

STATE OF FLORIDA
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LEGAL AFFAIRS
AG # L10-3-1147

IN RE:
INVESTIGATION OF LAW OFFICES
OF MARSHALL C. WATSON

_____ /

DEPOSITION OF JESSICA CABRERA

12:54 p.m. - 1:45 p.m.

September 23, 2010

Office of the Attorney General
110 Southeast 6th Street, 10th Floor
Fort Lauderdale, Florida 33301

Reported By:

Kalandra Smith
Notary Public, State of Florida
Apex Reporting Group
Phone - 954.467.8204

APPEARANCES:

ON BEHALF OF THE STATE:

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ON BEHALF OF MS. KAPUSTA:

SILVIA PINERA-VAZQUEZ, ESQUIRE

International Center

1900 Southwest 3rd Avenue

Miami, Florida 33129

I N D E X

Name	Direct	Cross	Redirect	Recross
Ms. Cabrera	3			

E X H I B I T S

Item	Page
Copy of subpoena -- Exhibit A	3
Assignment of mortgage -- Exhibit B	45
Assignment of mortgage -- Exhibit C	45
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P R O C E E D I N G S

- - -

Deposition taken before Kalandra Smith, Court
Reporter and Notary Public in and for the State of
Florida at Large, in the above cause.

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THEREUPON:

JESSICA CABRERA

having been first duly sworn or affirmed, was examined
and testified as follows:

DIRECT EXAMINATION

BY MS. CLARKSON:

Q State your name for the record, please.

A Jessica Cabrera.

Q I'm going to ask you to take a look at this
subpoena. Is that subpoena why you're here today?

A Yes, it is.

MS. CLARKSON: Can we have that marked as
Exhibit A.

(Thereupon, Defense Exhibit A was marked for
identification.)

BY MS. CLARKSON:

Q I brought you in today to discuss the
investigation we're having with the Law Office of
Marshall Watson. Let me ask you a question. Have you

1 ever had your statement or deposition taken before?

2 **A** No.

3 **Q** You need to answer yes or no verbally so that
4 the court reporter can take it down.

5 **A** Okay.

6 **Q** Your nods don't show up.

7 **A** Okay.

8 **Q** If you don't understand what I'm asking ask me
9 to rephrase it and I will. If you need a break just let
10 me know.

11 **A** Okay.

12 **Q** If you have any questions you can stop and ask
13 me.

14 **A** Okay.

15 **Q** So did you work at Marshall Watson?

16 **A** Yes.

17 **Q** When did you work there?

18 **A** For three years.

19 **Q** Could you give me the dates?

20 **A** Yeah. December '07 to July of 2010.

21 **Q** So just until a few months ago?

22 **A** Correct.

23 **Q** What did you do there?

24 **A** Judgment attorney.

25 **Q** What were your duties as a judgment attorney?

1 **A** Review pleadings, prepare files for hearings,
2 response to pleadings and motions.

3 **Q** What do you mean response to pleadings and
4 motions?

5 **A** Motion to dismiss, any answers, affirmative
6 defenses, we'd respond to those.

7 **Q** So you'd prepare the paperwork. Would you
8 actually go into court?

9 **A** I would not, no.

10 **Q** Okay. Did you do that the entire time that
11 you were there?

12 **A** Yes.

13 **Q** That's all you did?

14 **A** Yes.

15 **Q** What other documents did you prepare, if any?

16 **A** That was it.

17 **Q** When did you go to law school?

18 **A** A long time ago. I graduated in '07.

19 **Q** From where?

20 **A** Nova.

21 **Q** Was this your first law job?

22 **A** As an attorney, yes.

23 **Q** Where do you work now?

24 **A** I'm on my own.

25 **Q** Your firm is?

1 **A** Law Offices of Jessica Cabrera.

2 **Q** Where is it located?

3 **A** In Miami.

4 **Q** Could you give me the address?

5 **A** 275 Fontainebleau Boulevard, suite 260, Miami,
6 Florida 33172.

7 **Q** What was the room number again?

8 **A** 260.

9 **Q** When you were at Marshall Watson were you
10 aware of documents being prepared by the Watson Law Firm
11 to be used in foreclosure cases such as assignments of
12 mortgage?

13 **A** They were actually preparing them in office?

14 **Q** Yes. Were members of Watson's law firm
15 preparing, drafting assignments of mortgage?

16 **A** Not that I'm aware of. I would do notice of
17 filings for assignments that I would receive already
18 signed and notarized.

19 **Q** So in the Marshall Watson office they came in
20 from outside?

21 **A** That I'm aware of. That's how I would receive
22 them.

23 **Q** Do you know where they came from?

24 **A** No, I do not.

25 **Q** Were they already signed, executed --

1 **A** Yes.

2 **Q** Let me ask the whole question. Executed and
3 notarized?

4 **A** Yes.

5 **Q** When you were preparing to file a foreclosure
6 lawsuit would the office file a lis pendens?

7 **A** I did not deal with the complaints. When I
8 would receive the file we were after the complaint
9 stage. In reviewing the file there were lis pendens
10 filed. I just would not file them.

11 **Q** Somebody else filed them?

12 **A** Another attorney, correct.

13 **Q** Along with the complaint typically?

14 **A** Yes.

15 **Q** The complaint and the lis pendens were filed
16 but there was no assignment in the file as of yet?

17 **A** I don't know because I did not receive the
18 file from the initiative.

19 **Q** Okay.

20 **A** So, I don't know what was reviewed in order to
21 file that complaint and that lis pendens.

22 **Q** Were you ever working on a file and midway
23 through it you would get an assignment? After it had
24 been opened and you were doing something with the file
25 would an assignment come in?

1 **A** The way the files were set up we didn't get an
2 entire file. It would just be the pleading. I don't
3 know if the assignment was in the actual file.

4 **Q** So you didn't get the entire file? They would
5 take it apart?

6 **A** Well, we would get the pleading and then it
7 would be signed, executed after it was reviewed and then
8 copied and then it would be put into the file or scanned
9 into the system.

10 **Q** So you wouldn't have a reason to know when
11 then lis pendens was filed whether there was an
12 assignment before, with it, or afterwards?

13 **A** Correct.

14 **Q** Did you have a supervisor?

15 **A** Yes.

16 **Q** Who was your supervisor?

17 **A** When I first started it was Caryn Graham.
18 About a year ago Karen Morgan became our supervisor.

19 **Q** When you received this subpoena did you call
20 anyone over at the law firm of Marshall Watson?

21 **A** Yes, I did. She's no longer there.

22 **Q** She who?

23 **A** Tania, one of my friends.

24 **Q** You called her?

25 **A** Yes. I'm sorry. She called me and we spoke

1 about the subpoena. I apologize.

2 Q That's okay. Tania called you and you spoke
3 about it?

4 A Right.

5 Q Did you speak to anyone at Marshall?

6 A No, other than John Watson, which is
7 Marshall's brother.

8 Q You called him?

9 A Yes, letting him know I received a subpoena.

10 Q What did he say?

11 A Other than tell the truth. That was it.

12 Q That was it?

13 A Yeah. I did let Marlene Daley, who is Caryn
14 Graham's secretary know that I had received this.

15 Q What did she say?

16 A She didn't say anything. She just told me she
17 would let them know.

18 Q She was Caryn Graham's secretary?

19 A She is Caryn Graham's assistant.

20 Q Legal assistant?

21 A Yes.

22 Q Did Caryn Graham call you?

23 A Yes, she did.

24 Q What was the gist of that conversation?

25 A She just wanted to know what I received. I

1 let her know I received a subpoena and about legal
2 representation.

3 Q What about legal representation?

4 A If I wanted legal representation.

5 Q She would make that available to you?

6 A Yes.

7 Q Did she make that available to you?

8 A Yes.

9 Q Do you know how many attorneys were working
10 over at Marshall Watson while you were there?

11 A In the judgment department maybe --

12 Q The whole legal department?

13 A I don't know because we were in different
14 buildings. I know the first legal department had about
15 three attorneys and the judgment department had maybe
16 about twenty, twenty-five attorneys and then we had a
17 litigation department. I don't know how many attorneys
18 were in that department.

19 Q Do you have any idea whether it was three or
20 four or thirty?

21 A I know it was a lot more than three or four.
22 Maybe fifteen. I really don't know.

23 Q Was that during the height of the business?

24 A Yes. This is when I just left.

25 Q While you were working there did you hear any

1 complaints from homeowners that they did not receive
2 their service of process of the complaint?

3 **A** Yes. That they were not served?

4 **Q** Yes, or properly served?

5 **A** Yes.

6 **Q** Was that common?

7 **A** No, not on my files.

8 **Q** What about on other people's files?

9 **A** I wouldn't know. That's why I'm saying not on
10 mine.

11 **Q** Well, what did you hear?

12 **A** I didn't really talk to many people.

13 **Q** Who was the process server that Marshall
14 Watson used?

15 **A** I can't remember the name now.

16 **Q** ProVest?

17 **A** Yes, ProVest.

18 **Q** Did Marshall Watson have any ProVest employees
19 at his office?

20 **A** Not that I was aware of.

21 **Q** How many files would you say that you handled
22 at any one time?

23 **A** Five to six thousand files rotating.

24 **Q** Would you say that the twenty to twenty-five
25 other judgment attorneys in the office had the same

1 amount of caseload?

2 A Yes, that's what we were told.

3 Q So five to six thousand cases for you and the
4 twenty to twenty-five other attorneys that were in
5 there?

6 A Correct.

7 Q Once a foreclosure came to final judgment what
8 would happen to the file?

9 A The physical file?

10 Q Yeah.

11 A I don't know.

12 Q Well, what would you do with the file when the
13 foreclosure got a final judgment?

14 A If I handled the hearing to get the final
15 judgment entered?

16 Q Did you normally do that?

17 A I did telephonic hearings, yes.

18 Q Oh you did?

19 A Yes.

20 Q So you didn't go to court but you did
21 hearings?

22 A Telephonic, yes.

23 Q Did you work the file all the way through like
24 that?

25 A What do you mean?

1 **Q** You didn't go to court. You had telephonic
2 hearing, correct?

3 **A** Correct.

4 **Q** Did you have hearings all the way through the
5 file? Were you the attorney on the file?

6 **A** No. Sometimes yes. Sometimes no. It
7 depends.

8 **Q** Depends on what?

9 **A** How they assign the hearings.

10 **Q** What jurisdictions allowed you have telephonic
11 hearings on motions for summary judgment?

12 **A** I know which ones didn't. Can I answer that
13 one?

14 **Q** Yes.

15 **A** Dade, Broward, West Palm. Those are the only
16 ones that I can recall off the top of my head. Majority
17 of the other ones allowed us to unless telephonic
18 privileges were taken away.

19 **Q** So pretty much the rest of the whole state
20 except for South Florida?

21 **A** Correct.

22 **Q** What about Monroe?

23 **A** Monroe?

24 **Q** That's the Keys.

25 **A** No. You had to go in person.

1 **Q** Did you have a team of notaries in your
2 office?

3 **A** A team? We'd have a notary come by and sign
4 affidavits that I would sign off on.

5 **Q** Can you tell me how that process worked from
6 the moment that the affidavit got created?

7 **A** Well, the affidavit would come to me already
8 created. I would review. It would come usually in a
9 package with other documents. I would sign off on the
10 pleadings and tab the notary page need to notarize.
11 When the notary would come around once or twice a day or
12 whether I'd call a notary to come in and then I'd sign
13 and they would stamp in front of me.

14 **Q** What about witnesses?

15 **A** We didn't have any witnesses.

16 **Q** They weren't on the affidavits?

17 **A** Right. Nothing that I was dealing with.

18 **Q** Had you heard that maybe they were notarizing
19 without the person being there signing?

20 **A** As far as attorneys in the office?

21 **Q** Uh-huh.

22 **A** Yes.

23 **Q** You had heard that?

24 **A** Yes.

25 **Q** That attorneys were just signing? Were they

1 have stacks of them be sent to the notary?

2 **A** Yes.

3 **Q** But you personally didn't do that?

4 **A** No. The practice before was that's what we
5 were doing. We were signing off on the affidavits and
6 then they were going back to get notarized. The
7 practice changed seven, eight months ago to where we
8 were having a notary come in to the office. So when I
9 first started, yes. Once the practice changed as we
10 realized that was an issue I used the method that I just
11 told you.

12 **Q** How many notaries would you say were at the
13 office?

14 **A** We've got a list. I would say about fifty in
15 my building. We've got a list of notaries with their
16 extensions so we could call if we had any issues.

17 **Q** Do you recall any of their names?

18 **A** The ones that I used.

19 **Q** Yeah.

20 **A** Sue Hoyt.

21 **Q** H-O-Y-T?

22 **A** You're going to call them and they're gonna
23 kill me. Yeah. Jessica Vicenty.

24 **Q** Can you spell the last name?

25 **A** V-I-C-E-N-T-Y.

1 **Q** Okay.

2 **A** Giselle Valentine.

3 **Q** Is that with a G or a J?

4 **A** A G. Those are the ones I would call. Other
5 than that I don't remember their --

6 **Q** Giselle who?

7 **A** Valentine. I don't recall the names of the
8 ones that would come around.

9 **Q** The roving ones?

10 **A** Yeah.

11 **Q** Was this true just on affidavits or were there
12 other documents that were signed without the notary
13 being present?

14 **A** Anything that needed to be notarized I would
15 wait until a notary was there, sign it, and notarize it.

16 **Q** I'm talking about prior. Before you changed
17 it were there other documents --

18 **A** No.

19 **Q** Was it the affidavits for attorneys fees or
20 indebtedness or both?

21 **A** Affidavit of indebtedness already came
22 executed by the client. We did not execute that.

23 **Q** Okay.

24 **A** Affidavit as to attorneys fees, yes.

25 **Q** Okay. Now, when you signed in blank back when

1 you were signing in blank were the numbers even in
2 there?

3 **A** Yes.

4 **Q** The numbers were in there?

5 **A** Yes. Everything was filled out so I was able
6 to check and confirm. The only thing that wasn't being
7 done is it wasn't notarized while I signed it.

8 **Q** Okay. When you say you were in different
9 buildings how many people were in the other building?
10 Do you know?

11 **A** No. I was transferred a little bit before I
12 left to another building and there was maybe on the
13 floor that I was on maybe fifty, a hundred people on
14 that floor.

15 **Q** How many floors did he have?

16 **A** In that building, two; the floor that I was on
17 and one other floor.

18 **Q** What about the other building?

19 **A** I don't know. It may have just been one floor
20 but I don't know.

21 **Q** How many buildings did he upgrade out of?

22 **A** Three including the building that I was in.

23 **Q** The building you were in had how many floors
24 of people that he was occupying?

25 **A** The one that I went to last had two floors.

1 The building that I was working at before was just one
2 floor.

3 Q And then there was a third building?

4 A Correct, in the same parking lot as that first
5 building that I was in. I think it was just one-floor
6 building also. But I don't know how many people were in
7 there.

8 Q Is this all at the same address?

9 A Two of the buildings were in the same parking
10 lot.

11 Q Okay.

12 A One was just on another street.

13 Q Walking distance?

14 A No.

15 Q When you would get complaints from homeowners
16 about the service of process that ProVest was supplying
17 what did you do about that?

18 A If it was a valid reason, meaning there was an
19 error on the service of process, quash service and
20 re-serve. That's how we would handle it.

21 Q Okay.

22 A Majority of the time when service was raised
23 as an issue we would quash and re-serve.

24 Q Would Marshall Watson, if you know, have to
25 pay for that service even though it was bad service?

1 Were you billed for it?

2 A I don't know.

3 Q Because you didn't out in the affidavit of
4 indebtedness; is that right? You had nothing to do with
5 preparing that, right?

6 A The AOI, no.

7 Q So you had nothing to do with the billing?

8 A The putting in of the billing?

9 Q Yes.

10 A No. We signed off on affidavit of costs which
11 would be like your filing fees and things like that.

12 Q Well, wouldn't that be your service of process
13 fees?

14 A Yeah, that would include your service of
15 process.

16 Q Who would put those numbers in? You would be
17 making up the affidavit, right?

18 A No. I would receive the invoices and we would
19 base it off of whatever the invoice was, the affidavit
20 of cost.

21 Q Was there typically more than one service of
22 process per individual?

23 A On some occasions.

24 Q Most occasions or some occasions?

25 A Most occasions.

1 **Q** How many more per person on average?

2 **A** You're talking about quashing service or are
3 you talking about just the initial service?

4 **Q** I'm talking about the service.

5 **A** We sometimes had to try locating someone
6 three, four times.

7 **Q** They weren't living at the property?

8 **A** No.

9 **Q** Did you ever use more than just the individual
10 homeowners? Was it practice to say John Doe, Jane Doe,
11 tenant one, two, three, four?

12 **A** Yes.

13 **Q** What was the typical complaint?

14 **A** Anyone that had a lien on the property, any
15 judgments on the property, yes we would include John or
16 Jane Doe or unknown tenant. Sometimes they changed how
17 they would name them.

18 **Q** Let's talk about the unknown tenant. How many
19 would you do?

20 **A** One.

21 **Q** One unknown tenant?

22 **A** In the beginning they used to do unknown
23 tenant one, unknown tenant two and then we changed to
24 doing just one unless we were notified that there was
25 more than one tenant living in the property.

1 **Q** Okay. What about Jane Doe? You would list
2 the homeowner?

3 **A** Correct.

4 **Q** Mr. and Mrs. Smith?

5 **A** Um-hum.

6 **Q** And then you would do what with the Jane Does
7 and John Does? Add a Jane Doe and a John Doe?

8 **A** Correct.

9 **Q** Just one each?

10 **A** Correct. Unless it was a duplex. I wouldn't
11 add them in. It would already come to me with that
12 information in the documents.

13 **Q** So the complaints were already drafted up?

14 **A** Correct.

15 **Q** By another attorney?

16 **A** Correct.

17 BY MS. EDWARDS:

18 **Q** How was it that you managed to get your first
19 job with Watson?

20 **A** I sent over my resume through fax and was
21 called back by the office for an interview.

22 **Q** What lead you to send your resume over?

23 **A** They did real estate work. I was looking for
24 a real estate job.

25 **Q** Did they advertise? Were you responding to an

1 advertisement?

2 **A** No.

3 **Q** So you initiated the contact?

4 **A** Yes.

5 **Q** You said that you filed notices of assignments
6 and you had received the assignments from some other
7 location?

8 **A** Correct.

9 **Q** Where did the assignments come from?

10 **A** I would assume the original docs department.
11 Whenever original docs came to the office there was a
12 department and they would be put away in that
13 department. I did not go and request them from that
14 department. The paralegals would bring them to me with
15 the notice of filing.

16 **Q** So you don't know where the original docs were
17 kept?

18 **A** I know we had an original docs department and
19 that's where all the original documents were supposed to
20 be kept.

21 **Q** Where was that?

22 **A** In our office. It was a separate section.

23 **Q** Did you ever see any original assignments
24 there?

25 **A** Did I personally? No.

1 **Q** When the assignments came to you they were
2 already signed and notarized and witnessed?

3 **A** Yes.

4 **Q** But you don't know where that was done?

5 **A** No.

6 **Q** Was it done in the office?

7 **A** I don't know.

8 **Q** Did it have signatures of people or notaries
9 that were in the office?

10 **A** There were signatures on the assignments of
11 like Caryn Graham and Patricia who were principals.
12 They would sign as principals for whoever the client
13 was.

14 **Q** Did you ever see them do that?

15 **A** No.

16 **Q** They came to you already done?

17 **A** Yes.

18 **Q** If I understood you correctly, you didn't file
19 complaints you received them after the complaints had
20 been filed?

21 **A** Correct.

22 **Q** Where did the files stay?

23 **A** We had a file room.

24 **Q** How could you respond to the motions that were
25 filed if you didn't have the file?

1 **A** If we received a pleading on the file we
2 opened up the case file in the system everything was
3 scanned in there. So I could see if there was a pending
4 motion to dismiss or if there was an answer or
5 affirmative defenses that needed to be responded to.
6 We'd also receive mail on a daily basis and faxes which
7 would include all of that information.

8 **Q** So even though you didn't have the physical
9 file you had access to all the documents that were
10 contained in the physical file?

11 **A** Yes.

12 **Q** And they were scanned into the system so it
13 didn't matter if you had the file or not?

14 **A** Correct.

15 **Q** So when you had to respond to a motion you had
16 access to the documents that were involved?

17 **A** Yes.

18 **Q** What is John Watson's position in the firm?

19 **A** Local counsel. He does our Broward hearings.

20 **Q** Is there more than one person that does them?

21 **A** If there's too many I think we have in-house
22 attorneys that would attend also.

23 **Q** You said that Caryn Graham offered to get you
24 a lawyer?

25 **A** Yes.

1 **Q** Have they paid for your lawyer?

2 **A** Yes.

3 **Q** So does she represent you or does she
4 represent them?

5 **A** She represents me.

6 MS. PINERA-VAZQUEZ: That's an interesting
7 question since I said I represented Ms. Cabrera
8 when I got here.

9 BY MS. EDWARDS:

10 **Q** You said that you weren't aware of any ProVest
11 employees working in the office; is that right?

12 **A** Correct.

13 **Q** Are you aware of any ProVest people that were
14 there on a regular basis during the day?

15 **A** No.

16 **Q** When you said there was a question about
17 quashing service of process did you ever have any
18 contact with the ProVest people?

19 **A** Yes.

20 **Q** What would that have been?

21 **A** Whether it be through email or calling, just
22 letting them know that there is this issue so we're
23 going to be sending them an alias summons and to serve
24 them right away or provide them with a new address if
25 there was an attorney and the attorney decided to accept

1 service on behalf of their client.

2 Q What was the reason that they put Jane and
3 John Does in as defendants?

4 A If there were any unknown tenants living in
5 the property if there was no homeowner to allow everyone
6 to know what's going on with the property.

7 Q Who made that decision?

8 A I don't know.

9 Q The same thing as far as any tenants?

10 A Correct.

11 Q You said that you handle five to six thousand
12 files at a time?

13 A Correct.

14 Q As well as the other twenty to twenty-five
15 attorneys doing approximately the same?

16 A Correct. That's what I was told was our
17 caseload.

18 Q Does that mean that the case from the time you
19 got it, which would be up to the complaint was filed
20 until final judgment, you would handle anything that
21 came up?

22 A Unless it litigated department. Then it would
23 go to the litigation department.

24 Q What would cause it to be called a litigation
25 matter?

1 **A** If there were any RESPA issues or TILA issues,
2 those were the issues we were told to send over to
3 litigation. Other than that we would handle them.

4 **Q** So you handled any issues that came up with
5 regard to improper notices of assignment or lack of
6 standing?

7 **A** Yes.

8 **Q** How did you deal with those issues?

9 **A** If we didn't already file an assignment, get a
10 copy or get the original assignment and do a notice of
11 filing. If we had the original note and there was a
12 blank endorsement on the note or an allonge, make sure
13 that was filed and make sure that opposing counsel or
14 the judge, depending on what stage we were at, was
15 notified of the same.

16 **Q** When you got a motion to dismiss in saying
17 that there was not a notice of assignment filed at the
18 time the complaint was filed how did you respond to that
19 motion?

20 **A** Well, if I had the original assignment I would
21 file the original assignment or if I had the original
22 note which had the blank endorsement and say we didn't
23 have an assignment then I would file that with the case
24 law to support that we didn't need the assignment.

25 **Q** What did you do if none of those documents

1 were in the file?

2 **A** Very rarely -- discuss with opposing counsel
3 what was going on and if anything if we didn't have an
4 assignment that was executed before and no allonge or
5 blank endorsement then we'd have to dismiss and re-file
6 or work something out with opposing counsel.

7 **Q** Were you responsible for doing that?

8 **A** Dismissing the action, yes.

9 **Q** Did you have the authority to do that?

10 **A** Yes.

11 **Q** When the issue came up that there was not an
12 assignment that was executed or repaired or recorded
13 before the complaint was filed what was your authority
14 with regard to handling that issue?

15 **A** The assignment was not executed or recorded
16 prior to?

17 **Q** The filing of the case.

18 **A** Notify the paralegal, speak to the attorney,
19 the same thing, to see if there was a way -- we don't
20 need an assignment to have standing. As long as we have
21 the original note and there was a blank endorsement.
22 That's how we would handle it. If there was no blank
23 endorsement, we didn't have the original note, and no
24 assignment then we were going to have to dismiss or work
25 something out with opposing counsel to where we could

1 move the file forward.

2 Q And that's what you did?

3 A Yes.

4 Q And you had authority from your supervisor to
5 do that or did you have to consult with anybody on that
6 issue?

7 A No, I didn't.

8 Q No, you didn't have authority?

9 A I don't know if I had authority or if I would
10 just do it.

11 Q Okay. So you were handling the case. It
12 seems to me like probably there would be somebody who
13 would be reported or who would get a report or something
14 would happen. If you were authorized to dismiss a case
15 there must have been somebody that was looking over your
16 shoulder somewhere down the road to see what was going
17 on.

18 A Well, maybe in the long run but as an attorney
19 I didn't need to go and get approval for every decision
20 that I made.

21 Q That's what I'm asking.

22 A No. I would not, no.

23 Q So if you dismissed a foreclosure then would
24 that just be over with?

25 A No. Then we would re-file. It would be at

1 the same time. Dismiss and make sure we get the
2 documents that are needed in order to proceed and then
3 it would be re-filed.

4 Q Who took care of doing that?

5 A The first legal department.

6 Q So how would it get from you to them?

7 A Emails.

8 Q So you would start doing emails saying this is
9 what I'm doing and now you need to go back and get the
10 documents?

11 A Correct.

12 Q So you were not responsible and you did not
13 participate in getting the documents necessary to
14 re-file?

15 A No.

16 Q And your testimony is that that rarely
17 happened?

18 A Correct, on my files.

19 Q Well, you really wouldn't have control over
20 whether or not there was an assignment filed before the
21 filing would you?

22 A No, I would not.

23 Q Because that would have already been doing
24 before you got it?

25 A Correct. That would have already been done.

1 **Q** Who assigned who was going to be handling the
2 telephone hearings?

3 **A** When I left it was Linda Chelvam.

4 **Q** What was the last name again?

5 **A** Chelvam, C-H-E-L-V-A-M.

6 **Q** Would she just say okay you're handling them
7 all for today or was it done by jurisdiction? How was
8 that done?

9 **A** It was done by jurisdiction and by time. So I
10 that's why I was saying I may do my files or I may not
11 depending on what time set I was put in.

12 **Q** And you testified that you signed affidavits
13 and then a notary would come around during the day to
14 notarize it, right?

15 **A** Correct.

16 **Q** Now, what type of affidavits were you signing?

17 **A** Affidavit of costs, affidavit of attorneys
18 fees. That was it.

19 **Q** For the affidavit of costs what did you do to
20 confirm the information that was contained in the
21 affidavit of costs?

22 **A** The invoices were in the system, scanned into
23 the system. I would just make sure that was actually
24 for that case and just make sure that the totals matched
25 whatever the affidavit of costs stated.

1 Q And so that would include a filing fee?

2 A Yes.

3 Q And that would include service of process?

4 A Yes.

5 Q Did you have any questions about the amount
6 for service of process?

7 A No.

8 Q Did you just always put in exactly what was in
9 the invoice?

10 A Yes.

11 Q Were there any other invoices you reviewed for
12 an affidavit of costs?

13 A No.

14 Q Just those two things, the service of process
15 and the filing fee?

16 A Correct. Well there were other costs included
17 but they were standard costs depending on the client.

18 Q Like what?

19 A Title search. Those were standard costs.

20 Q Did you check for those prices as well?

21 A No. We were just told if it's this client
22 it's that amount for title search fees.

23 Q How much would that be?

24 A The most was \$325 and the least was \$200.

25 Q Which was charged for which client?

1 **A** Fannie Mae was the only \$200. Every other
2 client was \$325.

3 **Q** Who did the title searches?

4 **A** The title department.

5 **Q** Do you have any idea why they would charge
6 different amounts?

7 **A** I would assume the contract that they have
8 with the client. I don't know.

9 **Q** But you never saw that?

10 **A** No.

11 **Q** And so you didn't have invoices? You were
12 just charging what you were told?

13 **A** Yes.

14 **Q** What other expenses did you have in the cost
15 affidavit?

16 **A** That was it.

17 **Q** Just the title search?

18 **A** Yes.

19 **Q** And you wouldn't have had any mediation fees
20 because that would have gone to a different department?

21 **A** No. If there were mediations that would be
22 put in there.

23 **Q** But you wouldn't be doing that would you
24 because didn't litigation go to another department?

25 **A** No. We would handle the mediations.

1 **Q** I thought litigation went to another
2 department?

3 **A** Litigation, yeah. We wouldn't bill for
4 litigation. You said mediation.

5 **Q** Right.

6 **A** Mediation is not litigation.

7 **Q** So you would sometimes have mediation even if
8 you did not have litigated files?

9 **A** Correct.

10 **Q** How do you have mediation if you don't have a
11 litigated file?

12 **A** By administrative order. If the property was
13 owner-occupied and homestead we were mandated to go to
14 mediation.

15 **Q** That was kept in your division?

16 **A** Yes.

17 **Q** Who attended the mediation?

18 **A** The attorneys. Us. I physically did not go
19 to mediations. I only did telephonic.

20 **Q** You didn't appear at mediations by telephone
21 did you?

22 **A** Yes, on a few I did.

23 **Q** Were you authorized to represent the client?

24 **A** Yes.

25 **Q** Were you authorized to settle the cases?

1 **A** No. The client was on the line with us. The
2 client would make that determining factor.

3 **Q** So you would be on the phone and you would
4 have the client on the phone with you?

5 **A** Yes.

6 **Q** So then you included the mediation fees in
7 your affidavit of costs?

8 **A** Yes.

9 **Q** How much would those be?

10 **A** Whatever the charge was. I think it was like
11 \$750 for the call-in center. It was whatever was set by
12 the call-in center.

13 **Q** What is the call-in center?

14 **A** The ones that mandated --

15 **Q** Oh you mean the call-in center for the
16 mediations?

17 **A** Yes.

18 **Q** Did you do them all at the call-in center?

19 **A** No. The mediations that I did, yes.

20 **Q** Those are for Dade County?

21 **A** Yes. They have mediations in other counties
22 too with the call-in center.

23 **Q** Okay. So you would be on the phone with who
24 was authorized to settle the case?

25 **A** Correct.

1 **Q** Who was it?

2 **A** The client.

3 **Q** Who was the client?

4 **A** The client representative.

5 **Q** Who would that be?

6 **A** What do you mean?

7 **Q** Say for instance you're having a mediation.

8 On the last mediation that you did who would have been
9 on the phone with?

10 **A** Whoever the contact information is that they
11 gave me for that client. I'd call them and they were
12 authorized.

13 **Q** Did you ever attend a mediation that was
14 settled?

15 **A** Yes.

16 **Q** Did you?

17 **A** Yes.

18 **Q** What was the name of the client that
19 represented them?

20 **A** I do not recall.

21 **Q** How many mediations would you say you
22 attended?

23 **A** I didn't do that many mediations. Maybe ten.

24 **Q** Did you ever attend any arbitrations?

25 **A** Would that be considered a conciliation?

1 **Q** A conciliation.

2 **A** Yes.

3 **Q** How many conciliations would you say attended?

4 **A** Thirty.

5 **Q** What were the circumstances of how you handled
6 that as far as the client there?

7 **A** The same as a mediation since we didn't have a
8 mediator. We'd have a client on the line and opposing
9 counsel if there was opposing counsel and a borrower.

10 **Q** So nobody from your office ever appeared at
11 the conciliation and mediation?

12 **A** No. Conciliations were done telephonically.

13 **Q** And nobody appeared at mediation either?

14 **A** Well, not the ones that I handled. I only did
15 telephonic but there were a lot of mediations that were
16 handled in person.

17 **Q** But those were not handled by you?

18 **A** No.

19 **Q** Were there any other expenses other than the
20 mediation or conciliation fees as well as the filing fee
21 and the service of process fee and the title fee?

22 **A** No.

23 **Q** What about the attorney affidavit. What
24 information did you have in order to complete the
25 attorney fee affidavit?

1 **A** The attorney fee affidavit was also set by
2 client. Depending on who the client was would depend on
3 what the charge was. That was it. We didn't have an
4 invoice or anything.

5 **Q** So you would have an attorney fee affidavit
6 saying that there was a standard flat fee?

7 **A** Correct.

8 **Q** What was the flat fee?

9 **A** Depending on the client it ranged from \$1,200
10 to \$1,450.

11 **Q** Which was \$1,200 and which was \$1,450 and in
12 between?

13 **A** Majority of them were \$1,200. There really
14 wasn't any in between. \$1,450 was -- I don't recall. I
15 know the majority were \$1,200.

16 **Q** So those were pursuant to flat fee
17 arrangements?

18 **A** Correct.

19 **Q** And that's what all your affidavits say; that
20 there's a flat fee agreement?

21 **A** Well, it had a breakdown of eight hours. It
22 was eight hours times whatever amount of hours. I mean
23 they were flat fee. I don't know how many hours we
24 really spent working the file.

25 **Q** Well, how many hours did you work on the file?

1 **A** I would get the file in stages so I don't
2 know. I never really kept track of any specific file.

3 **Q** Well, for the allegations in the affidavit did
4 those things happen in each one that you signed?

5 **A** Yes.

6 **Q** How do you know that?

7 **A** Because I reviewed the file or I would have
8 the documents in front of me to make sure that they
9 occurred.

10 **Q** Wasn't it the same allegations in each
11 affidavit as to amount of time spent?

12 **A** Yes.

13 **Q** For each effort?

14 **A** Yes.

15 **Q** Well, would it be fair to say that each file
16 didn't use the same amount of effort?

17 **A** No. If it was for litigation then they would
18 be billed completely separate and then you would have
19 another affidavit coming in. As far as a standard we'd
20 always have motions for summary judgment. It's the same
21 pleadings for every file.

22 **Q** What about a motion dismiss?

23 **A** A motion to dismiss was the same thing. We
24 never billed separate for that. That was not on our
25 affidavit as to attorneys fees.

1 **Q** What if it was a default? Was there any
2 difference?

3 **A** No.

4 **Q** What if you had nothing come in from the
5 defendant?

6 **A** No.

7 **Q** So you had the same amount billed and the same
8 affidavit whether there was any defense raised by a
9 defendant or not?

10 **A** Yes.

11 **Q** You said that you had heard that the attorneys
12 were signing documents without reviewing them?

13 **A** No.

14 **Q** Did you say that earlier?

15 **A** No. She said signed them without the notary
16 being present.

17 **Q** Were you aware of attorneys signing documents
18 without reviewing them?

19 **A** Paralegals talk but I don't know.

20 **Q** Did you hear paralegals talking about the fact
21 that attorneys were signing documents without reviewing
22 them?

23 **A** Yes.

24 **Q** What did you hear?

25 **A** Just that. That they were signing and not

1 reviewing.

2 Q Which documents were they saying that that was
3 happening with?

4 A They would just talk like just in general.

5 Q Which attorneys would they say were not
6 reviewing the documents?

7 A They never said any names. They were just
8 very general.

9 Q Were there any circumstances you're aware of
10 where you heard there were large piles of documents
11 being signed by attorneys or paralegals or other
12 employees from the firm without reviewing them?

13 A Yes.

14 Q What were those circumstances?

15 A What do you mean? What lead maybe the
16 attorneys to sign off on documents without reviewing?

17 Q Were you aware of tables that were set up to
18 have piles of documents put on so the attorneys went in
19 and signed in mass?

20 A No, not that.

21 Q Did you ever see it?

22 A No.

23 Q What is it you're talking about that you heard
24 about?

25 A Files that were put into the attorney's office

1 that they said they were just signing and they that
2 weren't reviewing them. I don't know anything about a
3 mass table that the attorneys were doing that.

4 Q Who are the paralegals that you're talking
5 about? Who are they?

6 A I don't know names.

7 Q Who was your paralegal?

8 A I didn't have one paralegal. They were all my
9 paralegals.

10 Q How many paralegals were there?

11 A Two hundred just in my building.

12 Q Name five of them.

13 A I gave you three, the three for the notary.

14 Q Okay.

15 A Robert Lynch, Desiree Cruz. Is that five?
16 I'm not good with names.

17 Q Which of them told you that they had observed
18 this?

19 A Giselle.

20 Q That's one you mentioned earlier?

21 A Yes, for the notary.

22 Q She told you that she had seen attorneys sign
23 documents they hadn't reviewed?

24 A Correct.

25 Q Any others?

1 **A** No, not from that list. I don't recall names
2 like I said.

3 MS. EDWARDS: I don't have any further
4 questions.

5 MS. CLARKSON: I just have some follow-up.
6 BY MS. CLARKSON:

7 **Q** When you said that you went to a mediation you
8 went to it telephonically?

9 **A** Right.

10 **Q** And it was a rep from the bank also at the
11 phone?

12 **A** Correct.

13 **Q** Not at the phone in your office?

14 **A** Correct.

15 **Q** Did anyone in your office have authority to
16 mediate for the bank?

17 **A** No, the bank was always on the line with us.

18 **Q** So it wasn't any lawyer or paralegal from your
19 firm that had authority?

20 **A** No.

21 **Q** When you're talking about these standard
22 amounts for attorneys fees and title, you said that you
23 thought that was probably a set contract with the
24 client?

25 **A** Um-hum.

1 **Q** Did you ever hear that there were kickbacks
2 going back to the client?

3 **A** No.

4 **Q** You never heard that?

5 **A** No.

6 **Q** You also said that you didn't need an
7 assignment to file a lawsuit if you had the original
8 note, correct?

9 **A** Um-hum.

10 **Q** Well, there's thousands and thousands and
11 thousands of Marshall Watson assignments filed. Is that
12 because you guys didn't have the original note?

13 **A** No. We can have both of the file also. It's
14 just we didn't need an assignment in order to have
15 standing if we have the original note with the blank
16 endorsement with the allonge.

17 **Q** Right. But you did file all these
18 assignments?

19 **A** Um-hum.

20 **Q** And you didn't need to; is that what you're
21 saying?

22 **A** In order to have standing, no.

23 **Q** So I wonder why you did? Was there ever any
24 discussions why you would go to that extra expense?

25 **A** From a titles perspective, just my opinion,

1 chain of title. Assignments are recorded. The blank
2 endorsement and the note is not. That's what I assumed.

3 Q Do you know what Caryn Graham's signature
4 looks like?

5 A Yeah, if I see it.

6 Q I'm going to ask you to take a look at this
7 document. It's an assignment of mortgage. Do you see
8 her signature on there?

9 A Um-hum.

10 Q Do you recognize it?

11 A No.

12 Q I'm going to ask you to look at this one. Do
13 you see her signature?

14 A Um-hum.

15 Q Do you recognize that one?

16 A Yes.

17 MS. CLARKSON: Let's have these marked. The
18 first one that she does not recognize her signature
19 as B. The third one where she does recognize her
20 signature as C.

21 BY MS. CLARKSON:

22 Q Did you have occasion to see her signature
23 often?

24 A Yes.

25 Q Daily?

A No, not daily.

Q Weekly?

A Yeah.

Q Did she ever sign any of these in front of you?

A No.

Q You never saw her sign these assignments in front of you?

A No.

Q Did you ever hear that there was someone else signing Caryn Graham's name?

A No. I know there was someone else that had authority to sign but then their name was there.

Q Someone else had authority to sign for the --

A The client but their name was there. They were not signing for Caryn Graham.

Q Who was that?

A Patricia Arango.

Q Do you know her signature?

A No.

BY MS. EDWARDS:

Q While she's looking for that do you have any idea how it could be the signatures are so different on the two exhibits B and C?

A No.

1 **Q** Do you think those are signatures of the same
2 person?

3 **A** No.

4 **Q** Were you aware that that happened in the
5 office?

6 **A** No.

7 **Q** This is news to you?

8 **A** Yes.

9 BY MS. CLARKSON:

10 **Q** I'm not going to use Patricia Arango's because
11 hers are all the same. Back to Caryn Graham for a
12 second. You said you recognized C's signature, correct?

13 **A** Yes.

14 **Q** Do you recognize that signature purporting to
15 be the one of Patricia Arango?

16 **A** No, I recall her signature.

17 **Q** You don't know if that signature is hers?

18 **A** No.

19 **Q** You couldn't tell either way?

20 **A** No. I don't recall her signature.

21 **Q** How about that signature purporting to be
22 Caryn Graham?

23 **A** No. The only one that I recall is this one.

24 **Q** I'm just going to ask you to look at a couple
25 more. What about that one?

A No.

Q That's not her signature as you've seen it?

A No.

Q What about that one?

A No.

MS. CLARKSON: I need to get these marked.

Put these as composite D.

MS. EDWARDS: How many are there?

MS. CLARKSON: Three.

MR. BRIESMEISTER: Just a couple questions

from me just so I understand.

BY MR. BRIESMEISTER:

Q Jessica, you said earlier that Caryn Graham was your first supervisor when you started working there?

A Yes.

Q What was her position or title with the company at that point?

A I think she was just an attorney but just a supervisor. I know in the interim she became managing attorney.

Q What is her current title?

A Managing attorney.

Q Then later Karen Morgan became your attorney?

A She became assistant managing attorney about a

1 year ago. So she reported to Caryn and we reported to
2 Morgan.

3 Q As far as you know she is still the assistant
4 managing attorney?

5 A Yes.

6 Q You said you left in July of 2010. Under what
7 circumstances did you leave the firm?

8 A What do you mean by what circumstances?

9 Q What was your relationship? How did you come
10 to leave the firm?

11 A I do not have good relations with Karen
12 Morgan, assistant managing attorney. Personality-wise
13 we just clashed. I was looking to further my career,
14 which is why I opened my own office.

15 Q Did you resign or were you terminated?

16 A I resigned.

17 Q Do you still have any ongoing contact with any
18 of the employees at Watson?

19 A Yes.

20 Q Who?

21 A You want their names?

22 Q Yes.

23 A Ingrid Fadil.

24 Q Her title?

25 A Attorney. I went to law school with her.

1 Monica Winter. Everybody else I speak to has already
2 left.

3 Q At any time during your employment did you
4 remove from the office any documents or emails or do you
5 have any of that in your possession?

6 A No, I do not.

7 MR. BRIESMEISTER: That's all I have.

8 MS. EDWARDS: One last question.

9 BY MS. EDWARDS:

10 Q Are you aware of any improprieties that were
11 going on at the office while you were there?

12 A No, I was not.

13 MS. EDWARDS: Okay. I don't have anything
14 else. If this is transcribed you have the
15 opportunity to read it to make sure it was taken
16 down correctly by the court reporter or you can
17 waive that right.

18 MS. PINERA-VAZQUEZ: She'll read.

19 (Thereupon, the deposition was concluded at

20 1:45 p.m.)
21
22
23
24
25

1 STATE OF FLORIDA)

2 COUNTY OF BROWARD)

3
4 I, the undersigned authority, certify that JESSICA
5 CABRERA appeared before me and was duly sworn.

6
7 WITNESS my hand and official seal this 23rd day of
8 September, 2010.

9
10 
11

Kalandra Smith

12 Notary Public - State of Florida

My Commission No.: EE3599

13 My Commission Expires: 06/23/14
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C E R T I F I C A T E

The State of Florida,)
County of Broward)

I, Kalandra Smith, Court Reporter and Notary Public
in and for the State of Florida at Large, do hereby
certify that aforementioned witness was by me first duly
sworn to testify the whole truth; that I was authorized
to and did report said deposition; and that the
foregoing pages are a true and correct transcription of
my reporting of said deposition.

I further certify that said deposition was taken at
the time and place herein above set forth and that the
taking of said deposition was commenced and completed as
herein above set out.

I further certify that I am not an attorney or
counsel of any of the parties, nor am I a relative or
employee of any attorney or counsel of party connected
with the action, nor am I financially interested in the
action.

The foregoing certification of this transcript does
not apply to any reproduction of the same by any means
unless under the direct control and/or direction of the
certifying reporter.

IN WITNESS WHEREOF, I have hereunto set my hand
this 23rd day of September, 2010.

Kalandra Smith
Notary Public - State of Florida
My Commission No.: EE3599
My Commission Expires: 06/23/14

READ AND SIGN

I have read the foregoing pages and except for the corrections or amendments I have indicated on the sheets attached for such purposes, I hereby subscribe to the accuracy of this transcript.

Signature of Deponent

Date

E R R A T A S H E E T

IN RE:

Deposition of:

Date taken:

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Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

Date:

Signature of Deponent:

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**STATE OF FLORIDA
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LEGAL AFFAIRS**

**ECONOMIC CRIMES
SUBPOENA FOR APPEARANCE**

IN THE INVESTIGATION OF: Law Office of Marshall C. Watson, P.A. and
Marshall C. Watson
1800 N.W. 49 Street
Suite 120
Ft. Lauderdale, Florida 33309

TO: Attention: Jessica Cabrera

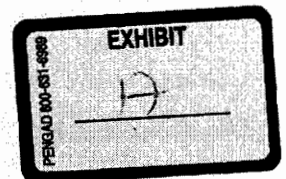
Law Offices of Jessica Cabrera, P.A.
275 Fontainebleau Blvd.
Suite 260
Miami, Florida 33172

(or any other legal address for process service)

This investigative Civil Subpoena is issued pursuant to Florida's Deceptive and Unfair Trade Practices Act, Chapter 501, Part II, Florida Statutes, in the course and authority of an official investigation. The general purpose and scope of this investigation extends to possible unfair and deceptive trade practices of the above named Company(s). Your attention is directed to Sections 501.204 and 501.206, Florida Statutes, printed at the end of this document.

YOU ARE HEREBY COMMANDED to appear on Tuesday September 21, 2010 at 10:30 a.m., at the following location, to give sworn testimony before the court reporting firm of Official Reporting Service, Inc.

**DEPARTMENT OF LEGAL AFFAIRS
OFFICE OF THE ATTORNEY GENERAL
110 S.E. 6th Street
10th Floor
Ft. Lauderdale, Florida 33301**



**ANY PERSON FAILING TO APPEAR WHEN REQUESTED WILL BE SUBJECT TO
LEGAL ACTION.**



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 Law Office of Marshall C. Watson
 1800 NW 49th Street, Suite 120
 Fort Lauderdale, Florida 33309
 Telephone: (954) 453-0365
 Facsimile: (954) 771-6052

RECORD AND
 RETURN TO

ASSIGNMENT OF MORTGAGE

KNOW ALL MEN BY THESE PRESENTS:

THAT MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INCORPORATED, ACTING SOLELY AS
 A NOMINEE FOR HSBC MORTGAGE CORPORATION residing or located at 1595 Springhill Road, # 310
 Vienna, VA 22182 herein designated as the assignor, for and in consideration of the sum of \$1.00 Dollar and other
 good and valuable consideration, the receipt of which is hereby acknowledged, does hereby grant, bargain, sell, assign,
 transfer and set over unto BAC HOME LOANS SERVICING, L.P. FKA COUNTRYWIDE HOME LOANS
SERVICING, L.P. residing or located at: 7105 CORPORATE DRIVE, PLANO, TX 75024
 herein designated as the assignee, the mortgage executed by FIORDALIZA FERNANDEZ
 recorded March 25, 2005 in Palm Beach County, Florida at BOOK 18315 and PAGE 883 encumbering the property
 more particularly described as follows:

LOT 4, BLOCK 4, PLAT OF CAM ESTATES, ACCORDING TO THE PLAT THEREOF
 AS RECORDED IN PLAT BOOK 32, PAGE 126, OF THE PUBLIC RECORDS OF
 PALM BEACH COUNTY, FLORIDA.

Together with the note and every other obligation described in said mortgage and the money due and to
 become due thereon

TO HAVE AND TO HOLD the same unto the said assignee, its successors and assigns forever, but without recourse
 on the undersigned.

In Witness Whereof, the said Assignor has hereunto set his hand and seal or caused these presents to be signed by its
 proper corporate officers and its corporate seal to be hereto affixed this 7 day of July, 2009.

MORTGAGE ELECTRONIC REGISTRATION
 SYSTEMS, INCORPORATED, ACTING SOLELY AS A
 NOMINEE FOR HSBC MORTGAGE CORPORATION

ATTEST:
 PRINT NAME: Caryn A. Graham, Assistant Secretary

Signed in the presence of:

WITNESS: [Signature]
 Print Name: [Name]
 WITNESS: [Signature]
 Print Name: [Name]

STATE OF FLORIDA

COUNTY OF BROWARD

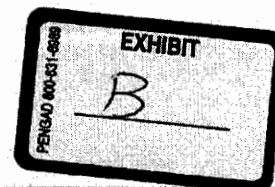
PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the aforesaid county and state, on this
 the 7 day of July, 2009, within my jurisdiction, the within named who
 acknowledged to me that (s)he is CARYN A. GRAHAM and who are personally known to me or has provided
 as identification, that for and on behalf of MORTGAGE ELECTRONIC REGISTRATION
 SYSTEMS, INCORPORATED, ACTING SOLELY AS A NOMINEE FOR HSBC MORTGAGE
 CORPORATION and as its act and deed (s)he executed the above and foregoing instrument, after first having been
 duly authorized by MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INCORPORATED, ACTING
 SOLELY AS A NOMINEE FOR HSBC MORTGAGE CORPORATION to do so.

WITNESS my hand and official seal in the County and State last aforesaid this 7 day of
July, 2009.

[Signature]
 NOTARY PUBLIC



09-30580





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Prepared by: Nathalie Demesmin, Esquire

Record & Return to: Law Office of Marshall C. Watson
 1800 NW 49th Street, Suite 120
 Fort Lauderdale, Florida 33309
 Telephone: (954) 453-0365
 Facsimile: (954) 771-6052

RECORD AND
 RETURN TO

ASSIGNMENT OF MORTGAGE

KNOW ALL MEN BY THESE PRESENTS:

THAT MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INCORPORATED AS NOMINEE FOR GLOBAL EQUITY LENDING, INC. residing or located at 1545 Spring Hill Rd #310 Weston, FL 33390 herein designated as the assignor, for and in consideration of the sum of \$1.00 Dollar and other good and valuable consideration, the receipt of which is hereby acknowledged, does hereby grant, bargain, sell, assign, transfer and set over unto CHASE HOME FINANCE, LLC residing or located at: 3415 Vision Dr Columbus, ON 43219 herein designated as the assignee, the mortgage executed by JHANON L. JAMES recorded August 3, 2007 in Palm Beach County, Florida at Book 21999 and Page 667 encumbering the property more particularly described as follows:

LOT 2, BLOCK 2, LAKES OF LANTANA, PHASE 1B, ACCORDING TO THE PLAT THEREOF, AS RECORDED IN PLAT BOOK 38, PAGES 122 THROUGH 124, INCLUSIVE, OF THE PUBLIC RECORDS OF PALM BEACH COUNTY, FLORIDA.

together with the note and each and every other obligation described in said mortgage and the money due and to become due thereon

TO HAVE AND TO HOLD the same unto the said assignee, its successors and assigns forever, but without recourse on the undersigned, effective as of _____

In Witness Whereof, the said Assignor has hereunto set his hand and seal or caused these presents to be signed by its proper corporate officers and its corporate seal to be hereto affixed this 3rd day of March 2008.

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INCORPORATED AS NOMINEE FOR GLOBAL EQUITY LENDING INC.

CARYN A. GRAHAM
 ASSISTANT SECRETARY

Signed in the presence of:

WITNESS: R. Metayer
 Print Name: Ronnie Metayer

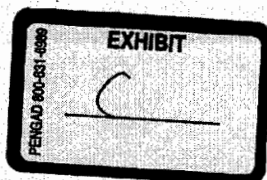
WITNESS: Dominique Blon
 Print Name: Dominique Blon

STATE OF Florida

COUNTY OF Broward

PERSONALLY APPEARED BEFORE ME the undersigned authority in and for the aforesaid county and state, on this the 3rd day of March, 2008, within my jurisdiction, the within named who acknowledged to me that (s)he is Caryn A. Graham, Assistant Secretary and that for and on behalf of Mortgage Electronic Registration Systems Incorporated As Nominee For Global Equity Lending, Inc. and as its act and deed (s)he executed the above and foregoing instrument, after first having been duly authorized by Mortgage Electronic Registration Systems Incorporated As Nominee For Global Equity Lending, Inc. to do so.

WITNESS my hand and official seal in the County and State last aforesaid this 3rd day of March, 2008.



Sharon R. Bock
 NOTARY PUBLIC

THIS IS NOT A
CERTIFIED COPY

RECORD & RETURN TO:
Law Office of Marshall C. Watson
1800 NW 49th Street, Suite 320
Fort Lauderdale, Florida 33309
Telephone: (954) 453-0365
Facsimile: (954) 771-6052

ASSIGNMENT OF MORTGAGE

KNOW ALL MEN BY THESE PRESENTS:

THAT MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INCORPORATED, AS A NOMINEE FOR COUNTRYWIDE HOME LOANS, INC. DBA AMERICA'S WHOLESALE LENDER residing or located at 1595 Springhill Road, # 310 Vienna, VA 22182 herein designated as the assignor, for and in consideration of the sum of \$1.00 Dollar and other good and valuable consideration, the receipt of which is hereby acknowledged, does hereby grant, bargain, sell, assign, transfer and set over unto BAC HOME LOANS SERVICING LP, FKA COUNTRYWIDE HOME LOANS SERVICING LP residing or located at 7105 CORPORATE DRIVE, PLANO, TX 75024 herein designated as the assignee, the mortgage executed by TREVOR M ULM A/K/A TREVOR ULM recorded August 2, 2007 in Hillsborough County, Florida at BOOK 17998 and PAGE 488 encumbering the property more particularly described as follows:

LOT 118, WESTCHASE SECTION "430A", ACCORDING TO THE MAP OR PLAT THEREOF AS RECORDED IN PLAT BOOK 85, PAGE 42, OF THE PUBLIC RECORDS OF HILLSBOROUGH COUNTY, FLORIDA.

Together with the note and each and every other obligation described in said mortgage and the money due and to become due thereon

TO HAVE AND TO HOLD the same unto the said assignee, its successors and assigns forever, but without recourse on the undersigned.

In Witness Whereof, the said Assignor has hereunto set his hand and seal or caused these presents to be signed by its assistant secretary and its corporate seal to be hereto affixed this 26 day of August, 2009.

MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS INCORPORATED, AS A NOMINEE FOR
COUNTRYWIDE HOME LOANS, INC. DBA
AMERICA'S WHOLESALE LENDER

Caryn A. Graham, Assistant Secretary

Signed in the presence of:

WITNESS: [Signature]
Print Name: YVONNE JACOBS
WITNESS: [Signature]
Print Name: KAY TYLER

STATE OF FLORIDA

COUNTY OF BROWARD

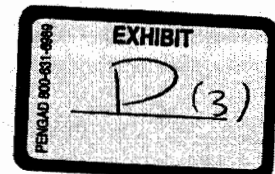
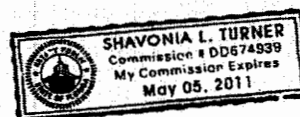
PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the aforesaid county and state, on this the 26 day of August, 2009, within my jurisdiction, the within named who acknowledged to me that (s)he is CARYN A. GRAHAM, ASSISTANT SECRETARY and who is personally known to me or has provided as identification, that for and on behalf of MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INCORPORATED, AS A NOMINEE FOR COUNTRYWIDE HOME LOANS, INC. DBA AMERICA'S WHOLESALE LENDER and as its act and deed (s)he executed the above and foregoing instrument, after first having been duly authorized by MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INCORPORATED, AS A NOMINEE FOR COUNTRYWIDE HOME LOANS, INC. DBA AMERICA'S WHOLESALE LENDER to do so.

WITNESS my hand and official seal in the County and State last aforesaid this 26 day of August, 2009.

[Signature]
NOTARY PUBLIC

Exhibit C

09-41999



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RECORD & RETURN TO:
Law Office of Marshall C. Watson
1805 NW 49th Street, Suite 120
Fort Lauderdale, Florida 33309
Telephone: (954) 453-0365
Facsimile: (954) 771-6052

ASSIGNMENT OF MORTGAGE

KNOW ALL MEN BY THESE PRESENTS:

THAT MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INCORPORATED AS NOMINEE FOR COUNTRYWIDE BANK, N.A., residing or located at 1595 Springhill Road, # 310 Vienna, VA 22182 herein designated as the assignor, for and in consideration of the sum of \$1.00 Dollar and other good and valuable consideration, the receipt of which is hereby acknowledged, does hereby grant, bargain, sell, assign, transfer and set over unto BAC HOME LOANS SERVICING, L.P. FKA COUNTRYWIDE HOME LOANS SERVICING, L.P., residing or located at: 7105 CORPORATE DRIVE, PLANO, TX 75024

herein designated as the assignee, the mortgage executed by ROBERT FRANKS A/K/A ROBERT R. FRANKS recorded April 9, 2007 in Hillsborough County, Florida at BOOK 17645 and PAGE 788 encumbering the property more particularly described as follows:

LOT 123, BLOCK 1, OAKDALE RIVERVIEW ESTATES UNIT 2, ACCORDING TO THE PLAT THEREOF, AS RECORDED IN PLAT BOOK 69, PAGE 23, OF THE PUBLIC RECORDS OF HILLSBOROUGH COUNTY, FLORIDA.

Together with the note and each and every other obligation described in said mortgage and the money due and to become due thereon

TO HAVE AND TO HOLD the same unto the said assignee, its successors and assigns forever, but without recourse on the undersigned.

In Witness Whereof, the said Assignor has hereunto set his hand and seal or caused these presents to be signed by its assistant secretary and its corporate seal to be hereto affixed this SEP 01 2009 day of

MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS INCORPORATED AS NOMINEE FOR
COUNTRYWIDE BANK, N.A.

Caryn A. Graham, Assistant Secretary

Signed in the presence of:

WITNESS:
Print Name: Caryn A. Graham

WITNESS:
Print Name: Warne Jacobs

STATE OF FLORIDA

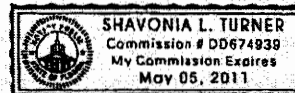
COUNTY OF BROWARD

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the aforesaid county and state, on this the SEP 01 2009 day of SEP 01 2009, within my jurisdiction, the within named who acknowledged to me that (s)he is CARYN A. GRAHAM, ASSISTANT SECRETARY and who is personally known to me or has provided as identification, that for and on behalf of MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INCORPORATED AS NOMINEE FOR COUNTRYWIDE BANK, N.A. and as its act and deed (s)he executed the above and foregoing instrument, after first having been duly authorized by MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INCORPORATED AS NOMINEE FOR COUNTRYWIDE BANK, N.A. to do so.

WITNESS my hand and official seal in the County and State last aforesaid this SEP 01 2009 day of SEP 01 2009, 2009.

NOTARY PUBLIC

Exhibit D



THIS IS NOT A
CERTIFIED COPY

RECORD & RETURN TO:
Law Office of Marshall C. Watson
1800 NW 49th Street, Suite 120
Fort Lauderdale, Florida 33309
Telephone: (954) 453-0865
Facsimile: (954) 771-6052

ASSIGNMENT OF MORTGAGE

KNOW ALL MEN BY THESE PRESENTS:

THAT MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INCORPORATED, AS A NOMINEE FOR COUNTRYWIDE HOME LOANS, INC., residing or located at 1595 Springhill Road, # 310 Vienna, VA 22182 herein designated as the assignor, for and in consideration of the sum of \$1.00 Dollar and other good and valuable consideration, the receipt of which is hereby acknowledged, does hereby grant, bargain, sell, assign, transfer and set over unto BAC HOME LOANS SERVICING LP, FKA COUNTRYWIDE HOME LOANS SERVICING LP residing or located at 7105 Corporate Drive Plano, TX 75024 herein designated as the assignee, the mortgage executed by TED G CHRONIS AND DIANE B CHRONIS recorded January 18, 2007 in Hillsborough County, Florida at BOOK 17343 and PAGE 709 encumbering the property more particularly described as follows:

LOT 51, TOWNHOMES AT PARKSIDE, ACCORDING TO THE MAP OR PLAT THEREOF, AS RECORDED IN PLAT BOOK 104, PAGE 42-47, OF THE PUBLIC RECORDS OF HILLSBOROUGH COUNTY, FLORIDA.

Together with the note and each and every other obligation described in said mortgage and the money due and to become due thereon

TO HAVE AND TO HOLD the same unto the said assignee, its successors and assigns forever, but without recourse on the undersigned.

In Witness Whereof, the said Assignor has hereunto set his hand and seal or caused these presents to be signed by its assistant secretary and its corporate seal to be hereto affixed this 20 day of Sept, 2009.

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INCORPORATED, AS A NOMINEE FOR COUNTRYWIDE HOME LOANS, INC.

Caryn A. Graham, Assistant Secretary

Signed in the presence of:

WITNESS: Larry Stevens
Print Name: Larry Stevens
WITNESS: Shavonia Turner
Print Name: Shavonia Turner

STATE OF FLORIDA

COUNTY OF BROWARD

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the aforesaid county and state, on this the 20 day of Sept, 2009, within my jurisdiction, the within named who acknowledged to me that (s)he is CARYN A. GRAHAM and who is personally known to me or has provided as identification, that for and on behalf of MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INCORPORATED, AS A NOMINEE FOR COUNTRYWIDE HOME LOANS, INC. and as its act and deed (s)he executed the above and foregoing instrument, after first having been duly authorized by MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INCORPORATED, AS A NOMINEE FOR COUNTRYWIDE HOME LOANS, INC. to do so.

WITNESS my hand and official seal in the County and State last aforesaid this 20 day of Sept, 2009.

NOTARY PUBLIC



Exhibit F

