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

10 **FOR THE COUNTY OF LOS ANGELES**

11) Case No:
12)
13) **PLAINTIFF'S FIRST SET OF REQUESTS**
14) **FOR PRODUCTION OF DOCUMENTS**
15) **TO U.S. BANK NATIONAL**
16) **ASSOCIATION AS INDENTURE**
17) **TRUSTEE, ON BEHALF OF THE**
18) **HOLDERS OF THE TERWIN**
19) **MORTGAGE TRUST 2007-QHL1 ASSET-**
20) **BACKED SECURITIES, SERIES 2007-**
21) **QHL1, WITHOUT RECOURSE**
22)
23)
24)
25)
26)
27)
28)

9 ,
10 **PLAINTIFFS,**
11 vs.
12 SPECIALIZED LOAN SERVICING, LLC;
13 MTC FINANCIAL INC., DBA TRUSTEE
14 CORPS; U.S. BANK NATIONAL
15 ASSOCIATION AS INDENTURE
16 TRUSTEE, ON BEHALF OF THE
17 HOLDERS OF THE TERWIN MORTGAGE
18 TRUST 2007-QHL1 ASSET-BACKED
19 SECURITIES, SERIES 2007-QHL1,
20 WITHOUT RECOURSE; MORTGAGE
21 ELECTRONIC REGISTRATION SYSTEMS,
22 INC.; ALL PERSONS UNKNOWN,
23 CLAIMING ANY LEGAL OR EQUITABLE
24 RIGHT, TITLE, ESTATE, LIEN, OR
25 INTEREST IN THE PROPERTY
26 DESCRIBED IN THE COMPLAINT
27 ADVERSE TO PLAINTIFFS' TITLE, OR
28 ANY CLOUD ON PLAINTIFFS' TITLE
THERETO; and DOES 1-20, INCLUSIVE,

DEFENDANTS.

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

2 PROPOUNDING PARTY: PLAINTIFF

3 RESPONDING PARTY: DEFENDANT U.S. BANK NATIONAL ASSOCIATION
4 AS INDENTURE TRUSTEE, ON BEHALF OF THE HOLDERS OF THE TERWIN
5 MORTGAGE TRUST 2007-QHL1 ASSET-BACKED SECURITIES, SERIES 2007-QHL1,
6 WITHOUT RECOURSE

7 Plaintiff (“Plaintiff”) hereby requests that Defendant U.S. BANK NATIONAL
8 ASSOCIATION AS INDENTURE TRUSTEE, ON BEHALF OF THE HOLDERS OF THE
9 TERWIN MORTGAGE TRUST 2007-QHL1 ASSET-BACKED SECURITIES, SERIES 2007-
10 QHL1, WITHOUT RECOURSE (“Defendant” or “YOU”) produce the following items, papers,
11 documents and materials now in YOUR possession or under YOUR control and to permit the
12 reproduction of the originals thereof (or copies if the originals cannot be produced) pursuant to
13 CCP Section 2031.010 et seq. The items hereinafter requested shall be produced at 10:00 a.m.,
14 on, at 620 N. Brand Blvd., Ste. 405, Glendale, CA 91203.

15 **INSTRUCTIONS FOR COMPLIANCE WITH THIS REQUEST**

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

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

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

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

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

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

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

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

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

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

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

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

25 All documents which establish that YOU were the legal, beneficial or equitable owner of
26 the promissory note that is the subject of this action at the time of the non-judicial foreclosure of
27 the Subject Property.

REQUEST FOR PRODUCTION NO. 2:

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

REQUEST FOR PRODUCTION NO. 3:

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

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

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

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

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

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

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

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

9 All documents that establish YOUR standing to foreclose on the Subject Property,
10 including but not limited to:

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

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

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

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

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

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

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

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

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

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

REQUEST FOR PRODUCTION NO. 12:

1 All original and intervening Assignments showing a complete chain of assignments from
2 the originator to the person assigning the deed of trust and note to YOU.

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

4 All original and intervening receipts of delivery and acceptance of each note showing a
5 complete chain of such receipts from the originator to the person accepting the document for
6 YOU.

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

8 All original and intervening endorsements showing a complete chain of endorsements
9 from the originator to the person endorsing Plaintiffs' note to YOU.

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

11 All documents relating to the transfer and assignment of Plaintiffs' deed of trust and
12 promissory note from the originator of the underlying mortgage note to the depositor for the
13 securitized trust known as THE HOLDERS OF THE TERWIN MORTGAGE TRUST 2007-
14 QHL1 ASSET-BACKED SECURITIES, SERIES 2007-QHL1, WITHOUT RECOURSE Trust
15 ("the Trust") so as to show a complete chain of transfers and assignments from the originator to
16 the person so endorsing to the YOU (the Trustee for the Trust).

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

18 All documents relating to the endorsement and delivery of Plaintiff's mortgage note from
19 the originator there to the depositor for THE HOLDERS OF THE TERWIN MORTGAGE
20 TRUST 2007-QHL1 ASSET-BACKED SECURITIES, SERIES 2007-QHL1, WITHOUT
21 RECOURSE Trust ("the Trust") so as to show a complete chain of endorsements and signed
22 delivery receipts from the originator to the person so endorsing to YOU (the Trustee for the
23 Trust).

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

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

REQUEST FOR PRODUCTION NO. 18:

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

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

5 All documents (including all computer or digital media-stored data) relating to Plaintiff,
6 the Subject Property, and the subject transaction and/or account, or which are indexed, filed or
7 retrievable under his name or any number, symbol, designation or code (such as a transaction
8 number or Social Security number) assigned to him or to the subject transaction(s), including but
9 not limited to all documents relating to the origination, approval, disbursement, assignment and
10 administration of the loan(s), all agreements, and all correspondence related to the subject
11 transaction.

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

13 All documents relating or referring to YOUR policy and practice relating to the
14 origination, approval or underwriting, preparation, disbursement and acceptance of assignment
15 of a residential mortgage loan such as the subject transaction(s), including but not limited to all
16 agreements with brokers, lenders, title companies, assignors, etc.; all documents relating to or
17 reflecting such policy, practices and agreements, including all documentation required to be in
18 assigned account files; and all instructions, policy and procedure manuals, memoranda and
19 guidelines given to brokers, title companies, lenders, closing agents, and/or any persons who
20 review account files for approval and/or acceptance of assignment.

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

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

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

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

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

27 All correspondence by and between YOU and any Defendants to this action with regard
28 to the subject mortgage loan.

REQUEST FOR PRODUCTION NO. 24:

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

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

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

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

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

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

6 All documents and records, electronic or otherwise, of assignments of this mortgage,
7 monetary instrument or servicing rights to this mortgage including any such assignments on
8 MERS.

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

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

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

15 The Investor Loss Mitigation and Loan Modification Guidelines related to Plaintiffs'
16 mortgage loan.

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

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

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

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

24 **REQUEST FOR PRODUCTION NO. 32:**

25 All letters, statements and documents sent to YOU by previous servicers, sub-servicers
26 or others in the account file. If none, state "none".

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

28 Each and every canceled check, money order, draft, debit or credit notice issued to any
servicers of Plaintiffs' account for payment of any monthly payment, other payment, escrow
charge, fee or expense on the account. If none, state "none".

REQUEST FOR PRODUCTION NO. 34:

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

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

5 All data, information, notations, text, figures and information contained in your mortgage
6 servicing and accounting computer systems including, but not limited to Alltel or Fidelity CPI
7 system, or any other similar mortgage servicing software used by you, any servicers, or sub-
8 servicers of Plaintiffs' mortgage account from the inception of Plaintiffs' account to the present
date. If none, state "none".

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

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

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

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

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

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

21 **REQUEST FOR PRODUCTION NO. 39:**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

23 **REQUEST FOR PRODUCTION NO. 47:**

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

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

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

REQUEST FOR PRODUCTION NO. 49:

1 A statement of the past due scheduled principal payments, together with interest thereon
2 at the contract rate, past due taxes, hazard insurance, mortgage insurance premiums, late fees or
3 charges, homeowners association dues, and any other assessments in connection with Plaintiffs’
4 mortgage loan.

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

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

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

11 An itemized statement of all attorneys’ fees incurred at any time since the origination of
12 Plaintiffs’ loan and describe the date and nature of all such services, attaching copies of all bills
13 and invoices, and attach all canceled checks in payment thereof. Also, please attach all emails
14 or electronic messages using NewTrak or any similar communication system regarding such
15 fees and charges.

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

16 A complete and itemized statement from the date of the origination of Plaintiffs’ loan to
17 the present of any property inspection fees, property preservation fees, broker opinion fees,
18 appraisal fees, bankruptcy monitoring fees, or other similar fees or expenses related in any way
19 to this loan.

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

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

22 **REQUEST FOR PRODUCTION NO. 54:**

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

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

26 All invoices for each charge such as inspection fees, BPO s, appraisal fees, attorney fees,
27 insurance, taxes, assessments or any expense which has been charged to Plaintiffs’ mortgage
28 account from the inception of the account to the present date. If none, state “none”.

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

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

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

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

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

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

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

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

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

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

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

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

25 **REQUEST FOR PRODUCTION NO. 62:**

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

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

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

REQUEST FOR PRODUCTION NO. 64:

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

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

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

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

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

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

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

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

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

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

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

22 **REQUEST FOR PRODUCTION NO. 70:**

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

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

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

REQUEST FOR PRODUCTION NO. 72:

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

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

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

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

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

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

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

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

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

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

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

20 **REQUEST FOR PRODUCTION NO. 78:**

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

23 **REQUEST FOR PRODUCTION NO. 79:**

24 All documents which relate to, refer to or evidence the rules of THE HOLDERS OF
25 THE TERWIN MORTGAGE TRUST 2007-QHL1 ASSET-BACKED SECURITIES, SERIES
26 2007-QHL1, WITHOUT RECOURSE Trust related to the use of Lost Note Affidavits and
specifically all limitations on the use thereof.

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

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

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

4 All endorsements to Plaintiffs' original note, including all such endorsements from the
5 date of origination to the present, so as to show a complete chain of endorsements from the
6 originator to the person so endorsing to the YOU.

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

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

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

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

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

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

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

16 The information disk delivered to THE HOLDERS OF THE TERWIN MORTGAGE
17 TRUST 2007-QHL1 ASSET-BACKED SECURITIES, SERIES 2007-QHL1, WITHOUT
18 RECOURSE Trust in connection with the acquisition of Plaintiffs' mortgage loan.

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

20 The Pooling and Servicing Agreement and all addendums and amendments thereto for
21 THE HOLDERS OF THE TERWIN MORTGAGE TRUST 2007-QHL1 ASSET-BACKED
22 SECURITIES, SERIES 2007-QHL1, WITHOUT RECOURSE Trust.

23 **REQUEST FOR PRODUCTION NO. 87:**

24 Please produce the custodial agreement and all amendments thereto for THE HOLDERS
25 OF THE TERWIN MORTGAGE TRUST 2007-QHL1 ASSET-BACKED SECURITIES,
26 SERIES 2007-QHL1, WITHOUT RECOURSE Trust.

27 **REQUEST FOR PRODUCTION NO. 88:**

28 Any and all documents which relate to, refer to or evidence whether Plaintiffs' loan was
drawn out of the original pool of securities and swapped, traded, leveraged, or sold to another
entity.

REQUEST FOR PRODUCTION NO. 89:

1 If Plaintiffs' loan was drawn out of the original pool of securities and swapped, traded,
2 leveraged, or sold to another entity, all documents which relate to, refer to or evidence all SEC
3 Accession Numbers along with detailed contact information for each successor in interest along
4 with the dates of each transaction.

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

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

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

9 The "Opinion of Counsel" that was issued pursuant to the terms of the subject Pooling
10 and Servicing Agreement, stating that acceptance of Plaintiffs' mortgage into THE HOLDERS
11 OF THE TERWIN MORTGAGE TRUST 2007-QHL1 ASSET-BACKED SECURITIES,
12 SERIES 2007-QHL1, WITHOUT RECOURSE Trust ("the Trust") would not cause the Trust or
13 any Person having an ownership interest in any Class of Certificates to incur a liability for any
14 federal tax imposed under the IRS Code, or adversely affect the Trust as a REMIC.

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

15 The COMMITMENT TO PURCHASE FINANCIAL INSTRUMENT and SERVICER
16 PARTICIPATION AGREEMENT for the HOME AFFORDABLE MODIFICATION
17 PROGRAM under the EMERGENCY ECONOMIC STABILIZATION ACT OF 2008 entered
18 into by YOU and the United States government.

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

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

21 **REQUEST FOR PRODUCTION NO. 94:**

22 YOUR entire file related to Plaintiffs.

23 **REQUEST FOR PRODUCTION NO. 95:**

24 YOUR entire file related to Plaintiffs' mortgage loan.

25 **REQUEST FOR PRODUCTION NO. 96:**

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

28 **REQUEST FOR PRODUCTION NO. 97:**

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

4 **REQUEST FOR PRODUCTION NO. 98:**

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

7 **REQUEST FOR PRODUCTION NO. 99:**

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

10 **REQUEST FOR PRODUCTION NO. 100:**

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

13 DATED:

LAW OFFICES OF CAMERON H. TOTTEN

14 By:

15 _____
16 Cameron H. Totten
17 Attorney for Plaintiffs
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