such material.

26 C. The term “Subject Property” shall mean the property commonly known as.

27 D. The listing of any specific document or writing or categories of documents or
28 writings following any general request herein shall be solely by way of example and shall not be
deemed to limit the generality of any such request.

E. The request for any documents or writings which relate or refer to any subject
shall be deemed to request any document or writing which deals with, relates to or refers in any
way whatsoever, either directly or indirectly, to that subject.

1 F. In complying with this request, you are required to furnish all the items asked for
2 which are available to you. This would include items in the possession or control of other
3 persons directly or indirectly employed by, or connected with, you or your attorney or your
4 insurance carriers or anyone subject to your control of anyone else acting in your behalf.

5 G. In complying with this request, you must make a diligent search of the records,
6 papers, and materials in your possession or available to you.

7 H. In any requested document or writing is known to have existed by no longer
8 exists or is no longer in your possession or control, identify its last known custodian and state
9 the date upon which it was lost or destroyed or became unavailable, or if the document or
10 writing still exists, identify its present custodian and location.

11 I. If you cannot obtain the requested items in time to comply with this request, you
12 may ask for an extension of time, explaining the circumstances and explaining what is being
13 done to obtain the requested items.

14 J. If you can only produce copies but not originals, you must provide an explanation
15 as to the absence of the originals.

16 K. If privilege is claimed as to any requested document or writing, state the author or
17 recipient of said document, the date of said document or writing, describe the nature of the
18 document or writing, and specify the privilege claimed.

19 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

20 **REQUEST FOR PRODUCTION NO. 1:**

21 All documents which establish that U.S. BANK NATIONAL ASSOCIATION AS
22 INDENTURE TRUSTEE, ON BEHALF OF THE HOLDERS OF THE TERWIN MORTGAGE
23 TRUST 2007-QHL1 ASSET-BACKED SECURITIES, SERIES 2007-QHL1, WITHOUT
24 RECOURSE was the legal, beneficial or equitable owner of the promissory note that is the
25 subject of this action at the time of the non-judicial foreclosure of the Subject Property.

26 **REQUEST FOR PRODUCTION NO. 2:**

27 The original promissory note signed by Plaintiffs in this matter.

28 **REQUEST FOR PRODUCTION NO. 3:**

A copy of the original promissory note signed by Plaintiffs in this matter.

REQUEST FOR PRODUCTION NO. 4:

All Powers of Attorney for any person signing any of the documents requested herein.

REQUEST FOR PRODUCTION NO. 5:

1 All documents that purport to grant authority to any person to sign any of the documents
2 referred to herein.

3 **REQUEST FOR PRODUCTION NO. 6:**

4 The notary registration book for any public notary who certified the signature of any
5 person on any document referred to herein.

6 **REQUEST FOR PRODUCTION NO. 7:**

7 All documents that establish U.S. BANK NATIONAL ASSOCIATION AS
8 INDENTURE TRUSTEE, ON BEHALF OF THE HOLDERS OF THE TERWIN MORTGAGE
9 TRUST 2007-QHL1 ASSET-BACKED SECURITIES, SERIES 2007-QHL1, WITHOUT
10 RECOURSE standing to foreclose on the Subject Property, including but not limited to:

11 A. Copies of all contracts, documents, agreements and other disclosure forms,
12 written communications, notes, memoranda and records concerning the note and mortgage that
13 are the subject of this action, including attorney fee contracts.

14 B. Copies of all receipts for payments made by or to and/or received by YOU
15 concerning the note and mortgage that are the subject of this action.

16 **REQUEST FOR PRODUCTION NO. 8:**

17 All documents that establish the identity of the servicer of Plaintiffs' mortgage loan that
18 is the subject of this action.

19 **REQUEST FOR PRODUCTION NO. 9:**

20 All contracts between YOU and any person or entity regarding the servicing of the deed
21 of trust and/or note at issue in this matter.

22 **REQUEST FOR PRODUCTION NO. 10:**

23 All assignments, transfers, allonge, or other documents evidencing a transfer, sale or
24 assignment of Plaintiffs' note, deed of trust, monetary instrument or other document that secured
25 payment by Plaintiffs of the loan at issue in this matter from the inception of the mortgage loan
26 to the present date including any such assignment on MERS. If none, state "none".

27 **REQUEST FOR PRODUCTION NO. 11:**

28 All electronic transfers, assignments and sales of Plaintiffs' note/asset, mortgage, deed of
trust or other security instrument.

REQUEST FOR PRODUCTION NO. 12:

All original and intervening Assignments showing a complete chain of assignments from
the originator to the person assigning the deed of trust and note to U.S. BANK NATIONAL

1 ASSOCIATION AS INDENTURE TRUSTEE, ON BEHALF OF THE HOLDERS OF THE
2 TERWIN MORTGAGE TRUST 2007-QHL1 ASSET-BACKED SECURITIES, SERIES 2007-
3 QHL1, WITHOUT RECOURSE.

4 **REQUEST FOR PRODUCTION NO. 13:**

5 All original and intervening receipts of delivery and acceptance of each note showing a
6 complete chain of such receipts from the originator to the person accepting the document for
7 U.S. BANK NATIONAL ASSOCIATION AS INDENTURE TRUSTEE, ON BEHALF OF
8 THE HOLDERS OF THE TERWIN MORTGAGE TRUST 2007-QHL1 ASSET-BACKED
9 SECURITIES, SERIES 2007-QHL1, WITHOUT RECOURSE.

10 **REQUEST FOR PRODUCTION NO. 14:**

11 All original and intervening endorsements showing a complete chain of endorsements
12 from the originator to the person endorsing Plaintiffs' note to U.S. BANK NATIONAL
13 ASSOCIATION AS INDENTURE TRUSTEE, ON BEHALF OF THE HOLDERS OF THE
14 TERWIN MORTGAGE TRUST 2007-QHL1 ASSET-BACKED SECURITIES, SERIES 2007-
15 QHL1, WITHOUT RECOURSE.

16 **REQUEST FOR PRODUCTION NO. 15:**

17 All documents relating to the transfer and assignment of Plaintiffs' deed of trust and
18 promissory note from the originator of the underlying mortgage note to the depositor for the
19 securitized trust known as THE HOLDERS OF THE TERWIN MORTGAGE TRUST 2007-
20 QHL1 ASSET-BACKED SECURITIES, SERIES 2007-QHL1, WITHOUT RECOURSE Trust
21 ("the Trust") so as to show a complete chain of transfers and assignments from the originator to
22 the person so endorsing to U.S. BANK NATIONAL ASSOCIATION AS INDENTURE
23 TRUSTEE, ON BEHALF OF THE HOLDERS OF THE TERWIN MORTGAGE TRUST
24 2007-QHL1 ASSET-BACKED SECURITIES, SERIES 2007-QHL1, WITHOUT RECOURSE
25 (the Trustee for the Trust).

26 **REQUEST FOR PRODUCTION NO. 16:**

27 All documents relating to the endorsement and delivery of Plaintiff's mortgage note from
28 the originator there to the depositor for THE HOLDERS OF THE TERWIN MORTGAGE
TRUST 2007-QHL1 ASSET-BACKED SECURITIES, SERIES 2007-QHL1, WITHOUT
RECOURSE Trust ("the Trust") so as to show a complete chain of endorsements and signed
delivery receipts from the originator to the person so endorsing to U.S. BANK NATIONAL
ASSOCIATION AS INDENTURE TRUSTEE, ON BEHALF OF THE HOLDERS OF THE

1 TERWIN MORTGAGE TRUST 2007-QHL1 ASSET-BACKED SECURITIES, SERIES 2007-
2 QHL1, WITHOUT RECOURSE (the Trustee for the Trust).

3 **REQUEST FOR PRODUCTION NO. 17:**

4 All documents relating to the endorsement and delivery of Plaintiffs' mortgage note from
5 the depositor for THE HOLDERS OF THE TERWIN MORTGAGE TRUST 2007-QHL1
6 ASSET-BACKED SECURITIES, SERIES 2007-QHL1, WITHOUT RECOURSE Trust ("the
7 Trust") to the Trustee for the Trust or YOU so as to show a complete chain of endorsements and
8 signed delivery receipts from the depositor for the Trust to the Trustee for the Trust.

9 **REQUEST FOR PRODUCTION NO. 18:**

10 All documents which relate to, refer to or evidence any and all electronic transfers,
11 assignments and sales of the note or asset, mortgage, deed of trust or other security instrument.
12 If none, state "none".

13 **REQUEST FOR PRODUCTION NO. 19:**

14 All documents (including all computer or digital media-stored data) relating to Plaintiffs,
15 the Subject Property, and the subject transaction and/or account, or which are indexed, filed or
16 retrievable under their name or any number, symbol, designation or code (such as a transaction
17 number or Social Security number) assigned to them or to the subject transaction(s), including
18 but not limited to all documents relating to the origination, approval, disbursement, assignment
19 and administration of the loan(s), all agreements, and all correspondence related to the subject
20 transaction.

21 **REQUEST FOR PRODUCTION NO. 20:**

22 All documents relating or referring to YOUR policy and practice relating to the
23 origination, approval or underwriting, preparation, disbursement and acceptance of assignment
24 of a residential mortgage loan such as the subject transaction(s), including but not limited to all
25 agreements with brokers, lenders, title companies, assignors, etc.; and all instructions, policy and
26 procedure manuals, memoranda and guidelines given to brokers, title companies, lenders,
27 closing agents, and/or any persons who review account files for approval and/or acceptance of
28 assignment.

REQUEST FOR PRODUCTION NO. 21:

All documents, records and transaction books maintained by YOU for the mortgage loan
at issue in this matter.

REQUEST FOR PRODUCTION NO. 22:

1 All correspondence by and between YOU and either of the Plaintiffs to this action.

2 **REQUEST FOR PRODUCTION NO. 23:**

3 All correspondence by and between YOU and any Defendant to this action with regard
4 to the subject mortgage loan.

5 **REQUEST FOR PRODUCTION NO. 24:**

6 All sales contracts, servicing agreements, assignments, allonges, transfers,
7 indemnification agreements, recourse agreements and any agreement related to this account
8 from the inception of this account to the present date.

9 **REQUEST FOR PRODUCTION NO. 25:**

10 The outside and inside front and back of the file folder for Plaintiffs' loan account.

11 **REQUEST FOR PRODUCTION NO. 26:**

12 The entire loan file related to Plaintiffs' loan for the Subject Property.

13 **REQUEST FOR PRODUCTION NO. 27:**

14 All documents and records, electronic or otherwise, of assignments of this mortgage,
15 monetary instrument or servicing rights to this mortgage including any such assignments on
16 MERS.

17 **REQUEST FOR PRODUCTION NO. 28:**

18 The Federal National Mortgage Association (Fannie Mae), Federal Home Loan
19 Mortgage Corporation (Freddie Mac), Housing and Urban Development (HUD) Family
20 Servicing Guidelines or any other servicing guidelines used for the servicing of Plaintiffs'
21 mortgage loan.

22 **REQUEST FOR PRODUCTION NO. 29:**

23 The Investor Loss Mitigation and Loan Modification Guidelines related to Plaintiffs'
24 mortgage loan.

25 **REQUEST FOR PRODUCTION NO. 30:**

26 All documents recording, reflecting or otherwise relating to visits which YOU or YOUR
27 agents made to the Subject Property.

28 **REQUEST FOR PRODUCTION NO. 31:**

All account servicing transaction records, ledgers, registers and similar items detailing
how Plaintiffs' account has been serviced from the inception of the account to the present date.
If none, state "none".

REQUEST FOR PRODUCTION NO. 32:

1 All letters, statements and documents sent to YOU by previous servicers, sub-servicers
2 or others in the account file. If none, state “none”.

3 **REQUEST FOR PRODUCTION NO. 33:**

4 Each and every canceled check, money order, draft, debit or credit notice issued to any
5 servicers of Plaintiffs’ account for payment of any monthly payment, other payment, escrow
6 charge, fee or expense on the account. If none, state “none”.

7 **REQUEST FOR PRODUCTION NO. 34:**

8 All account servicing records, payment payoffs, payoff calculations, ARM audits,
9 interest rate adjustments, payments records, transaction histories, account histories, accounting
10 records, ledgers, and documents that relate to the accounting of Plaintiffs’ account from the
11 inception of the account to the present date. If none, state “none”.

12 **REQUEST FOR PRODUCTION NO. 35:**

13 All data, information, notations, text, figures and information contained in your mortgage
14 servicing and accounting computer systems including, but not limited to Alltel or Fidelity CPI
15 system, or any other similar mortgage servicing software used by you, any servicers, or sub-
16 servicers of Plaintiffs’ mortgage account from the inception of Plaintiffs’ account to the present
17 date. If none, state “none”.

18 **REQUEST FOR PRODUCTION NO. 36:**

19 All descriptions and legends of all Codes used in YOUR mortgage servicing and
20 accounting system so as to enable the examiners and auditors and experts retained to audit and
21 review this mortgage account to properly carry on their work. If none, state “none”.

22 **REQUEST FOR PRODUCTION NO. 37:**

23 All account servicing transaction records, ledgers, registers and similar items detailing
24 how Plaintiffs’ account was serviced from the inception of the account to the present date. If
25 none, state “none”.

26 **REQUEST FOR PRODUCTION NO. 38:**

27 All records for any custodial accounts used for any purpose in connection with Plaintiffs’
28 mortgage loan including the date, amount and source of all deposits in such accounts and the
date, amount and purpose for all disbursements including the name and address of any party
who received any such disbursement.

REQUEST FOR PRODUCTION NO. 39:

1 All documents and records related to all servicer advances made by any servicer of
2 Plaintiffs' mortgage loan.

3 **REQUEST FOR PRODUCTION NO. 40:**

4 All documents and records related to all non-recoverable advances made by any servicer
5 of Plaintiffs' mortgage loan.

6 **REQUEST FOR PRODUCTION NO. 41:**

7 A complete and itemized statement from the date of the origination of Plaintiffs' loan to
8 the present of any fees incurred to modify, extend, or amend the loan or to defer any payment
9 due under the terms of the loan.

10 **REQUEST FOR PRODUCTION NO. 42:**

11 All collection notes, reports, memos, statements, entries, data records, computer records,
12 daily records, calendar reports, default reports, collection contacts, collection reports or other
13 documents generated in connection with the servicing of Plaintiffs' mortgage loan.

14 **REQUEST FOR PRODUCTION NO. 43:**

15 All documents which relate to, refer to or evidence any and all civil actions, adversary
16 proceedings, arbitrations, or administrative proceedings that have been filed against YOU at any
17 time in the past 60 months for any alleged misconduct related to mortgage servicing or
18 foreclosures.

19 **REQUEST FOR PRODUCTION NO. 44:**

20 Any and all correspondence, transfers, documents to or from Fannie Mae and/or Freddie
21 Mac in connection with Plaintiffs' mortgage loan.

22 **REQUEST FOR PRODUCTION NO. 45:**

23 Any and all letters, statements and documents contained in Plaintiffs' account file or
24 imaged by YOU, any servicers or sub-servicers of the mortgage from the inception of the
25 account to the present date.

26 **REQUEST FOR PRODUCTION NO. 46:**

27 All written property inspection reports and property preservation reports related to the
28 Subject Property, including all digital photographs or other images of the real property.

REQUEST FOR PRODUCTION NO. 47:

All bills and invoices for property inspections for the Subject Property and copies of the
front and back of all checks in payment thereof or all confirmed wire transfers in payments
thereof.

1 **REQUEST FOR PRODUCTION NO. 48:**

2 All invoices for each charge such as inspection fees, BPOs, appraisal fees, attorney fees,
3 insurance, taxes, assessments or any expense which was charged to Plaintiffs' mortgage account
4 from the inception of this account to the present date.

5 **REQUEST FOR PRODUCTION NO. 49:**

6 A statement of the past due scheduled principal payments, together with interest thereon
7 at the contract rate, past due taxes, hazard insurance, mortgage insurance premiums, late fees or
8 charges, homeowners association dues, and any other assessments in connection with Plaintiffs'
9 mortgage loan.

10 **REQUEST FOR PRODUCTION NO. 50:**

11 An itemized statement of all of the filing fees, service fees, postage, advertising and
12 publication expenses and reasonable attorney fees actually incurred with respect to any and all
13 foreclosure proceedings regarding the Subject Property. Such attorney time records should be
14 itemized by the date and nature of the service and the time devoted to each service. You should
15 also produce the front and back of each and every canceled check in payment of each invoice for
16 the charges described herein along with a copy of each respective bill, statement and invoice.

17 **REQUEST FOR PRODUCTION NO. 51:**

18 An itemized statement of all attorneys' fees incurred at any time since the origination of
19 Plaintiffs' loan and describe the date and nature of all such services, attaching copies of all bills
20 and invoices, and attach all canceled checks in payment thereof. Also, please attach all emails
21 or electronic messages using NewTrak or any similar communication system regarding such
22 fees and charges.

23 **REQUEST FOR PRODUCTION NO. 52:**

24 A complete and itemized statement from the date of the origination of Plaintiffs' loan to
25 the present of any property inspection fees, property preservation fees, broker opinion fees,
26 appraisal fees, bankruptcy monitoring fees, or other similar fees or expenses related in any way
27 to this loan.

28 **REQUEST FOR PRODUCTION NO. 53:**

A complete and itemized statement of any late charges to Plaintiffs' loan from the date of
the origination of the loan to the present.

REQUEST FOR PRODUCTION NO. 54:

1 A complete and itemized statement of any and all arrears including each month in which
2 the default occurred, and the amount of each monthly default.

3 **REQUEST FOR PRODUCTION NO. 55:**

4 All invoices for each charge such as inspection fees, BPO s, appraisal fees, attorney fees,
5 insurance, taxes, assessments or any expense which has been charged to Plaintiffs' mortgage
6 account from the inception of the account to the present date. If none, state "none".

7 **REQUEST FOR PRODUCTION NO. 56:**

8 All checks used to pay invoices for each charge such as inspection fees, BPO s, appraisal
9 fees, attorney fees, insurance, taxes, assessments or any expense which has been charged to
10 Plaintiffs' account from the inception of the account to the present date. If none, state "none".

11 **REQUEST FOR PRODUCTION NO. 57:**

12 Each and every canceled check, draft or debit notice issued for payment of closing costs,
13 fees and expenses, listed on any and all disclosure statements including, but not limited to,
14 appraisal fees, inspection fees, title searches, title insurance fees, credit life insurance premiums,
15 hazard insurance premiums, commissions, attorney fees, points, etc., on Plaintiffs' account.

16 **REQUEST FOR PRODUCTION NO. 58:**

17 All invoices and detailed billing statements from any law firm or attorney that has billed
18 such fees that have been assessed or collected from Plaintiffs' account from the inception to the
19 present date.

20 **REQUEST FOR PRODUCTION NO. 59:**

21 All agreements, contracts and understandings with vendors that have been paid for any
22 charge on Plaintiffs' account from the inception of the account to the present date. If none, state
23 "none".

24 **REQUEST FOR PRODUCTION NO. 60:**

25 All property inspection reports, appraisals, BPO s and reports done on the Subject
26 Property. If none, state "none".

27 **REQUEST FOR PRODUCTION NO. 61:**

28 All documents that reflect or relate to fees, commissions or other payments made to
anyone in connection with Plaintiffs' loan, including but not limited to, contracts, bills,
cancelled checks and other back-up documentation for such payment.

REQUEST FOR PRODUCTION NO. 62:

1 All documents relating to any fees, commission or payments received by YOU in
2 connection with Plaintiffs' loan.

3 **REQUEST FOR PRODUCTION NO. 63:**

4 All bills and invoices for property inspections for the Subject Property and copies of the
5 front and back of all checks in payment thereof or all confirmed wire transfers in payments
6 thereof.

7 **REQUEST FOR PRODUCTION NO. 64:**

8 Any and all invoices and detailed billing statements from any law firm or attorney that
9 has billed fees that have been assessed to or collected from Plaintiffs' account from the inception
10 to the present date.

11 **REQUEST FOR PRODUCTION NO. 65:**

12 All telephone log sheets, internal memoranda, notes or other documents prepared or
13 reflecting activity on Plaintiffs' account in connection with his loan transaction.

14 **REQUEST FOR PRODUCTION NO. 66:**

15 Each and every check issued or received in connection with Plaintiffs' loan.

16 **REQUEST FOR PRODUCTION NO. 67:**

17 All payment receipts, checks, money orders, drafts, automatic debits and written
18 evidence of payments made by Plaintiffs or others on Plaintiffs' account.

19 **REQUEST FOR PRODUCTION NO. 68:**

20 A complete and itemized statement of the loan transactional history from the date of the
21 origination of Plaintiffs' loan to the present including, but not limited to, all receipts by way of
22 payment or otherwise and all charges to the loan in whatever form. This history should include
23 the date of each and every debit and credit to any account related to this loan, the nature and
24 purpose of each such debit and credit, and the name and address of the payee of any type of
25 disbursement related to this account.

26 **REQUEST FOR PRODUCTION NO. 69:**

27 All checks and/or wire transfers to any party issued from funds received from any party
28 in connection with Plaintiffs' mortgage loan.

REQUEST FOR PRODUCTION NO. 70:

A complete and itemized statement from the date of the origination of Plaintiffs' loan to
the present of any and all debits and credits to any suspense accounts or any other suspense
account entries related in any way to his loan.

1 **REQUEST FOR PRODUCTION NO. 71:**

2 All digital and numerical codes associated with the loan transaction history for Plaintiffs'
3 loan along with all definitions associated with each such code so as to make the history legible
4 and understandable. Also, state the name of the software system YOU use, the version, and the
5 name and address of the software provider.

6 **REQUEST FOR PRODUCTION NO. 72:**

7 All account servicing records, payment payoffs, payoff calculations, ARM audits,
8 interest rate adjustments, payment records, transaction histories, account histories, accounting
9 records, ledgers, and documents that relate to the accounting of Plaintiffs' account from the
10 inception of his account to the present date. If none, state "none".

11 **REQUEST FOR PRODUCTION NO. 73:**

12 All payment receipts, checks, money orders, drafts, automatic debits and written
13 evidence of payments made by Plaintiffs' or others on his account. If none, state "none".

14 **REQUEST FOR PRODUCTION NO. 74:**

15 Each and every canceled check, draft or debit notice issued for payment of closing costs,
16 fees and expenses listed on any and all disclosure statements including, but not limited to,
17 appraisal fees, inspection fees, title searches, title insurance fees, credit life insurance premiums,
18 hazard insurance premiums, commissions, attorney fees, points, etc. If none, state "none".

19 **REQUEST FOR PRODUCTION NO. 75:**

20 All escrow analyses conducted on Plaintiffs' account from the inception of the account
21 until the present date. If none, state "none".

22 **REQUEST FOR PRODUCTION NO. 76:**

23 All MORTGAGE ELECTRONIC REGISTRATIONS SYSTEMS, INC. (MERS)
24 documents related to Plaintiffs' loan, including the MIN number.

25 **REQUEST FOR PRODUCTION NO. 77:**

26 Any and all communications and/or documents evidencing instructions and/or directions
27 that YOU received concerning the non-judicial foreclosure of the Subject Property from any and
28 all other entities.

REQUEST FOR PRODUCTION NO. 78:

Each and every assumption, modification, written assurance or substitution agreement
related to any document requested herein.

REQUEST FOR PRODUCTION NO. 79:

1 All written acknowledgments for the receipt of all documents related to Plaintiffs'
2 mortgage loan executed by YOU.

3 **REQUEST FOR PRODUCTION NO. 80:**

4 All endorsements to Plaintiffs' original note, including all such endorsements from the
5 date of origination to the present, so as to show a complete chain of endorsements from the
6 originator to the person so endorsing to THE HOLDERS OF THE TERWIN MORTGAGE
7 TRUST 2007-QHL1 ASSET-BACKED SECURITIES, SERIES 2007-QHL1, WITHOUT
8 RECOURSE trust.

9 **REQUEST FOR PRODUCTION NO. 81:**

10 Plaintiffs' original deed of trust, with evidence of recording thereon.

11 **REQUEST FOR PRODUCTION NO. 82:**

12 All documents or records maintained by any duly appointed custodian who accepted
13 delivery or acknowledged receipt of any document referred to herein on behalf of YOU.

14 **REQUEST FOR PRODUCTION NO. 83:**

15 All documents in the "mortgage file" for this loan in YOUR possession or any designated
16 custodian.

17 **REQUEST FOR PRODUCTION NO. 84:**

18 All original intervening receipts of delivery and acceptance of each assignment of
19 Plaintiffs' mortgage loan showing a complete chain of such receipts from the originator to the
20 person accepting the document for YOU.

21 **REQUEST FOR PRODUCTION NO. 85:**

22 The COMMITMENT TO PURCHASE FINANCIAL INSTRUMENT and SERVICER
23 PARTICIPATION AGREEMENT for the HOME AFFORDABLE MODIFICATION
24 PROGRAM under the EMERGENCY ECONOMIC STABILIZATION ACT OF 2008 entered
25 into by YOU and the United States government.

26 **REQUEST FOR PRODUCTION NO. 86:**

27 Any and all loan modification agreements entered into between Plaintiffs and
28 Defendants. If none, state "none."

REQUEST FOR PRODUCTION NO. 87:

YOUR entire file related to Plaintiffs.

REQUEST FOR PRODUCTION NO. 88:

YOUR entire file related to Plaintiffs' mortgage loan.

1 **REQUEST FOR PRODUCTION NO. 89:**

2 Any and all documents which relate to, refer to or evidence the sale of the Subject
3 Property.

4 **REQUEST FOR PRODUCTION NO. 90:**

5 Any and all documents which relate to, refer to or evidence the accounting with regard to
6 debts owed, amounts paid and future interests as a result of the non-judicial foreclosure sale of
7 the Subject Property.

8 **REQUEST FOR PRODUCTION NO. 91:**

9 Any and all documents which relate to, refer to or evidence the marketing of the Subject
10 Property, after the non-judicial foreclosure of the Subject Property.

11 **REQUEST FOR PRODUCTION NO. 92:**

12 Any and all documents which relate to, refer to or evidence the non-judicial foreclosure
13 of the Subject Property.

14 **REQUEST FOR PRODUCTION NO. 93:**

15 Any and all documents identified in YOUR responses to Plaintiff's First Set of Form
16 Interrogatories.

17 DATED:

LAW OFFICES OF CAMERON H. TOTTEN

18 By:

19 _____
20 Cameron H. Totten
21 Attorney for Plaintiffs
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25
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