

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA

Case No. 2019-CA-00XXXX

DITECH FINANCIAL LLC, F/K/A GREEN
TREE SERVICING, LLC,

Plaintiff,

vs.

DENNIS DOE, et. al.,

Defendants.

_____ /

FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW the Defendant, Dennis Doe, and pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, requests that Plaintiff produce and permit Defendant to inspect and photocopy the documents listed below within the terms prescribed by the Rules of Civil Procedure. Plaintiff may mail true and correct copies of all documents to the attorney for defendant at the below address at the signature line on this document.

DOCUMENTS REQUESTED:

1. Produce all documents relied upon YOU in responding by denial to Defendant Dennis Doe's First Request for Admissions, served concurrently with this request.
2. Produce all documents identified in responding to Defendant Dennis Doe's First Set of Interrogatories propounded concurrently with this request.
3. Produce a payoff letter.
4. Produce a complete transaction history.

5. Produce all invoices for all charges you are seeking to recover. This request is NOT a request for invoices for attorneys' fees or taxes. Instead, this request is for all other charges, such as property inspections, insurance, and any other charge you seek to recoup.
6. Produce the breach letter/notice of default that you intend to rely upon at a motion for summary judgment and/or trial.
7. Produce all case notes, comment notes, comment logs, and screen shots that show the breach letter/notice of default was actually mailed.
8. If a third-party mailed the breach letter/notice of default, produce all case notes, comment notes, comment logs, and screen shots that show the directive to a third party to mail the breach letter/notice of default.
9. Produce all notices you sent to the defendant of force placed insurance policies on the subject property.
10. Produce the latest escrow analysis.
11. Produce all notices of transfer of loan servicing.
12. Produce the document that created the agency relationship between Plaintiff and the owner of the debt.

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing is being furnished this 26th day of September, 2019 pursuant to Rule 2.516 of the Rules of Judicial Administration to:

Alecia Daniel, c/o Robertson, Anschutz & Schneider, 6409 Congress Avenue, Suite 100, Boca Raton, FL 33487 mail@rasflaw.com adaniel@rasflaw.com

/s/ George Gingo
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