

IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR CLAY COUNTY, FLORIDA
CASE NO. 2009-CA-1920
DIVISION B

DEUTSCHE BANK NATIONAL TRUST
COMPANY AS TRUSTEE IN TRUST
FOR THE BENEFIT OF THE
CERTIFICATE HOLDERS FOR
AMERIQUEST MORTGAGE SECURITIES
TRUST 2005-R9, ASSET-BACKED
PASS-THROUGH CERTIFICATES
SERIES 2005-R9,

Plaintiff,

ORIGINAL

vs.

GARY L. HANNAH, et al,

Defendants.
-----/

DEPOSITION OF: BRYAN J. BLY

TAKEN: Pursuant to Notice by
Counsel for Defendants

DATE: July 2, 2010

TIME: 2:03 p.m. - 3:50 p.m.

LOCATION: Akerman Senterfitt
401 East Jackson Street, Suite 1700
Tampa, Florida

REPORTER: DAVID L. KELLY
Notary Public
State of Florida at Large

MAXA ENTERPRISES, INC.
1275 Cleveland Street
Clearwater, Florida 33755
(727) 441-2404 Fax: (727) 448-0028

APPEARANCES: ADINA L. POLLAN, ESQ.
 WILLIAM HELLER, ESQ. (by telephone)
 Akerman Senterfitt
 50 North Laura Street, Suite 2500
 Jacksonville, FL 32202-3646

Attorney for the Plaintiff

GLORIA A. EINSTEIN, ESQ.
 Jacksonville Area Legal Aid, Inc.
 P.O. Box 1999
 Green Cove Springs, FL 32043

Attorney for the Defendant

ALSO PRESENT: Raye Blair

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1 MS. EINSTEIN: Okay. Are we going to
2 stipulate that the notice was sufficient and
3 Mr. Bly's appearance here is pursuant to notice --

4 MS. POLLAN: Yes.

5 THE COURT: -- pursuant to subpoena, and
6 Mr. Bly is a nonparty?

7 MS. POLLAN: Yes.

8 THEREUPON

9 BRYAN J. BLY,

10 After being duly sworn an oath was examined and
11 testified as follows:

12 THE DEPONENT: I do.

13 EXAMINATION

14 BY MS. EINSTEIN:

15 Q Okay. And you are represented by your
16 counsel, Ms. Pollen; is that correct?

17 A Correct.

18 Q Okay. There's some ground rules of
19 depositions. One is if you need a break for any
20 reason just ask, and we'll stop and start again.

21 As you can see, this court reporter is
22 typing. So he can't type "uh-huh" or "huh-uh" very
23 well, and he can't type nods or shaking your head at
24 all. So, if you would, say yes or no. That would
25 really help.

1 Also he can't type two things at once very
2 well. So if you would please let me finish my
3 question before you answer, and I will try to let you
4 finish your answer before I start another question.

5 The most important thing is if you don't
6 understand any of my questions, please ask, and I'll
7 rephrase it so that you do. Okay? What is your
8 name, sir?

9 A Bryan Jay Bly.

10 Q Does the "J" stand for something in
11 particular?

12 A J-a-y is my middle name.

13 Q Oh, okay. All right. And your business
14 address?

15 A It's 2100 Alternate 19, Palm Harbor.

16 Q Okay. And that's in Florida, of course?

17 A Correct.

18 Q Have you had your deposition taken before?

19 A No.

20 Q Okay. You have been served with subpoenas
21 in other depositions that you didn't give, haven't
22 you?

23 A I don't know.

24 Q Okay. Do you recall one that was supposed
25 to be on June 2nd, just exactly a month ago, that you

1 were served with a subpoena?

2 A I remember signing for one. I didn't know
3 what the details were.

4 Q Okay. And do you know that Erika Lance gave
5 that deposition instead?

6 MS. POLLAN: Okay. I'm going to go ahead
7 and object, and I would like for the record -- I'm
8 going to give you an exhibit. This is the order
9 that was signed yesterday by Judge Wilkes, and I
10 apologize I don't have it.

11 MS. EINSTEIN: I have it.

12 MS. POLLAN: Okay. I'm going to give this
13 to the court reporter. If you could attach this
14 as Exhibit 1.

15 (Deposition Exhibit Number 1 was marked for
16 identification.)

17 MS. POLLAN: This is an order, for the
18 record, that specifically limits what Mr. Bly will
19 be talking about today. Specifically I'm going to
20 read it. It says:

21 Non-party Bryan J. Bly will only be required
22 to bring to the deposition those documents that he
23 has in his possession, custody or control. The
24 scope of the deposition will be strictly limited
25 only to Bryan J. Bly signing the assignment of

1 Mr. Hannah's mortgage in his capacity as Vice
2 President for Citi Residential Lending, Inc.

3 Items 1-2, 8-9, 16 and 20 are stricken from
4 the subpoena duces tecum for deposition as
5 irrelevant. Bryan Bly will not be required to
6 bring to the deposition any documents regarding
7 these items, and any questioning about these items
8 will not be permitted.

9 Further, any questioning regarding Bryan Bly
10 signing other mortgage assignments for any other
11 entities is prohibited.

12 I'm going to object and instruct him not to
13 answer because that has nothing to do with this
14 case.

15 MS. EINSTEIN: Okay. And I would respond
16 that it is very typical to ask people about having
17 depositions before at a deposition.

18 MS. POLLAN: You're asking about Erika
19 Lance's deposition.

20 Q (By Ms. Einstein) Do you remember being
21 served with notice in this deposition?

22 A Yeah. I guess so. I don't remember what
23 the subpoena was exactly for that I signed.

24 Q Okay. Do you remember being served with a
25 subpoena on May 13th of this year?

1 A I remember being served a subpoena that I
2 turned over to my boss as far as that goes.

3 Q Do you remember that there was a list of
4 things to bring with you?

5 A I didn't receive a list then. I mean, the
6 only thing I know what I'm supposed to bring is
7 through my attorney.

8 Q Okay.

9 MS. POLLAN: If you'd like, I can go ahead
10 and give you what he's given to me to produce
11 or --

12 MS. EINSTEIN: I would, but I would also
13 like to see whether he can identify the subpoena
14 that he was --

15 MS. POLLAN: Yeah, sure. He can go ahead.
16 I'll just -- do you want me to do this now or --

17 MS. EINSTEIN: Yes. Go ahead.

18 MS. POLLAN: Okay. Mr. Bly has given me
19 to produce -- he doesn't have this, but it's
20 from -- it's called The Unanimous Written Consent
21 and a Limited Power of Attorney.

22 I believe Ms. Einstein has seen this before,
23 but I'm going to go ahead and give them to the
24 court reporter.

25 MS. EINSTEIN: Okay. Would you mark

1 those, please? Call the Unanimous Written
2 Consent -- well, call the Limited Power of
3 Attorney Exhibit 3.

4 (Deposition Exhibit Number 3 was marked for
5 identification.)

6 MS. EINSTEIN: And the Unanimous Written
7 Consent as Exhibit 4.

8 (Deposition Exhibit Number 4 was marked for
9 identification.)

10 MS. EINSTEIN: And let's call this copy of
11 the subpoena Exhibit 1 -- I'm sorry, 2. 1 was the
12 order.

13 (Deposition Exhibit Number 2 was marked for
14 identification.)

15 Q (By Ms. Einstein) Okay. Now, the lines are
16 things that Judge Wilkes decided you did not have to
17 bring, but without the lines, do you remember seeing
18 this particular document before?

19 A Vaguely.

20 Q Okay. Do you recognize it as having a list
21 of documents you were suppose to bring with you to
22 the deposition?

23 A Yes.

24 Q Okay. And you said you gave it to your
25 supervisor or your boss? What did you say exactly

1 who you gave it to?

2 A Basically I gave it to Erika Lance after I
3 signed for the subpoena.

4 Q Okay. And did you discuss it with Erika
5 Lance?

6 A Not at that time.

7 Q Okay. Did you ever discuss it with someone
8 who wasn't your lawyer?

9 A No.

10 Q Okay. All right. Give that back to the
11 court reporter now. Well, you recognize that there
12 is a list of things. And as your lawyer said, Judge
13 Wilkes said there were certain things you didn't have
14 to produce, but there is some things that you did.

15 So I'm going to ask you about each one, and
16 if you didn't produce it, I'd like you to tell me
17 whether there is such a thing, and if there is, why
18 you didn't -- whether you have it and why you didn't
19 produce it.

20 The first thing is item three: Any
21 corporate resolution or other document showing your
22 position or authority with Citi Mortgage, Inc.?

23 A That was submitted.

24 Q Okay. What was submitted was one with Citi
25 Residential Lending. Is there one with Citi

1 Mortgage, Inc.?

2 A I don't know.

3 Q Okay. Number four is: Any corporate
4 resolution or other document showing your position or
5 authority with Ameriquest Mortgage Company.

6 A I don't know.

7 Q Do you -- is what you don't know whether
8 such a thing exists or you don't know why you don't
9 have it with you today?

10 A I know it exists, but they were never in my
11 possession.

12 Q Okay. And number five is the same question
13 regarding Citi Residential Lending, and that is the
14 thing you produced, which we will call Exhibit 4.

15 Just to make things simple, let's call Citi
16 Residential Lending "Citi" from now on. Okay? All
17 right. Now, is Exhibit 4, which -- do you need to
18 see it again?

19 A No.

20 Q Okay. Is that the only corporate resolution
21 or other document showing your position or authority
22 with Citi Residential Lending, which we're now
23 calling Citi?

24 A I don't know.

25 Q Have you ever seen another one?

1 A They're not in my possession.

2 Q Okay. Okay. Was this one in your
3 possession?

4 A The only time I saw it was yesterday in
5 preparation.

6 Q Okay. When did you first find out that it
7 existed?

8 A I knew they existed because when we sign an
9 account our names are applied to submit for the
10 corporate resolutions.

11 Q Okay. And how did you know when the
12 resolution actually was finalized or approved?

13 A We can't sign before it is.

14 Q Okay.

15 A It's that simple.

16 Q How did you find that out? How did you find
17 out now you can sign?

18 A That's up to our quality control and our
19 senior vice-presidents. When we have the
20 determination, they give the okay for the documents
21 to be printed.

22 Q Okay. So did they tell you or it's just the
23 fact that these showed up?

24 A It's reasonable for me to assume when they
25 showed up that the resolution was in place.

1 Q And reasonable based on what?

2 A Common sense.

3 Q Okay. When did these documents for Citi
4 Residential Lending start showing up?

5 A It varies. I don't recall.

6 Q Okay. Do you recall signing papers for Citi
7 based on some other documents?

8 A Yes.

9 Q Okay. And what would that have been?

10 A I can't recall specific documents. Only I
11 can recall that I've signed for that account.

12 Q Okay. But my question was before you
13 learned of this document, did you sign papers for
14 Citi based on some other document?

15 A I signed other documents for Citi as they
16 were produced. I can't give an exact date.

17 Q Okay. So you were signing documents for
18 Citi without ever having seen Exhibit 4 which
19 authorized you to do that; is that correct?

20 A Yes.

21 Q Okay. Now, let me let you see this again,
22 Exhibit 4, for a minute. Okay. It is signed in one
23 place by Timothy M. Hayes and another sheet by Sanjiv
24 Das and Paul R. Ince. Do you know any of these
25 people?

1 A No.

2 Q Do you know that they are the executive
3 committee of the board of directors at Citi?

4 A No.

5 Q Okay. Did you look them up to see who they
6 are?

7 A No.

8 Q Okay. Did you get on Citi's web site to see
9 if they're the right people?

10 A No.

11 Q Did you rely on anyone else to do that
12 research?

13 A Yes.

14 Q Who?

15 A My bosses.

16 Q Okay. Can you give names of particular
17 people you relied on?

18 A Just the overall team: The account set up,
19 the vice-presidents and so forth.

20 Q Okay. So did you ask them specifically,
21 "Are these the right three people to sign this so
22 that I'm covered?"

23 A No.

24 Q Okay. Now, you just had Exhibit 4 in your
25 hand. You can look at it again, but is there

1 anything -- any letterhead, any corporate seal,
2 anything that -- other than what it says, is there
3 anything that identifies it uniquely to Citi? You
4 can see it again, if you would like.

5 A No.

6 Q Okay. Did it come in any special binder or
7 any special letterhead?

8 A I wouldn't know because I never saw it.

9 Q Okay. What does the document mean?

10 A A document is variable. It could be an
11 assignment. It could be for a lease or satisfaction
12 of mortgage. The document is just an instrument to
13 meet a particular need.

14 Q Okay. I'm not -- I'm sorry, I meant this
15 particular document, Exhibit 4. What does that mean?

16 A Oh, that means that I have the authorization
17 to sign on their behalf.

18 Q And to sign as what?

19 A Sign as an authorized signature.

20 Q Okay. But what title or description do you
21 sign as?

22 A The way the signator works is depending on
23 the area that it's going to be recorded. There's
24 stipulations whether it's a vice-president or
25 attesting secretary to meet the recording

1 requirements of that particular county or state.

2 That would be the designated title per document.

3 Q Okay. Did you say attesting secretary?

4 A Yes.

5 MS. POLLAN: Okay. I'm going to go ahead
6 and object for the record. This is speculation
7 because he's never seen this before other than
8 preparing for today. The document speaks for
9 itself.

10 MS. EINSTEIN: His understanding of it is
11 very relevant since it's been relied on.

12 Q (By Ms. Einstein) Okay. The next item:
13 Any corporate resolution or any document showing your
14 position or authority with NTC. Did you bring that
15 kind of a document?

16 A No.

17 Q Is there such a document?

18 A No, not to my knowledge.

19 Q Okay. So there may be, but you don't know?

20 A I don't know.

21 Q Okay. Any corporate resolution or other
22 document showing your position or authority with
23 Deutsche Bank?

24 A I didn't bring any, but I have signed a
25 submission for the corporate resolution. So I'm sure

1 one exists. I just don't have it in my possession.

2 Q Okay. Well, what are you meaning by
3 submission?

4 A Before we start an account the names of the
5 signers that are going to be approved are sent to the
6 corporation for approval, and not until the approval
7 is received back by us do we go forward.

8 Q Okay. So have you gone forward with signing
9 anything for Deutsche Bank?

10 A Actually I've signed for Deutsche Bank,
11 yes.

12 Q Okay. All right. All documents -- do you
13 have an idea of how many you signed for Deutsche
14 Bank?

15 MS. POLLAN: I'm going to instruct him not
16 to answer. That has nothing to do with this case.

17 MS. EINSTEIN: Well, it's not one of the
18 things that were struck, and Deutsche Bank is the
19 Plaintiff. I'm sorry, were you instructing him
20 not to answer?

21 MS. POLLAN: I need a minute to think
22 about this. If he signs for Deutsche Bank in this
23 case -- but he signed for Citi residential. So
24 I'm going to instruct him not to answer.

25 Q (By Ms. Einstein) Okay. The next thing you

1 were suppose to do -- to bring was all documents
2 showing your communications with Citi Residential
3 Lending concerning your duties as vice-president,
4 including telephone logs, notes on telephone calls,
5 e-mails and memos.

6 A I have brought none because I have none.

7 Q Okay. Next is your job description as
8 vice-president of Citi Residential Lending.

9 A I have brought none because my job
10 description simply is as signer.

11 Q Okay. The next item was records, including
12 travel records, showing all your meetings,
13 conferences or other contact with other officers of
14 Citi Residential Lending.

15 A None exist.

16 Q Okay. And does that mean that no records
17 exist or none of these meetings, conferences or other
18 contacts exist?

19 A None of them exist.

20 Q Okay. The next item was all your past and
21 present employment contracts at Citi Residential
22 Lending.

23 A There's none.

24 Q Okay. Next was all corporate seals or
25 corporate stamps of which you have custody and

1 control, including those for Citi Residential Lending
2 and any other financial institution or business
3 entity.

4 A I have none related to that.

5 Q Okay. You mean you have none of the things
6 I just described?

7 A Correct.

8 Q Okay. All certificates, diplomas or any
9 other documentation showing any post-secondary
10 education, vocational training, certification courses
11 or other education and training received by you after
12 high school.

13 A I have none.

14 Q Okay. Any document showing the authority of
15 Citi Residential Lending to act as Attorney-in-Fact
16 for Ameriquest Mortgage Company, and I believe that
17 is Exhibit 3. So if I can have you look at that,
18 please. Do you want to look at all the pages?

19 Okay. Is this the -- is Exhibit 3 the only
20 document that meets the description in our request
21 any document showing the authority of Citi
22 Residential Lending to act as Attorney-in-Fact for
23 Ameriquest Mortgage Company?

24 A I don't know.

25 Q Okay. When did you receive this?

1 A I first saw this yesterday.

2 Q Okay. Before you learned of this paper, did
3 you sign papers -- documents involving Ameriquest
4 loans?

5 A Yes.

6 Q Okay. And was that based on some other
7 document?

8 A Based on knowing it wouldn't be presented to
9 me unless I had signing authority.

10 Q Okay. And that's just relying on the
11 management of your company; is that correct?

12 A Yes.

13 Q Okay. Do you have signing authority for
14 Ameriquest?

15 A I would say yes.

16 Q Okay. And what title do you use for
17 Ameriquest?

18 A Depending on the state I'm an authorized
19 signer, and some states have different titles that
20 you have.

21 Q Okay. So you don't know what ones you use
22 for Ameriquest?

23 A Not specifically.

24 Q Okay. Would some of those be -- would
25 vice-president be among them?

1 A Yes.

2 Q Okay. Now, do you know the people -- we're
3 not done that with, sorry. Do you know the people
4 whose names are on there at the end?

5 A No.

6 Q Okay. Do you know that Eileen Rubens was a
7 vice-president of Ameriquest?

8 A No.

9 Q And so you wouldn't know if she was a real
10 vice-president or just someone with signing
11 authority?

12 A I wouldn't know.

13 Q Okay. Did you make any inquiry to find out
14 who she is?

15 A No.

16 Q Okay. And, again, that's a simple piece of
17 paper with typed words on it with nothing particular
18 identifying it with Ameriquest.

19 Did it come to you in any kind of folder or
20 binder or letterhead or anything that made you think
21 that it really was from Ameriquest?

22 MS. POLLAN: I'm going to object, but you
23 can answer.

24 THE DEPONENT: I was going to say, as I
25 stated before, that I didn't see this until

1 yesterday.

2 Q (By Ms. Einstein) Okay. But you saw it in
3 exactly the form that it appears to be?

4 A In this form.

5 Q Okay. Thank you. We can give that back to
6 the court reporter. Thank you. Okay. Now, do you
7 know what that document means?

8 A No.

9 Q Okay. Did anyone other than your lawyer
10 tell you what it means?

11 A No.

12 Q Do you have any idea how that document
13 effects your job?

14 A No.

15 Q Okay. The next item was any document
16 showing any consideration paid by the assignor or
17 assignee for the assignment you signed including a
18 printout of any electronic document or part of a
19 document, and the assignment we're talking about here
20 is this one, which we'll label 5.

21 MS. EINSTEIN: And you'll have to stick it
22 over this, if you don't mind.

23 (Deposition Exhibit Number 5 was marked for
24 identification.)

25 THE DEPONENT: Could you rephrase that,

1 please?

2 Q (By Ms. Einstein) Okay. This is the
3 document that we're here in particular about, the
4 assignment that was signed of my client's mortgage.

5 A Okay.

6 Q And the request is any document showing any
7 consideration paid by the assignor or the assignee
8 for the assignment you signed.

9 A So you're asking me if I have seen those
10 documents?

11 Q Right, anything involving consideration.

12 A No, I have not.

13 Q Okay. Any instructions you relied on in
14 preparing this Assignment of Mortgage including a
15 printout of any electronic document or part of a
16 document?

17 A No.

18 Q There were no instructions?

19 A No.

20 Q Okay. All right. You might as well
21 continue to hold that because that's -- I'm going to
22 ask more questions about it, but first let me ask you
23 did you review any other documents to get ready for
24 this deposition?

25 A I am trying to think. Just pretty much what

1 you have I think is what I was presented with.

2 Q Okay.

3 A That's my understanding.

4 Q Okay. So you don't recall any other
5 documents that you reviewed to get ready for this
6 deposition?

7 A No.

8 Q Okay. And who is your employer, sir?

9 A Nationwide Title Clearing.

10 Q Do you have any other employer at this time?
11 Do you have any other jobs?

12 A No.

13 Q Okay. What are the -- what past employment
14 have you had?

15 A I've worked in insurance, and I've worked at
16 Eckerd's.

17 Q Okay. Before -- right before Nationwide
18 Title Clearing, where did you work?

19 A It would be Eckerd's.

20 Q Okay. And what did you do there?

21 A Remodeled, converted their stores. It's in
22 the remodeling division.

23 Q And you were an employee of Eckerd's,
24 however?

25 A Right.

1 Q Okay. And what was your title in that
2 division?

3 A I guess just remodeler, general labor.

4 Q Okay. And how long did you do that?

5 A That was for a year.

6 Q Okay. And before that, what did you do?

7 A Let me think here. I worked as a temporary
8 through Spherion, and my assignment was at Valpak for
9 about three years.

10 Q Okay. Valpak is a company?

11 A Yes.

12 Q Okay. And I think the court reporter will
13 probably want to know how you spell Spherion.

14 A I think it's S-p-h-e-r-i-o-n.

15 Q Okay. And they assigned you to a temporary
16 job at Valpak?

17 A Right, the coupon place.

18 Q Oh, okay. And what did you do there?

19 A I sorted and loaded coupons for the mailers.

20 Q Okay. And before that, what did you do?

21 A Let me see if we can go all the way back. I
22 worked for a few years with a company called Bears
23 and Fairs in the carnival business. This was in
24 promotions.

25 Q Okay. And before that?

1 A That would be like seven years. So we go
2 from that probably back to MTA Truck School where I
3 was an admission representative.

4 Q Okay. And that's a private truck driving
5 school --

6 A Correct.

7 Q -- is that what that is? Okay. And do you
8 remember what it was -- well, how long did you work
9 there?

10 A Approximately a year and-a-half.

11 Q Okay. And do you know what did you before
12 that?

13 A It would be I was selling insurance.

14 Q Okay. For a particular company?

15 A For Guarantee Trust.

16 Q Okay. And was that here also in the Tampa
17 area?

18 A No. The only jobs in a temporary area would
19 have been Spherion and the Eckerd's, of course. The
20 other jobs would be up north in Ohio.

21 Q All right. And what is your education, sir?

22 A Just high school.

23 Q Okay. And have you had any vocational
24 training besides that?

25 A No.

1 Q Okay. Any certification programs?

2 A No.

3 Q Did you get any training by NTC?

4 A I'm trying to think how to phrase it. A
5 little bit of research, but not -- nothing with a
6 certification.

7 Q Okay. When you say research, can you
8 explain what that means?

9 A Well, in addition to my job as signing, I
10 create cover sheets as required by the New York
11 Boroughs. For example, Kings, Queens, the Bronx, and
12 they train me how to follow their web site to what
13 the county wanted.

14 Q Okay.

15 A It's not a certifiable course, but it's
16 something they trained me on.

17 Q Okay. So it's essentially to find
18 information and fill in the information on those
19 cover sheets?

20 A Right, to make them recordable.

21 Q Okay. Any other training by NTC?

22 A No.

23 Q And I think you mentioned your job title is
24 signer?

25 A Correct.

1 Q Okay. How long have you been a signer?

2 A I've been a signer probably a little over
3 seven years. I've worked there seven and a half.

4 Q Okay. So what were you before a signer?

5 A I was -- they call it post scanning. I was
6 assembling and reassembling mortgages to mail back to
7 clients or homeowners.

8 Q Okay. Explain the title signer.

9 A It means that you're designated by the
10 company that -- the account that we're dealing with
11 to sign on their behalf to help execute the document.

12 Q Okay. How many in that title at NTC?

13 A I wouldn't know because the corporate
14 resolution varied between 10 people and maybe as many
15 as 30 or 40 and sometimes --

16 Q Okay. But, I mean, do you mean how many
17 people at your job location are signers?

18 A I don't know the exact number.

19 Q Okay. Is it more than 10 but less than 25
20 or is it like 100 or --

21 A It's definitely less than 25. I would say
22 the main signers are under a dozen.

23 Q Okay. But more than eight or --

24 A Should I say on a typical day? Would that
25 be what you're searching for? I'm trying --

1 Q Well, I'm searching for, you know, if you
2 ask me about my office, I would know how many
3 attorneys there are. I'm wondering how many people
4 in your rank or job title that you know are there.

5 A Well, I would say on the average day I'm
6 involved with eight or less signers.

7 Q Okay. All right. What title is above
8 signer?

9 A Document inspector.

10 Q Okay. Anything else?

11 A The document completion director.

12 Q Okay. What title is below signer?

13 A Processing.

14 Q Okay. And you told us you were briefly
15 doing processing. Have you had any other titles at
16 NTC?

17 A No, I have not.

18 Q Okay. Now, we're meeting at your lawyer's
19 office today. So can you tell me where your office
20 is?

21 A It's at 2100 Alternate 19 North, Palm
22 Harbor, Florida.

23 Q Do you know how many people work there?

24 A It varies between 200 and 350.

25 Q Okay. And they all work for NTC?

1 A Correct.

2 Q Okay. So if there's like 8 to 12 signers,
3 and you mentioned a few other titles, what are most
4 of those 200 or 300 people doing?

5 A Research, data entry and various other jobs
6 that are servicing our clients.

7 Q Okay. Do you have any idea how many work at
8 data entry?

9 A No.

10 Q Would that be most of the people?

11 A It would be probably 20 percent of the
12 people, in that ball park.

13 Q Okay. So what would the other -- you know,
14 I'm sure there's some administration, but what
15 would -- the bulk of that large number of people,
16 what are they doing?

17 A I really don't delegate that, but I think
18 the bulk is in the research --

19 Q Okay.

20 A -- and the qual area.

21 Q Okay. When you say research, what do you
22 mean by research?

23 A Them verifying with the county records about
24 whether a stock memo is recorded and so forth,
25 whether it's by contact with abstractors or online,

1 things of that nature.

2 Q Okay. Are they verifying recordings or
3 verifying transactions?

4 A I wouldn't know.

5 Q Okay. And does NTC have more than one
6 location?

7 A Not to my knowledge.

8 Q Okay. Do you have an office there?

9 A No.

10 Q Okay. A cubical?

11 A Yes.

12 Q Okay. How many cubicles would you say are
13 in the room?

14 A In my processing signing area?

15 Q In sort of before you see a wall on all four
16 sides.

17 A Well, the whole building?

18 Q Well, if that's what the space is like, yes.

19 A Well, the whole building would include data
20 entry and research and final docs and all the other
21 entities. It would be cubicles for probably within
22 my building of over 200.

23 Q Okay. So -- and all those people are
24 essentially in one space separated by cubicles?

25 A Correct.

1 Q Okay. Do you have a phone on your desk?

2 A No.

3 Q Okay. Do you have a computer on your desk?

4 A Not on my desk, next to my desk.

5 Q Okay. I mean, is the monitor on your desk?

6 A No. It's on the desk next to me.

7 Q Okay.

8 A The one that I use.

9 Q Okay. Is that somebody else's desk or --

10 A No. I have two desks.

11 Q Okay. So you have a computer on your other
12 desk?

13 A Right.

14 Q Okay. What other equipment do you have, sir?

15 A Just pens, paper clips, you know, standard.

16 Q Okay. How has your work changed since you
17 began as a signer?

18 MS. POLLAN: I'm going to object. I don't
19 know how -- what this has to do with the
20 assignment or even this case.

21 MS. EINSTEIN: Well, I mean --

22 MS. POLLAN: As far as the order is
23 concern is where my objection lies.

24 Q (By Ms. Einstein) Okay. Now, let's go back
25 to Citi in particular. How long have you been a

1 vice-president.

2 A I don't recall.

3 Q Okay. Do you recall any qualifications you
4 had to show them to be a vice-president?

5 A The only qualifications I know is that they
6 do a background check on you before they submit your
7 name for corporate resolution.

8 Q Okay. And by "they", are you meaning NTC
9 does the background check?

10 A Correct.

11 Q Okay. Have you gotten any training from
12 Citi directly?

13 A No.

14 Q Okay. Have you spent any time at their
15 place of business?

16 A No, I haven't.

17 Q Do you know where their place of business
18 is?

19 A No.

20 Q Okay. So is there anyone you report to at
21 Citi?

22 A No.

23 Q Okay. And is there any department at Citi
24 that you deal with?

25 A No.

1 Q Okay. Do you have any idea how many other
2 vice-presidents there are at Citi?

3 A No, I do not.

4 Q Okay. Do you know how many other
5 vice-presidents are working for NTC?

6 A No.

7 Q And have you ever met another vice-president
8 besides those at NTC?

9 A No.

10 Q Okay. If you have a problem or a question
11 about one of the Citi assignments you're suppose to
12 sign, who do you contact?

13 A The only problem I have when I sign a
14 document, the qual that I do is on the printing
15 quality.

16 In other words, is this legible enough to be
17 recorded, and if it's not or not within the margins
18 by the view, I submit it to our printing IC to
19 reprint it.

20 Q Okay. And IC would stand for?

21 A In charge.

22 Q Oh.

23 A In charge of printing.

24 Q Okay. So if it's legible and the margins
25 are right, that's all you look at?

1 A Correct.

2 Q Okay. What questions have you asked your
3 supervisor about Citi assignments?

4 A None.

5 Q Okay. Now, we're going to be talking
6 specifically about the assignment that you have in
7 front of you, which is labeled Exhibit 5. Okay.
8 Now, Exhibit 5 is in front of you. Do you have any
9 specific memory of this assignment?

10 A No.

11 Q Okay. Do you know about it because of the
12 general processes you use?

13 A I had never seen this until yesterday.

14 Q Okay. Do you recognize your signature on
15 it?

16 A Yes.

17 Q Okay. Was that a signature you physically
18 signed?

19 A No.

20 Q Okay. Can you tell me how your signature
21 got on it?

22 A With corporate resolution the account set-up
23 guy, Tom McKinnon, came by for signatures to scan for
24 counties that wanted E-recordings, and so they
25 scanned my signature.

1 Q Okay. And Tom McKinnon is an employee of
2 NTC?

3 A Yes.

4 Q And the first thing you said it was
5 corporate something?

6 A Yeah. In other words, I have the
7 corporate -- I know I'm allowed to sign for this
8 company. So then I submit my signature to Tom to
9 scan. It's not like a blank signature to sign
10 anywhere.

11 MS. POLLAN: Can I take a quick break?

12 MS. EINSTEIN: Sure.

13 MS. POLLAN: Thank you.

14 (A brief recess was held.)

15 Q (By Ms. Einstein) We are back on the
16 record. Okay. Mr. Bly, right before we took a break
17 you were telling me that you had not ever seen
18 Exhibit 5 before and that your signature on there was
19 done by an electronic process, that you had given an
20 exemplar to an NTC employee named Thomas McKinnon; is
21 that correct?

22 A That's correct.

23 Q Okay. When did you do that, sir?

24 A I don't recall.

25 Q Okay. And was that specifically for Citi?

1 Was that for any signing you would do?

2 A I don't recall.

3 Q Okay. Now, the specific document that
4 Exhibit 5 that has your signature, who actually
5 created it?

6 A I don't know.

7 Q Okay. Was it somebody at NTC? Do you know
8 that?

9 A I would assume.

10 Q Okay. Do you know the title of a person who
11 would create that document and put your signature on
12 it?

13 A No.

14 Q Okay. Do you know how many people do that
15 job?

16 A No.

17 Q Okay. Do you know where it gets done?

18 A No.

19 Q Okay. So you don't know the actual person
20 who pushes a button, clicks a mouse, does something,
21 and suddenly your signature gets on the piece of
22 paper?

23 A No.

24 Q Okay. So you don't supervise these people
25 that apply your signature to documents; is that

1 correct?

2 A That's correct.

3 Q Do you know who supervises them?

4 A No.

5 Q Okay. Do you have any communication with
6 them about what documents they are applying your
7 signature to?

8 A No.

9 Q Okay. Does anyone ever come to ask you
10 about a particular document, should you -- you know,
11 should your signature go on it?

12 A No.

13 Q Okay. Do you know about any procedures that
14 are in place to check these documents?

15 A No.

16 Q Okay. Now, do you know anything about how
17 your signature or your E-signature would have been
18 notarized?

19 A I don't know the technical end and all the
20 encryptions and all that, no, I don't.

21 Q Okay. Can you tell whether the notarization
22 is also done electronically on that?

23 A I would assume.

24 Q So you know that notarizations are done
25 electronically?

1 A Correct.

2 Q And you assume that it was done in this
3 case?

4 A Correct.

5 Q But you have no way of telling if it was
6 real or not, if it was physically signed or
7 electronically notarized?

8 A No.

9 Q Okay. Now, the notary -- okay. Since
10 you're not actually signing this, there's no way the
11 notary can be watching you sign it. Would that be a
12 fair statement?

13 A Yes.

14 Q Okay. Now, do you know from your own
15 experience that -- have you authorized your
16 notary -- your signature to be used as a notary
17 through this electronic process?

18 MS. POLLAN: I'm going to object because
19 he didn't notarize this document, and otherwise
20 based on the order this has nothing to do with
21 this case.

22 MS. EINSTEIN: Well, except that since he
23 has no actual knowledge his knowledge of the
24 process is --

25 MS. POLLAN: He's already told you what he

1 knows about the process. So because he didn't
2 notarize this document, I'm going to object based
3 on the order.

4 MR. EINSTEIN: Okay. Are you going to
5 instruct him not to answer?

6 MS. POLLAN: Yes.

7 Q (By Ms. Einstein) Okay. Where did these
8 assignments go after they leave NTC?

9 A I don't know.

10 Q Do you know where they end up?

11 A No.

12 Q Do they go all over the state of Florida or
13 do they go to other states?

14 A I have no knowledge where they go
15 individually.

16 Q Okay. Would it surprise you to learn that
17 they're filed in public land records along with deeds
18 and mortgages?

19 MS. POLLAN: Object to form, but you can
20 answer.

21 THE DEPONENT: I -- through our volume, I
22 wouldn't be surprised. We do a lot of products
23 for customers.

24 Q (By Ms. Einstein) Okay. Can you tell me
25 what that assignment accomplishes?

1 A No.

2 Q Okay. Is there anything you know that would
3 indicate whether it could be used to foreclose on
4 somebody's house?

5 A No.

6 Q Okay. Did you know that that's what some
7 of -- that's what that document is being used for?

8 A No.

9 Q Okay. Now, do you say you're a
10 vice-president of Citi when you're applying for a
11 credit card?

12 A No.

13 Q Okay. Or applying for an apartment to live
14 in?

15 A No.

16 Q Applying for a car loan?

17 A No.

18 Q If you met someone socially and they said
19 what do you do, would you say you're a vice-president
20 of Citi?

21 A No.

22 Q Okay. Why not?

23 A Because my capacity with Citi is limited to
24 signing.

25 Q Okay. Now, is there anything on that

1 document, Exhibit 5, which says your capacity is
2 limited in any way?

3 A No.

4 Q Now, what investigation do you do to know
5 that the company doing the assignment really owns the
6 thing that they are assigning away?

7 A None.

8 Q Okay. And do you do any investigation to
9 know that the right company is getting the
10 assignment?

11 A None.

12 Q Okay. Have you ever had someone tell you
13 that you signed an assignment, and it had the wrong
14 information on it?

15 A No.

16 Q Okay. Do you also sign endorsements?

17 MS. POLLAN: I'm going to object based on
18 the order. I'm going to instruct you not to
19 answer.

20 Q (By Ms. Einstein) Okay. Do you sign
21 affidavits?

22 MS. POLLAN: I'm going to also object.
23 There's no affidavit in this case.

24 Q (By Ms. Einstein) Since February are you
25 signing verifications of court pleadings?

1 MS. POLLAN: Object. There's no court
2 pleadings assigned in this case.

3 Q (By Ms. Einstein) Okay. Now, let's talk
4 about the specific terms in the assignment, and
5 that's the document in front of you, Exhibit 5.

6 It says at the top American Home Mortgage
7 Services Company care of NTC. Do you see that?

8 A Yes.

9 Q Okay. Does American Home Mortgage Servicing
10 have an office at NTC?

11 A No.

12 Q Does it have an office at Palm Harbor at
13 all?

14 A No.

15 Q So if the assignment that I was reading to
16 you as -- do you agree that it says return to
17 American Home Mortgage Service, Inc.?

18 MS. POLLAN: Object to form.

19 Q (By Ms. Einstein) Okay. What does it say
20 under return to?

21 A American Home Mortgage Service, Inc., care
22 of NTC.

23 Q Okay.

24 A 2100 Alternate 19 North.

25 Q Palm Harbor, right?

1 A Palm Harbor, yeah, Florida, 24683.

2 Q So if it comes back to that address, where
3 does it go after that?

4 A It comes back there for additional
5 processing.

6 Q And what does that consist of?

7 A The -- I don't know exactly, but I would
8 assume retrieving the recording information when it
9 was submitted to the County on the book and page and
10 things of that nature. Then the document is mailed
11 back from the County.

12 Q And then what happens?

13 A It depends upon the contract with the
14 client. I wouldn't know.

15 Q Okay. And in this case the client would be
16 Citi or would the client be some other entity or can
17 you tell?

18 A I can't tell.

19 Q Okay. Now, under that return to thing we
20 were just discussing, there is a CRL number. Do you
21 know what that means?

22 A No.

23 Q Okay. There's also an assignee number. Do
24 you know what that means?

25 A No.

1 Q There's also an investor number?

2 A No.

3 Q Okay. And it also said custodian. Do you
4 know what that means?

5 A No.

6 Q Okay. Now, if you don't know, who would
7 know what these numbers refer to?

8 A I'd have to speculate.

9 Q Okay.

10 A It would be --

11 MS. POLLAN: I object, but --

12 THE DEPONENT: Well, it would be with
13 quality control and the people that put the loan
14 together.

15 Q (By Ms. Einstein) Okay. But you don't know
16 who that is or --

17 A No, not specifically.

18 Q Okay. Is there a database where you can
19 look them up that you have access to?

20 A No.

21 Q Okay. Have you ever asked anyone else at
22 NTC what those numbers mean or --

23 A No.

24 Q Okay. Did you ever check them to see if
25 they were correct?

1 A No.

2 Q Okay. Now, under that there is something
3 indicating an effective date, which is February 11th
4 of '09. Do you see that?

5 A Yes.

6 Q Okay. Now, if you look down at the bottom,
7 it appears it was notarized on February 13th of '09.

8 A Where it says dated.

9 Q Is that yes?

10 A Yes.

11 Q Okay. The -- do you know why it says the
12 effective date is different from the date of the
13 notarization?

14 A No.

15 Q Do you know in general why an effective date
16 would be different from the date notarized?

17 A No.

18 Q Do you know who puts the effective date on
19 there?

20 A No.

21 Q Okay. Going further down now into the body
22 of the paragraph there, it says for good and valuable
23 consideration. What does that mean?

24 A I don't know.

25 Q Okay. Do you know anything about how much

1 was paid for this mortgage?

2 A No.

3 Q Or anything about when?

4 A No.

5 Q Anything about what company paid it?

6 A No.

7 Q Anything about what company got it?

8 A No.

9 Q Do you know whether anything was paid at
10 all?

11 A No.

12 Q Okay. Now, how do you know that Citi -- it
13 does then say Citi Residential Lending as
14 Attorney-in-Fact for Ameriquest Mortgage Company; is
15 that correct?

16 MS. POLLAN: Object to form, but you can
17 answer.

18 Q (By Ms. Einstein) Would you read the next
19 part after the for good and valuable consideration?

20 A Let's see, Citi Residential Lending,
21 Incorporated as Attorney-in-Fact for Ameriquest
22 Mortgage Company.

23 Q Okay. What does Attorney-in-Fact mean?

24 A I don't know.

25 Q Okay. How do you know that Citi Residential

1 Lending is an Attorney-in-Fact for Ameriquest
2 Mortgage Company?

3 A I don't know.

4 Q Okay. Do you know whose address that is
5 Rancho Cucamonga, California?

6 A No.

7 Q Okay. The next thing: By these presence
8 does convey, grant, sell, assign, transfer and set
9 over. Do you see that in the document?

10 A Yes.

11 Q Okay. Do you know what that means?

12 A No.

13 Q The next thing is Deutsche Bank National
14 Trust Company as trustee for. Do you see that in the
15 document?

16 A Yes.

17 Q Do you know what a trustee is?

18 A No.

19 Q Okay. Would you know why Erika Lance said
20 you don't ever transfer mortgages into trusts?

21 MS. POLLAN: I'm going to object. Erika
22 Lance is not in this case, and I'm going to object
23 based on the order because that has nothing to do
24 with this case.

25 MS. EINSTEIN: But it has to do with what

1 exactly is there.

2 MS. POLLAN: Well, he should know what
3 Erika Lance should know.

4 Q (By Ms. Einstein) Okay. Is Erika Lance the
5 senior vice-president for administration?

6 A Yes.

7 Q Okay. Do you think she knows what your
8 company does and doesn't do?

9 A I can't comment on to what degree her
10 knowledge is --

11 Q Okay.

12 A -- because it would be speculation.

13 Q All right. Continuing back with this
14 Exhibit 5, do you see asset-backed pass-through
15 certificates?

16 A Yes.

17 Q Do you know what that means?

18 A No.

19 Q Okay. Then do you see pooling and servicing
20 agreement?

21 A Yes.

22 Q Do you know what that means?

23 A No.

24 Q Do you see whose address -- oh, I'm sorry,
25 do you see an address in Santa Ana, California?

1 A Yes.

2 Q Do you know whose address that is?

3 A No.

4 Q Okay. Now, going back down to your
5 signature.

6 A Okay.

7 Q Do you see underneath that it says whose
8 address is 10801 East 6th Street, Rancho Cucamonga,
9 California?

10 A Yes.

11 Q Is that your address?

12 A No.

13 Q Have you ever been there?

14 A No.

15 Q Okay. Who is Jessica Fretwell?

16 A She's an employee of NTC.

17 Q Okay. Do you know what she does?

18 A Not specifically.

19 Q Okay. Well, do you know generally what she
20 does?

21 A Her duties vary. She prepares some
22 documents.

23 Q Okay. When you say she prepares them, what
24 would that mean in specific relation to that
25 document?

1 A I wouldn't know because I didn't see her
2 process or create.

3 Q Okay. So does she create documents like
4 that by adding electronic signatures too?

5 A I couldn't accurately describe what she
6 does.

7 Q Okay.

8 A I have no knowledge.

9 Q Okay. Let's go back to when you gave your
10 signature to Thomas McKinnon.

11 A Okay.

12 Q Did you authorize specific people at NTC to
13 use your signature?

14 A No.

15 Q Okay. Did you sign anything saying this is
16 really my signature?

17 A I'm trying to think. No.

18 Q Did you sign anything saying they could use
19 your signature?

20 A No.

21 Q Okay. Did you say anything to anyone
22 saying, "Here's my signature. Use it in such and
23 such a way or any way you want," or --

24 A No.

25 Q Okay. Back to Exhibit 5, what are the

1 numbers above the bar code? Do you see at the bottom
2 there's a bar code?

3 A Okay.

4 Q There's some numbers above it. Can you tell
5 me what those are?

6 A The C-R-L-A-S and then the numbers?

7 Q Yes. What are those?

8 A That would be a document identification
9 number.

10 Q Okay. And that would be within NTC?

11 A Within NTC.

12 Q Okay. Can you using that number access this
13 document or can only certain other people do it?

14 A Only certain other people can.

15 Q Okay. Do you know who those are?

16 A Not specifically.

17 Q Okay. What about the number below the bar
18 code?

19 A It's the same as the identifier.

20 Q Within NTC?

21 A Within NTC.

22 Q Okay. And do you have access to know what
23 it means?

24 A I just know that number is the number they
25 use when they research or do anything with this loan

1 or if they have to retrieve it to print, this is the
2 number they use for identification purpose.

3 Q But you're not able to do that?

4 A No.

5 Q Okay. Now, in this loan, which you sign the
6 assignment of, did you see the original note or
7 mortgage change hands?

8 A No.

9 Q Okay. Do you know where the original note
10 and mortgage are now?

11 A No.

12 Q Do you know where they were, excuse me, when
13 you signed the assignment?

14 MS. POLLAN: Object.

15 MS. EINSTEIN: I'm sorry?

16 MS. POLLAN: I'm objecting to form. You
17 can answer.

18 THE DEPONENT: Okay. Well, I wouldn't
19 know because I didn't sign this. This was done
20 electronically.

21 Q (By Ms. Einstein) Okay. If you had
22 physically signed it, would you know where those
23 documents were?

24 A No.

25 Q Okay. Do you know anything at all about the

1 original mortgage and note in this case?

2 A No.

3 Q Okay. Now, have you ever signed this
4 mortgage before February 13, 2009?

5 A I don't know.

6 Q Okay. So there's nothing in your process
7 that would have prevented you from signing this
8 mortgage other times?

9 A Can you rephrase that?

10 Q Okay. Exhibit 5 you assign it from Citi
11 Residential as Attorney-in-Fact for Ameriquest to
12 Deutsche Bank as trustee with certain other
13 stipulations of what they're trustee for.

14 A Okay.

15 Q Okay. Is there -- do you know if you could
16 have assigned this mortgage to some other company?

17 A No.

18 Q Meaning you could have?

19 A I don't -- I have no way of recalling.

20 Q Okay. And would you have any way of finding
21 out?

22 A No.

23 Q Okay. So before assigning a mortgage, you
24 don't check to see if it has been assigned to some
25 other company?

1 A Correct.

2 Q Okay. And similarly you have no way of
3 knowing if you have signed an assignment of this
4 particular mortgage after February 13th of '09; is
5 that right?

6 A Correct.

7 Q Okay. And that would be true even if it was
8 a few days before because of the volume that you sign
9 or that are signed with your name; is that correct?

10 A Correct.

11 Q Okay. And I think you testified a little
12 before that no one ever told you that an assignment
13 you signed was incorrect?

14 A Correct.

15 Q Okay. Do you know how many people work for
16 quality control?

17 A No.

18 Q Okay. Do you know how many assignments they
19 process a day?

20 A Not exactly.

21 Q Between 100 and 1,000 or between 1,000 and
22 10,000?

23 A Would it be proper to give you a ball park
24 of --

25 Q Yes.

1 A -- an average day?

2 Q Yes.

3 A Would that be acceptable?

4 Q Yes. That's what I'm asking you.

5 A I would say on a daily it varies between two
6 and 5,000 documents whether assignments -- two and
7 \$5,000 documents of whatever nature.

8 Q And that's what goes through quality control
9 or is that what you do?

10 A That's what I would do. It would go through
11 quality before it came through me.

12 Q Okay. So there are other people who do what
13 you do, which also have to go through quality?

14 A Yes. There's several layers of quality.

15 Q Okay. Do you know how many?

16 A Not exactly, but there's quality in the data
17 and then the creation of the docs -- quality before
18 it's printed, and then I sign and quality after I
19 sign. So in reviewing it in every capacity, qual and
20 research and so forth.

21 Q Okay. And the research is whether it has
22 been recorded; is that correct?

23 A Well, not that narrow of a scope. I mean,
24 to find anything, if the title is clear, whatever is
25 required if the assignment changed in correct order

1 and so forth. It's pretty extensive.

2 Q Okay. And how many people are doing that
3 for how many assignments?

4 A Well, research could be 60 people or more
5 depending on the given situation or the quality of
6 their information that they're receiving from the
7 client.

8 Q Okay. So all of these people with all of
9 this research, and no one has ever come back and
10 said, hey, wait, something was wrong to you?

11 A Not to my knowledge at all.

12 Q Okay. And you've said what you check
13 yourself is the clarity of the print and whether it's
14 entered on the page; is that correct?

15 A Correct.

16 Q Now, are you paid by the hour or by the
17 assignment or --

18 A I'm paid by the hour.

19 Q Okay. What would be the outside limits of
20 how many you would sign in a day?

21 A Two to 5,000 would be on an eight-hour day.

22 Q Okay. And what is it varied by? I mean,
23 seasonal? Is it -- what does it depend on?

24 A By the contract situation.

25 Q Okay. And has there been a trend over

1 time?

2 A Seasonally not actually. It's variable.

3 Q When you sign by hand, where do the
4 assignments come from?

5 MS. POLLAN: I'm going to object based on
6 the order. He didn't sign this by hand, and you
7 have already gone through that process.

8 MS. EINSTEIN: Are you instructing him not
9 to answer?

10 MS. POLLAN: Yes.

11 Q (By Ms. Einstein) Okay. And the
12 E-signatures you've testified you never see it. It's
13 all based on a signature you gave to Thomas McKinnon
14 sometime ago. So -- and you don't know when; is that
15 correct?

16 A Correct.

17 Q And you don't know when or how the
18 notary -- notarization is effected?

19 A That's correct.

20 Q Okay. So you don't know how many of those
21 bear your name that go out in a day?

22 A That would be correct.

23 Q Okay. Is there any other form besides hand
24 signing and E-signatures that your name has gotten
25 onto documents, a stamp or something like that?

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A No.

Q Okay. Has E-signing reduced your work load?

A I would assume, yes.

Q Okay. Do you still notarize for other people at NTC?

A Yes.

Q Okay. And do you know how often?

MS. POLLAN: I'm going to object and instruct him not to answer. That has nothing to do --

Q (By Ms. Einstein) Okay. Have you registered with the commissioning official that you do E-notarizations?

A To my knowledge, I don't do E-notarizations.

Q Okay. Now, have you stopped signing assignments?

A No.

Q Okay. Has the pace slowed at all?

A Like I said before, it's variable.

Q Okay. Has Citi stopped sending assignments to sign?

A No.

Q Okay. And has the pace of Citi assignments specifically slowed?

1 A They're variable.

2 Q Okay. Has anyone other than your lawyer
3 told you that assignments don't matter anymore?

4 A No.

5 MS. EINSTEIN: Okay. Okay. Do you have
6 anything you want to ask?

7 MS. POLLAN: If I could take a brief
8 recess and just talk with Bill and see. We
9 probably will do some cross-examination.

10 MS. EINSTEIN: Okay.

11 MS. POLLAN: Thank you.

12 (A brief recess was held.)

13 MS. POLLAN: Okay. We're back on the
14 record.

15 EXAMINATION

16 BY MS. POLLAN:

17 Q Okay. Mr. Bly, I'm only going to ask you a
18 handful of questions. Do you remember when
19 Ms. Einstein was asking you about your knowledge at
20 the time you signed Exhibit 5? Do you remember
21 that?

22 A Yes.

23 Q Okay. Do you remember when Ms. Einstein
24 asked you whether you knew at the time you signed
25 Exhibit 5 whether or not it had been assigned before

1 or if the information was accurate? Do you remember
2 that?

3 A Yes.

4 Q When you signed this document, did you rely
5 on your own knowledge? And when I say this document,
6 I mean Exhibit 5. Do you rely on your own knowledge
7 or the process at Nationwide?

8 A I rely on the process.

9 Q Okay. And when I say the process, is that
10 the same one that you -- with quality control that
11 you had described to Ms. Einstein?

12 A Right, the multilayer quality control and
13 security.

14 MS. POLLAN: Okay. That's all the
15 questions that I have.

16 MS. EINSTEIN: Okay. And I want to ask
17 about that.

18 EXAMINATION

19 BY MS. EINSTEIN:

20 Q Do you know what the quality control -- how
21 much time the quality control spends on each
22 assignment checking it?

23 A I don't know exactly. I do know it varies
24 upon a verification, variability to verify what's
25 there.

1 Q What are they verifying it with?

2 A It's variable.

3 Q Do you know what they're checking or you
4 just know --

5 A No. It would be just speculation, but I
6 would assume, for example, when the physical files
7 are sent in, that's easier to inspect than if they're
8 looking up something online and so forth.

9 Q Are there physical files sent in?

10 A Sometimes, yes.

11 Q Okay. Do you know when they are and when
12 they aren't?

13 A No, I wouldn't.

14 Q Okay. And when you say it's easier
15 than -- well, what's in the physical files?

16 A That varies per file, per account.

17 Q You don't know, do you?

18 A No, I don't know.

19 Q Okay. And do you know the qualifications of
20 the people in quality control? Do you know what
21 their training is?

22 A No, I do not.

23 Q Okay. And do you know what their education
24 is?

25 A No.

1 Q Okay. Do you know how long they have worked
2 there?

3 A No.

4 Q Does that vary?

5 A Somewhat.

6 Q How much bigger is NTC than when you started
7 working there seven and-a-half years ago?

8 A Currently we're about the same when I
9 started, 300 some employees, 350 right now.

10 Q Okay. And what would you say is the
11 turnover?

12 A That's hard to speculate. It depends upon
13 the volume.

14 Q Okay. So you don't know how long these
15 people have been working there. You don't know their
16 training. You don't know what they check. You don't
17 know their education, and you don't know how much
18 time they spend?

19 A Well, I don't know exactly individually, but
20 the main people in qual have been there longer than I
21 have.

22 Q Okay. And who are they?

23 A Well, Phillip Wood is one of the
24 individuals.

25 Q Okay. And do you know what his education or

1 training is?

2 A No.

3 Q Okay. And do you know the names of any
4 others?

5 A I really couldn't list them.

6 Q Okay. And when they do qual, again, you
7 don't know how much time they spend or what they look
8 at?

9 A No, I do not.

10 Q Sometimes they have a paper file, sometimes
11 they don't; is that correct?

12 A That's correct.

13 Q Okay. Is there anything else you know that
14 quality control does specifically with assignments
15 before you get them or before your name is applied to
16 them?

17 A No.

18 Q Okay. Do you know if one person checks
19 everything in an assignment or --

20 A No. I don't know.

21 Q Okay. And if they check it, why do they
22 need you, sir?

23 A As signer.

24 MS. EINSTEIN: Okay. I have nothing
25 further.

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MS. POLLAN: Okay. We don't have any other questions. We are going to read.

(The deposition was concluded at 3:50 p.m.)

* * *

I hereby certify that I have read and examined the foregoing transcript, and the same is a true record of the testimony given by me unless otherwise noted.

BRYAN J. BLY DATE

SIGNATURE PAGE/ERRATA SHEET

WITNESS: BRYAN J. BLY

CASE REFERENCE: DEUTSCHE BANK NATIONAL TRUST
 COMPANY AS TRUSTEE IN TRUST FOR THE BENEFIT OF THE
 CERTIFICATE HOLDERS FOR AMERIQUEST MORTGAGE
 SECURITIES TRUST 2005-R9, ASSET-BACKED PASS-THROUGH
 CERTIFICATES SERIES 2005-R9 vs. GARY L. HANNAH, et al

CASE NO.: 2009-CA-1920

DATE: July 2, 2010

After you have read your transcript, please note any errors in transcription on this page. DO NOT MARK on the original transcript itself. Please, sign and date this sheet as indicated below. If additional lines are required for corrections, attach additional sheets. If no corrections, please, indicate "None" below.

<u>PAGE/LINE</u>	<u>ERROR OR AMENDMENT</u>	<u>REASON</u>
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Under penalties of perjury, I declare that I have read the foregoing transcript, and I subscribe to its accuracy, to include the corrections or amendments noted above or hereto attached.

 BRYAN J. BLY

DATE

Original to: GLORIA A. EINSTEIN, ESQ., Jacksonville
 Area Legal Aid, Inc., P.O. Box 1999, Green Cove
 Springs, FL 32043

Copy to: ADINA L. POLLAN, ESQ., Akerman Senterfitt,
 50 North Laura Street, Suite 2500, Jacksonville, FL
 32202-3646

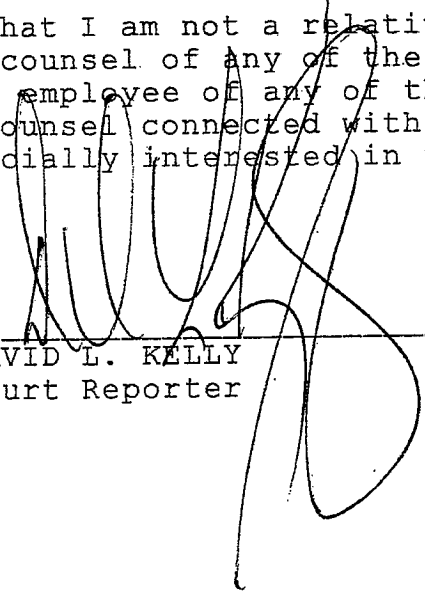
CERTIFICATE OF REPORTER

STATE OF FLORIDA)

COUNTY OF PINELLAS)

I, DAVID L. KELLY, Court Reporter, certify that I was authorized to and did stenographically report the deposition of BRYAN J. BLY; that a review of the transcript was requested; and that the transcript, pages 1 through 67, inclusive, is a true and complete record of my stenographic notes to the best of my ability.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.



DAVID L. KELLY
Court Reporter

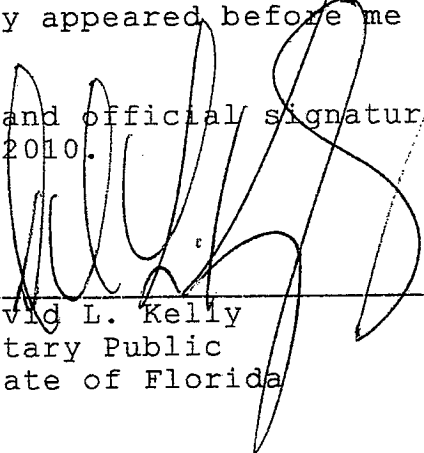
CERTIFICATE OF OATH

STATE OF FLORIDA)

COUNTY OF PINELLAS)

I, the undersigned authority, certify that
BRYAN J. BLY personally appeared before me and was
duly sworn.

WITNESS, my hand and official signature and seal
this 9th day of July, 2010.



David L. Kelly
Notary Public
State of Florida



DAVID L. KELLY
MY COMMISSION # DD 658110
EXPIRES: May 1, 2011
Bonded Thru Budget Notary Services

SIGNATURE PAGE/ERRATA SHEET

WITNESS: BRYAN J. BLY

CASE REFERENCE: DEUTSCHE BANK NATIONAL TRUST
 COMPANY AS TRUSTEE IN TRUST FOR THE BENEFIT OF THE
 CERTIFICATE HOLDERS FOR AMERIQUEST MORTGAGE
 SECURITIES TRUST 2005-R9, ASSET-BACKED PASS-THROUGH
 CERTIFICATES SERIES 2005-R9 vs. GARY L. HANNAH, et al

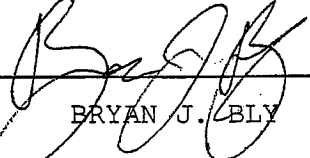
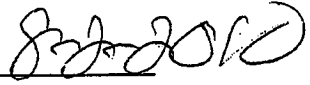
CASE NO.: 2009-CA-1920

DATE: July 2, 2010

After you have read your transcript, please note any errors in transcription on this page. DO NOT MARK on the original transcript itself. Please, sign and date this sheet as indicated below. If additional lines are required for corrections, attach additional sheets. If no corrections, please, indicate "None" below.

<u>PAGE/LINE</u>	<u>ERROR OR AMENDMENT</u>	<u>REASON</u>
3 / 16	"Pollen" should be "Pollan"	
25 / 18	"a temporary" should be "the Tampa"	
31 / 23	"concern" should be "concerned"	
48 / 2	"should" should be "shouldn't"	

Under penalties of perjury, I declare that I have read the foregoing transcript, and I subscribe to its accuracy, to include the corrections or amendments noted above or hereto attached.

 BRYAN J. BLY DATE

Original to: GLORIA A. EINSTEIN, ESQ., Jacksonville
 Area Legal Aid, Inc., P.O. Box 1999, Green Cove
 Springs, FL 32043

Copy to: ADINA L. POLLAN, ESQ., Akerman Senterfitt,
 50 North Laura Street, Suite 2500, Jacksonville, FL
 32202-3646

IN THE CIRCUIT COURT, FOURTH
JUDICIAL CIRCUIT, IN AND FOR
CLAY COUNTY, FLORIDA

CASE NO.: 2009-CA-1920
DIVISION: B

DEUTSCHE BANK NATIONAL TRUST
COMPANY AS TRUSTEE IN TRUST
FOR THE BENEFIT OF THE
CERTIFICATEHOLDERS FOR
AMERIQUEST MORTGAGE
SECURITIES TRUST 2005-R9, ASSET-
BACKED PASS-THROUGH
CERTIFICATES SERIES 2005-R9,

Plaintiff,

vs.

GARY L. HANNAH, *et al.*,

Defendants.

**ORDER GRANTING IN PART AND DENYING IN PART
MOTION FOR PROTECTIVE ORDER**

This case was before the Court on non-parties Citi Residential Lending, Inc.'s and Brian J. Bly's motion for protective order. Having reviewed motion and record, and hearing argument from counsel, it is hereby:

ORDERED AND ADJUDGED:

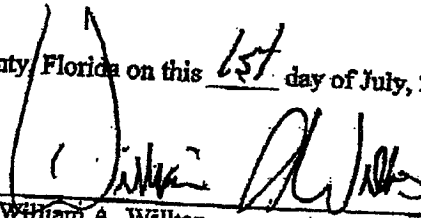
1. The motion is **DENIED IN PART**. The deposition of Bryan J. Bly currently scheduled for July 2, 2010 at 2:00 P.M. will continue as scheduled.
2. The motion is **GRANTED IN PART**. Non-party Bryan J. Bly will only be required to bring to the deposition those documents that he has in his possession, custody or control. The scope of the deposition will be strictly limited only to Bryan J. Bly signing the assignment of Mr. Hannah's mortgage in his capacity as Vice President for Citi

EXHIBIT
7-2-10 / DLK

Residential Lending, Inc. Items 1-2, 8-9, 16 and 20 are stricken from the subpoena *duces tecum* for deposition as irrelevant. Bryan Bly will not be required to bring to the deposition any documents regarding these items, and any questioning about these items will not be permitted. Further, any questioning regarding Bryan Bly signing any other mortgage assignments for any other entities is prohibited.

3. Each party shall bear its own fees and costs.

DONE AND ORDERED in Chambers at Clay County Florida on this 15th day of July, 2010.



William A. Wilkes
Circuit Court Judge

cc: All counsel of record

PLEASE DELIVER THIS FACSIMILE IMMEDIATELY TO:

DATE: 7/1/10

NAME: Adina Pollan
RE: Case No.: 2009-CA-1920
FAX NO. (904) 798-3730

NO PAGES: 3
(including this page)

-
- Please Review
 - Please Call Me
 - For Your Comments
 - Reply/Action Required
 - As You Requested
 - As We Discussed
 - For Your Information
 - Other (See below)

SENT BY: Lenore Dunaway Judicial Assistant to the Honorable William A. Wilkes
Circuit/Administrative Judge
Phone: (904) 269-6338 Fax: (904) 278-3676

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPY OF THIS COMMUNICATION IS STRICTLY PROHIBITED AND WILL BE CONSIDERED AS A TORTUOUS INTERFERENCE IN OUR CONFIDENTIAL BUSINESS RELATIONSHIPS. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U. S. POSTAL SERVICE

TRANK YOU:

MESSAGE: Attached is the signed order in the above case.
Lenore

5/19/2010 9:00 AM James B. Jett Page 2

IN THE CIRCUIT COURT OF THE
FOURTH JUDICIAL CIRCUIT, IN AND
FOR CLAY COUNTY, FLORIDA

CASE NO.: 2009-CA-1920
DIVISION: B

DEUTSCHE BANK NATIONAL TRUST
COMPANY AS TRUSTEE IN TRUST
FOR THE BENEFIT OF THE
CERTIFICATEHOLDERS FOR AMERIQUEST
MORTGAGE SECURITIES TRUST 2005-R9,
ASSET-BACKED PASS-THROUGH
CERTIFICATES SERIES 2005-R9
Plaintiff,

vs.

GARY L. HANNAH, et al,
Defendants. /

SUBPOENA DUCES TECUM FOR DEPOSITION

TO: Bryan J. Bly
c/o Nationwide Title Clearing
2100 Alt 19 North
Palm Harbor, FL 34683

TIME 11:50 A
DATE 5/13/10
SERVED BY: [Signature]
R ID: [Signature]

YOU ARE COMMANDED to appear before a person authorized by law to take depositions
at Maxx Enterprises, Inc., 1275 Cleveland Street, Clearwater, FL 33755 on WEDNESDAY,
JUNE 23 at 1:00 p.m. for the taking of your deposition in this action and to have with you at that
time and place the following:

1. Your resume or curriculum vitae.
2. Copies of all your W-2s for the years 2008 and 2009. You may redact any amounts received.
3. Any corporate resolution or other document showing your position or authority with CitiMortgage, Inc.
4. Any corporate resolution or other document showing your position or authority with Ameriquest Mortgage Company.
5. Any corporate resolution or other document showing your position or authority with Citi Residential Lending.

EXHIBIT "D"

EXHIBIT
2
7-2-10 DLK

5/19/2010 9:00 AM James B. Jeff Page 3

6. Any corporate resolution or other document showing your position or authority with NTC.
7. Any corporate resolution or other document showing your position or authority with Deutsche Bank.
8. Any corporate resolution or other document showing your position or authority with Option One Mortgage.
9. Any corporate resolution or other document showing your position or authority with any other financial institution or business entity.
10. All documents showing your communications with Citi Residential Lending concerning your duties as Vice President, including telephone logs, notes on telephone calls, emails and memos.
11. Your job description as Vice-President of Citi Residential Lending.
12. Records, including travel records, showing all your meetings, conferences, or other contact with other officers of Citi Residential Lending.
13. All your past and present employment contracts at Citi Residential Lending.
14. All corporate seals or corporate stamps of which you have custody and control, including those for Citi Residential Lending and any other financial institution or business entity.
15. All certificates, diplomas, or any other documentation showing any post-secondary education, vocational training, certification courses, or other education or training received by you after high school.
16. Any log, list or database which lists the assignments of mortgage you signed in 2009 and 2010.
17. Any document showing the authority of Citi Residential Lending to act as Attorney-in-Fact for Ameriquest Mortgage Company.
18. Any document showing any consideration paid by the assignor or the assignee for the

5/19/2010 9:00 AM James B. Jett Page 4

assignment you signed, including a printout of any electronic document or part of a document.

- 19. Any instructions you relied on in preparing the assignment of Mortgage in this case (attached hereto for reference) including a printout of any electronic document or part of a document.
- 20. Any employment evaluations you have received in 2008, 2009 and 2010.

If you fail to appear, you may be in contempt of court. You are subpoenaed to appear by the following attorney and unless excused from this subpoena by the attorney or the court, you shall respond to this subpoena as directed.

DATED on May 10, 2010

WITNESS my hand and seal of said Court on May 10, 2010
As Clerk of said Court
JAMES B. JETT



By: [Signature]
As Deputy Clerk

JACKSONVILLE AREA LEGAL AID, INC.

[Signature]
Gloria Einstein, Esquire
Florida Bar No.: 801119
P.O. BOX 1999
Green Cove Springs, FL 32043-1999
(904) 284-8410 ext. 3002
FAX (904) 284-8485
Attorney for Defendant

Any minor subpoenaed for testimony shall have the right to be accompanied by a parent or guardian at all times during the taking of testimony notwithstanding the invocation of the rule of sequestration of section 90.616, Florida Statutes, except upon a showing that the presence of a parent or guardian is likely to have a material, negative impact on the credibility or accuracy of the minor's testimony, or that the interests of the parent or guardian are in actual or potential conflict with the interests of the minor.

If you are a person with a disability who needs any accommodation in order to participate in this deposition, you may request such assistance by contacting Gloria Einstein at P.O. Box 1999, Green Cove Springs, Florida 32043 or 904-284-8410 ext. 3002 within 2 working days of your receipt of this subpoena; if you are hearing or voice impaired, call 711.

After Recording, Please Return To:
Citi Residential Lending Inc.
10801 6th Street
Rancho Cucamonga, CA 91730-5977

LIMITED POWER OF ATTORNEY

KNOWN ALL MEN BY THESE PREMISES:

That Ameriquest Mortgage Company, a Delaware corporation, and having an office located at 1100 Town & Country Road, Orange, California 92868, as Trustee and/or Beneficiary hath made constituted and appointed, and does by these presents make, constitute and appoint Citi Residential Lending Inc. ("Servicer") a corporation organized and existing under the laws of the State of Delaware, its true and lawful Attorney-in Fact, with full power and authority to sign, execute, acknowledge, deliver, file for record, and record any instrument on its behalf and to perform such other act or acts as may be customarily and reasonably necessary and appropriate to effectuate the following enumerated transactions in respect of any of the mortgages or deeds of trust (the "Mortgages" and "Deeds of Trust", respectively) and promissory notes secured thereby (the "Mortgage Notes").

This Appointment shall apply only to the following enumerated transactions and nothing herein or in the Agreements shall be construed to the contrary:

1. The modification or re-recording of a Mortgage or Deed of Trust, where said modification or re-recording is solely for the purpose of correcting the Mortgage or Deed of Trust to conform same to the original intent of the parties thereto or to correct title errors discovered after such title insurance was issued; provided that (i) said modification or re-recording, in either instance, does not adversely affect the lien of the Mortgage or Deed of Trust as insured and (ii) otherwise conforms to the provisions of the Agreement.
2. The subordination of the lien of a Mortgage or Deed of Trust to an easement in favor of a public utility company of a government agency or unit with powers of eminent domain; this section shall include, without limitation, the execution of partial satisfactions/releases, partial reconveyances or the execution or requests to Trustee or Beneficiaries to accomplish same.
3. The conveyance of the properties to the mortgage insurer, or the closing of the title to the property to be acquired as real estate owned, or conveyance of title to real estate owned.
4. The completion of loan assumption agreements.
5. The full satisfaction/release of a Mortgage or Deed of Trust or full conveyance upon payment and discharge of all sums secured thereby, including, without limitation, cancellation of the related Mortgage Note.



6. The assignment of any Mortgage or Deed of Trust and the related Mortgage Note, in connection with the repurchase of the mortgage loan secured and evidenced thereby.
7. The full assignment of a Mortgage or Deed of Trust upon payment and discharge of all sums secured thereby in conjunction with the refinancing thereof, including, without limitation, the assignment of the related Mortgage Note.
8. With respect to a Mortgage or Deed of Trust, the foreclosure, the taking of a deed in lieu of foreclosure, or the completion of judicial or non-judicial foreclosure or termination, cancellation or rescission of any such foreclosure, including, without limitation, any and all of the following acts:
 - a. the substitution of Trustee or Beneficiary(s) serving under a Deed of Trust, in accordance with state law and the Deed of Trust;
 - b. the preparation and issuance of statements of breach or non-performance;
 - c. the preparation and filing of notices of default and/or notices of sale;
 - d. the cancellation/rescission of notices of default and/or notices of sale;
 - e. the taking of deed in lieu of foreclosure; and
 - f. the preparation and execution of such other documents and performance of such other actions as may be necessary under the terms of the Mortgage, Deed of Trust or state law to expeditiously complete said transactions in paragraphs 8.a. through 8.e. above.
9. With respect to the sale of property acquired through a foreclosure or deed-in lieu of foreclosure, including, without limitation, the execution of the following documentation:
 - a. listing agreements;
 - b. purchase and sale agreements;
 - c. grant/warranty/quit claim deeds or any other deed causing the transfer of title of the property to a party contracted to purchase same;

- d. escrow instructions; and
 - e. any and all documents necessary to effect the transfer of property.
10. The modification or amendment of escrow agreements established for repairs to the mortgaged property or reserves for replacement of personal property.
 11. Endorse on behalf of the Trustee or Beneficiary all checks, drafts and/or negotiable instruments made payable to Ameriquest Mortgage Company.

The undersigned gives said Attorney-in-Fact full power and authority to execute such instruments and to do and perform all and every act and thing necessary and proper to carry into effect the power or powers granted by or under this Limited Power of Attorney as fully as the undersigned might or could do, and hereby does ratify and confirm to all that said Attorney-in-Fact shall be effective as of September 2007.

This appointment is to be construed and interpreted as a limited power of attorney. The enumeration of specific items, rights, acts or powers herein is not intended to, nor does it give rise to, and it is not to be construed as a general power of attorney.

Nothing contained herein shall (i) limit in any manner any indemnification provided by the Servicer to the Trustee or Beneficiary under the Agreements, or (ii) be construed to grant the Servicer the power to initiate or defend any suit, litigation or proceeding in the name of Ameriquest Mortgage Company except as specifically provided for herein. If the Servicer receives any notice of suit, litigation or proceeding in the name of the Trustee or Beneficiary, then the Foreclosure Trustee shall promptly forward a copy of same to the Trustee or Beneficiary.

This limited power of attorney is not intended to extend the powers granted to the Servicer under the Agreements or to allow the Servicer to take any action with respect to the Mortgages, Deeds of Trust or Mortgage Notes not authorized by the Agreements.

The Servicer hereby agrees to indemnify and hold the Trustee or Beneficiary and its directors, officers, employees and agents harmless from and against any and all liabilities, obligations, losses, damages, penalties, actions, judgments, suits, costs, expenses or disbursements of any kind or nature whatsoever incurred by reason or result of or in connection with the exercise by the Servicer of the powers granted to it hereunder.

This Limited Power of Attorney is entered into and shall be governed by the laws of the State of New York, without regard to conflicts of law principles of such state.

Third parties without actual notice may rely upon the exercise of the power granted under this Limited Power of Attorney; and may be satisfied that this Limited Power of Attorney shall continue in full force and effect and has not been revoked unless an instrument of revocation has been made in writing by the undersigned.

IN WITNESS WHEREOF, Ameriquest Mortgage Company has caused its corporate seal to be hereto affixed and these presents to be signed and acknowledged in its name and behalf by a duly elected and authorized signatory this 10 day of October 2007.

Ameriquest Mortgage Company

By: *Eileen Rubens*
Name: Eileen Rubens
Title: Vice President

Witnesses:


[Signature]
Miana Barajas

[Signature]
GENEVIEVE GONZALEZ

STATE OF CALIFORNIA)
) SS.:
COUNTY OF ORANGE)

On the 12 day of **October 2007**, before me, **Michele E. Negrete**, personally appeared **Eileen Rubens**, personally known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity of **Ameriquest Mortgage Company**, and that by her signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.


Notary Public

UNANIMOUS WRITTEN CONSENT
OF THE EXECUTIVE COMMITTEE
OF THE BOARD OF DIRECTORS OF
CITI RESIDENTIAL LENDING INC.

November 20, 2008

By unanimous action the Executive Committee of the Board of Directors of CITI RESIDENTIAL LENDING INC. (the "Corporation") hereby consents to the actions set forth herein and adopts the following resolutions, all in lieu of a meeting of the Executive Committee.

WHEREAS, the Corporation is the owner of certain mortgages and deeds of trust; and

WHEREAS, the Corporation now finds it desirable to authorize agents to process on its behalf the preparation, execution and recording of documents of satisfaction and reconveyance (collectively, the "Releases"), as well as those of assignment (the "Assignments"), in connection with said mortgages and deeds of trust; it is hereby

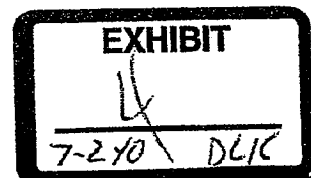
RESOLVED, that each of the employees of Nationwide Title Clearing, Inc. ("NTC") listed below be, and they hereby are, named and appointed as a Vice President and Assistant Secretary of the Corporation solely for the purpose of acting as duly authorized signatories on its behalf, such that any of the listed personnel may, solely in their capacity as authorized signatories, execute any and all reasonable and necessary documents required in connection with processing the Assignments and Releases;

Susan Bankowski
Bryan Bly
Vilma Castro
Dhurata Doko
John Giberson
Chris Jones

Erika Lance
Tom McKinnon
Crystal Moore
Dave Pearson
Elsa McKinnon
Sean Williams

FURTHER RESOLVED, that the authority hereby granted to the listed employees of NTC shall include specifically, but without limitation, the execution of any documents that obligate the Corporation to indemnify the Public Trustee of the City and County of Denver, Colorado (the "Public Trustee") pursuant to C.R.S. §38-39-102(3.5)(a) for any and all damages, costs, liabilities and reasonable attorney fees incurred by the Public Trustee as a result of action taken in reliance on a Request for Release submitted by or on behalf of the Corporation;

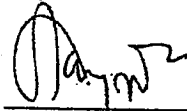
FURTHER RESOLVED, that the Assistant Secretaries and Vice Presidents hereby appointed are not authorized to act as officers or employees of the Corporation in any respect other than as specifically authorized above;



FURTHER RESOLVED, that the appointment of the listed employees of NTC as Assistant Secretaries and Vice Presidents of the Corporation pursuant to these resolutions be, and it hereby is, specifically conditioned on the receipt by the Corporation of a duly executed Indemnity Agreement by NTC in a form substantially identical to that attached to these resolutions;

FURTHER RESOLVED, that in the event the Corporation should seek to terminate the appointment and authorization described above, it shall do so by serving written notice of such termination on NTC, at 2100 Alternate 19 North, Palm Harbor, Florida 34683, and such termination shall become effective only upon its receipt by NTC.

The undersigned, being all the members of the Executive Committee of the Board of Directors of the Corporation, hereby consent in writing to the above actions and do hereby approve the same.



Sanjiv Das

Timothy M. Hayes



Paul R. Ince

The undersigned, being all the members of the Executive Committee of the Board of Directors of the Corporation, hereby consent in writing to the above actions and do hereby approve the same.

Sanjiv Das

T M Hayes 8/24/08

Timothy M. Hayes

Paul R. Ince

CFN # 2009006918, OR 3083 Pages 1654 - 1654, Recorded 02/13/2009 at 09:05 AM, James B. Jett, Clerk Circuit Court, Clay County, Deputy Clerk RECORD

When Recorded Return To:
AMERICAN HOME MTO SERVICING
C/O NTC 2100 Alt. 19 North
Palm Harbor, FL 34683

CRL L#: 0133223644
Assignee L#: 4001744673
Investor L#: 0133223644
Custodian: 85
Effective Date: 02/11/2009

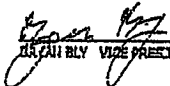
ASSIGNMENT OF MORTGAGE

FOR GOOD AND VALUABLE CONSIDERATION, the sufficiency of which is hereby acknowledged, the undersigned, CITI RESIDENTIAL LENDING INC., AS ATTORNEY-IN-FACT FOR AMERIQUEST MORTGAGE COMPANY, WHOSE ADDRESS IS 10801 E. 6TH STREET, RANCHO CUCAMONGA, CA 91730, (ASSIGNOR), by these presents does convey, grant, sell, assign, transfer and set over the described mortgage together with the certain note(s) described therein together with all interest secured thereby, all liens, and any rights due or to become due thereon to DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR, AMERIQUEST MORTGAGE SECURITIES INC. ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2005-R9, UNDER THE POOLING AND SERVICING AGREEMENT DATED OCTOBER 1, 2005, WHOSE ADDRESS IS 1761 EAST ST. ANDREW PLACE, SANTA ANA, CA 92705-4934, (ASSIGNEE)

Said Mortgage was made by GARY L. HANNAH AND MELISSA D. HANNAH and was recorded in Official Records of the Clerk of the Circuit Court of CLAY County, Florida, in Book 2602, Page 652 or Instr # 2005069519

upon the property situated in said State and County as more fully described in said mortgage.


Dated: 02/13/2009
CITI RESIDENTIAL LENDING INC., AS ATTORNEY-IN-FACT FOR AMERIQUEST MORTGAGE COMPANY



BRYAN HLY VICE PRESIDENT

Whose address is: 10801 E. 6TH STREET, RANCHO CUCAMONGA, CA 91730

STATE OF FLORIDA COUNTY OF PINELLAS

The foregoing instrument was acknowledged before me THIS 13TH DAY OF FEBRUARY IN THE YEAR 2009 by BRYAN HLY, personally known to me to be the VICE PRESIDENT of CITI RESIDENTIAL LENDING INC., AS ATTORNEY-IN-FACT FOR AMERIQUEST MORTGAGE COMPANY, a corporation, on behalf of the corporation.


Bobbie Jo Stoldt Notary Public
Commission Expires: 11/06/2011

 BOBBIE JO STOLDT
MY COMMISSION # DD731800
EXPIRES November 06, 2011
(407) 378-0103 FloridaNotaryService.com

Document Prepared By:
Jessica Fretwell/NTC 2100 Alt. 19 North, Palm Harbor, FL 34683 (800)346-9152
CRLAS 9187231 form5/EPRMFL1


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EXHIBIT
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