

1 August 26th, 2008.

2 **Q Okay. Because that's the date of the**  
3 **letter?**

4 A That's the date of the letter and it's  
5 also the date that appears at the top.

6 **Q That top date would change if it was**  
7 **prepared the day before?**

8 A Yes.

9 **Q So if that was prepared the day before,**  
10 **the top would say the 27th and the bottom would say**  
11 **the 28th?**

12 A No. It would actually be, the letter  
13 would be dated the 26th and if it was being mailed  
14 it would then say at the top August 27th.

15 **Q How did you learn all those procedures?**

16 A Through classroom training, day-to-day  
17 interaction with the various departments.

18 **Q And you mentioned at some point there was**  
19 **a written manual. Is there a written manual with**  
20 **any of these policies?**

21 A As Aurora is in the process of winding  
22 down, I don't know if a written manual would still  
23 exist or not.

24 **Q Was there a written manual as of the date**  
25 **of this letter?**

1           A       I don't know. I didn't work for the  
2 company as of the date of this letter.

3           **Q       Was there a written manual when you did**  
4 **work there with regards to acceleration letters?**

5           A       Yes.

6           **Q       And when was the written manual that you**  
7 **saw created?**

8           A       The iteration that I reviewed contained  
9 information from 2009 and 2010.

10          **Q       So you can only talk about the written**  
11 **manual policies for 2009 and 2010. You don't know**  
12 **what they were in 2008?**

13          A       The only way I know is through again  
14 classroom training and what was relayed to me  
15 through management and my discussions with the  
16 different departments. And there was nothing in  
17 writing.

18          **Q       Was the classroom training that you took**  
19 **so you could testify in court or some other purpose**  
20 **to that classroom training?**

21          A       That classroom training was two fold: One  
22 was to ensure that we understood, "we" being  
23 individuals who were testifying how records were  
24 kept and maintained in the actual course of  
25 business.

1           It was also to provide understanding of  
2 the various departments that worked within Aurora  
3 and to better understand the policies and procedures  
4 within that department.

5           **Q     Why did you need to have that global**  
6 **understanding?**

7           A     Working in the contested default  
8 department, we interacted with numerous departments  
9 within the company. In order to efficiently perform  
10 my job duties, it was important to understand how  
11 work was done on a day-to-day basis, the reason  
12 behind it, understanding how these records were  
13 created and also to foster a teamwork atmosphere as  
14 I would have to refer out to them at times to  
15 discuss various issues on files.

16           **Q     But you were not personally responsible,**  
17 **at least when we talk about this letter, you were**  
18 **not personally responsible while you worked at**  
19 **Aurora Loan Services for creating these types of**  
20 **letters, were you?**

21           A     No, I was not.

22           **Q     You were not ever responsible for sending**  
23 **the letters?**

24           A     No, I was not.

25           **Q     You were not responsible to maintain a**

1 **record of those letters being created or sent?**

2 A Correct.

3 **Q So you were given the training regarding**  
4 **the demand letters so that you could testify about**  
5 **those procedures and have an understanding of how**  
6 **the company worked?**

7 A In part it also helped to provide this  
8 information to counsel to be able to explain our  
9 policies and procedures as needed.

10 **Q So your basic job responsibility is to**  
11 **learn as much as you can about what is supposed be**  
12 **done at the bank and then tell court or counsel what**  
13 **should have been done?**

14 A No. My job responsibility at Aurora and  
15 both at Nationstar is to know as much as I can about  
16 the company, not necessarily in preparation for  
17 testimony but in order to effectively perform my job  
18 duties which also include assisting counsel on other  
19 matters that I am not required to testify on.

20 **Q But you only work on litigated cases,**  
21 **correct?**

22 A I work on cases that are involved within  
23 our in-house legal department or bankruptcy  
24 department.

25 **Q So you wouldn't work on these files unless**

1       **there was some lawsuit or legal proceeding involved?**

2           A     Or if I am being questioned to do  
3       research, yes.

4           Q     Okay. I will take that document back from  
5       you. I am now going to show you Plaintiff's 3 in  
6       evidence.

7                     And when was the first time you saw what  
8       you called the original note?

9           A     The first time I saw the original note was  
10       Monday.

11          Q     And are there any notes anywhere in the  
12       files of Aurora Loan Services or Aurora Bank FSB or  
13       Nationstar as to when the note was endorsed?

14          A     No.

15          Q     Nothing else on that. Thank you.

16                     I'm going to show you the collateral notes  
17       again, Plaintiff's 2. If you need a break at any  
18       time, just let me know.

19          A     Okay.

20          Q     Besides something called a collateral  
21       file, you don't know exactly what was being  
22       transferred in those transactions, do you?

23          A     I know that the collateral file contains  
24       the original notes, mortgage, and title policy, and  
25       at times various other documents from closing.