

1 move on.

2 BY MS. LUNGERGAN:

3 **Q I didn't catch earlier, what's your job**
4 **description with Ocwen, your job title?**

5 A I'm a loan annalist.

6 **Q Did you receive any training as a loan analysis?**

7 A Yes, I did.

8 **Q Did you receive any training regarding**
9 **testifying at trials?**

10 A Yes, I did.

11 **Q What kind of training would that be?**

12 A I had a whole -- quite a few lengthy days of
13 training from superior attorneys that work directly in our
14 firm in preparation to prepare us for trials.

15 **Q When you say your firm, you mean in-house**
16 **counsel?**

17 A Yes.

18 **Q Did that include role playing?**

19 A Yes.

20 **Q Did you ever receive any written materials or**
21 **videos, anything other than role playing?**

22 A Yes, we did receive some information. It was
23 just basically on different depositions and how to handle,
24 you know, ourselves in different situations whether it's
25 depositions, mediations, or trial.

1 **Q How to answer certain types of questions?**

2 A Right.

3 **Q What percentage of your job involves testifying,**
4 **whether it be at trials or depositions?**

5 A What percentage? I would say it's the bulk of
6 my job. I travel frequently for trials and mediations,
7 and depositions. So I'd say it's the bulk of it. I mean
8 in preparation -- prep work and traveling it's about
9 90 percent of my job duties.

10 **Q And your job -- in your job you don't get**
11 **involved in foreclosure cases until there is a trial or**
12 **deposition set; is that correct?**

13 A Correct.

14 **Q And your knowledge of what you call the industry**
15 **standards has really come from that training that you've**
16 **received; correct?**

17 A Yes.

18 **Q You never worked for any prior servicers?**

19 A No, I did not.

20 **Q Do you receive compensation related to your**
21 **performance at trials?**

22 A No.

23 **Q Do you receive reviews based on your performance**
24 **at trials?**

25 A No, we do not.

1 Q Forgive me because I can't remember what you
2 said to this one, are there any written documents or
3 manuals regarding your job responsibilities and roles?

4 A Most everything is online within our system, our
5 computer system, most everything is online.

6 Q Because you testify so much you are almost like
7 a professional witness; correct?

8 A More or less.

9 Q I'm now going to show you what was marked as --
10 they are stapled together, but I really only want to focus
11 on Plaintiff's Exhibit 1 which is the original promissory
12 note at this point. They are stapled together so I'm
13 handing you two which is the note and mortgage, but for
14 right now -- Ocwen was not the custodian of the document;
15 correct?

16 A Correct.

17 Q And in fact, at one point this document was
18 lost; correct?

19 A I do not know.

20 Q I'm now going to show you what's been marked for
21 identification and as Exhibit 1, which is a copy of the
22 complaint. I'm going to show it to your attorney. If you
23 could please turn for me -- I don't have page numbers so
24 bear with me. Count two of the complaint, it looks like
25 it's going to be about the fifth page, I believe.