

IN THE CIRCUIT COURT FOR THE 11TH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA  
GENERAL JURISDICTION DIVISION

COUNTRYWIDE HOME LOANS  
SERVICING, L.P.,

Plaintiff,  
vs.

Case No.: 09-21198CA09

██████████ et al.,  
Defendants.

---

DEPOSITION OF  
MICHELE SJOLANDER  
Wednesday, March 14, 2012  
10:07 a.m.

4500 Park Granada  
Calabasas, California

REPORTED BY:  
Julee Sokol  
CSR No. 11319

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

APPEARANCES:

For Plaintiff Countrywide Home Loans Servicing, L.P.:

AKERMAN SENTERFITT  
BY: JEFFREY A. TRINZ, ESQ.  
One Southeast Third Avenue  
Twenty-fifth Floor  
Miami, Florida 33131  
Telephone: (305) 375-5600

SHAPIRO & FISHMAN, LLP  
BY: TRAVIS HARVEY, ESQ.  
2424 North Federal Highway  
Suite 360  
Boca Raton, Florida 33431  
Telephone: (561) 998-6849  
(Appearing telephonically)

For Defendant [REDACTED] [REDACTED] et al.:

ICE LEGAL, P.A.  
BY: AMANDA LUNDERGAN, ESQ.  
1015 North State Road 7  
Suite D  
Royal Palm Beach, Florida 33411  
Telephone: (561) 729-0530  
(Appearing telephonically)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

INDEX TO EXAMINATION

WITNESS: MICHELE SJOLANDER

EXAMINATION	PAGE
By Ms. Lundergan	5

## INDEX TO EXHIBITS

WITNESS: MICHELE SJOLANDER

Countrywide Home Loans Servicing, L.P.

vs.

[REDACTED] et al.

Wednesday, March 14, 2012

Julee Sokol, CSR No. 11319

MARKED	IDENTIFICATION	PAGE
Exhibit 1	Amended Complaint to Foreclose Mortgage	58
Exhibit 2	Complaint to Foreclose Mortgage and to Enforce Lost Loan Documents	90
Exhibit 3	Plaintiff's Response to Defendant's Request for Production	96
Exhibit 4	Plaintiff Notice of Service of Answers to Interrogatories	111

1 CALABASAS, CALIFORNIA;

2 WEDNESDAY, MARCH 14, 2012; 10:07 A.M.

3  
4 MICHELE SJOLANDER,

5 having been duly sworn, was examined

6 and testified as follows:

7  
8 EXAMINATION

9 BY MS. LUNDERGAN:

10 Q Ms. Sjolander, can you please state your full name  
11 for the record?

12 A Michele Sjolander.

13 Q Is it okay if I call you "Michele"?

14 A Yes.

15 Q Okay. Michele, who do you work for?

16 A Currently, I work for Bank of America.

17 Q And what is your title?

18 A Senior Vice President.

19 Q And what's the address where you work?

20 A 4500 Park Granada, Calabasas, California.

21 Q Thank you. Before we get into other questions, I  
22 just want to go over some preliminary matters, and I know that  
23 you've sat for other depositions before; so you may have heard  
24 these previously, but just so everyone is on the same page, if  
25 you could wait until I finish asking my question so that the

1 court reporter can get it all typed out before you start to  
2 answer, and I'll also try to make sure I wait until you've  
3 finished answering before I move on to the next answer. That  
4 way the court reporter doesn't have to try to listen to two  
5 people at the same time.

6 If you can please keep your answers to verbal  
7 answers. I can't see you; so I don't know if you are shaking  
8 your head "Yes" or "No," and if you say "Uh-huh," it doesn't  
9 come across readable on the transcript. So try to keep your  
10 answers to verbal answers and no gestures and things like  
11 that.

12 If you don't understand something I'm asking, please  
13 tell me you don't understand, and I'll try to rephrase it or  
14 re-word it so that I can help you understand the question.

15 Your attorney may have some objections, but unless  
16 he instructs you not to answer, please answer the question.

17 In addition, because this is a telephonic  
18 deposition, I would ask that you refrain from any text  
19 messaging, emails, things of that nature, while the deposition  
20 is ongoing.

21 And I also want to clarify for the record that there  
22 is only going to be one attorney speaking.

23 Is that correct, Travis? You are not going to be  
24 speaking at the deposition. You are just here to observe.

25 MR. HARVEY: No. I'm not making that stipulation.

1 MS. LUNDERGAN: But you both are going to be conducting  
2 because my understanding is only one attorney will be  
3 conducting the deposition and one attorney will be defending  
4 it. Not multiple attorneys defending the same deposition.

5 MR. TRINZ: No. Let me be clear. I'm defending -- this  
6 is Jeff Trinz in -- with -- with Michele. I'm defending. The  
7 only thing I would say is that Travis may have -- has more  
8 knowledge of the case, the history of the case, and so forth.

9 So if a question comes up, he may be able to assist  
10 with that. It's not defending the depo but just if something  
11 comes up.

12 MS. LUNDERGAN: Right. I have no problem with him  
13 talking to you. I just want to make sure he's not going to be  
14 objecting--

15 MR. TRINZ: No.

16 MS. LUNDERGAN: -- or instructing the witness --

17 MR. TRINZ: No. No.

18 MS. LUNDERGAN: -- or anything of that nature. He is  
19 here as counsel, things of that nature?

20 MR. TRINZ: Yes.

21 MR. HARVEY: Yes. I would agree with that.

22 MS. LUNDERGAN: Okay.

23 **Q Michele, do you understand everything that I've said**  
24 **as far as the instructions?**

25 A Yes.

1 Q Okay. Michele, you have been deposed before;  
2 correct?

3 A Yes.

4 Q And how many times has that been now?

5 A Six.

6 Q Six times. And, recently, you were deposed in the  
7 case of Clinton Kirby; is that correct?

8 A Yes.

9 Q Was that your most recent deposition that you've  
10 given?

11 A Yes.

12 Q Okay. And at that deposition you talked about what  
13 companies you have been an officer for. You stated that you  
14 had been an officer of Countrywide Home Loans, Inc.

15 Is that correct?

16 A Yes.

17 Q And you also were an officer at one point of  
18 Countrywide Bank, FSB.

19 Is that correct?

20 A Yes.

21 Q And now you, currently, stated that you are an  
22 officer of Bank of America.

23 Correct?

24 A Yes.

25 Q Are these -- are those the only three corporations



1       **you've been an officer of?**

2           A    No.

3           **Q    Who else have you been an officer of?**

4           A    Many different entities of Countrywide and the joint  
5 ventures.

6           **Q    Can you tell me who those are?**

7           A    I cannot recall all of them.

8           **Q    Okay. Well, let's -- let's go through your  
9 employment history then.**

10                   **After you graduated from college, who did you work  
11 for first?**

12           A    Warehouser Mortgage Company.

13           **Q    I'm sorry. Can you state that again? I can't hear  
14 you.**

15           A    Warehouser Mortgage Company.

16           **Q    Okay. And then where did you work after that?**

17           A    Countrywide Home Loans.

18           **Q    Countrywide Home Loans, Inc.?**

19           A    Countrywide. Yes.

20           **Q    And then where did you work?**

21           A    Bank of America.

22           **Q    I'm sorry. I don't know if it's your phone or where  
23 it's positioned, but I can't hear your responses. Can we try  
24 to adjust that?**

25           A    Can I turn this?

1 MR. TRINZ: Yeah. We'll turn it up a little bit.

2 MS. LUNDERGAN: It's very faint. I'll try to turn my  
3 volume up too.

4 THE COURT REPORTER: Off the record.

5 (Off the record from  
6 10:12 a.m. to 10:13 a.m.)

7 MS. LUNDERGAN: Can you read back the last question?

8 (Whereupon the record  
9 was read as follows:

10 "Question: And then where  
11 did you work?

12 "Answer: Bank of America.")

13 **Q BY MS. LUNDERGAN: Can you go ahead and answer that**  
14 **question, please?**

15 A Can you repeat it? I thought I answered that  
16 question.

17 (Whereupon the record  
18 was read as follows:

19 "Question: And then where  
20 did you work?

21 "Answer: Bank of America.")

22 THE WITNESS: Bank of America was my answer.

23 **Q BY MS. LUNDERGAN: Okay. So from your -- you had**  
24 **that original mortgage company you worked for. Then you**  
25 **worked for Countrywide. And then you work for Bank of**

1       **America.**

2                   **Going back to the question of what have been your**  
3       **capacities as an officer, can you now state any other**  
4       **companies that you've been an officer of other than**  
5       **Countrywide Home Loans, Inc., Countrywide Bank, FSB, and Bank**  
6       **of America?**

7                   A    I was on officer for different entities of  
8       Countrywide.

9                   **Q    And can you tell me those different entities that**  
10       **you were an officer of?**

11                  A    There were many and I cannot recall all of them.

12                  **Q    Is there anything that would help refresh your**  
13       **recollection of that?**

14                  A    I would have to go back through years of history  
15       of -- of what I was an authorized signer for.

16                  **Q    Okay.  If you were an authorized signer, are you**  
17       **considering yourself then an officer of that company?**

18                  A    Yes.

19                  **Q    Okay.  Were you at any time an officer of**  
20       **Countrywide Home Loans Servicing, L.P.?**

21                  A    I had -- I had the authority -- the authority to  
22       sign.  As an officer.

23                  **Q    Okay.  But were you actually a named officer of the**  
24       **corporation?**

25                  A    I was a named officer of Countrywide, yes.

1           **Q**   And what was your title as an officer of Countrywide  
2 **Home Loans Servicing, L.P.?**

3           A    I had several titles. I was an EVP. Then I went to  
4 a Senior Vice President and a managing director.

5           **Q**   Okay. And Countrywide Home Loans Servicing, L.P.,  
6 **doesn't exist anymore; is that correct?**

7           A    Its successor is Bank of America, L.P.

8           **Q**   But the actual Countrywide Home Loan Servicing,  
9 **L.P., doesn't exist?**

10          A    Correct.

11          **Q**   Okay. So when I noticed this deposition of you as  
12 **an officer of Countrywide Home Loans Servicing, L.P., you**  
13 **can't technically be an officer since that company doesn't**  
14 **exist anymore; correct?**

15          MR. TRINZ: I'm going to object as a legal conclusion  
16 you are asking the witness.

17          **Q**   **BY MS. LUNDERGAN:** Can you, please, answer the  
18 **question?**

19          A    I don't understand the question.

20          **Q**   Well, you just previously stated that Countrywide  
21 **Home Loan Servicing, L.P., doesn't exist; correct?**

22          A    It was -- I stated that it does not exist. Its  
23 successor is/was Bank of America, L.P., Servicing L.P.

24          **Q**   Correct.

25          A    Yes.

1           Q    And we noticed your deposition today as an officer  
2 of Countrywide Home Loan Servicing, L.P.; correct?

3           A    Yes.

4           Q    Okay. But if that corporation doesn't exist  
5 anymore, you can't technically be an officer of a corporation  
6 that doesn't exist?

7           A    I am an officer of its successor.

8           Q    Okay. But you are not currently an officer of  
9 Countrywide Home Loan Servicing, L.P.; correct?

10          A    Correct.

11          Q    Okay. Going back to the depositions that you've  
12 given previously, do you remember you stated there were six  
13 depositions you believe you've done?

14          A    Yes.

15          Q    And how many of those were related to foreclosure  
16 cases?

17          A    Four to -- four or five.

18          Q    And do you remember the names of any of those cases?

19          A    Not offhand.

20          Q    Is there anything that would help you remember that?

21          A    I have a document in my office.

22          Q    Can you -- can you go look at that?

23          A    No. I can't.

24          MR. TRINZ: No. We're not getting it.

25          MS. LUNDERGAN: If is there something that would refresh

1 your recollection, you are not going to allow her to review  
2 that?

3 MR. TRINZ: That's correct.

4 **Q BY MS. LUNDERGAN: And what is the document called?**  
5 **Does it have a title?**

6 A No. It's my own writing.

7 **Q Just some notes that you had taken?**

8 A Yes.

9 **Q Did you review those notes in the anticipation of**  
10 **this deposition?**

11 A No.

12 **Q Can you please state, again, what your current title**  
13 **is at Bank of America?**

14 A Senior Vice President.

15 **Q And what is your job responsibility as a Senior Vice**  
16 **President?**

17 A My current job responsibilities as of today?

18 **Q Yes.**

19 A Today I manage the loan delivery department and  
20 operations.

21 **Q And what does that mean?**

22 A I run the GSE eligibility loan delivery, which is a  
23 securitization of the loans into securities for Fannie,  
24 Freddie, and Ginnie.

25 And my operations, I have collateral oversight.

1           **Q**    **Okay. What about in 2009? Was it the same job**  
2           **responsibilities that you have today?**

3           A    No. I had more.

4           **Q**    **What else did you have?**

5           A    I had more departments underneath me.

6           **Q**    **Like what?**

7           A    I had a master file audit department.

8                    I had a bond department.

9                    I had a collateral deficiency.

10                   Collateral management. And --

11          **Q**    **And on behalf of who did you work in 2009?**

12          A    Who was my boss?

13          **Q**    **What company did you work for?**

14          A    In the beginning of 2009 I worked for Countrywide,  
15          and I think in March I was Associate Day One, I became Bank of  
16          America.

17          **Q**    **And what was your title when you were with**  
18          **Countrywide in 2009?**

19          A    Countrywide in 2009 I was a Managing Director.

20          **Q**    **In your current capacity, have you received any**  
21          **training?**

22          A    That's pretty broad. Training in what?

23          **Q**    **You just listed what you do currently today in your**  
24          **capacity for Bank of America.**

25                    Did you receive any training to do those jobs you do

1 **today?**

2 A I've been doing these jobs for 15 years.

3 **Q Okay. So when you became part of Bank of America,**  
4 **you didn't receive any additional training?**

5 A No. We kept Countrywide legacy, Countrywide systems  
6 and processes.

7 **Q Okay. How about when you were working for**  
8 **Countrywide? Did you receive any training in doing the jobs**  
9 **that you outlined for me when you were working for**  
10 **Countrywide?**

11 A As I took on new responsibilities, I received  
12 training.

13 **Q And what kind of training was that? Was it, you**  
14 **know, written training that you read, or was it an in-class**  
15 **type of training?**

16 A A variety.

17 **Q Like can you tell me about those?**

18 A I had one-on-one training with the previous Managing  
19 Director.

20 I had training with the associates on systems.

21 I had class training regarding conduct and H.R.  
22 issues.

23 I would receive monthly classes that you would take  
24 on the web.

25 **Q And what were those regarding?**



1 A Mostly H.R. Reg "W." Variety of different classes.

2 Q Was any of the training that you received in the  
3 form of written policies or handbooks?

4 A Of reading handbooks or --

5 Q Yeah. Something that you could read.

6 A Yes. There was always -- there is handbooks  
7 included in the on -- on-the-web training.

8 Q Okay. And is that still true today there are  
9 handbooks for the job positions that you do?

10 A Are you asking for typical responsibilities or  
11 handbooks regarding Reg "W," and H.R.-related issues? That's  
12 what I'm saying yes to.

13 Q Okay. Are there --

14 A There are policies --

15 Q -- handbooks that deal with what you do today,  
16 whether it's --

17 A There are policies --

18 Q -- you listed loan delivery operations, different  
19 things that you do.

20 Are there any handbooks today regarding those  
21 functions that you do today on a day-to-day basis?

22 A There are policies and procedures that have been  
23 created regarding the job duties of my departments.

24 Q And where are those kept?

25 A Mostly are kept within or secondary marketing

1 databases on-line.

2 **Q Okay. And are they all stored in the same location**  
3 **or are they in different locations depending on what the topic**  
4 **is?**

5 A They're all stored in -- currently, they're all  
6 stored in our SharePoint site.

7 **Q Have those policies changed from 2009 to now?**

8 A Yes.

9 **Q How have they changed?**

10 A As jobs changed, the policies changed.

11 **Q Can you give me an example?**

12 A Well, an example is I don't have master file audit  
13 anymore; so it is no longer within my job -- in my -- my  
14 SharePoint site.

15 **Q But has the actual policy changed or you just no**  
16 **longer do that?**

17 A Oh, I can't comment on the policy. Now that policy  
18 falls in a different area.

19 **Q How about the jobs --**

20 A But there are policies --

21 **Q -- that you still do? Have any of the policies of**  
22 **the jobs that you still do changed from 2009 to now?**

23 A Of my associates that report to me, yes, their jobs  
24 have changed as well.

25 And as their jobs change or systems change or there

1 is accounting changes, the policies are updated accordingly.

2 **Q Okay. And do they store the old policies in a**  
3 **system as well as the new policies?**

4 A I can't answer that. I don't -- I don't know.

5 **Q Do you know who would know that?**

6 A Our risk.

7 **Q I'm sorry. Can you say that again?**

8 A Our risk department.

9 **Q The risk department.**

10 **And who is in charge of the risk department?**

11 A For secondary marketing Cindy Tutor.

12 **Q Okay. Have you reviewed any of the policies in**  
13 **anticipation of the deposition today?**

14 A No.

15 **Q How many people do you have in your department?**

16 A As of today, I have approximately 20 to 30 people.

17 **Q And you work out of the California location; is that**  
18 **correct?**

19 A Yes.

20 **Q Do you have offices as well in the Texas and Tampa**  
21 **locations?**

22 A No.

23 **Q Where do you work when you go to those locations?**

24 A In the -- in an assigned area.

25 **Q Have you ever had signing authority on behalf of**

1       **MERS?**

2           A    No.

3           **Q    Are you familiar with the MERS system?**

4           A    No.  I know what MERS is.

5           **Q    Did you ever --**

6           A    I've never been on system.

7           **Q    -- know what MERS is?**

8           A    I know what MERS is.  When you just said the word  
9           "system," I thought it meant -- I took it as you going on the  
10          system and applying in MERS.  No.

11          **Q    Okay.  But you are familiar with MERS itself?**

12          A    I know what MERS is.  Yes.

13          **Q    Okay.  Does anyone in your department have access to**

14          **MERS?**

15          A    No.

16          **Q    Do you?**

17          A    Access in the sense of -- let me just -- access in  
18          the sense of going in and doing MERS, signing a loan into  
19          MERS?

20          **Q    Access -- let's break it up into two parts.**

21                   **Is anyone in your department an officer of MERS?**

22          A    No.

23          **Q    Do you know anyone in Bank of America who is an**  
24          **officer of MERS?**

25          A    I would think so.  Yes.

1 Q Okay. Can you tell me who those people would be?

2 A I -- In the MERS department?

3 Q Okay. So Bank of America has a MERS department?

4 A In servicing. Yes.

5 Q Okay. And how many people are in that MERS  
6 department?

7 A It's completely out of the scope of my position.

8 Q You have no knowledge of who is in the MERS  
9 department?

10 A I know people that are in it. I don't know how many  
11 people are in that department, no.

12 Q Okay. Can you give me some names of the people who  
13 are in it?

14 A I can say "Christy Cafferty."

15 Q Okay. Is that the only name you know?

16 A That's my contact.

17 Q Okay. Do you know anybody else who works with  
18 Christy in the MERS department?

19 A Not personally.

20 Q Okay. Do you ever have any interaction with the  
21 MERS department? You said that was your contact. What would  
22 you use her for?

23 A If I had questions regarding a MERS Milestone or if  
24 a loan was registered in MERS.

25 Q Okay. And then Christy would be the one that would

1 **be able to access that information?**

2 A I would contact her. I'm not sure who accesses it.  
3 She gets back to me with my questions.

4 **Q Okay. So you are familiar then with the MERS**  
5 **documents such as the Milestones and the Min audit; correct?**

6 A I know what a MERS Milestone is. Yes.

7 I do not know what a Min audit is. No.

8 I look at documentation and see if the note was  
9 printed on Mom docs. I'm more on that end.

10 **Q Tell me that just again. It was printed on Mom**  
11 **docs?**

12 THE COURT REPORTER: Could she repeat that? I couldn't  
13 hear it?

14 MR. TRINZ: Can you repeat that? The court reporter  
15 didn't pick up your last question.

16 **Q BY MS. LUNDERGAN: I guess my question is -- I**  
17 **wasn't clear what she said. You said "Mom docs"?**

18 A Yes. M-o-m Docs.

19 **Q Okay. And what is that?**

20 A The documents are on -- are on MERS documentation  
21 and they call them "Mom docs."

22 **Q So it's the way you would access the MERS documents?**

23 A No.

24 **Q Okay. So what do you use Mom docs for?**

25 A Those are the docs, documents, that the borrower has

1 in connection with the MERS. They're the note, the security  
2 instrument. And they are on what we call Mom docs, M-o-m  
3 docs.

4 **Q Is that separate from your imaging system?**

5 A Yes.

6 **Q Okay. How often in your -- your current position do**  
7 **you have to access MERS information as far as asking Christy**  
8 **for information?**

9 A Only on -- when I have cases that come up.

10 **Q Weekly? Monthly?**

11 A Monthly.

12 **Q Monthly. Do you have -- other than the companies**  
13 **that you identified, do you have signing authority on behalf**  
14 **of anybody else?**

15 A I don't understand what you are saying. It's  
16 open-ended.

17 **Q Okay. Did you have -- are you -- do you currently**  
18 **have signing authority on behalf of Bank of America?**

19 A Yes.

20 **Q How about Countrywide Home Loans, Inc.?**

21 A Yes.

22 **Q Countrywide Bank, FSB?**

23 A Yes.

24 **Q How about Premium Capital Funding?**

25 A No.

1           **Q   Any other companies that I haven't listed that you**  
2 **have signing authority for?**

3           A   As I previously said, I have signing authority for  
4 several entities of Countrywide or I should say had.  
5 Countrywide is no longer in business as you know.

6           **Q   Okay. How about BAC Home Loans? Do you have**  
7 **signing authority for them?**

8           A   BAC Home Loans?

9           **Q   Yes.**

10          A   The servicing L.P., yes.

11          **Q   Yes. You do have signing authority for them?**

12          A   Yes.

13          **Q   Was that a "Yes"?**

14          A   Yes.

15          **Q   Okay. And when we talk about "signing authority,"**  
16 **what types of documents can you sign on behalf of the entities**  
17 **that you've stated that you have signing authority for?**

18          A   I have signing authority for my endorsement on the  
19 collateral.

20                   And I have signing authority for creation of LNA's,  
21 if there is a loss note affidavit.

22          **Q   Okay. Anything else?**

23          A   Just collateral-related documents and execution of  
24 GSE agreements.

25          **Q   What are those that you just said? The GSE?**



1           A    GSE agreements.  So anything with Fannie, Freddie,  
2   Ginnie.

3                    For example, Ginnie for commitment authority.  
4   Fannie to approve a contract to transmit.  Freddie, a bill of  
5   sale.

6           **Q    So you have authority on behalf of Freddie Mac to**  
7   **execute certain documents?**

8           A    Not on behalf of Freddie Mac.  I have signing  
9   authority on behalf of Bank of America to execute documents  
10  pertaining to those -- to those agreements.

11          **Q    Okay.  And you said the LNA.  What was that?**

12          A    That is a loss note affidavit.

13          **Q    Okay.  And how often do you execute loss note**  
14  **affidavits?**

15          A    Never.

16          **Q    You never have executed a loss note affidavit?**

17          A    No.  I have not.

18          **Q    But you know you have the authority to do that?**

19          A    Yes.

20          **Q    Is that in one of your handbooks or policies?**

21          A    It is in -- that I have -- that I have authority or  
22  the authority spelled out?

23          **Q    The authority spelled out.**

24          A    Yes.  My -- we do have procedures pertaining to  
25  creation of loss note affidavits when we were doing them.  We

1 no longer -- my department no longer create or execute a loss  
2 note affidavit.

3 **Q What department does do the loss note affidavits?**

4 A That would be post-closing.

5 **Q Okay. And do you know anyone who works in that**  
6 **department?**

7 A Yes. I do.

8 **Q Was there an answer?**

9 A Yes. I do.

10 **Q I don't know if it -- is cutting out -- is it**  
11 **cutting out for you guys when I speak?**

12 MR. TRINZ: We can hear you clearly.

13 MS. LUNDERGAN: Okay. For whatever reason I'm still  
14 having a hard time hearing her.

15 MR. TRINZ: Is there more volume?

16 THE WITNESS: If we turn on the volume, I think we're  
17 going to get that back.

18 MR. TRINZ: Oh.

19 THE WITNESS: I'm talking the same. I'm not changing my  
20 tone. I'm talking the same.

21 MR. TRINZ: We'll move the phone a little closer. So we  
22 don't want it to fall off the table.

23 **Q BY MS. LUNDERGAN: What I need you to do for me,**  
24 **Michele, is can you walk me through how a typical loan moves**  
25 **through your systems?**

1           What I'm referencing is, if it was not an original  
2 lender, if this was not an original Bank of America loan and  
3 it was not an original Countrywide loan, but you received it  
4 from a third party, how does that loan make it into your  
5 system in your physical possession? Where is the first place  
6 it comes?

7           MR. TRINZ: Object to the form.

8           Q BY MS. LUNDERGAN: I can't hear. You might have  
9 said something. It cut out.

10          MR. TRINZ: I said I object to the form of your  
11 question.

12          MS. LUNDERGAN: Okay. We're going to have to figure out  
13 another method because I only heard just "I," and it's cutting  
14 out of the rest it. I don't know if we can try to re-start  
15 the system or --

16          THE COURT REPORTER: Off the record.

17                   (Off the record from

18                   10:35 a.m. to 10:41 a.m.)

19          Q BY MS. LUNDERGAN: Going back to what we had talked  
20 about, Michele, basically, I just wanted you to walk me  
21 through the process of how these loans are received, either  
22 from, you know, the original lender in the collateral files.

23                   Can you walk me through, you know, how they're  
24 received, where they go, and how they get processed through  
25 your system?

1 MR. TRINZ: I'm going to object to the form.

2 Q BY MS. LUNDERGAN: Michele, can you answer that,  
3 please? Are you guys there?

4 MR. TRINZ: Yes. We're here. I think you need to  
5 clarify the question. Can you --

6 Q BY MS. LUNDERGAN: Michele, did you understand my  
7 question?

8 A I don't. You are -- you need to clarify. Are  
9 you -- you want me to walk -- and let me see if I'm  
10 understanding it correctly.

11 You want me to walk you through how the collateral  
12 is moved through -- through the company? Is that -- is that  
13 what you are asking?

14 Q That's correct.

15 A The collateral documentation?

16 Q Yes. That's correct.

17 A Yes. So the collateral -- in this case, this is a  
18 correspondent lending loan. The collateral is received into  
19 the correspondent lending vault in Tampa, Florida, and it is  
20 logged in and imaged.

21 At that time it goes into the vault in -- for the  
22 correspondent lending vault until the funding occurs on the  
23 loan.

24 At the time of the funding, the collateral is moved  
25 from the correspondent lending vault into our Tampa facility

1 vault.

2 And, actually, that's -- I'm speaking as of today.

3 If you want as of this loan, I'm -- in 2009?

4 **Q Let's talk about today and then we'll talk about --**

5 A Okay.

6 **Q -- 2009.**

7 A So today --

8 **Q First, we'll talk about today.**

9 A Yes. It's two different processes.

10 But today, so the collateral then is moved from the  
11 correspondent lending vault in Tampa to our Tampa vault, which  
12 is "Rincon Trust." It is logged in there.

13 At that time an endorsement stamp is placed on the  
14 note.

15 And it goes -- if it is pooled to a Fannie, Freddie,  
16 or Ginnie security, it will then go for review and the  
17 collateral will be reviewed against the transmission of the  
18 data for Fannie, Freddie, or Ginnie.

19 At that time the collateral is looked at to make  
20 sure it is true and original and placed -- after it passes, if  
21 it's reviewed without a deficiency, it is then placed into the  
22 vault. And it remains there --

23 **Q The vault in Tampa?**

24 A -- until --

25 Yes.

1           And it will remain there until a release is filed on  
2           the -- on the loan.

3           **Q   Okay.  When you say, "a release is filed," a release**  
4           **to who?**

5           A   It would depend.  If it's -- if it's in a  
6           foreclosure, a release will be requested by a foreclosure  
7           attorney.

8                   If it is paid off, a release will be requested by  
9           the payoff department.

10          **Q   Do you know if a release was requested in this case?**

11          A   Yes.  It was.

12          **Q   Have you reviewed that document?**

13          A   Yes.  I have.

14          **Q   Did you review it in anticipation of today's**  
15          **deposition?**

16          A   Yes.  I did.

17          **Q   And do you have access to that today?**

18          A   I look -- I have access to the collateral --  
19          tracking of the collateral.  Yes.

20          **Q   Okay.  Then I would request that you -- can you guys**  
21          **go ahead and email me that document, please?**

22          **MR. TRINZ:  No.**

23          MS. LUNDERGAN:  Well, I'm entitled to anything she  
24          reviews in anticipation of the deposition.

25          MR. TRINZ:  I don't think that's the case.

1 MS. LUNDERGAN: Well, she stated that's where she's  
2 getting her knowledge from, which she's testifying to, which  
3 we're entitled to.

4 MR. TRINZ: Well, I disagree and we're not producing it.

5 MS. LUNDERGAN: Okay. So your position is that any  
6 documents that she's basing her knowledge on today that she  
7 reviewed to answer the questions, you are not willing to  
8 produce?

9 MR. TRINZ: That's correct.

10 MS. LUNDERGAN: All right.

11 **Q So you stated there was a release in this case?**

12 A The system shows a release. Yes.

13 **Q And do you know the date of that release?**

14 A I think it was -- it was March 6th.

15 **Q Of two thousand and --**

16 A I think it was -- I can't -- I can't tell you the  
17 year. I just looked at the date.

18 **Q Okay. Okay. So the basic outlines you've given me**  
19 **is what is currently happening today; correct?**

20 A Yes.

21 **Q Okay. Now let's talk about how it was in 2009.**

22 A In 2009, it was very similar. The loan would be  
23 logged into our collateral area in CLD.

24 And at the time of funding, the collateral then  
25 would go to our Simi Valley vault and be logged in.

1           So it was -- the only difference is -- is the vault  
2 location. In 2009 we did not have the Tampa facility.

3           **Q   Okay. In 2009 --**

4           A   I mean -- I'm sorry. Not 2009.

5                    In 2007 when this loan funded. I'm sorry.

6           **Q   Your position, from reviewing the documents, that**  
7 **you acquired this loan document in 2007?**

8           A   Yes. Well, 2008. But it funded in December of '07  
9 and we acquired it in 2008, in January.

10          **Q   All right. And what did you look at to ascertain**  
11 **that you acquired it in 2008?**

12          A   I looked at the system and the collateral, when the  
13 collateral was logged into our facility, the collateral  
14 processing.

15          **Q   When you say, "our facility," which entity are you**  
16 **talking about?**

17          A   As I said, Countrywide and Bank of America was its  
18 successor. So when I say "our" in this case, I mean  
19 Countrywide and Bank of America. It's the same location.

20          **Q   But it wasn't Bank of America in 2008; correct?**

21          A   Correct.

22          **Q   Okay. So which entity would it have been that**  
23 **received this collateral in 2008?**

24          A   In 2008 it would have been Countrywide Bank.

25          **Q   FSB?**



1           A    I would assume so.  I don't have a timeline of when  
2   the entities changed names.

3           **Q    And when did Countrywide cease to exist?**

4           A    Can you repeat that?

5           **Q    When did Countrywide cease to exist?**

6           MR. TRINZ:  Objection.  Calls for a legal conclusion.

7           **Q    BY MS. LUNDERGAN:  Can you, please, answer that?**

8           A    Legal Day One, I recall, was January of 2009.  I  
9   mean July of 2009.  I'm sorry.

10          **Q    So in July of 2009 was when Countrywide merged with**  
11 **Bank of America?**

12          A    That is --

13          MR. TRINZ:  Objection --

14          THE WITNESS:  -- what we call Legal Day One.

15          MR. TRINZ:  -- to the form.

16                And I object to the form.

17          **Q    BY MS. LUNDERGAN:  And how do you know that that's**  
18 **the date?**

19          A    That is what we call Legal Day One.

20          **Q    All right.  And when you say, "we call Legal Day**  
21 **One," where did you get that from?**

22          A    That's what Bank of America --

23          **Q    Was it --**

24          A    Written.

25          **Q    It is written down?**

1 A It was in all of our announcements.

2 Q Okay. So it was something that they announced that  
3 that was going to be the day that you merged?

4 A You are using --

5 MR. TRINZ: Objection as to the form.

6 THE WITNESS: You are using words -- I did not say the  
7 word "merge." I said "Legal Day One." That is the day that  
8 we call -- that they called "Legal Day One."

9 You would have to talk to the legal aspect of  
10 whether it was called a merge or -- I'm just testifying to the  
11 fact that that was Legal Day One.

12 Q BY MS. LUNDERGAN: Okay. On Legal Day One, is that  
13 the date that you stopped being an employee of Countrywide and  
14 started being an employee of Bank of America?

15 A No.

16 Q Okay. When did that change occur?

17 A On Associate Day One.

18 Q And when was Associate Day One?

19 A I do not know the exact date. It was between April  
20 of 2009. I -- I do not have the exact date. I do not know.  
21 It's just recollection from three years ago. So --

22 Q So you stated that under both systems, the 2009  
23 system and the current system, that the endorsements are  
24 placed on -- in the --

25 THE COURT REPORTER: I'm having a hard time hearing her.

1 THE WITNESS: Yeah. We're now having a hard time  
2 hearing you.

3 MR. TRINZ: Right.

4 MS. LUNDERGAN: Sorry.

5 I'm asking the court reporter, is there anything  
6 else we can do with this system because it's becoming really  
7 difficult.

8 MR. TRINZ: It's better now. We just turned it up a  
9 little bit. And just speak up a little bit. I think that  
10 will help.

11 MS. LUNDERGAN: Okay. I don't even have speaker phone  
12 now. I'm just on the regular phone.

13 MR. TRINZ: Okay. It's better now.

14 MS. LUNDERGAN: Okay.

15 **Q Going back to the question, you stated both in your**  
16 **description of the 2009 and your description of the current**  
17 **process, that you endorse the documents when they came in**  
18 **along with the imaging system at that time.**

19 **Is that correct?**

20 A I did not say I endorsed. I said the collateral  
21 documents are endorsed upon arrival.

22 **Q And did you ever work in that department that**  
23 **endorsed the collateral?**

24 A I did not never worked for -- no.

25 **Q Did you ever supervise the department that endorsed**

1       **the collateral?**

2           A    No.

3           **Q    Okay.  So you don't have any first-hand knowledge**  
4 **then of the endorsing of the promissory notes, do you?**

5           A    I have oversight to the -- I have collateral  
6 oversight in which I do ensure that the processes of the  
7 collateral -- I walk through and review them.

8           **Q    Okay.  Can you explain to me what that means?**

9           A    It means I -- the department does not directly  
10 report to me, but I have insight to the processes and  
11 procedures that that department does.

12          **Q    And where does your knowledge of the process and**  
13 **procedure come from?**

14          A    Mostly from doing audits.

15          **Q    Okay.  And when you say, "doing audits," what does**  
16 **that mean?**

17          A    I conduct a -- every six months an audit of the  
18 facility.

19          **Q    Okay.  And were you doing audits of the facilities**  
20 **back in 2008?**

21          A    Yes.

22          **Q    And are you still doing audits of the facilities**  
23 **today?**

24          A    Yes.

25          **Q    And what is it you are looking for when you are**

1       **doing audits of the facilities?**

2               A    I ensure that the procedures that the GSE's require  
3       are in place.

4               **Q    And what procedures would those be?**

5               A    Those will be the procedures on All Regs.

6               **Q    Okay.  And what, specifically, are you looking for  
7       when it comes to endorsing a promissory note?**

8               A    That the endorsement is placed in blank.

9               **Q    Are you looking for all endorsements to be placed in  
10       blank?**

11              A    The final endorsement is an open endorsement in  
12       blank --

13              **Q    Okay.**

14              A    -- or the -- let me rephrase that.

15                        That the endorsement chain is correct.

16              **Q    Okay.  And when you are looking to see if the  
17       endorsement chain is correct, what are you comparing that to  
18       to make sure that it's correct?**

19              A    I am looking at the note.

20              **Q    Are you looking at the original promissory note --**

21              A    Yes.

22              **Q    -- or are you looking at the copy of the original  
23       promissory note?**

24              A    I am looking at the original promissory note at that  
25       time.

1           Q    Okay.  And what on the original promissory note are  
2 you looking at to make sure that the chain of endorsements is  
3 correct?

4           A    The endorsement chain.

5           Q    Okay.  But when you are looking at the endorsement  
6 chain, how do you know it's correct?  What are you looking at  
7 to make sure that that endorsement chain is correct in the way  
8 it's supposed to be?

9           A    I ensure that the endorsement is -- follows the path  
10 of our funding.

11          Q    Okay.  And so where do you compare it to find that  
12 out, the funding?  Is there something you are looking at to  
13 make sure it matches up and make sure it follows what it is  
14 supposed to follow?

15          A    Another document.  Sometimes I will be looking on  
16 the system to ensure that it follows the -- the -- the -- the  
17 chain on the system.

18                   In most cases I'm looking at the actual stamps to  
19 ensure that what is -- what each entity is closed and opened  
20 correctly.

21          Q    Okay.  And when you said you look at the system,  
22 what is it on the system that you would be looking at?

23          A    I'll look at the -- on the movement of investor  
24 numbers.

25          Q    Is that through your own system or are you talking

1       **about the MERS system?**

2           A    That is through my own system.

3           **Q    What --**

4           A    I am not looking at the assignment chain if that's  
5       what you are asking.

6           **Q    No.   That wasn't what I was asking.**

7                   **What is the system called that you are looking at?**

8           A    It's a web secondary marketing website.

9           **Q    And is that the same system that you were using back**  
10       **in 2008?**

11          A    Yes.

12          **Q    And are you still using it today?**

13          A    Yes.

14          **Q    And who inputs that information into that system?**

15          A    That -- the system goes through our investor  
16       accounting.

17          **Q    And they would be the ones who would put in the**  
18       **chain of ownership into that system?**

19          A    Well --

20               MR. TRINZ:  Objection as to form.

21               THE WITNESS:  -- it --

22          **Q    BY MS. LUNDERGAN:  Was that the department, the one**  
23       **that puts in --**

24          A    I think you are -- you are -- I'm not talking about  
25       the chain of ownership here.  I'm -- I'm looking at the

1 endorsement chain of the collateral versus how it -- ensuring  
2 that it is correct. That the chain is correct going through.

3 I look at the system to ensure that -- to look at  
4 investor changes and how the loan -- loan was sold to. And  
5 how the investor change went through.

6 I do not want to confuse the two.

7 **Q So you look at the endorsements to make sure each**  
8 **endorsement follows in a proper chain so that it goes from A**  
9 **to B, B to C, C to D; correct?**

10 A Yes. That is correct.

11 **Q And then when you look on the actual system, you are**  
12 **looking at the actual documentation that -- that shows the**  
13 **change in actual ownership of the loan; correct?**

14 A I'm looking at -- no.

15 I'm looking at the investor change. The investor --  
16 how the investor is positioned.

17 **Q So you are just looking --**

18 A I'm just looking at how the investor numbers have  
19 moved through. It's a secondary marketing system. I'm  
20 looking at who was our first investor and how it moved  
21 through -- through the different investor channels. Who was  
22 the ultimate investor -- Fannie, Freddie, Ginnie.

23 **Q Shouldn't that chain that's on-line match the chain**  
24 **of endorsements on the note?**

25 A No. Because if it's an open endorsement, it



1 wouldn't say Ginnie as your final. It would just be an  
2 open -- an endorsement in blank.

3 **Q Okay. Besides the last person in the chain,**  
4 **shouldn't the endorsements line up with the previous parties?**

5 A The -- the endorsement on the document should be  
6 lined up. The endorse -- if you are looking at my system, it  
7 doesn't -- it does not read that way. No.

8 **Q Okay. So the endorsements don't always follow the**  
9 **information that's on your system?**

10 A No. You're -- you're -- that is not correct. Two  
11 different sources.

12 **Q When you say, "two," I guess I'm not understanding**  
13 **what it is you are saying.**

14 **Can you explain to me the two different sources?**

15 A One is -- one is an investor. The -- the investor  
16 number and how it moves through our systems.

17 And one is an endorsement chain, which is the chain  
18 of title, of the endorsement on the note. Two different  
19 things --

20 **Q But you do --**

21 A I look at our system for different reasons.

22 I was not finished. I'm sorry.

23 **Q Okay. That's fine.**

24 **Do you ever check then the chain of title? I know**  
25 **you are saying your system shows something different. But do**

1           **you ever check to see when you do your audits that the**  
2           **endorsements properly follow the chain of title?**

3           MR. TRINZ:  Objection as to form.  Title to what?

4           THE WITNESS:  I'm -- I'm -- this is an endorsement, not  
5           an assignment.  So I'm speaking directly to the endorsement of  
6           the note, not to the assignment chain.

7                     And this is -- I'm looking at are the endorsements  
8           open and closed correctly on the note; is the chain correct.

9           **Q   BY MS. LUNDERGAN:  Okay.  What I'm asking --**

10          A   And --

11          **Q   -- and I think what you are getting at is to make**  
12          **sure that it properly follows, like I said, from A to B, B to**  
13          **C, C to D --**

14          A   Correct.

15          **Q   -- instead of going A to D, C to B.**

16                     You are saying you properly -- you look to see that  
17          **the chain follows that natural progression from one party to**  
18          **the next --**

19          A   The correct possession.

20          **Q   -- correct?**

21          A   Yes.

22          **Q   Okay.  What I am asking is do you ever check that**  
23          **that chain -- that A to B, B to C -- is really what occurred?**  
24          **Is that part of your auditing to check and see --**

25          A   But --

1           **Q    -- that --**

2           A    -- that is what occurred.  There is no what really  
3 occurred.  The note is what the possession is.  It's the  
4 collateral.  So that is what occurred.

5                   And I guess that's why I'm being confused here --

6           **Q    You --**

7           A    -- because what occurred on the note is the  
8 possession of the collateral, and that's what I am looking at.

9           **Q    Okay.  How do you know that?**

10          A    Because it is -- the note is the promise to pay.  
11 It's your document -- your collateral.

12          **Q    But you don't ever check any -- you don't ever check**  
13 **that?  You just assume -- what I'm trying to understand --**

14          A    I don't know what you want me to check.

15          **Q    -- if the endorsements are there --**

16          A    I don't know what you want me to check, I guess.  
17 Because the note is your promise to pay.  That is your  
18 collateral.  That is your -- that is your underlining (sic)  
19 document of what the borrower has to pay.

20                   So I am checking to ensure that the endorsement  
21 chain is followed correctly, A to B to C to D as you said  
22 previously.

23          **Q    Okay.  But you don't ever do any other -- you don't**  
24 **check anything else?  You look at it to see that it's A to B,**  
25 **B to C, C to D?**

1 A I ensure that it's correct. Yes.

2 Q Okay. Who decides -- let's go back then.

3 Are you -- are you still endorsing promissory notes  
4 as far as is it your name still being --

5 A No.

6 Q -- executed on endorsements?

7 No?

8 A No.

9 Q When did that stop?

10 A March -- April -- March or April of last year.

11 Q And why did it stop?

12 A Two -- two reasons. I had a heart attack and I was  
13 out on leave and we needed to replace my signatures.

14 And the second reason was we decided to change  
15 bank -- we went to Bank of America's processes after that.

16 Q Okay. And what is Bank of America's process?

17 A That the collateral is endorsed upon receipt of into  
18 imaging. So prior to image --

19 Q How is that different than the process that you  
20 already had?

21 A The collateral would come in, be imaged, and then go  
22 to the vault and have the endorsement placed.

23 Now the collateral comes in as the endorsement is  
24 placed and the collateral is imaged.

25 Q Okay. So in the old system it would have endorsed

1           **after it went to the vault?**

2           A    In the old system it would have -- can you repeat  
3           that?  Sorry.

4           **Q    You stated that Bank of America's system now is for**  
5           **the document to be endorsed as soon as it comes into the**  
6           **imaging; correct?**

7           A    As soon as it is logged in -- yes -- to collateral  
8           processing.  Yes.

9           **Q    Okay.  Under the previous system, it would not have**  
10          **been endorsed until it went through imaging and went to the**  
11          **vault; correct?**

12          A    Yes.

13          **Q    Okay.  Why is there a change from the old system to**  
14          **the new system?**

15          A    I was not here at that time.

16          **Q    Was that when you were out because of your heart**  
17          **attack?**

18          A    I was out.  Yes.

19          **Q    Okay.  Have you ever personally executed any**  
20          **endorsements?**

21          A    My -- with my -- my personally placed a stamp on a  
22          note?

23          **Q    Yes.**

24          A    No.

25          **Q    Have you ever assigned any endorsements personally?**

1 A A wet signature on an endorsement?

2 Q You actually physically signed an endorsement.

3 A Are you asking a wet signature on an endorsement on  
4 a piece of collateral?

5 Q I'm saying have you ever physically signed an  
6 endorsement on an original note?

7 MR. TRINZ: Object to the form.

8 THE WITNESS: My stamp has been placed on collateral on  
9 a note.

10 Q BY MS. LUNDERGAN: Okay. That's not what I asked.

11 A Okay.

12 Q What I'm asking is have you ever physically --

13 A That's what I was trying to --

14 Q -- signed for a note?

15 A My wet signature has never been placed on an  
16 original note. That is not common practice.

17 Q Now, you stated that the endorsements are stamps on  
18 the collateral; is that correct?

19 A That is correct.

20 Q Has that always been the policy since 2008?

21 A Yes. And it is still policy.

22 Q Are they ever stamped in any other method or -- I'm  
23 sorry.

24 Are they ever placed on there in any other method  
25 other than stamping?

1 A No.

2 Q Are any endorsements ever what you called wet ink  
3 signature where someone actually signs the endorsement?

4 A It is -- it is not -- not -- none of mine have been.

5 Q Okay. How about anyone else's? Do you have any  
6 knowledge if anyone else's signatures are --

7 MR. TRINZ: Objection.

8 Q BY MS. LUNDERGAN: -- physically placed on versus  
9 stamping?

10 MR. TRINZ: Objection. Outside of her knowledge.

11 THE WITNESS: Outside the scope of my business.

12 Q BY MS. LUNDERGAN: Okay. Do you have any knowledge  
13 then of that?

14 A No.

15 Q Okay. How long has -- you are no longer executing  
16 endorsements, but when did you begin executing endorsements or  
17 when did they begin using a stamped signature to execute your  
18 endorsement?

19 A 2005.

20 Q And how did that arise? Was it something that they  
21 asked you to do or was it something that became part of your  
22 job position?

23 A Yes. My previous boss had left the company and my  
24 stamp was replaced with his.

25 Q Okay. And how did they create the stamps? Did you

1           **sign something for them to model the stamp after?**

2           A    Yes.

3           **Q    Okay. Did you do that one time or have you done it**  
4           **several times?**

5           A    Many, many times.

6           **Q    And why change the stamp?**

7           A    My title has changed. The entities have changed.  
8           The old stamps got old. Were peeling back. Variety of  
9           reasons.

10          **Q    And do you know how many stamps were issued with**  
11          **your name on them?**

12          A    Not the exact number. But many.

13          **Q    Could you estimate? Is it more than 10? More than**  
14          **100?**

15          A    More than -- more than 10.

16          **Q    Less than 50?**

17          A    I don't -- through the whole years, I can't even  
18          give that answer.

19          **Q    Okay. And what happens to the stamps? What happens**  
20          **to the old stamps when you execute new stamps?**

21          A    I collect them and burn them.

22          **Q    Okay. You physically collect them?**

23          A    Yes. Well, I don't physically go -- they -- they --  
24          they give them -- the bank gives them back to me and I destroy  
25          them.



1           **Q**   **Okay. Is there any written policy on who can use**  
2 **your stamp?**

3           A    There is a power of attorney.

4           **Q**   **Okay. And does the power of attorney give a**  
5 **specific person the ability to use your stamp or is it a group**  
6 **of people?**

7           A    It's the -- the bank, the custodian is able to use  
8 mine -- my stamp.

9           **Q**   **So the power of attorney gives power to who?**

10          A    To the custodian --

11          **Q**   **And who is the custodian?**

12          A    -- to endorse collateral.

13                   Who is the custodian now or at the time of  
14 Mr. [REDACTED] note?

15          **Q**   **Well, is there only one power of attorney or have**  
16 **you executed more than one?**

17          A    There has been more than one power of attorney. As  
18 entities change, the power of attorney is --

19          **Q**   **Well, let's talk about in 2008. Who was the power**  
20 **of attorney at that time?**

21          A    I gave a power of attorney to Countrywide Bank.

22          **Q**   **Anyone else?**

23          A    No. Only the custodian had power of attorney to  
24 apply my stamp.

25          **Q**   **Okay. So in 2008 only Countrywide could put your**

1       **stamp on notes; is that correct?**

2           A    Only Countrywide Bank, yes.  The custodian, yes.

3       **Q    How about in 2009?**

4           A    I would have to look at the chain of when the  
5       custodian changed from Countrywide Bank.  They were  
6       Countrywide N.A. to Countrywide Bank, NSB, to "Rincon Trust."

7                    I do not have the legal dates of when each entity  
8       changed in my head.

9       **Q    Okay.  But from your knowledge there have been  
10       several powers of attorney?**

11           A    I've executed powers of attorney, yes.

12       **Q    Okay.  And each time you execute a power of  
13       attorney, it goes to an entity instead of individually named  
14       people?**

15           A    Yes.

16       **Q    Okay.  Do you know the people who are using your  
17       stamp currently?**

18           A    Currently no one is using my stamp.

19       **Q    I'm sorry.  Did you know the people in 2008 who were  
20       using your stamp?**

21           A    Do I know them personally?  No.

22       **Q    How about in 2009?**

23           A    Did I know them personally?  No.  Do I know the  
24       group of the department?  Yes.

25       **Q    Okay.  The people who were executing your**

1           **endorsements, is the power of attorney the only instructions**  
2           **they got as to using your endorsements?**

3           A    You would have to check with the custodian on their  
4           policies and procedures and their instructions.

5           **Q    You have no knowledge of what instructions they were**  
6           **given?**

7           A    I do not know what their training is or how -- or  
8           their policies and procedure.  No.

9           **Q    Okay.  Were there any limitations on the power of**  
10          **attorney as to how they could use your endorsement?**

11          A    I would have to read the whole document.  I don't --  
12          I have not read it in many, many years.

13          **Q    Okay.  From what you remember, do you remember any**  
14          **specifics about what the power of attorney said?**

15          A    I can't recall what the power of attorney said.

16          **Q    Okay.  And do you keep copies of all the powers of**  
17          **attorney?**

18          A    I do.

19          **Q    Okay.  Are they in your personal files or are they**  
20          **part of your Bank of America files?**

21          A    They are part of Bank of America files.

22          **Q    Okay.  And if I wanted to find those, where would**  
23          **they be?**

24          A    You would have to go back to the custodian and  
25          request for the power of attorney through the custodian.

1           **Q    Okay.  So they're not physically at Bank of**  
2 **America's location?**

3           A    That is Bank of America locations.  Our custodian  
4 is --

5           **Q    You said --**

6           A    Our custodian is in -- is on the Bank of America  
7 location in Simi Valley, Tampa, Fort Worth.

8           **Q    But they are a separate entity; correct?**

9           A    They are a separate entity.  Yes.

10          **Q    So the power of attorney is stored at the -- at**  
11 **their office versus the other buildings?**

12          A    The power -- I mean I -- yes.  The -- the custodian  
13 holds the power of attorney that they're using to execute my  
14 stamp.

15          **Q    Okay.  Is there anyone who oversees the actual**  
16 **physical application of the endorsements on a day-to-day**  
17 **basis?**

18          A    The custodian.  Yes.  There is a manager that  
19 oversees that group.

20          **Q    Okay.  And what's his name?**

21          A    It's her name.  Lori Meter.

22          **Q    And does Lori currently oversee the physical**  
23 **application of the endorsements?**

24          A    Does that department report to her?  I do not know.  
25 I would think so.  I can't -- you would have to talk to the

1           custodian of -- the reporting structure of the custodian.

2           **Q    Okay.  Well, you said Lori over -- Lori was the**  
3 **person who was overseeing the physical application.**

4                   **Is that currently her position or are you stating**  
5 **that was her position?**

6           A    I know when my signature was applied, or my stamp,  
7 it was her position.  My stamp is no longer applied.  I don't  
8 know if that is still her position or if it is other -- if she  
9 has people reporting to her that oversee that.  You would have  
10 to speak to the custodian of how their reporting structure is.  
11 It's out of my scope.

12           **Q    Is there any time that your stamp was being used**  
13 **Lori Meter oversaw the application of the endorsements?**

14           A    Lori Meter was my contact person for the associates  
15 and Maria Gardener was my risk contact in the -- the  
16 compliance officer.

17           **Q    And isn't it true that Lori Meter also has her**  
18 **signature endorsed?**

19           A    Yes.

20           **Q    And did Lori Meter have a stamp as well as the stamp**  
21 **that you had?**

22           A    Not for the servicing L.P.  but, yes, she does have  
23 a stamp for Countrywide Bank FSB.

24           **Q    And not for the servicing L.P.  is that because she**  
25 **didn't endorse on behalf of them or because she didn't have a**

1 **stamp?**

2 A Because she did not endorse on behalf of the -- of  
3 the servicer. She only endorsed on behalf of the custodian,  
4 the bank.

5 **Q Okay. When the collateral file comes in, how does**  
6 **it get triggered for an endorsement? What I'm saying is how**  
7 **does the department know it needs an endorsement?**

8 A As I said, the collateral file -- are you -- today's  
9 practices or back in '07 or '08?

10 **Q Let's start back in 2008.**

11 A Back in 2008 at every -- every piece of collateral  
12 that went into the custodian, into collateral, the processing  
13 area, received the correct endorsement chain and stamp.

14 **Q So every collateral that came in received the chain**  
15 **of endorsements?**

16 A Well, yeah. The -- the entity chain is an  
17 endorsement in blank.

18 **Q But on some promissory notes there are multiple**  
19 **endorsements; correct?**

20 A Yes. Because it has to show the chain of the  
21 ownership of the loan.

22 **Q Okay. And if I'm the person who is sitting down and**  
23 **going to stamp these documents, how do I know which**  
24 **endorsements it needs?**

25 A You would have to go and ask Lori what her policies

1 and procedures are and what the custodian's policies and  
2 procedures were at that time.

3 **Q Okay. So you have no knowledge as to how the people**  
4 **who are stamping these documents know which stamps to use?**

5 A Well, when you say, "no knowledge," I know how  
6 they -- how they ran through the chain. But I -- I'm not  
7 going to speak on their policies and procedures and how their  
8 training was and how they know. You would have to talk to the  
9 custodian.

10 **Q Okay. When you say you know how they ran through**  
11 **the chain, what does that mean?**

12 A Well, I can see that they would logistically look  
13 that it was how -- what the entity -- what the closing entity  
14 needed to be and how to get there.

15 **Q Okay. And what did they look at to determine that?**

16 A You would have to -- it's not in the scope of my  
17 department.

18 **Q Okay. But you said you have knowledge of it. So**  
19 **what is your understanding of it?**

20 A The knowledge of how they look at the chain and of  
21 how -- I guess I would say my knowledge is my personal  
22 knowledge. Let's go there. My knowledge is my personal  
23 knowledge --

24 **Q But --**

25 A -- of how to apply an endorsement.

1 I do not know how they were trained or what their  
2 policies and procedures were to apply the endorsement chain on  
3 the note.

4 **Q Okay. Well, you said your personal knowledge. From**  
5 **your personal knowledge, how do they determine which**  
6 **endorsement to place on the note?**

7 A Well, if -- they will look at each -- each note is  
8 different. I guess without me having a piece of collateral in  
9 front of me and explaining it, it's very difficult.

10 **Q Okay. Well, let's look at the one in this case.**

11 A You really have look -- so we could look at the one  
12 in this case.

13 So the one in this case, they're receiving it. This  
14 is actually an allonge.

15 MR. TRINZ: Hold on a second. Do you want to mark this  
16 as an exhibit?

17 THE WITNESS: They already have it as an exhibit.

18 MS. LUNDERGAN: Let's go ahead and mark this as  
19 Exhibit 1.

20 MR. TRINZ: Okay. Just the allonge or the note? What  
21 is it you want?

22 MS. LUNDERGAN: Are we looking at -- what I would like  
23 you to show her, I guess, is attached to the amended  
24 complaint.

25 MR. TRINZ: Okay. Hold on.



1 MS. LUNDERGAN: We can go ahead and turn to the page  
2 with the allonge.

3 MR. TRINZ: Hang on one second. Okay.

4 Do you want to mark the entire amended complaint as  
5 an exhibit or just the note and allonge?

6 MS. LUNDERGAN: Let's mark Exhibit 1 the entire amended  
7 complaint.

8 MR. TRINZ: Hold on a second. Let's make sure it's not  
9 mixed with something else. It's clipped. That will be the  
10 complaint and the exhibit. Hold on one second. Okay.

11 Page 1 is "Amended Complaint to Foreclosed  
12 Mortgage." The last page -- is from Stern's office -- oh --  
13 is the lis pendens. Is that correct? I want to make sure we  
14 have the proper exhibit.

15 MS. LUNDERGAN: Is it the -- the amended complaint, not  
16 the original complaint?

17 MR. TRINZ: No. It says amended complaint.

18 MS. LUNDERGAN: Okay.

19 MR. TRINZ: And the last two pages are the lis pendens  
20 from Stern's office.

21 MS. LUNDERGAN: That should be it then. Can you go  
22 ahead and turn to the allonge?

23 MR. TRINZ: Okay. It's been marked as 1, and you want  
24 her to turn to the note and the allonge?

25 MS. LUNDERGAN: Yes. Please.

1 (Whereupon Defendants' Exhibit No. 1  
2 was marked for Identification.)

3 MR. TRINZ: Okay. All right. We have the note and the  
4 allonge. Go ahead.

5 Q BY MS. LUNDERGAN: Okay. Looking at this allonge,  
6 is it fair to say that when it would have arrived at your  
7 office, it would have already had the portion of allonge that  
8 is typed that says Premium Capital Funding, borrower name,  
9 property address, loan amount, closing date.

10 Is that correct?

11 A Yes.

12 Q Okay. Would it have had the stamp above the line  
13 that says Countrywide Bank, FSB?

14 A No.

15 Q Okay. So it would have come to you as a blank  
16 endorsement; correct?

17 A Yes.

18 Q Okay. Now, if this was received by someone who was  
19 supposed to add the endorsements, how would they know to add  
20 these three stamps to this document?

21 A I can answer how I would know.

22 Q Okay.

23 MR. TRINZ: And I'm just going to interpose. Object to  
24 the form on that.

25 THE WITNESS: Yeah. I cannot answer what the custodian

1 did or what the custodian's policies or procedures were or  
2 training. I can say this is how I would look at this -- this  
3 open endorsement.

4 MR. TRINZ: I'm also objecting because you seem to  
5 assume that all the stamps are applied at the same time, and I  
6 don't know that that's the case.

7 Q BY MS. LUNDERGAN: Well, okay. Lori, how -- or,  
8 Michele, how would we know whether these -- you testified  
9 previously that the collateral would come in and the  
10 endorsements would be executed.

11 Is that correct?

12 A Yes.

13 Q Okay. Would endorsements be executed all at once or  
14 were they executed at different times?

15 A All at once.

16 Q Okay. So we can assume then from your knowledge of  
17 the general procedures that these three stamps were executed  
18 all at the same time; correct?

19 A Correct.

20 Q Okay. So from your knowledge what would you do to  
21 determine what stamps to place on this allonge?

22 A From my knowledge I would know that the -- I know,  
23 because I'm secondary marketing, that the loan is funded in  
24 Countrywide Bank, FSB's, name. So the pay to the order of  
25 Countrywide Bank, FSB, that was the cash.

1           And then it was sold from the bank to the mortgage  
2 company. So it went from Lori Meter's stamp from Countrywide  
3 Bank, FSB, to Countrywide Loan Servicing, L.P.

4           Then I sold it out of the mortgage company, or in  
5 this case when the stamp was applied, it was sold to Ginnie.  
6 And my stamp is applied that says Countrywide Homes, L.P., to  
7 pay to the order of blank.

8           And that is a common practice to leave the  
9 endorsement open for all -- per All Regs and the guidance of  
10 the GSC's.

11           **Q   Okay. So we're in agreement then that all three of**  
12 **these stamps were executed at the same time; correct?**

13           A   Yes.

14           **Q   Okay. Was there actually a physical transfer of**  
15 **this original note from Countrywide Bank, FSB, to Countrywide**  
16 **Home Loan Servicing, L.P., to Ginnie Mae?**

17           A   In the vault, yes.

18           **Q   Okay. So the note physically remained in a vault**  
19 **during all times?**

20           A   Well, the note, yes; but when it's sold to Ginnie,  
21 it's then isolated in the vault in the Ginnie Mae portfolio  
22 area.

23           **Q   Okay. But it's not actually transferred to Ginnie**  
24 **Mae, to their actual headquarters?**

25           A   The endorsement -- the pay to the order of, yes,

1 remains blank unless something happens and Ginnie Mae wants to  
2 then close their endorsement.

3 That's -- once the loan is sold to Ginnie, it is  
4 their -- however, they want. If they would like to close the  
5 endorsement, they could.

6 Q Okay. So even though all these endorsements were  
7 executed from Countrywide Bank, FSB, to Countrywide Home Loan  
8 Servicing, L.P., to what you stated was in blank to Ginnie Mae  
9 the loan actually -- the original loan actually stayed in the  
10 vault.

11 Is that correct?

12 MR. TRINZ: Object to the form.

13 THE WITNESS: Are you talking about the collateral?  
14 Yes. The collateral would stay in the -- after the  
15 endorsements are placed, the collateral then would go and be  
16 reviewed, and then it would be placed in the vault, and the  
17 collateral would remain in the vault. In this case it  
18 remained in the Ginnie vault.

19 Q BY MS. LUNDERGAN: There was no -- there was no  
20 physical transfer of the collateral from Countrywide Home  
21 Loans Servicing, L.P., to Countrywide Home Loans -- or from  
22 Countrywide Bank, FSB, to Countrywide Home Servicing, L.P.?

23 What I'm saying is this loan didn't actually leave  
24 that location and go to another location --

25 A Correct.

1           Q    -- from Countrywide Bank, FSB, to Countrywide Home  
2 Loan Servicing, L.P.; correct?

3           A    Correct.

4           Q    Okay. You stated previously that you knew that this  
5 loan was to be transferred to Countrywide Bank, FSB.

6                   How would you know, if this came in as a blank, a  
7 blank endorsement, who it was being transferred to?

8           A    Well, I knew at that time that Countrywide Bank,  
9 FSB, funded -- funded our loans so that the money that was  
10 used --

11           Q    So you would -- it would just go off of -- it would  
12 just go off of the time frame. So at that time you knew the  
13 loans coming in were being funded by Countrywide Bank, FSB;  
14 correct?

15           A    Yes.

16           Q    Okay. Do you know who the current owner is of this  
17 loan that we're talking about today?

18           A    I have not researched that.

19           Q    Okay. You stated that this loan was transferred to  
20 Ginnie Mae; is that correct?

21           A    It was sold to Ginnie Mae. Yes.

22           Q    Okay. Are you aware that the loan has been pulled  
23 from Ginnie Mae to Bank of America?

24           A    Re-purchased, you mean?

25           Q    Yes.

1 A I -- I don't -- I did not look at that.

2 Q Okay. Did you review any documents with regards to  
3 this original -- this -- this loan before the deposition?

4 A Yes. The allonge.

5 Q What did you review?

6 A The allonge.

7 Q Go on.

8 A I reviewed the allonge.

9 I reviewed the commitment history to see how the  
10 loan was moved there. So how -- when it was received into our  
11 collateral processing area.

12 It was reviewed without a deficiency. It went to  
13 the Ginnie vault. And then, as I said, it was released.

14 I reviewed the collateral, more of the collateral,  
15 and of the loan.

16 Q Okay. Are endorsements ever put on by a printer?

17 A No.

18 Q Never? Since 2008 to now your position is they've  
19 never been put on by a printer?

20 A They are printed on by a person, by a stamp.

21 Q They're always -- they're always done by stamps?

22 A These are stamps. Yes.

23 Q And they -- it's always been done that way? It's  
24 always been a stamp?

25 A To my knowledge.

1           **Q**    When the endorsements are created, is there any  
2           documentation that's done simultaneously to document who put  
3           on these endorsements or when they were done?

4           MR. TRINZ:  Objection as to form.

5           THE WITNESS:  As I said, this is not in the scope of my  
6           department.

7           **Q**    BY MS. LUNDERGAN:  Okay.  But is it in the scope of  
8           your knowledge?

9           A    No.  I don't know.

10          **Q**    So you have no idea if the people who are using your  
11          stamps, do they make a note of when they used it and then in  
12          what circumstance?

13          A    Correct.

14          **Q**    Do you know why you don't personally stamp  
15          documents?

16          A    It was not common business practice.  The common  
17          business practice is that the note is most secure with the  
18          custodian, and that the stamp would be applied at the  
19          custodian in the vault.

20                    It would not -- the note would not be secure if it  
21          was sent to my office for me to endorse it.  It's all about  
22          the security of the note.

23          **Q**    Okay.  And it's always been done that way since  
24          you've been involved in 2008?

25          A    Yes.



1           Q    Do you know what kind of -- you are stating you  
2   have, you know -- because it's secure and that's why you do it  
3   that way.

4                    Have you ever come across the situation where the  
5   original note has been lost?

6           A    Yes.

7           Q    Okay.  And, typically, is that something that it's  
8   been lost because the original lender lost it or was it  
9   because, once you received it, it somehow was lost?

10           MR. TRINZ:  Objection.  Calls for speculation.

11                    Do you have a specific instance you want to  
12   reference?

13           Q    BY MS. LUNDERGAN:  How about in this case?  Are you  
14   aware that, when the complaint was filed, it alleged that the  
15   note was lost?

16           A    No.  I'm not aware.

17           Q    Okay.  Is there anything that you've reviewed that  
18   shows the circumstances regarding the lost note in this case?

19           A    No.  I -- I -- this -- no.

20           Q    Okay.  If I were to look in your system, where would  
21   I look to find out whether there were any problems with the  
22   note being lost?

23           A    I -- our servicing system.

24           Q    That's where you would keep track of notes that  
25   become lost?

1           A    I -- I'm not talking about notes that have been  
2 lost. I'm talking about this particular note. And in this  
3 case the collateral was not lost. Up until Ginnie, I don't  
4 show it ever being lost. And so after it hit servicing and  
5 the years that go by, then it would have to be noted in  
6 servicing if the collateral was misplaced or lost.

7                    At the time when I looked at this loan, it did not  
8 show anything of the collateral being lost. The collateral  
9 was reviewed without deficiency which ensures --

10           **Q    And when was that done, the review?**

11           A    As it was logged into the custodian. I think it was  
12 like --

13           **Q    You testified --**

14           A    -- January -- and I'm just going off memory. But  
15 around January 16th, I think.

16           **Q    Of?**

17           A    Of '08.

18           **Q    Okay. So as of January 16th, 2008, based on your**  
19 **memory, there was nothing in the system showing that this note**  
20 **was lost?**

21           A    Correct.

22           **Q    Okay. And if I wanted to look today to see whether**  
23 **there were any notes made as to whether or not this note was**  
24 **lost, I would look to the servicing records?**

25           A    Yes.

1           **Q**   How about in general? Is that, generally, where any  
2           **documentation is made regarding a lost note?**

3           A    You would have to talk to that department that  
4           creates the lost notes.

5           **Q**   Okay. Who creates the lost notes?

6           A    Post-closing.

7           **Q**   Okay. And what -- where is that department located?

8           A    I think -- I think the department is located in  
9           several different areas.

10          **Q**   Okay. In what areas would those be?

11          A    To my knowledge Simi Valley and -- I do not know if  
12          they have people in Fort Worth or not.

13          **Q**   Okay. And do you know anyone who works in those  
14          **departments?**

15          A    Yes. I do.

16          **Q**   Okay. And what would their names be?

17          A    "Allen Colluse."

18          **Q**   Okay. And where does he work out of?

19          A    To my knowledge he's located in Simi Valley.

20          **Q**   Okay. Anyone else?

21          A    That's my contact.

22          **Q**   Okay. And so that would be the department who would  
23          **make notes if it was discovered that the note was lost?**

24          A    Yes.

25          **Q**   And would anybody else be involved in that other

1       **than that department?**

2           A    The creation of the lost note affidavit?

3           **Q    Let's start generally.  If it was discovered that a**  
4 **note was lost, who would be involved in documenting that and**  
5 **that sort of information?**

6           A    That is so open-ended that I couldn't even begin to  
7 answer.

8           **Q    Okay.  If it was discovered that a note was lost,**  
9 **what department handles that?  Is it only that department that**  
10 **you discussed?**

11          A    If a note -- if -- if a loan is reviewed, gets to  
12 the custodian and does not have the original note, a  
13 deficiency is placed on the system.

14                    There are several areas that can review that  
15 deficiency, including my group, that can see that there was --  
16 that there is a deficiency on the note and the collateral --  
17 the note -- well, the note has been -- a lost note affidavit  
18 might need to be corrected -- created.

19          **Q    Okay.  So that's when the loan is originally**  
20 **received.  What if it's lost after that point?**

21          A    And that's exactly what I said.  That is completely  
22 out of my scope.

23          **Q    Okay.  You have no knowledge then if a note is lost**  
24 **after that point?**

25          A    No.

1           **Q   Who would be involved?**

2           A   It would be "Allen Colluse's" area.

3           **Q   Okay. That's what I'm trying to understand.**

4                   **So Allen handles any notes that are lost after they**  
5           **come in and the review is done. You stated that when they**  
6           **came in and you did the collateral review, if there were any**  
7           **problems at that time, it would be documented?**

8           A   Right. And he -- he would then be alerted as well  
9           at that time. So his group, to the best of my knowledge, is  
10          the group that is alerted if a lost note affidavit needs to be  
11          created. Whether it is at the time of review, at the time of  
12          receipt, or, I guess, when you are -- as you are saying for  
13          services.

14                   You would have to talk to those departments. It is  
15          completely -- post-closing is completely out of my scope.

16           **Q   Okay. And out of your knowledge? You have no**  
17           **knowledge of those areas?**

18           A   I have no knowledge of their policies and  
19          procedures.

20           **Q   Okay. You talked about the deficiencies and the**  
21           **collateral file. What type of deficiencies are you looking**  
22           **for?**

23           A   Am I looking for? I just look to see -- if a loan  
24          has a collateral deficiency, I cannot sell it.

25           **Q   Okay. And what do you mean "collateral deficiency"?**

1       **What are some examples of collateral deficiencies?**

2           A     There could be -- the borrower could not have  
3     initialed the second page of the note.

4           There could be --

5       **Q     Okay.**

6           A     -- a rider.  An issue with the rider.

7           An issue with language.

8           If it's a "seema," you need to go collect the old  
9     note.

10          There is a variety of reasons why a loan needs to be  
11     reviewed and to ensure that the collateral, all the pieces of  
12     collateral, are there.

13       **Q     Okay.  You testified in your deposition with**  
14     **Mr. Kirby that you had a checklist of things that you reviewed**  
15     **when you did your audits.**

16          A     Yes.

17       **Q     What kind of things are on that checklist?**

18          A     I have -- I send a list of loans out that I want to  
19     pull out of the vault to ensure that the collateral is all in  
20     the file.

21                 I look at the endorsements.  I look at their  
22     safekeeping.

23                 I look at the fire and ensure that there is no --  
24     it's up to fire code.

25                 Many of my checklist items are just found in All

1 Regs and it's -- I ensure that we're following the same  
2 guidance that the GSC's give us.

3 Q Is this a written checklist that you are referring  
4 to?

5 A Yeah.

6 Q Okay. And where is that stored?

7 A In my computer.

8 Q Okay. To your knowledge has an audit ever been done  
9 on the loan that's the subject of this case?

10 A I -- I look at many loans. I can't -- to my  
11 knowledge, no. But I can't tell you that for sure.

12 Q If we wanted to find out whether an audit had been  
13 done, is there a way to search for that?

14 A I don't keep track of the loans I look at. No.

15 Q Okay. If you had audited this loan and found a  
16 problem, would there be any documentation of that?

17 A Yes. There would.

18 Q And where would that be?

19 A In the collateral deficiency post-closing system.

20 Q Okay. And if you had audited this file and not  
21 found any deficiencies, then am I correct there would be no  
22 documentation of the audit?

23 A That is correct.

24 Q Okay. Is one of the things that you look for in the  
25 collateral deficiency audit to find out whether there are

1       **powers of attorney?**

2               A    It's not a collateral deficiency audit.  It's a -- I  
3       don't look for deficiencies.  I don't try to find  
4       deficiencies.

5               **Q    Okay.  Then what would you call it?**

6               A    Just an audit.  A QC audit.

7               **Q    Okay.  In your QC audit is one of the things that**  
8       **you look for whether or not the powers of attorneys that are**  
9       **required to be there, is that one of the things you look for?**

10              A    If the loan was signed for power of attorney, yes, I  
11       will look for power of attorney in the file.

12              **Q    Okay.  And when we're talking about that type of a**  
13       **power of attorney -- I'm just trying to picture what that**  
14       **would look like.**

15                        Is that where we're talking about, for instance, if  
16       there were two borrowers and one borrower wouldn't make it to  
17       the closing, the other borrower would sign with their power of  
18       attorney?  Is that what we're talking about?

19              A    I -- yes.  Or a trust.  Yes.

20              **Q    Okay.  Is the powers of attorney that -- what I'm**  
21       **picturing or what I'm thinking -- for instance, there is a**  
22       **husband and wife.  And the wife can't be there that day to**  
23       **sign the loan.**

24                        She might execute a power of attorney giving him  
25       authority to sign the loan for her; correct?  Is that kind of



1           **what you are looking for? Those types of power of attorneys?**

2           A    I don't think I go into that detail. I look to see  
3 if the -- I look at the signatures of the note to see if a  
4 power of attorney was needed.

5           **Q    Okay. And when you say you look at the signature of**  
6 **the note, so if someone had signed as attorney in fact for**  
7 **somebody else, you would know that that needed a power of**  
8 **attorney; right?**

9           A    I would look for a power of attorney in the file or  
10 a copy. Actually, a copy of the power of attorney, I should  
11 say.

12                    You know what --

13           **Q    Okay. So that's how it would trigger you to look**  
14 **for a power of attorney, to look at that signature?**

15           A    -- can we pause here?

16           MR. TRINZ: Amanda, she needs a take a quick break.

17           Yes. Real quick.

18           MS. LUNDERGAN: Okay.

19           MR. TRINZ: We'll go off the record.

20                    (Off the record from

21                    11:37 a.m. to 11:51 a.m.)

22           **Q    BY MS. LUNDERGAN: Michele, before we get back into**  
23 **the questions, I need to ask you did you have any**  
24 **conversations with your attorney about this deposition while**  
25 **you were on break?**

1 A Yes.

2 MR. TRINZ: I have to also --

3 Q BY MS. LUNDERGAN: And you want to tell me what  
4 those conversations were?

5 A We talked about the tenses.

6 Q Okay. And what specifically was that?

7 A How sometimes you are saying -- I'm very confused of  
8 when it's -- when you are talking about 2007 or 2008, when the  
9 loan funded, and then today's practices. And as --

10 Q Okay.

11 A -- our company has evolved.

12 Q And were you --

13 A Okay. I was --

14 Q Okay. So you were asking your attorney about the  
15 tenses?

16 A Yes.

17 Q Okay. And did he give you any instructions?

18 MR. TRINZ: I'm going to object. It's attorney-client  
19 privilege.

20 But the -- the short answer is we did not discuss  
21 anything of substance, other than I asked her how she felt  
22 because she has to take medication, which is why she left to  
23 take medication.

24 MS. LUNDERGAN: Well, she was stating she was discussing  
25 the tenses of my questions, and if she's discussing my

1 questions on the break, I have a right to that.

2 THE WITNESS: It was not a specific question. It was  
3 just --

4 MR. TRINZ: She just told you that was her -- she  
5 expressed a concern to me. So that was the extent of the  
6 conversation.

7 MS. LUNDERGAN: If you could just let her just answer  
8 those questions.

9 **Q So, Ms. Sjolander, you simply stated to your**  
10 **attorney you were having difficulty understanding the tenses;**  
11 **is that correct?**

12 A Yes.

13 **Q And did he give you any advice in response to that?**

14 A Just for me to further clarify it with you.

15 **Q Okay. And was that the substance of your**  
16 **conversation during the break?**

17 A Other than us talking about computers and my heart  
18 attack.

19 **Q Okay. Going back to the question, we are talking**  
20 **about how you would review a file to see if it needed a power**  
21 **of attorney and how, in order to determine that, you would**  
22 **look to see whether the signatures had been signed as power of**  
23 **attorney; correct?**

24 A Yeah. If the -- if the -- yes. Attorney in fact.  
25 Right.

1           **Q**   **Okay. So let's look then at your endorsement of**  
2 **this promissory note in this case.**

3                   **How do I know, by looking at that endorsement, that**  
4 **somebody is signing as power of attorney for you?**

5           **A**   Well, someone is not signing as power of attorney  
6 for me. They are placing my signature stamp.

7           **Q**   **But someone has a power of attorney to do that?**

8           **A**   Yes. They have a power of attorney to place my  
9 signature stamp. They are not putting my wet signature on it.

10           **Q**   **Okay. And how do I know from that endorsement that**  
11 **somebody has had the power of attorney to stamp your name to a**  
12 **document?**

13           **A**   I just told you.

14           **Q**   **But if I was just -- if I didn't know you and I was**  
15 **just looking at this endorsement, is there any way to tell**  
16 **from that endorsement that somebody is executing this as your**  
17 **power of attorney?**

18           **A**   Common practice. I think if you know the mortgage  
19 industry, you would know a stamp is placed.

20           **Q**   **Okay.**

21           **A**   If you do not --

22           **Q**   **Okay. But there is nothing, other than the**  
23 **document, that shows somebody is executing this as a power of**  
24 **attorney; correct?**

25           **A**   No. Correct.

1           Q    Okay.  And do you know why it's done this way  
2  instead of having that person sign their name as power of  
3  attorney for you?

4           A    This has been common practice for years.  I can't  
5  tell you why.  I mean it's been 20 years in the making.

6           Q    Okay.  Okay.  So it's your understanding it's always  
7  been done this way?

8           A    To my understanding, yes.  In our area, yes.

9           Q    Fine.  Okay.  Have there ever been any discussions  
10 about doing it the typical way, which is what we discussed,  
11 where somebody signs it, as attorney in fact, for somebody  
12 else?  Has Bank of America ever had any discussions about  
13 that?

14          A    No.  I've never discussed that with anyone.

15          Q    Okay.  Have you ever questioned that, of why it's  
16 done this way, instead of the way it's typically done, which  
17 is someone signing as attorney of fact for someone else?

18          MR. TRINZ:  I'm objecting to the use of the word  
19 "typically done."  What's typically done is what's done on  
20 this.  So you are injecting your own opinion into this  
21 question and I'm objecting to it.

22          Q    BY MS. LUNDERGAN:  Okay.  Michele, has there ever  
23 been any discussion of why it's done this way versus the way  
24 we discussed earlier, which is a person signing as attorney in  
25 fact for someone else?  Has there ever been any discussion of

1       **why it's done this way?**

2           A    Not to my knowledge.

3           **Q    Okay.  Do you know who we would ask as to why it's**  
4       **done this way?  Is there a department or person that you would**  
5       **know of who would have knowledge of why it's done this way?**

6           A    I mean you could go an All Regs.  As I said, you  
7       know, it's a system that shows all the regulations of all the  
8       GSC's.  I mean it is in there for Fannie, Freddie, and Ginnie.  
9       It discusses the use of a stamp for an endorsement.

10          **Q    Okay.  And where would I find that?  Is that**  
11       **available to the public or is that --**

12          A    I think --

13          **Q    -- something that's only available to Bank of**  
14       **America?**

15          A    No.  It is available to the public.

16          **Q    Okay.  And can you --**

17          A    I think you have --

18          **Q    Can you --**

19                THE COURT REPORTER:  I can't understand.

20                THE WITNESS:  You would have to purchase it.  I think  
21       you -- I don't know how it's on-line.

22          **Q    BY MS. LUNDERGAN:  Okay.  I would have -- I would**  
23       **have to purchase access to that information?**

24          A    I believe so.  I'm not sure.

25          **Q    Okay.  And is it your understanding that information**

1 would be on Fannie Mae's website?

2 A I believe so.

3 Q Okay. Do you know, offhand, the website where the  
4 information can be found?

5 A Not offhand, the exact website.

6 Q Okay. Okay.

7 A I mean I --

8 Q Where do you get your knowledge then that it's  
9 available to the public? How do you know that?

10 A Well, I know All Regs is available -- I mean I know  
11 when I -- I could look at All Regs at Warehouse, All Regs at  
12 Bank of America.

13 I'm not -- I know that you can go in and it --  
14 request the software. Request access to the software.

15 Q Okay. If I were going to request that information  
16 from you, what would I call it? If I wanted to get access to  
17 their instructions about these stamps, what would I call it if  
18 I wanted to ask you for it?

19 A All Regs.

20 Q I would just say, "Can I have the All Regs for this  
21 loan?"

22 A Well, you wouldn't -- you would have to ask for what  
23 particular regulation you are looking for.

24 Q Okay.

25 A So in this case you would say, "What are the

1 regulations around facsimile stamps?"

2 Q Okay. And you call it a facsimile stamp. Is that  
3 because it's done electronically or because -- I mean why do  
4 you call it a facsimile stamp?

5 A That's what they call it.

6 Q Okay. But it's not actually put on by a fax?

7 A Correct.

8 Q Okay. But it's manually done with a stamp?

9 A It's not a fax, like f-a-x. It's f-a-s.

10 Q Okay.

11 A It's facsimile.

12 Q Okay. I -- I understand that now.

13 These powers of attorney that you've executed over  
14 the years, do you know if they're recorded?

15 A I believe so. I -- I can't tell you for sure. I  
16 believe I've seen some that have been recorded.

17 Q Okay. So it may be some of them but not all of  
18 them?

19 A I can't answer that. I think you would have to go  
20 back and research.

21 Q Okay. But your understanding is some of them may be  
22 recorded?

23 A To my knowledge.

24 Q Are they notarized?

25 A No. I don't --



1           **Q   None of them?**

2           A   I don't think so. I would have to go back and  
3 review that. As I said, it was many years. I would have to  
4 go through -- through them and look at them. I don't --

5           **Q   Okay. Do you ever remember having a notary there**  
6 **when you executed a power of attorney?**

7           A   I've executed many things with a notary. So I  
8 can't -- I can't tell you whether yes or no.

9           **Q   Okay. When was the most recent power of attorney**  
10 **that you executed?**

11          A   I don't have that answer.

12          **Q   Okay. Were there witnesses there when you executed**  
13 **powers of attorney?**

14          A   Yes.

15          **Q   There were witnesses there; is that correct?**

16          A   Yes. There is usually someone in my office watching  
17 me, yes.

18          **Q   Okay. And who would those people be? Is it**  
19 **somebody you supervised or is it always the same person?**

20          A   It's usually someone that works for me. Yes.

21          **Q   Okay. And do you remember names of any of the**  
22 **people who witnessed your signature?**

23          A   "Joan Martinez." "Joanne Inness." If it was --

24          **Q   Anyone else?**

25          A   -- if it was notarized, it would have been one of my

1 notaries, "Jose Sevala."

2 I mean we're looking at years of people that have  
3 worked for me that bring in the documents and I review them to  
4 sign them.

5 Q Okay. Going back to your stamp, when the stamps are  
6 created, are they sent to you to review before someone uses  
7 them?

8 A Yes. They -- yes.

9 Q Okay. And is there a limit on how many stamps can  
10 be used at any given time?

11 A I don't understand that question.

12 Q So could -- for instance, could you execute -- you  
13 know, could you have 20 stamps being used or can you only have  
14 five stamps being used at any given time?

15 Is there a limit on the number of stamps that can be  
16 in use at a certain time?

17 A Not to my knowledge.

18 Q Okay. And you said that you would get copies -- or  
19 you would get the stamps back to burn them.

20 Would they just send them to you in the mail?

21 A No. We were in the same facility; so I would --  
22 they would walk them over to me.

23 Q Okay. And you stated that this was done when the  
24 entities changed and you had to get new stamps; correct?

25 A Yes.

1 Q And you said that you would burn those stamps?

2 A Yes.

3 Q Is that the policy or was that just something you  
4 had done?

5 A That's my policy. I mean they're my stamps --

6 Q Okay.

7 A -- with my signature. I don't want them out; so I  
8 destroy them.

9 Q Okay. And do you do that at work or do you do that  
10 at home?

11 A I do that at home.

12 Q Okay. How many stamps have you burned over the  
13 years that you had stamps?

14 A I don't know.

15 Q Is it more than 100?

16 A No.

17 Q More than 50?

18 A I don't know.

19 Q Is it -- is it more than 10?

20 A I mean -- more than 10.

21 Q Okay. Okay. Do you know if Bank of America has any  
22 policy on what to do with the old stamps that are done being  
23 used?

24 A Not to my knowledge.

25 Q Okay. So nobody instructed you that you had to burn

1       **them; correct?**

2               A    No.  I mean I know I am an officer.  I know that I  
3   need to destroy them.

4               **Q    Okay.  Does Lori Meter destroy her stamps?**

5               A    I cannot speak for her.

6               **Q    Okay.  But do you have knowledge of whether she  
7   burns her stamps?**

8               A    I have no knowledge --

9               **Q    Okay.**

10              A    -- on what she does with her stamps.

11              **Q    Is there ever a stamp that contains two  
12   endorsements?**

13              A    Yes.

14              **Q    Okay.  Is that a stamp that contains both yours and  
15   Lori's endorsement?**

16              A    Yes.

17              **Q    Is that -- when was that stamp first issued or when  
18   did that first start with the double endorsement?**

19              A    I don't have the year.

20              **Q    Okay.  Why did you go to a double endorsement stamp?**

21              A    You would have to talk to the bank.  I mean I'm sure  
22   because we were -- it was easier to apply one instead of  
23   applying two.

24              **Q    Okay.  Did they have to get your approval to do a  
25   double endorsement stamp?**

1 A Yes.

2 Q Okay. And you had no problems with them using a  
3 double endorsement stamp?

4 A Nope.

5 Q To your knowledge are they still using any double  
6 endorsement stamps?

7 A Not with my name on it.

8 Q Okay. How about with anyone else's name on it?

9 A I can't comment on that. It's out of the scope of  
10 my position.

11 Q How about in the scope of your knowledge? Do you  
12 have knowledge --

13 A I don't.

14 Q -- if they're using --

15 A I don't. I don't. I don't. They're not my stamps.  
16 It doesn't involve me. I don't know.

17 Q Okay. Was the double endorsement stamp -- well, did  
18 you destroy that stamp?

19 A I did.

20 Q And how long ago was that?

21 A I think June of last year.

22 Q Okay. Is Lori Meter still executing endorsements?

23 A I do not think so. I don't -- you would have to ask  
24 Lori.

25 Q Okay. What does Lori Meter do now?

1 A She works for "Rincon Trust."

2 Q So she actually works for the company that stores  
3 all the documents in their vault?

4 A Yes. She is our custodian.

5 Q Okay. Has she always worked for "Rincon"?

6 A "Rincon" has changed names through the development  
7 of -- you know, through its successors. But, yes.

8 Q Okay. And she was still with that entity even when  
9 the name was a different name?

10 A Yes.

11 Q Okay. Do you know how long she's been in the  
12 mortgage industry?

13 A I don't.

14 Q Are you -- are you friends with Lori Meter?

15 A Yes.

16 Q Okay. How long have you known Lori Meter?

17 A Since -- I don't know -- 2006, seven. I can't -- I  
18 can't put a pinpoint on it.

19 Q And what position does she hold now?

20 A She's with "Rincon Trust."

21 Q And what does she do there?

22 A You -- you would have to talk to her within -- what  
23 her scope of her job duties are.

24 Q Okay. As her friend, you don't know what she does?

25 A We don't really talk about her day-to-day

1 activities.

2 **Q Okay. You don't have any idea of what she does at**  
3 **her job?**

4 A She -- she manages the -- the -- the collateral.  
5 I -- I --

6 **Q Okay. Let's go back to this particular loan.**  
7 **You stated before you don't know who the current**  
8 **owner of this loan is?**

9 A I stated that. Yes. I saw that the loan was sold  
10 to Ginnie. And I --

11 **Q And do you know --**

12 A You told me there was a re-purchase.

13 **Q When it was sold to Ginnie?**

14 A I -- I would have to look at -- refresh my memory on  
15 the dates. I don't have --

16 **Q Okay.**

17 A I know it was after January 16th of '08.

18 **Q And do you know if Ginnie is still the owner of this**  
19 **loan?**

20 A I think you told me that there was a re-purchase.  
21 That Ginnie re-purchased it.

22 **Q Okay. Where would you look at to determine who the**  
23 **current owner of this loan is?**

24 A I would look at our investor, our commitment history  
25 of the loan, to show ownership.

1           **Q   And where is that stored? Is that on a certain**  
2 **system?**

3           A   Yeah. That's the system I was talking about  
4 earlier. The second marketing system. It's a website.

5           **Q   Okay. And who inputs information as to the current**  
6 **owner in that system?**

7           A   It's a system. It's generated through various  
8 systems of our servicing. I don't know who inputs it.

9           **Q   Okay. But you don't input it; correct?**

10          A   Correct.

11          **Q   And you don't oversee the department that does input**  
12 **that information?**

13          A   Correct.

14          **Q   Okay. Let's talk a little bit about Countrywide**  
15 **Home Loan Servicing, L.P.**

16                 **They were the servicing branch for Countrywide; is**  
17 **that correct?**

18          A   Yes.

19          **Q   And they only serviced loans?**

20          A   The L.P., yes. They are a servicer.

21          **Q   Okay. They didn't own loans though. They just**  
22 **serviced them; right?**

23          A   Well, the loan was sold out of the mortgage company.

24          **Q   But Countrywide Home Loan Servicing, L.P., didn't --**  
25 **they weren't the owner. They just serviced it for the owner?**



1           A    Well, Countrywide is the entity, the overall entity,  
2           that owned the loan.

3           **Q    Yeah.  The Countrywide Home Loans, Inc.; correct?**

4           A    You would -- you would really have to talk to the  
5           attorneys on how the structure of the ownership goes between  
6           Countrywide and the L.P. and the mortgage company.

7           **Q    Okay.  But from your understanding Countrywide Home  
8           Loan Servicing, L.P., is a servicing company; correct?**

9           A    Yes.  They are a servicer.

10          **Q    Okay.  Can we turn back to the original complaint in  
11          this case and can we mark that as Exhibit 2?**

12          MR. TRINZ:  Okay.  The original complaint, which has  
13          been replaced by the amended complaint, that goes -- let me  
14          look at the exhibits and make sure we're talking about the  
15          same thing.  Okay.

16                 There is the original.  There is an FHA planned unit  
17          development rider.  There is a notice of federal tax lien.  
18          And there --

19          MS. LUNDERGAN:  The last page should be a loan ledger  
20          marked exhibit -- is that a "D"?

21          MR. TRINZ:  Yeah.  It's something.  I can't really read  
22          it.

23                 It says Countrywide Home Loans at the top.  Is that  
24          the last -- is that part of the complaint?

25          MS. LUNDERGAN:  That is part of the original complaint.

1 MR. TRINZ: Okay. All right. So that's going to be  
2 Composite 2. Hold on while the court reporter marks it.  
3 Okay. It's marked.

4 (Whereupon Defendants' Exhibit No. 2  
5 was marked for Identification.)

6 **Q BY MS. LUNDERGAN: Okay. Michele, can you turn**  
7 **to -- they're not numbered -- page five of the complaint where**  
8 **it starts with Count 1?**

9 MR. TRINZ: There is only three pages.

10 MS. LUNDERGAN: Are you there?

11 MR. TRINZ: When you say page five of the complaint, the  
12 complaint is only three pages.

13 MS. LUNDERGAN: I'm sorry. The entire packet. The  
14 composite exhibit.

15 MR. TRINZ: Right.

16 MS. LUNDERGAN: So the fifth page in, which would be,  
17 technically, the first page of the allegations.

18 MR. TRINZ: Well, the whole package starts with the  
19 complaint. There is nothing else in the packet. It just says  
20 complaint.

21 MS. LUNDERGAN: The first page doesn't say, "Civil  
22 Action Summons"?

23 MR. TRINZ: Not what I have here. It just says,  
24 "Complaint to Foreclose Mortgage."

25 MS. LUNDERGAN: Okay. For whatever reason you don't

1 have the summons. Mine has a summons, a lis pendens.

2 MR. TRINZ: I mean I have it -- I mean -- I don't know  
3 if I have the summons. I'm not sure. Hang on.

4 MS. LUNDERGAN: But what we're --

5 MR. TRINZ: Right. I've got -- I've got the complaint.  
6 I don't seem to have the summons handy here.

7 MS. LUNDERGAN: Okay. The first two pages -- I'll just  
8 state for the record, the first two pages were the summons and  
9 the lis pendens.

10 So in my packet the fifth page is Count 1 of the  
11 original complaint. For you, that must be your --

12 MR. TRINZ: This is the first page.

13 MS. LUNDERGAN: -- the initial page, whatever it is  
14 numbered.

15 MR. TRINZ: This is -- the first page is Count 1.

16 MS. LUNDERGAN: In the first page, paragraph five reads,  
17 "The plaintiff owns and holds the note in mortgage."

18 Is that what your copy says?

19 MR. TRINZ: Yes.

20 **Q BY MS. LUNDERGAN: Ms. Sjolander, we had previously**  
21 **discussed the -- the rule that Countrywide had in these -- in**  
22 **these loans.**

23 **Going back to that, it's your understanding that**  
24 **Countrywide Home Loan Servicing, L.P., was the servicing**  
25 **branch for Countrywide; correct?**

1 A Yes. And Bank of America --

2 Q Okay.

3 A -- took over that.

4 Q Okay.

5 MR. TRINZ: And just for the --

6 Q BY MS. LUNDERGAN: And Countrywide Home Loans --

7 MR. TRINZ: Excuse me, Amanda. Just -- just -- Amanda,  
8 just for the record, I'm going to put an objection on the  
9 record to testifying about the original complaint.

10 There is an amended complaint. This is a nullity.  
11 It's been superceded by the amended complaint. It is of no  
12 import or effect in the case whatsoever. Now, you can ask the  
13 questions but I'm putting my objection.

14 MS. LUNDERGAN: Your objection is duly noted.

15 MR. TRINZ: Right.

16 Q BY MS. LUNDERGAN: Going back to paragraph five it  
17 says, "The plaintiff owns and holds the note in mortgage."

18 Michele, do you understand what "owns and holds"  
19 means?

20 A Yes.

21 Q Okay. In your understanding that if -- if -- if it  
22 is true that Countrywide Home Loans Servicing was only the  
23 servicer, they wouldn't own and hold anything; correct?

24 A Well --

25 MR. TRINZ: Object as calls for a legal conclusion.

1 THE WITNESS: Yeah. I mean there is legal entities.  
2 And I think that's what you would need to look at is the legal  
3 entities of Countrywide, and the servicing entity, the  
4 mortgage company.

5 So when it says, "The plaintiff," I'm sure it's  
6 talking about Countrywide as a whole who now is its successor  
7 (sic) of Bank of America. And --

8 **Q BY MS. LUNDERGAN: Okay.**

9 A -- and we do hold --

10 **Q So we should infer then that --**

11 MR. TRINZ: Let her finish the question (sic).

12 THE WITNESS: I was not done.

13 MR. TRINZ: Let her finish the answer, Amanda. You  
14 interrupted her. Let her finish.

15 THE WITNESS: So when we talk about owns and holds the  
16 note, we do own and we're holding the note on behalf of -- of  
17 Ginnie.

18 **Q BY MS. LUNDERGAN: Okay. And can you tell me where**  
19 **in the complaint it says that?**

20 A I did not write the complaint.

21 **Q You can take some time if you want to read through**  
22 **it and let me know where in the complaint that it says they**  
23 **are owning it and holding it on behalf of Ginnie.**

24 A I could not tell you that. I did not read the  
25 complaint. I got it ten minutes before I had to be here.

1           **Q**   **Okay. Well, we'll take a second. Go ahead and read**  
2 **through it. It's only a couple of allegations here. It's not**  
3 **that long.**

4           MR. TRINZ: You know, objecting regarding -- I mean you  
5 have an amended complaint, which is the operative complaint in  
6 the case. Why are you asking her about the original complaint  
7 from three years ago?

8           MS. LUNDERGAN: Okay. I got your relevance objection.  
9 I'm going to go ahead and have her answer my question.

10          THE WITNESS: It does not say that. How's that?

11          **Q**   **BY MS. LUNDERGAN: Okay. So there is nothing within**  
12 **the complaint that indicates this is being brought by anyone**  
13 **other than Countrywide Home Loan Servicing, L.P.; correct?**

14          A    It says the plaintiff. Well, Countrywide.

15          **Q**   **Is that correct? There is no mention of it being**  
16 **brought on behalf of anyone else?**

17          A    Well, Countrywide Servicing, L.P., is now a  
18 successor to Bank of America Servicing, L.P.

19          **Q**   **Okay. But on this complaint there is no allegations**  
20 **that it's being brought on behalf of anyone else; correct?**

21          A    Correct.

22          **Q**   **Okay. You stated earlier that you were familiar**  
23 **with some of the MERS records, such as the MERS Min Summary.**  
24 **So I would like to turn to that if you could.**

25                   I actually faxed you over two copies of the MERS

1 documents. One are the documents that MERS themselves  
2 produced, and the other are documents that David Stern Walker  
3 (sic) produced.

4 A Okay. I would like to --

5 Q What I would like to talk to --

6 MR. TRINZ: Hold on. I want to make sure --

7 THE WITNESS: MERS is completely out of the scope of my  
8 business. So as I --

9 Q BY MS. LUNDERGAN: That's fine. But you stated  
10 earlier you were familiar with those types of documents.

11 A I know what a Min document looks like. I know what  
12 a Milestone looks like. But I am not -- MERS is completely  
13 out of the scope of what my department does.

14 Q Okay. Perfect. So let's turn to the documents that  
15 were produced by David Stern's office and I would like to mark  
16 those as -- I think we're up to -- what? Exhibit 3?

17 MR. TRINZ: Okay. Let me just add -- okay. The first  
18 page is "Plaintiff's Response to Defendant's Request For  
19 Production."

20 MS. LUNDERGAN: And then it goes Min Summary,  
21 Milestones, Min Audits.

22 MR. TRINZ: And then there is some other documents.

23 MS. LUNDERGAN: Then Transfer Audits.

24 MR. TRINZ: There is documents from Bank of America, it  
25 looks like, or they're different. So you want Composite 3?

1 MS. LUNDERGAN: Yes, please.

2 (Whereupon Defendants' Exhibit No. 3  
3 was marked for Identification.)

4 MR. TRINZ: Okay. So let me just count how many pages  
5 there is one -- not counting the first page, the actual  
6 documents -- yeah -- one, two, three, four, five, six,  
7 seven -- eight pages of what seem to be MERS documents.

8 Is that right? There is eight pages?

9 MS. LUNDERGAN: That's correct.

10 MR. TRINZ: Then there is a letter addressed to [REDACTED]  
11 and Clara [REDACTED] right? I want to make sure we have  
12 everything you are marking a composite exhibit.

13 MS. LUNDERGAN: Three, four, five -- mine ends with --  
14 mine is, in total -- one, two, three, four, five, six, seven,  
15 eight, nine, ten -- mine is 14 pages in total.

16 MR. TRINZ: Well, let me count.

17 MS. LUNDERGAN: I'm really only going to be using the  
18 first handful of pages. So those last pages --

19 MR. TRINZ: Okay. I have 14 pages. All right. Let's  
20 mark this as Composite 3.

21 THE WITNESS: When you said you faxed it, you did not  
22 fax it to my department; right?

23 **Q BY MS. LUNDERGAN: I'm sorry. We emailed it.**

24 **A Okay.**

25 **Q It was emailed to your attorney and also to**



1 **Mr. Harvey?**

2 A Okay. I was just confirming it was not sent to our  
3 fax.

4 MR. TRINZ: Okay. We have Exhibit 3.

5 Q BY MS. LUNDERGAN: Okay. Can we please turn to  
6 page two, which would be titled, "Min Summary"?

7 A Yes.

8 Q Okay. You've seen this type of document before?

9 A Min Summary, no.

10 Q No. You've never seen a Min Summary before?

11 A I do not look at Min Summaries. No.

12 Q Okay. What do you look at?

13 A I've looked at the MERS Milestones before.

14 Q Okay. Let's turn to page three, which is the  
15 Milestones.

16 A Okay.

17 Q Okay. Looking at these MERS Milestones and the  
18 notes that they've made, can you walk me through the chain of  
19 ownership of this loan?

20 A I cannot.

21 Q Okay. You don't know how to read the MERS  
22 Milestones?

23 A This is not -- out of my scope of my department.

24 Q Okay. You said you were familiar with them;  
25 correct?

1           A    Familiar, yes. But I am not -- I do not feel  
2 comfortable enough to explain them in the court setting. I do  
3 not understand them. I do not understand them enough.

4           **Q    What is your knowledge of the MERS Milestones as far**  
5 **as what information do they contain?**

6           A    I -- they contain the -- the -- the lenders. I look  
7 at the description. I --

8           MR. TRINZ: All right. I'm going to object to her  
9 testifying from other business records. She is not here as a  
10 corporate representative of any entity, let alone MERS.

11          THE WITNESS: Right.

12          MR. TRINZ: So I don't -- I -- I --

13          MS. LUNDERGAN: She actually is here as a corporate  
14 officer of the plaintiff.

15          MR. TRINZ: Actually, she's here as a fact witness.

16          THE WITNESS: I'm actually here as a fact witness on the  
17 endorsement, not on MERS at all. So I think --

18          **Q    BY MS. LUNDERGAN: I would disagree on that. If you**  
19 **read the notice of deposition it reads as vice president of**  
20 **the plaintiff. It doesn't read as a fact witness --**

21          A    I cannot testify --

22          **Q    -- on your deposition.**

23          A    Okay. I cannot testify to this MERS document. It  
24 is out of the scope of my department. I think if you need a  
25 representative within servicing --

1           Q    Okay. Well, I'm only speaking what's in the scope  
2 of your knowledge. So let's talk about the scope of --

3           A    I am telling you --

4           Q    I don't care about what's in --

5           A    Okay. And I'm telling you, I do not have knowledge.  
6 I've seen this document. I do not have -- I don't know how  
7 the data gets there. I have no knowledge of what this  
8 document --

9           Q    Okay. Then you can tell me -- when I ask questions  
10 if you don't know, you can tell me you don't know. Let's go  
11 through it a little bit at a time and you can tell me what you  
12 are familiar with, what you have knowledge of. And if you  
13 don't know, tell me you just don't know and we'll address it  
14 at that time.

15                   Is that okay?

16           A    If your questions are not open-ended, that's fine.

17           Q    Okay. Looking at this document it appears that the  
18 most recent entry, you see the January 7th, 2010, entry, lists  
19 the current investor as Bank of America, N.A.; is that  
20 correct?

21           A    I do not know if that's the current investor, but it  
22 does say Bank of America, N.A.

23           Q    Okay.

24           A    Or actually it says Bank of America -- BAC Home Loan  
25 Servicing, L.P.

1           Q    Okay.  And you must not be looking at the same thing  
2 I'm looking at.  I'm looking at the entry marked January 7th,  
3 2010 --

4           MR. TRINZ:  Hold on.

5           Q    BY MS. LUNDERGAN:  -- under the Milestone  
6 information paragraph --

7           A    As I --

8           Q    -- it says new investor Bank of America, N.A.; is  
9 that correct?

10          MR. TRINZ:  We're trying to figure out what you're  
11 reading from.

12          THE WITNESS:  I do not see that.  No.  And if I knew how  
13 to read these documents, I would probably know what you are  
14 speaking about.

15          Q    BY MS. LUNDERGAN:  Okay.  Well, looking at the  
16 document you see we've got four paragraphs there; right?

17                   One says description, one says date, one says  
18 initiating organization, and one says Milestone information.

19                   Does your copy say that?

20          A    Yes.

21          Q    Okay.  Now, let's look at the fourth paragraph,  
22 which says Milestone information, right underneath that  
23 paragraph, the second line, it says, new investor Bank of  
24 America, N.A.

25                   Does yours say that?

1 A Yes. It does.

2 Q Okay. Perfect. Now, you said you don't know if  
3 that information is correct; right?

4 A I said I do not know where this information comes  
5 from. I do not know this document. I do not know what feeds  
6 this information. I can't say whether it's correct or  
7 incorrect.

8 Q Okay. If we said -- if -- for the sake of our  
9 discussion, if we said it was correct, that that was correct  
10 information, then that would mean that the owner of this loan,  
11 as of January 7th, 2010, appears to be Bank of America, N.A.;  
12 correct?

13 A I cannot say that.

14 MR. TRINZ: Object to the form of the question.

15 THE WITNESS: You are -- you are -- you are saying  
16 seeking this. As I said, I am not a -- I'm not -- I'm not a  
17 witness to this document. I am a witness to the endorsement.

18 Q BY MS. LUNDERGAN: Okay. You said you were familiar  
19 with Milestones; correct?

20 A Yes. I've seen them. I'm familiar with it. Yes.

21 Q Okay. And in what -- in what situation have you  
22 become familiar with Milestones?

23 A Just by looking to see if the loan was registered in  
24 MERS.

25 Q That's the only thing you've ever looked at the MERS

1 **document for?**

2 A That's what I look at.

3 **Q Okay.**

4 A If the -- if the loan is on Mom docs, is it  
5 registered in MERS.

6 "Christy, is it registered in MERS?"

7 "Yes. Here is your MERS Milestone."

8 "Okay. Thanks."

9 That's all I --

10 **Q And what do you use the MERS milestone for?**

11 A That is my knowledge. That is what I do. It's not  
12 in my department. It's not within the scope of my department.  
13 How they register, what they do, what this means. No.

14 **Q Okay. And when she says, "Here you go. Here is  
15 your Milestones," what do you do with those?**

16 A Confirm that it is the same loan number. Same -- it  
17 matches.

18 **Q All right. You confirm that it's the same loan  
19 number in comparison to what?**

20 A Same loan in comparison to the note. That it truly  
21 is --

22 **Q Okay. And where on here do you see the loan number?**

23 A Well, I look at -- well, she usually has the loan  
24 number on it. So I can't tell you. I can tell you what this  
25 is because it's -- it doesn't have the loan number.

1           The document she sends me, she puts the loan number  
2 on it, I guess. That's how I know.

3           **Q   Okay. Do you know if she adds the loan number or is**  
4 **the loan number present on the document you have access to?**

5           A   Usually she sends me the loan number. I don't know  
6 if she puts the loan number on it or what.

7           **Q   Okay. Does it appear to be handwritten or does it**  
8 **appear to be part of the document?**

9           A   I don't even know. Maybe it's handwritten on it.

10          **Q   Okay. Where would you look to refresh your**  
11 **recollection? Do you have any of these MERS documents that**  
12 **she sent you?**

13          A   On this file? Not here. No.

14          **Q   How about in general? Do you have any MERS**  
15 **documents that she sent you?**

16          A   Not here. No. Not in this room.

17          **Q   Where would they be?**

18          A   Probably my Simi Valley office.

19          **Q   Okay. So you have no knowledge then as to any of**  
20 **the other MERS documents? Is that what you are stating?**

21          A   Yes. That's what I'm stating.

22          **Q   Okay. The only thing that you use the MERS**  
23 **documents for are to look at the loan number; is that correct?**

24          A   No. That's not correct. I --

25          **Q   Okay. What else do you use them for?**

1           A    As I said, I confirm if the loans -- I don't use the  
2 MERS documents. You keep saying I use them. I don't use  
3 them.

4                    I confirm that the loan, if it's on Mom docs, was  
5 registered in MERS. By doing so, I contact that department  
6 and they send me the Milestones.

7                    "Yes. Michele, it is. Here's the MERS Milestones."

8                    "Great." I look at it and I stick it in the file.

9                    I don't -- I take -- I guess I take their word for  
10 it. I mean I can't say if there is a loan number on it. We  
11 have usually a conversation. They look it up, and they say,  
12 yes, it is on MERS. "Here is your MERS Milestone."

13           **Q    Okay.**

14                    A    I mean I can't go into detail of the document.

15                    THE COURT REPORTER: I didn't hear the question.

16                    MR. TRINZ: She said let's go back to page number two.

17           **Q    BY MS. LUNDERGAN: Okay. In looking at this**  
18 **document can you tell whether this loan has been securitized?**

19                    MR. TRINZ: The one that's marked Min Summary? You're  
20 on page two?

21                    MS. LUNDERGAN: Yes. Yes. Page two, Min Summary.

22                    THE WITNESS: No. I cannot tell.

23           **Q    BY MS. LUNDERGAN: Okay. If you were to try to tell**  
24 **whether a loan has been securitized, where would you look in**  
25 **your system?**



1           A    In our servicing system, I would look at the  
2 investor number, the investor history.

3           **Q    Okay.  And have you done that in this case?**

4           A    Yes.

5           **Q    Okay.  And is the loan securitized?**

6           A    It was securitized with Ginnie.  Yes.

7           **Q    Okay.  And that's not reflected in the name of the  
8 case, is it?**

9           MR. TRINZ:  Object to the form.

10          **Q    BY MS. LUNDERGAN:  In the caption of this case,  
11 which reads Countrywide Home Loan Servicing, L.P., Plaintiff,  
12 versus [REDACTED] [REDACTED] there is no indication in that caption  
13 that this loan is securitized, is there?**

14          A    No.  There is not.

15          **Q    And you stated it was securitized in -- back when it  
16 was moved to Ginnie Mae, and when would that be?**

17          A    Back in '08.

18          **Q    2008?**

19          A    Uh-huh.

20          **Q    Okay.  I also then would like to turn you to the  
21 interrogatories that were sent by fax.**

22                   **Do you have those?**

23          MR. TRINZ:  I'm looking to see.  Interrogatories.  I  
24 think I saw them.  Hold on.

25          THE WITNESS:  This?

1 MR. TRINZ: No. Those are the document requests we just  
2 looked at. Hang on.

3 MS. LUNDERGAN: It was part of the initial email to you.

4 MR. TRINZ: Right.

5 MS. LUNDERGAN: It was notice of servicing answer to  
6 intogs (sic).

7 MR. TRINZ: Well, I forwarded them to be -- for  
8 printing.

9 THE WITNESS: Was --

10 MR. TRINZ: It was four attachments; right?

11 THE WITNESS: There was four attachments. I printed all  
12 four.

13 MR. TRINZ: Okay. Hold on.

14 When you sent them by email, can you tell me what  
15 that file was called?

16 MS. LUNDERGAN: Yeah. It would have been called  
17 Plaintiff -- it would just be "P" apostrophe "S," notice of  
18 servicing, abbreviated N-O-S, answer to intogs (sic).

19 THE WITNESS: No. The attachment of the file -- there  
20 was one called P-R, S-P-D's. One that said Michele Sjolander  
21 Endorsements. There was one that said complaint. There was  
22 one that said amended complaint.

23 MS. LUNDERGAN: There should have been, in total, the  
24 amended complaint, the original complaint, a set of  
25 interrogatories, a set of requests for production, and your

1           endorsements.

2                       And then there was a second email with a second  
3 request for production response.

4           THE WITNESS: I never printed it.

5           MS. LUNDERGAN: So in total there should be four  
6 documents sent to your office.

7           MR. HARVEY: This is Travis Harvey. Let me interject,  
8 Amanda, I believe the reporter said she only received four  
9 emails. I believe there was five with six followed up this  
10 morning.

11           MS. LUNDERGAN: Yes. That's correct, Travis.

12           MR. TRINZ: You have four. I'm looking --

13           MS. LUNDERGAN: What I emailed to you, Travis, is the  
14 same thing that was emailed to your co-counsel.

15           MR. TRINZ: Okay.

16           MS. LUNDERGAN: So, Travis, you got six. Those are the  
17 six that I sent.

18           MR. HARVEY: Yeah. I got them this morning a few  
19 minutes before we started. I think the court reporter is  
20 indicating to you -- or whoever is there -- said they received  
21 the emails. They only received four. So --

22           MR. TRINZ: Right. I'm looking here --

23           MS. LUNDERGAN: Okay. What I'm relying on is that what  
24 I sent to your co-counsel is what we've got today. I didn't  
25 realize that the court reporter had printed documents.

1 MR. TRINZ: No. She didn't. She didn't. She didn't.  
2 Travis is mistaken. That was Michele talking.

3 MS. LUNDERGAN: Okay.

4 MR. TRINZ: Because I forwarded --

5 MS. LUNDERGAN: The one email to Travis is five, and  
6 then one, and that's what you should have received as well.

7 MR. TRINZ: Okay.

8 MS. LUNDERGAN: The interrogatories were in the initial  
9 set of five.

10 Travis, can you confirm that that was in that  
11 initial set of five?

12 MR. HARVEY: I can't confirm what you sent them. I got  
13 an email separately this morning.

14 MR. TRINZ: I'm looking here. I forwarded what I got to  
15 Michele for printing out. I forwarded one email because I did  
16 not get the second one until I'm seeing it now. Because it  
17 was as we were walking up to the office here.

18 So I do see plaintiff's notice of service of answers  
19 to interrogatories. So they either --

20 MS. LUNDERGAN: Okay.

21 MR. TRINZ: -- didn't get printed out or is it  
22 possible --

23 THE WITNESS: I only have four.

24 MR. TRINZ: Oh.

25 THE WITNESS: I only have these attachments.

1 MS. LUNDERGAN: Okay. So it looks like it didn't get  
2 printed. You want to take a quick break and print them?

3 MR. TRINZ: Well, how about -- can we do something else  
4 and go back and do it rather than -- so we can move it along  
5 and we'll take a break in a little bit and do it? Because I'm  
6 looking here -- I sent her whatever you sent me, except for  
7 the second email --

8 MS. LUNDERGAN: Okay.

9 MR. TRINZ: -- which I didn't get until -- I didn't see  
10 it until a few minutes ago actually. So --

11 MS. LUNDERGAN: I really would like to just finish with  
12 it because it's going -- it's going to hinge off what we just  
13 talked about.

14 MR. TRINZ: Okay.

15 MS. LUNDERGAN: So I would appreciate if we could just  
16 print it and move through this particular subject.

17 MR. TRINZ: Okay. All right. Is it possible to get it  
18 off the printer?

19 THE WITNESS: I clipped everything that I had.

20 MR. TRINZ: Okay.

21 THE WITNESS: So if --

22 MR. TRINZ: All right.

23 THE WITNESS: -- I don't have it, I don't have it.

24 MR. TRINZ: I understand.

25 THE WITNESS: It was one, two, three, four --

1 THE COURT REPORTER: Are we still on the record?

2 MR. TRINZ: No. Let's go off the record on this  
3 discussion here.

4 (Off the record from  
5 12:32 p.m. to 12:42 p.m.)

6 Q BY MS. LUNDERGAN: Again, my question,  
7 Ms. Sjolander, is did you have any discussions with your  
8 attorney during the break?

9 A No.

10 Q Okay. Going back to my question -- and if you can  
11 pull the interrogatories out and get those ready.

12 MR. TRINZ: We have them now.

13 Q BY MS. LUNDERGAN: You discussed that this loan  
14 was -- based on your review of the file, the loan was  
15 securitized back in 2008; correct?

16 A Yes.

17 Q Okay. And if we can turn to those interrogatories.  
18 Do you have them out?

19 MR. TRINZ: We have them.

20 MS. LUNDERGAN: Okay. And I think we're up to -- are we  
21 up to Defense Exhibit 4?

22 MR. TRINZ: Okay. Let's mark it. It starts with the  
23 notice of service --

24 MS. LUNDERGAN: Yes.

25 MR. TRINZ: -- and ends with the signature page on the

1 back.

2 MS. LUNDERGAN: A total of 13 pages.

3 MR. TRINZ: I didn't count them. I'm just looking at  
4 the signature page by -- I can't even see who it is. It says  
5 litigation specialist, notarized -- California -- California  
6 notary.

7 **Q BY MS. LUNDERGAN: Okay. And then the last page of**  
8 **it -- it looks like I've got duplicates.**

9 MR. TRINZ: Can I mark it? Can she mark it?

10 MS. LUNDERGAN: Mark it, please, as Defense Exhibit 4.

11 MR. TRINZ: Okay. It's been marked and the reporter is  
12 ready.

13 (Whereupon Defendants' Exhibit No. 4  
14 was marked for Identification.)

15 **Q BY MS. LUNDERGAN: Okay. Ms. Sjolander, based on**  
16 **the first page, do you see the date that these responses were**  
17 **served appears to be November 1st, 2010?**

18 A Yes.

19 **Q Was that a "Yes"?**

20 A Yes.

21 **Q Okay. And if we could turn then to interrogatory**  
22 **number nine, please, and can you take a moment and read that.**  
23 **And you see the response there to these interrogatories in**  
24 **2010 is that there is no trust.**

25 **So based on your -- your statement that this loan**

1       **was securitized in 2008, it appears that that is an incorrect**  
2       **statement; correct?**

3               MR. TRINZ: I'm just going to interpose an objection  
4       generally, Amanda, on this. She -- well, you can ask her but  
5       it doesn't appear she had anything to do with the preparation  
6       of this or --

7               MS. LUNDERGAN: Okay.

8               MR. TRINZ: -- submission to your office.

9               MS. LUNDERGAN: I'm just asking her to compare the  
10       response in that interrogatory to what she has stated to me.  
11       I'm not -- I'm not in any ways implying she had any part in  
12       drafting this response.

13               I'm just asking her to compare what she has told me  
14       to what the responses to this discovery were in 2010.

15               THE WITNESS: Okay. So --

16               **Q BY MS. LUNDERGAN: Ms. Sjolander, comparing that,**  
17       **does it appear that that answer is not correct?**

18               A I cannot state that. And I'll give you two reasons  
19       why.

20               One, this is 2010. The loan could have been  
21       re-purchased out of the security by then. And, two, when they  
22       say, "trust," are they talking about like a PSA? Like a  
23       trust? Or a security?

24               I don't know how they read "trust" when they  
25       write -- when they answer this question. I was not with them.



1           **Q**    Okay. Well, I will state to you that this is  
2 talking about security, whether or not this loan has been  
3 securitized. And in your review --

4           MR. TRINZ: Amanda, let me -- hold on.

5           **Q**    BY MS. LUNDERGAN: -- of this file --

6           MR. TRINZ: Hold on. Let me object. You are stating --  
7 I know your office probably prepared these, but she was  
8 saying -- I think she was interpreting the response.

9           You are saying -- you are giving your opinion as to  
10 what the question says; right? I just want to clarify.

11          MS. LUNDERGAN: Yes. That's correct. I'm not in any  
12 way interpreting what the person who responded to these would  
13 have interpreted.

14          MR. TRINZ: Okay.

15          MS. LUNDERGAN: I'm just stating what our position is  
16 here.

17          MR. TRINZ: Okay.

18          MS. LUNDERGAN: Okay.

19          **Q**    So, Ms. Sjolander, you had stated that in 2008 the  
20 loan was securitized and you knew that because you had  
21 reviewed some documents before you came here today.

22                Was there anything in those documents that you had  
23 reviewed that would lead you to believe the loan was taken out  
24 of the trust?

25          A    Nothing. Well, in the documents that I reviewed, I

1 did see a release. And so in that sense a release to me shows  
2 that it was probably taken out of the trust. I can't tell you  
3 the dates.

4 I can also say that for common foreclosure, when  
5 these loans go into foreclosure we -- and the loans go down,  
6 we'll re-purchase them out of the security, and that's to my  
7 knowledge.

8 So unless I was on my system and able to research it  
9 right now and look to see exact, I can't stipulate that. But  
10 I know to my knowledge usually when these go into foreclosure  
11 and there was a release, it is that the loan was released out  
12 of the security or re-purchased from the security.

13 **Q And this --**

14 A Back when this was prepared -- when this was  
15 prepared, I don't know what occurred. I can say back in 2008,  
16 when the loan was logged in, it was securitized under a Ginnie  
17 Mae security. And that's it.

18 **Q Okay. And you said there was a release in the file?**

19 A There was -- there was not -- when you say, "in the  
20 file," there was a release on our system. So our system  
21 showed that the collateral was released.

22 **Q And who was it released to?**

23 A In this case I think it was Stern. Back in --

24 **Q Okay. So it was simply -- when you say it was**  
25 **released, you mean the actual physical loan was taken out of**

1       **the vault and sent to Stern's office; correct?**

2               MR. TRINZ: Object to the form.

3               **Q BY MS. LUNDERGAN: Can you answer that, please?**

4               A I don't know. Can you restate the question? I  
5 don't know what you are asking.

6               **Q Okay. You said that on your system there was a  
7 release; correct?**

8               A Yes.

9               **Q And you believe that release was a release to David  
10 Stern's office; correct?**

11              A Yes.

12              **Q Okay. But what you didn't say that it was a release  
13 from the trust. What I'm trying to understand is when you say  
14 there was a release, are you talking about a release, meaning  
15 the physical release of the document from the vault to David  
16 Stern, or are you talking about a release from the trust to  
17 another entity?**

18              A I'm showing that there was a release of the  
19 collateral, which usually in -- in -- from my knowledge base  
20 tells me that the loan went into foreclosure and the loan was  
21 probably then re-purchased out of the trust.

22              I cannot guarantee that without going on my system  
23 and checking. I don't know what occurred between, you know,  
24 2008 and 2010. All I can say is there was a -- you know, when  
25 I looked at this system, the collateral system, I could

1 show -- I saw that there was a release of collateral.

2 **Q Okay. And you looked at those -- you looked at**  
3 **those systems in anticipation of this deposition?**

4 A Yes.

5 **Q Okay. And have you access to those in your office**  
6 **where you are today?**

7 A Yes.

8 MS. LUNDERGAN: Okay. And I know, Mr. Trinz, you are  
9 going to object, but at this time I would ask if there is  
10 something there that could refresh her recollection about the  
11 time, that she would take a moment and review those documents.

12 MR. TRINZ: No. We're not going to do that. We're  
13 objecting.

14 MS. LUNDERGAN: Okay. Then I also would ask that you  
15 send me a copy of the documents that she used in anticipation  
16 of this deposition.

17 MR. TRINZ: No. We are not going to do that. We are  
18 objecting.

19 MS. LUNDERGAN: Okay.

20 **Q So you would have to look at those documents then to**  
21 **ascertain when that release was -- was executed; correct?**

22 A The system. You keep talking about documents. Yes.  
23 I would have to look in our system.

24 **Q Okay.**

25 A Our system.

1 Q So you would have to look in your system to find out  
2 when that release was executed?

3 A Yes.

4 Q And you would have to look in your system to find  
5 out whether that release was a release from the trust;  
6 correct?

7 A Release from the security. Yes.

8 Q Okay. Versus what I stated could have been a  
9 possibility, which was just a release of a physical note to  
10 David Stern's office; correct?

11 A Yeah. Usually they happen together. But, yes.

12 Q Okay. Based on your review of the file then, do  
13 you -- could you tell who the current owner of the loan was?

14 A I would have to look at our commitment history and I  
15 don't -- I mean I -- I don't recall. I would have to go back  
16 and look through this -- this loan.

17 Q Okay. But we're in agreement then that Countrywide  
18 Home Loans Servicing, L.P., doesn't exist anymore. So it  
19 would have to be someone else who would be the current owner  
20 of the loan; correct?

21 MR. TRINZ: I'm going to object. Calls for a legal  
22 conclusion.

23 Q BY MS. LUNDERGAN: Can you answer my question or do  
24 you need me to restate it?

25 A Well, Countrywide Home Loans would be the successor

1 of Bank of America Servicing, L.P.

2 **Q Okay. I'm only talking about Countrywide Home Loan**  
3 **Servicing, L.P. They can't own this loan today because they**  
4 **don't exist anymore; correct?**

5 A I don't know how --

6 MR. TRINZ: Object. Again, let me interpose the  
7 objection and then you can answer, if you can.

8 The objection is based on you are calling for a  
9 legal conclusion.

10 THE WITNESS: Legally, I don't know how the entities --  
11 how it was -- the legal entities.

12 **Q BY MS. LUNDERGAN: Okay. How about non-legally?**  
13 **Just -- just your understanding.**

14 **If Countrywide Home Loan Servicing, L.P., doesn't**  
15 **exist, could they still own this loan?**

16 A Well, as I said, Bank of America purchased  
17 Countrywide Home Loans. So as its successor --

18 **Q Okay. Can you answer my question which was --**

19 A As successor --

20 **Q -- is Countrywide Home Loans -- can I finish my**  
21 **question, please?**

22 A If I could finish my answer.

23 **Q If Countrywide Home Loan Servicing, L.P., doesn't**  
24 **exist anymore -- and you stated they have ceased to exist --**  
25 **then they couldn't be the current owner of the loan. Maybe**

1       **another entity related to them could be the owner of the loan**  
2       **but Countrywide Home Loan Servicing, L.P., is not the owner of**  
3       **the loan today; correct?**

4               MR. TRINZ: Again, interposing the objection. You are  
5       calling for a continuing series of legal conclusions by a  
6       non-lawyer.

7               MS. LUNDERGAN: Okay. Please just let her respond to  
8       the question.

9               THE WITNESS: Does Countrywide -- can you repeat the  
10       question?

11              MS. LUNDERGAN: I'm going to keep repeating it and he's  
12       going to keep stating his objections. So can I have the court  
13       reporter just repeat back the question?

14                       (Whereupon the record

15                       was read as follows:

16                       "Question: If Countrywide Home  
17                       Loan Servicing, L.P., doesn't  
18                       exist anymore -- and you stated  
19                       they have ceased to exist -- then  
20                       they couldn't be the current owner  
21                       of the loan. Maybe another entity  
22                       related to them could be the owner  
23                       of the loan but Countrywide Home  
24                       Loan Servicing, L.P., is not the  
25                       owner of the loan today; correct?")

1 MR. TRINZ: Again, I'm also going to object on the basis  
2 of the form.

3 THE WITNESS: So an entity that -- of Countrywide Home  
4 Loans that -- the successor now owns the loan to my knowledge.

5 **Q BY MS. LUNDERGAN: But not Countrywide Home Loans**  
6 **Servicing, L.P.?**

7 A I do not know how legally it was set up.

8 **Q Okay. I'm not asking you for legally. Just within**  
9 **your knowledge if there is -- if Countrywide Home Loans**  
10 **Servicing, L.P., does not exist --**

11 A Within my knowledge the successor of Countrywide  
12 Home Loans, L.P., owns the loan, which is Bank of America  
13 Servicing, L.P. That's to my knowledge. I can't -- I can't  
14 answer it any other way.

15 **Q Okay. So your -- your response is that Countrywide**  
16 **Home Loan Servicing, L.P., as named, does not exist any**  
17 **longer; that now they are Bank of America or BAC?**

18 MR. TRINZ: Object as to the form. And you're calling  
19 for a legal conclusion still.

20 THE WITNESS: I don't know. I think you would have to  
21 talk to a legal attorney to get the answer correct.

22 **Q BY MS. LUNDERGAN: Okay. Does your company still**  
23 **execute documents to Countrywide Home Loan Servicing, L.P.?**

24 MR. TRINZ: Object to form.

25 THE WITNESS: I couldn't -- I don't know. To my



1 knowledge, I don't know.

2 Q BY MS. LUNDERGAN: Okay. Do you receive any  
3 letterhead from Countrywide Home Loan Servicing, L.P.?

4 A No.

5 Q Are there any current employees that would call  
6 themselves employees of just Countrywide Home Loan Servicing,  
7 L.P.?

8 A I don't know.

9 Q Okay.

10 A To be honest, I --

11 Q Is there -- are there officers of Countrywide Home  
12 Loan Servicing, L.P., today?

13 A I don't know.

14 Q Okay. Who would know that information?

15 A Somebody from our legal team.

16 Q Okay. That's the only person who would know whether  
17 or not that company still has officers?

18 A I would -- I would assume so. I don't feel that I  
19 should -- I have enough knowledge to be able to answer,  
20 legally, those questions.

21 Q Okay. And who is it that you are appearing on  
22 behalf of here today?

23 A I am here for -- under Bank of America.

24 Q Okay. You are not here then for Countrywide Home  
25 Loan Servicing, L.P.?

1           A    I am here for the endorsement that was placed under  
2           Countrywide Home Loan Servicing, L.P., which is -- Bank of  
3           America is representing me which is one in the same in its  
4           successor.

5           **Q    So you are appearing here on behalf of Bank of**  
6           **America?**

7           A    Yes.

8           **Q    Okay. I want to go back to something we had talked**  
9           **about earlier, which involves the endorsements of the note,**  
10          **and I guess maybe we had gone in circles and you didn't quite**  
11          **understand what it was I was asking, which is for the people**  
12          **who are putting the stamps on the promissory note, what**  
13          **instructions do they receive as far as what stamps to put on**  
14          **the note?**

15          A    As I said, you would have to talk to their training  
16          program and how they're trained. I think Lori Meter would be  
17          best to explain their polices and procedures and how they  
18          place the endorsement chain.

19          **Q    Okay. But you didn't have any oversight with**  
20          **regards to when your stamp was used and which documents?**

21          A    My stamp was used on the notes. And, no, I don't  
22          have --

23          **Q    Okay. All right. So you didn't have any oversight**  
24          **on when they were stamping the documents and which documents**  
25          **got stamped; correct?**

1           A    Well, the note would be stamped, or an allonge to  
2   the note.

3           **Q    Okay.  And did you have any oversight as to which**  
4   **particular loans got stamped with your endorsement?**

5           A    I knew that fundings that came in through the  
6   custodian were stamped with my endorsement stamp.  Yes.  I did  
7   know.

8           **Q    Okay.  And on a daily basis did you tell them which**  
9   **ones were able to be stamped with your endorsement?**

10          A    No.  They used the power of attorney.

11          **Q    How about -- can you repeat that?**

12          A    No.  They had a power of attorney.

13          **Q    Okay.  So once you executed the power of attorney,**  
14   **you really didn't have any oversight as far as what documents**  
15   **they stamped or which promissory -- I'm sorry.  Let me**  
16   **rephrase.**

17                    Once you executed the power of attorney, you didn't  
18   have any oversight as to which promissory notes they stamped;  
19   correct?

20          A    Correct.

21          **Q    Okay.  Mr. Trinz, can I have you state for the**  
22   **record on behalf of who you are appearing here today?**

23                    MR. TRINZ:  I'm here as counsel for Bank of America.

24                    MS. LUNDERGAN:  Okay.  You are not counsel for  
25   Countrywide Home Loan Servicing, L.P.?

1 MR. TRINZ: I'm not answering anything else and you  
2 can -- you want to take my deposition some time, that's fine.

3 MS. LUNDERGAN: So you are refusing to tell me who you  
4 are appearing here on behalf of?

5 MR. TRINZ: I just told you.

6 MS. LUNDERGAN: Okay. Is that the only party you are  
7 appearing here on behalf of today?

8 MR. TRINZ: Well, Ms. Sjolander, to the extent she's an  
9 individual witness, as opposed to a corporate representative,  
10 so, yes, I'll be representing her as well.

11 MS. LUNDERGAN: Okay. So your appearance here today is  
12 related solely to Bank of America and to Ms. Sjolander in her  
13 individual capacity; correct? I just want to clarify who it  
14 is you are appearing here on behalf of.

15 MR. TRINZ: I've answered it already.

16 MS. LUNDERGAN: Okay. We'll take it as an affirmative.

17 MR. TRINZ: Take it however you want. I already  
18 answered the question.

19 MS. LUNDERGAN: Okay. Thank you.

20 MR. TRINZ: You're welcome.

21 MS. LUNDERGAN: Let me see if -- I have just a few more  
22 follow-up questions and then we'll be done here.

23 **Q Back to those interrogatories that were signed. If**  
24 **we could pull those back out. I don't know if you set them**  
25 **down.**

1 MR. TRINZ: They're right here in front of us.

2 Q BY MS. LUNDERGAN: Ms. Sjolander, do you ever  
3 execute interrogatories on behalf of Bank of America or  
4 Countrywide?

5 A I've executed a declaration. I'm not sure if it's  
6 one and the same.

7 Q Okay. Do you ever remember answering  
8 interrogatories in your capacity at Bank of America or  
9 Countrywide?

10 A I could have been asked a question. I wouldn't have  
11 known if it was an interrogatory or not.

12 Q Okay. But you don't -- you don't specifically  
13 remember signing any interrogatories?

14 A No.

15 Q Okay. Do you know the person who signed the  
16 interrogatories in this case "Reeza R. Samedian"?

17 A No.

18 Q Okay. Do you know which department executes  
19 interrogatories?

20 A I think our litigation group.

21 Q Okay. And how many people are in the litigation  
22 group?

23 A I do not know.

24 Q Okay. And where the is the litigation group  
25 located?

1 A I do not know.

2 Q Okay. It's not in your office in California?

3 A They could be. I --

4 Q You have -- have you ever had any interaction with  
5 the litigation department?

6 A Just when cases like this come up.

7 Q Okay. And in your interaction what are the names of  
8 the people you've been involved with?

9 A I don't know offhand. I mean they're emails. I  
10 don't --

11 Q Okay. And from those emails you don't know where  
12 the people are located?

13 A No. We usually talk on the phone or email back and  
14 forth. I don't go to their offices.

15 Q Okay. You'll see on this, if you can turn to the  
16 interrogatories, that "Reeza R. Samedian" signed this as a  
17 litigation specialist.

18 Do you know what that means?

19 A No.

20 Q Okay. Is there anywhere in your handbook that we  
21 discussed earlier that would define what that title means?

22 A Not that I'm aware of.

23 Q Okay. So does Bank of America have any sort of  
24 documents that defines people's positions?

25 A Yes.

1           **Q    Okay.  And where are those documents?  Are those**  
2 **similar to the documents we discussed earlier that are**  
3 **on-line?**

4           A    Yeah.  You could go into human resources and look at  
5 job descriptions.  Is that what you are asking?

6           **Q    Yeah.  Would there be some sort of manual or some**  
7 **sort of document that would describe what each position**  
8 **entails?**

9           A    I don't know.  It's a manual.  There are job  
10 descriptions that describes people's jobs.

11          **Q    Is it written or is it on-line?**

12          A    Isn't that the same?

13          **Q    Well, is there a paper copy or is it only an**  
14 **electronic copy?**

15          A    Oh, I've only witnessed it electronically or you  
16 could print it.

17          **Q    Okay.  Is there only one manual for all of Bank of**  
18 **America or is it divided up into several?**

19          A    They said these are job descriptions.  They're not  
20 manuals that we're talking about here.

21          **Q    Are these job descriptions all located in one**  
22 **electronic location or are they divided up in separate**  
23 **locations?**

24          A    It's in one location.  You can look at various jobs  
25 and the job descriptions that go with it.

1 Q Okay. And if I were to ask for something like that,  
2 what would I ask for if I were to ask, you know, human  
3 resources?

4 A A job description.

5 Q A job description, is that what I would ask for? A  
6 job description for a litigation specialist?

7 A That's what I would call it.

8 Q Okay. It's not known by anything else?

9 A Not that I'm aware of.

10 Q Okay. Is there ever a time when the endorsements  
11 are executed after they're received by either Bank of America  
12 or Countrywide? You had stated earlier that they were imaged  
13 almost simultaneously with -- or they were endorsed -- I'm  
14 sorry. Let me rephrase.

15 You had stated earlier that they were endorsed  
16 almost simultaneously with receiving the collateral file and  
17 the imaging.

18 Is there ever a time when an endorsement would be  
19 executed some time after that? For instance, months or years  
20 later?

21 MR. TRINZ: Object to form.

22 THE WITNESS: I couldn't answer that. I mean there  
23 could be a deficiency -- from what I stated that there is two  
24 different processes. So I don't know what process you are  
25 referring to back in '08 or our current process.



1           **Q BY MS. LUNDERGAN:** Okay. Well, let's talk about the  
2 2008 process.

3           Back in the 2008 process was there ever a time when  
4 an endorsement would be added months or years after you  
5 received the note?

6           A If the -- if the collateral -- I mean in this case  
7 the collateral was reviewed without a deficiency. So that  
8 ensures that there was an endorsement placed on it. So part  
9 of the review process --

10          **Q Okay.** So that would be one of the things that they  
11 would look for in 2008 when they were reviewing the collateral  
12 file -- I'm sorry -- would be the endorsement?

13          A Yes.

14          MR. TRINZ: First, I'm going to object to form. Second,  
15 you interrupted her answer. So you talked over her so the  
16 reporter did not get part of her answer. If you can let her  
17 finish.

18           If you can remember what you were answering.

19          THE WITNESS: I was saying it was part of the review  
20 process.

21          MR. TRINZ: Okay.

22          **Q BY MS. LUNDERGAN:** Okay. And how about today? Is  
23 that part of the review process to check for the endorsements?

24          A Yes.

25          **Q Okay.** And are any notes made when a review is done

1       **of the file?**

2           A    You would have to talk to Lori Meter or how they --  
3   if there is a deficiency found, a deficiency is noted in our  
4   system. I'm not sure what you mean by "notes made."

5           **Q    Okay. For instance, if I was the person in 2008 who**  
6   **was doing a review of the file, would I make a note that the**  
7   **endorsements were present or would I only make a notation if**  
8   **there were no endorsements?**

9           A    To my knowledge you would only make a -- you would  
10   only make a note or place a -- place a deficiency if there was  
11   no endorsements so that we knew that we had to go place  
12   endorsements.

13          **Q    Okay.**

14          A    However, that's to my knowledge. You would -- to  
15   get the -- there could be other circumstances. I'm not sure.  
16   In that department --

17          **Q    You think Lori Meter would be the person who would**  
18   **know that type of information?**

19          A    Yes.

20          **Q    And Lori Meter, you had stated, was with the company**  
21   **back in 2008. She was -- she was the person who would have**  
22   **that information?**

23          A    Yes.

24          **Q    Okay. But you said today you're not sure what**  
25   **exactly her job -- her job entails today?**

1           A    Well, her job -- yeah.  I mean her job has changed  
2 as all of ours have.

3           **Q    Okay.  But you think, still today, Lori Meter would**  
4 **be the person who would know what kind of notes are made when**  
5 **the file is reviewed?**

6           A    Yes.

7           **Q    Okay.  Do you have any reason to believe that the**  
8 **promissory note in this case has ever been lost?**

9           A    Nope.

10          **Q    And your reason or your basis for stating that is**  
11 **because there were no notes in the system that the note had**  
12 **ever been lost?**

13          A    There were no notes in our collateral deficiency  
14 system that the note has been lost.  I did not look at the  
15 servicing system to see if there was any notes on the  
16 servicing system.

17          **Q    Okay.  And when these documents are transferred to**  
18 **the attorney for foreclosure, is there any notation made of**  
19 **what documents are transferred?**

20          A    Well, the collateral.  You know, what was in the  
21 collateral file was transferred.

22          **Q    Okay.  So the note would be that the collateral file**  
23 **was transferred to the attorney?**

24          A    You would have to talk to Lori Meter.  I'm not sure  
25 how they notate their system.

1           **Q**   **Okay. To your knowledge if -- if something was**  
2 **missing from the collateral file when it was sent to the**  
3 **attorney, would a note have been made of that?**

4           **A**   **Once again, you would have to speak with the**  
5 **custodian with regards to their practices and how they notate**  
6 **the systems.**

7           **Q**   **Okay. You have no knowledge of how they notate the**  
8 **system or what information is relayed in the collateral files**  
9 **of the attorney?**

10          **A**   **Correct.**

11          **Q**   **Okay. I want to go back really quick to why you no**  
12 **longer -- why they are no longer using your stamp to endorse**  
13 **notes.**

14                   **You had said that you had left because you had a**  
15 **heart attack; is that correct?**

16          **MR. TRINZ:**   **It's all been asked and answered, Amanda.**  
17 **You went into it and she answered it.**

18          **MS. LUNDERGAN:**   **Okay.**

19          **Q**   **Were there any other reasons why they stopped using**  
20 **your particular stamp?**

21          **A**   **I was out on leave at that time. I cannot comment**  
22 **on the change.**

23          **Q**   **You can't comment on it because you don't know?**

24          **A**   **Correct. I was not here. I was not involved.**

25          **Q**   **So you went -- or they stopped using your stamp;**

1           **correct?**

2           A    Right.  I was not involved in the conversations  
3 about the --

4           **Q    So how did you find out they stopped using your**  
5 **stamp?**

6           A    When I came back from leave.

7           **Q    Someone just told you, "Hey, we stopped using your**  
8 **stamp"?**

9           A    Yes.

10          **Q    And who was that person?**

11          A    Joan Martinez who works for me.

12          **Q    Now, who is that in relation to you?  Is that your**  
13 **supervisor?**

14          A    No.  She reports to me.

15          **Q    Who is it?**

16          A    Joan Martinez.

17          **Q    Yeah.  And why -- sorry.  I didn't mean to interrupt**  
18 **you.**

19                   **Why would she be the person who informed you that**  
20 **your stamp was no longer being used?**

21          A    Because after I went out on leave, she was  
22 responsible for notifying that I was leaving -- out on leave  
23 and that, you know, that we wanted to halt my stamp being used  
24 at that time that I was not here.

25          **Q    Okay.  Is there a policy that if you are on leave**

1           **that they can't use your stamp?**

2           A    No. There is not.

3           **Q    Okay. So why was it that, because you were on**  
4           **leave, they were no longer going to use your stamp?**

5           A    Well, for one, at that time I don't think that they  
6           knew my capacity of when I was coming back. I -- I can't --  
7           it was all hearsay. I was out. I was not here. We changed  
8           our practice. I -- when I came back from leave, I was  
9           notified of the change of practice by Joan Martinez who  
10          reports to me. It was her job. She took over a lot of what  
11          my duties at that time. And it was -- Lori Meter instructed  
12          her the practice is changing.

13          **Q    Okay. And you said the practice was changed. What**  
14          **do you mean when you say their practice changed?**

15          A    Well, the note is now being endorsed upon arrival  
16          prior to imaging. So when the collateral is imaged, it has  
17          the endorsement chain on it.

18          MR. TRINZ: Again, asked and answered previously. You  
19          already asked her this.

20          **Q    BY MS. LUNDERGAN: So why would that affect -- are**  
21          **you done?**

22          MR. TRINZ: Uh-huh. I'm done.

23          **Q    BY MS. LUNDERGAN: Why would that impact using your**  
24          **stamp?**

25          A    Because the custodian is no longer using the stamp.

1 Bank of America employees are now using the stamp as it  
2 arrives into the imaging plant. So it --

3 **Q Okay.**

4 A -- it changed our practice. In other words, a power  
5 of attorney did not need to be used because another entity was  
6 not applying the stamp. Bank of America associates were  
7 applying the stamp at the time it arrived into the imaging  
8 vault area. It was not --

9 **Q And how long --**

10 A I was not finished.

11 It was not in the custodian's possession.

12 **Q Okay. And how long has that change been in effect?**

13 A I think since March or April of last year.

14 **Q And do you know the reason why they made that**  
15 **change?**

16 MR. TRINZ: Asked and answered several times.

17 THE WITNESS: As I said, I was out on leave. I was not  
18 privy to those discussions.

19 **Q BY MS. LUNDERGAN: Okay. And you haven't heard any**  
20 **information since you've been back of why they made those**  
21 **changes?**

22 A They wanted to have the -- from what my knowledge is  
23 they wanted to make sure the endorsement chain was on imaging.  
24 It was a good change. That now --

25 **Q Why do you --**

1           A    Because now if you look on imaging you can see the  
2 endorsement chain.  Whereas --

3           **Q    And so now you said Bank of America employees are**  
4 **executing the endorsements?**

5           A    Yes.

6           **Q    And who are those Bank of America employees?  Are**  
7 **they a specific department?**

8           A    I'm sure it is.

9           **Q    Do you know the name of that department?**

10          A    It's in post-closing.  No.

11          **Q    Is Lori Meter part of the post-closing now?**

12          A    No.

13          **Q    So Lori Meter is not involved in endorsing the**  
14 **promissory notes?**

15          A    I don't know if she still -- I don't think so.  No.  
16 I'm not involved in that practice anymore because it's not my  
17 stamps being used.  I think I answered this same answer  
18 before.

19          **Q    Okay.**

20          A    You would have to talk to the new area.

21          **Q    Was there any written notification that went out to**  
22 **Bank of America employees when that policy took effect?**

23          A    Not to my knowledge.

24          **Q    Is there any written policy in place now about Bank**  
25 **of America employees endorsing the promissory notes?**



1           A    As I said, it is no longer in the scope of my  
2 department or any groups. You would have to talk to the new  
3 department and the new area of what their policies and  
4 procedures in training was.

5           **Q    How about in the scope of your knowledge? In the**  
6 **scope of your knowledge is there a current policy regarding**  
7 **the endorsing of promissory notes by Bank of America**  
8 **employees?**

9           A    I do not know.

10          **Q    You -- okay. I think that concludes it.**

11                   **Do you have anything you would like to ask,**  
12 **Mr. Trinz?**

13          **MR. TRINZ: No.**

14          MS. LUNDERGAN: Okay. Are you guys going to read?

15          MR. TRINZ: Yes.

16          THE COURT REPORTER: Where do I send it? The original?

17          MR. TRINZ: The original. I guess typically send it to  
18 the witness and I'm going to order a copy.

19          THE COURT REPORTER: Where does she send the original  
20 when she's done?

21          MR. TRINZ: Well, let's see. That's a good question.  
22 You can send it to you; right?

23          THE COURT REPORTER: Can we go off the record?

24          MR. TRINZ: Yeah. Let's go off the record.

25                   (Whereupon the deposition concluded at 1:18 p.m.)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

DECLARATION UNDER PENALTY OF PERJURY

I, MICHELE SJOLANDER, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on Wednesday, March 14, 2012; that I have made such corrections as appear noted on the Deposition Errata Page, attached hereto, signed by me; that my testimony as contained herein, as corrected, is true and correct.

Dated this \_\_\_ day of \_\_\_\_\_, 2012, at \_\_\_\_\_, California.

\_\_\_\_\_  
MICHELE SJOLANDER

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

DEPOSITION ERRATA SHEET

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_

Change: \_\_\_\_\_

Reason for Change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_

Change: \_\_\_\_\_

Reason for Change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_

Change: \_\_\_\_\_

Reason for Change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_

Change: \_\_\_\_\_

Reason for Change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_

Change: \_\_\_\_\_

Reason for Change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_

Change: \_\_\_\_\_

Reason for Change: \_\_\_\_\_

Page No. \_\_\_\_\_ Line No. \_\_\_\_\_

Change: \_\_\_\_\_

Reason for Change: \_\_\_\_\_

\_\_\_\_\_  
MICHELE SJOLANDER

\_\_\_\_\_  
Dated

