

1 foreclosures or other kinds of litigation.

2 **Q. Did you have any training for these**
3 **state-mandated mediation processes?**

4 A. Yes.

5 **Q. Who did you receive that training from?**

6 A. I don't recall specifically. It was from
7 either the local attorneys that we worked with, or there
8 was training through the company, as well.

9 **Q. Through Aurora Loan Services?**

10 A. Yes.

11 **Q. And you stated you were a contested default**
12 **paralegal for Aurora Loan, and a paralegal for Shapiro &**
13 **Meinhold. Did you ever receive any type of schooling to**
14 **become a paralegal?**

15 A. In my undergraduate, I took several classes,
16 paralegal studies. It would be classified as paralegal
17 studies, I guess. But I don't have certification, no.

18 **Q. Okay. And then what were your responsibilities**
19 **as a court advocate?**

20 A. To work with local counsel on contested matters
21 and non-contested matters, anything involving litigation,
22 to appear for live testimony for depositions or trials.

23 **Q. And when did you assume the position of court**
24 **advocate?**

25 A. 2010?

1 **Q. Did you receive training for the role of court**
2 **advocate?**

3 A. There was continuous training throughout my
4 employment with Aurora. I don't know which ones I would
5 have classified or considered to be specific for that
6 role, but it was ongoing training.

7 **Q. And you said you appeared as a witness, and**
8 **that was part of your responsibility as a court advocate.**

9 A. That's correct.

10 **Q. Did you receive training in your role as a**
11 **trial witness or a foreclosure case -- contested**
12 **foreclosure case witness?**

13 A. Can you rephrase as to what specifically?

14 **Q. Did you receive any training on how to be a**
15 **witness?**

16 A. I received lots of training, in general. I
17 don't know that anybody sat me down and would have
18 trained me on specifically how to appear as a witness. I
19 think that's something you just pick up.

20 **Q. So you never did any type of role-playing as**
21 **far as your -- with an attorney or paralegal or a**
22 **supervisor, as far as what would happen on the day of**
23 **trial and your testimony as a witness?**

24 MR. ELLISON: Object to the form.

25 THE WITNESS: As to any conversations or

1 training or role-playing I may have had with counsel,
2 that's privileged. Anything else, I don't recall
3 specifically.

4 BY MS. ATCHANAHA:

5 **Q. Your attorney didn't object to privilege.**

6 **So --**

7 MR. ELLISON: Well, she has the right to say
8 that to indicate that it's a privileged issue. And
9 so if she thinks it's privileged, then she doesn't
10 have to answer the question.

11 The question was vague, and that's why I
12 objected to the form, because it could involve
13 privilege and it could involve other things that
14 weren't privileged. So I'm comfortable with her
15 invoking the privilege. But the question also could
16 have indicated other possible answers, and that's why
17 there was a problem with the question.

18 MS. ATCHANAHA: Okay. I'll rephrase.

19 BY MS. ATCHANAHA:

20 **Q. Did you ever receive any literature on how to**
21 **testify as a witness?**

22 A. I don't recall specifically, no.

23 **Q. Any manuals?**

24 A. No, there was not a manual on how to be a
25 witness.

1 **Q. Any pamphlets?**

2 A. I don't -- I don't think so.

3 **Q. Did you ever engage in role-playing as a**
4 **witness?**

5 A. I engaged in lots of training that included
6 back and forth what you would consider being
7 role-playing, I guess.

8 **Q. Who did you do that with?**

9 A. I did that with several different attorneys and
10 several different, I guess, learning and development
11 individuals in my several years at Aurora.

12 **Q. You said learning and --**

13 A. Learning and development. It's a training
14 department at Aurora.

15 **Q. It's a training program?**

16 A. It was a training department at Aurora.

17 **Q. And how long did you stay in the position of**
18 **court advocate?**

19 A. Until July of 2012.

20 **Q. Where did you go from there?**

21 A. Nationstar Mortgage.

22 **Q. And what was your position at Nationstar**
23 **Mortgage?**

24 A. My current position is default legal analyst.

25 **Q. And has that been your position since**

1 **July 2012?**

2 A. I believe my title has changed, but it's been
3 the same job description.

4 **Q. What was your title prior to the default legal**
5 **analyst?**

6 A. I think it was just litigation resolution
7 analyst? Yeah.

8 **Q. Okay. What office do you work out of now as**
9 **the default legal analyst for Nationstar?**

10 A. Denver, Colorado.

11 MR. ELLISON: And you should -- just a point of
12 clarification. In the beginning of the deposition,
13 you referred to this case as Aurora vs. Macklin. In
14 fact, there was a substitution of Nationstar. Just
15 so that the record is clear.

16 MS. ATCHANAHA: Okay.

17 BY MS. ATCHANAHA:

18 **Q. Who do you work for?**

19 A. Nationstar Mortgage.

20 **Q. And who is your supervisor at Nationstar?**

21 A. A.J. Loll.

22 MR. ELLISON: A, period, J, period.

23 THE WITNESS: L-o-l-l.

24 BY MS. ATCHANAHA:

25 **Q. What department do you work in?**

1 A. Litigation support.

2 **Q. Have you ever worked in any other departments?**

3 MR. ELLISON: At Nationstar?

4 BY MS. ATCHANAHA:

5 **Q. At Nationstar.**

6 A. No.

7 **Q. What are your responsibilities?**

8 A. I work with local counsel, in-house counsel, in
9 connection of litigated matters for defaulted or
10 non-defaulted loans to appear for live testimony, for
11 depositions, mediations, trials.

12 **Q. How many people do you oversee in your**
13 **position?**

14 A. None.

15 **Q. And how many people oversee your work? Do you**
16 **have one direct boss?**

17 A. I have -- yes, one.

18 **Q. Okay. And that's A.J. Loll?**

19 A. Yes.

20 **Q. Who's A.J. Loll's supervisor?**

21 A. Lee Stratford (phonetic).

22 **Q. What's his title?**

23 MR. ELLISON: Her.

24 THE WITNESS: Her title.

25

1 BY MS. ATCHANAHA:

2 Q. Sorry, her title.

3 A. She's a senior SVP.

4 Q. And who is her supervisor?

5 A. Jim McDermott (phonetic)?

6 Q. Do you know what his title is?

7 A. I believe he's executive vice president,
8 but....

9 Q. Sure.

10 A. I'm not a hundred percent sure of that.

11 Q. Okay. What kind of training have you received
12 from your current job responsibilities as the default
13 legal analyst?

14 A. Could you rephrase the question?

15 Q. Have you received any training?

16 A. Yes.

17 Q. Okay. And what did that training consist of?

18 A. I received training on the overview of the
19 company, the systems, and then ongoing training on
20 changing or changes in litigation trends or state
21 requirements.

22 Q. And who provides that training?

23 A. Several different entities.

24 Q. Can you elaborate on what those entities are?

25 A. Attorneys, the learning and development

1 department, my boss.

2 Q. Okay. And is this a formal training where
3 maybe it's like in a classroom setting?

4 A. There has been, yes.

5 Q. Okay. And who provided that training that was
6 in the classroom setting?

7 A. The learning and development department.

8 Q. Is that -- when do you receive that type of
9 training?

10 A. I received that when I initially came on board
11 at Nationstar.

12 Q. How long was that training period?

13 A. A week and a half?

14 Q. Are there written materials from that training?

15 A. I don't know. I don't recall.

16 Q. Okay. Do you remember specifically who the
17 person or people were that were training you in the
18 classroom setting?

19 A. No.

20 Q. And you said you also received training from
21 attorneys --

22 A. Yes.

23 Q. -- is that correct?

24 A. Yes.

25 Q. Are these attorneys that are in-house counsel

1 **for Nationstar, or local counsel?**

2 A. Both.

3 **Q. Okay. Do you know the names of the attorneys**
4 **that you received training from?**

5 A. There's been several.

6 **Q. Can you name them?**

7 A. Well, it's an ongoing process. So I don't know
8 that I could name every attorney that I've spoken with or
9 had training with in the last year.

10 **Q. Can you name the attorneys that you remember**
11 **that you've received training from?**

12 A. No.

13 **Q. So you don't remember a single attorney that**
14 **you received training from?**

15 A. I consider that I'm constantly being trained
16 and learning new things. So I may have a conversation
17 with one attorney who has brought something to my
18 attention, and, therefore, I consider that to be some
19 kind of training. So I really couldn't give you the name
20 or the context of every conversation or training that
21 I've had in the last year and a half.

22 **Q. Okay. Do you receive training in the form of**
23 **role-playing with any of these attorneys?**

24 A. No.

25 **Q. Do you receive any training in the form of**

1 **role-playing with anyone at Nationstar?**

2 A. I haven't, no.

3 **Q. Have you performed any type of training**
4 **specifically on foreclosures in Florida?**

5 A. Yes.

6 **Q. From who did you receive that training?**

7 A. I have received training through our
8 foreclosure department, learning and development, and
9 local counsel.

10 **Q. Who in these departments is providing this**
11 **training?**

12 A. The foreclosure department has -- they have
13 people that put together the training.

14 **Q. Do you know what their titles are?**

15 A. No.

16 **Q. Are they supervisors, are they -- you don't**
17 **know?**

18 A. I don't know.

19 **Q. Okay. Do you have literature from the training**
20 **that you've had on Florida foreclosures?**

21 A. Personally, no.

22 **Q. Did you receive literature at some point?**

23 A. I don't recall.

24 **Q. Do you have signing authority for Nationstar?**

25 A. I do.