

1 that the merger occurred, yes.

2 Q Okay. Where did you review that document?

3 A In our bank records, and I probably maintained
4 a copy of that as well.

5 Q And where in your bank records would you have
6 reviewed that?

7 A I think I would, like, maintain a copy of that
8 in my email as well, probably.

9 Q Okay. And did you work for BAC Home Loans
10 Servicing, LP, at any time?

11 A No.

12 Q Did you work for Countrywide Home Loans
13 Servicing, LP, at any time?

14 A No.

15 Q And your testimony was that the payment
16 records that we looked at in composite Exhibit 1 reflect
17 a payment history dating back to the origination of the
18 loan; is that correct?

19 A Yes, to the origination of the loan, that's
20 correct.

21 Q You received training on the process of
22 updating payment, payment records, from the payment
23 record department in July 2012; is that correct?

24 A No, I didn't state when I received that
25 training.

1 Q Okay. Can you state for the record now when
2 you received that training?

3 A I don't recall.

4 Q Would it have been anytime prior to
5 October 2011?

6 A No.

7 Q Okay. So you received training regarding
8 the -- regarding the operating systems and the bank
9 procedures and policies sometime during or after
10 October 2011; correct?

11 A That's correct.

12 Q So you would not know about the policies and
13 procedures that were in place at the time that these
14 payment records were created; is that correct?

15 A Because the entities are the same, the process
16 was the same at that time as well.

17 Q And how do you know what the process -- the
18 recordkeeping process for Bank of America would have
19 been at in 2007?

20 A Because during the name change -- after the
21 name change and after the merger, Bank of America always
22 retained the same records that Countrywide had at the
23 time of the systems.

24 Q But you don't know the process of inputting
25 that information in 2007, do you?

1 A The process of inputting that information in
2 2007 would have been the process of today.

3 **Q And you know this because you worked at**
4 **Countrywide?**

5 A No. I know that because of the training that
6 I received.

7 **Q So in your training they told you that the**
8 **procedures and the policies that they were training you**
9 **about in 2011 are the same that they used in 2007?**

10 A Well, that the process has remained the same,
11 utilizing the same processing procedure.

12 **Q So in your training that you took in 2011, you**
13 **were informed that the policies and the procedures of**
14 **the servicing agent have been the same since 2007?**

15 A If you're speaking of payment processing?

16 **Q Payment processing, recordkeeping.**

17 A Then those processes have been maintained,
18 yes.

19 **Q Okay. So you know that the process for**
20 **inputting payment history and creating business records**
21 **was the same in 2007 as it is in 2011?**

22 A Well, the information that I've received is
23 that the -- at least as it pertains to payment
24 processing, would be the same process. There may have
25 been changes in other areas that I can't state.

1 mortgage --

2 A I assume so.

3 Q -- that has been recorded? And where was this
4 assignment of mortgage executed?

5 A In Texas, Collin County.

6 Q To backtrack a little bit, what office are you
7 employed out of?

8 A The Plano, Texas, office.

9 Q Okay. Who executed this assignment of
10 mortgage?

11 A It was executed by Carrie Ehinger and Keri
12 Selman.

13 Q Do you know if either Ms. Ehinger or Ms.
14 Selman are employed by Mortgage Electronic Registration
15 Systems, Inc.?

16 A I don't know.

17 Q Okay. Earlier you stated that you received
18 training for your role as assistant vice president in
19 the mortgage resolution department; am I correct? Is
20 that correct?

21 A Yes.

22 Q Okay. And part of your responsibilities as an
23 assistant vice president in that department is to
24 testify at trial; is that correct?

25 A Yes.

1 Q Okay. And you said that that comprises a
2 little under 40 percent of your responsibility?

3 A Yes.

4 Q Okay. And do you receive training to testify
5 as a trial witness?

6 A Yes.

7 Q Okay. And who do you receive that training
8 from?

9 A Management in my department.

10 Q Okay. And when you say management, are you
11 referring to who you identified as your supervisor,
12 Ronald Odeyeme?

13 A I have received training from him.

14 Q Okay. And who else have you received training
15 from?

16 A Previous management.

17 Q Okay. When you say previous management, who
18 are you referring to?

19 A Well, Sheryl would have been involved in
20 training when I was in my other role; training there as
21 well.

22 Q But they didn't train you as far as a -- your
23 role as a trial witness, did they?

24 A No, not my previous -- not before my current
25 position, no.

1 Q Okay. So with respect to training as a trial
2 witness, you received that from Mr. Odeyeme; correct?

3 A He would have provided some training, yes.

4 Q And have you received any training with
5 respect to your role as a trial witness from the
6 attorneys that you work with?

7 A No.

8 Q Okay. And does the training consist of role
9 playing or scenarios, playing out certain scenarios?

10 A There has been some training for that, yes.

11 Q Okay. So you've engaged in role playing as a
12 trial witness?

13 A Yes.

14 Q And are you provided scripts?

15 A I don't know if there are any scripts
16 involved. Maybe a scenario.

17 Q Are you provided literature with respect to
18 your testimony as a trial witness?

19 A I don't have any literature, no.

20 Q So you stated that you engaged in certain --
21 some type of role playing, or playing out certain
22 scenarios when it comes to training as a trial witness;
23 correct?

24 A Maybe initially, yes.

25 Q Okay. And does that consist of you pretending

1 to be the witness and someone pretending to ask you
2 questions with respect to a particular case or a file?

3 A Yes, there would be role playing.

4 Q And are you provided with the responses that
5 you are to give with respect to certain questions?

6 A No.

7 Q And do you get reviewed? Is your performance
8 as a trial witness reviewed?

9 A Yes.

10 Q Who do you receive those reviews from?

11 A From my manager.

12 Q And your manager doesn't attend the trials
13 that you testify in, does he?

14 A No.

15 Q So what does your manager base his review of
16 you as a trial witness on?

17 A I think he gets feedback probably from
18 counsel.

19 Q Are you compensated based on your performance
20 as a trial witness?

21 A No.

22 Q Are you compensated based on the outcome of
23 the trial?

24 A No.

25 Q Would you consider yourself a professional

1 **witness?**

2 A No.

3 **Q How much time approximately did you spend**
4 **reviewing this file in anticipation of being the trial**
5 **witness?**

6 A I couldn't say.

7 **Q Would you say more than two hours?**

8 A Yes.

9 **Q Would you say more than five hours?**

10 A I don't know.

11 **Q Would you say somewhere between three to five**
12 **hours?**

13 A Since it was piecemeal, it's really hard to
14 say.

15 **Q Would you say less than ten hours?**

16 A Yes.

17 **Q And how many -- how many cases are you**
18 **assigned as a trial witness at any given time?**

19 A I don't understand that question.

20 **Q Okay. So at this -- on this day, how many**
21 **cases do you know that you're designated as the trial**
22 **witness for?**

23 A I don't know.

24 **Q Not to testify today but at some point. Would**
25 **you say more than ten cases?**

1 A More than ten.

2 Q **Would you say less than 20?**

3 A Maybe around there.

4 MS. ATCHANAHA: I think I'm done if you would
5 like to do cross.

6 MS. FEVRY: Yes, I have a few questions.

7 CROSS EXAMINATION

8 BY MS. FEVRY:

9 Q **Ms. Woods, did you know you were being deposed**
10 **today? It was set for trial, right?**

11 A I didn't know that I was being deposed today,
12 no.

13 Q **Okay. Earlier you said that Countrywide, and**
14 **then there was a BAC Home Loans and then a Bank of**
15 **America merger; is that correct?**

16 A Yes.

17 Q **Okay. In Exhibit 1 that counsel showed you**
18 **earlier, is Bank of America's insignia listed on top of**
19 **that document?**

20 A Yes, it is.

21 Q **And at the time the merger occurred between**
22 **BAC Home Loans and Countrywide, did BAC Home Loans**
23 **acquire all of the documents?**

24 MS. ATCHANAHA: Objection. She said that there
25 was a name change and then a merger --