

**IN THE CIRCUIT COURT OF THE 18TH JUDICIAL CIRCUIT  
IN AND FOR BREVARD COUNTY, FLORIDA**

U.S. Bank National Association as Legal Title Trustee for Truman 2016 SC6 Title Trust, Case #:05-2022-CA-0XXXXX

Plaintiff,

v.

Betty Doe; Daniel Doe, Sr., et. al.

Defendants,

\_\_\_\_\_ /

**DEFENDANT BETTY Doe'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS TO PLAINTIFF**

Defendant Betty Doe, by and through her undersigned attorney, 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, at 400 Orange Street, Titusville, Florida 32796. In lieu of presenting the documents at the offices of the undersigned, Plaintiff may mail true and correct copies of all documents to the attorney for plaintiff at the above post office address.

DEFINITIONS

- A. The word “documents” as used herein includes all written, typed, printed, or reproduced matter, pictures, drawings, or diagrams of every nature whether inscribed by hand or by some mechanic, electronic, photographic, or other means, and also includes recordings and other means of providing sound reproductions of oral statements and conversations, which are in the possession, custody or control of Plaintiff or its attorneys or any employee, agent, bailee, custodian or representative of either of it.
- B. No demand should be interpreted as an implicit or explicit restriction on any other demand.

- C. If still in existence, original documents should be produced and, if not, any copies in existence should be produced.
- D. All documents are to be produced which are in the possession of Plaintiff, its attorneys, broker, investigators, agents, employees or other representatives.
- E. As used herein, “you” or “your” means Plaintiff, its attorneys, broker, investigators, agents, employees or other representatives.
- F. If you intend to claim any privilege recognized in the law against revealing any information which is requested, or producing any document, or in revealing any document, or in revealing any document, in addition to the foregoing information, state the applicable ones of the following: the date of and participants to any communication; the number of pages of any document, the persons who received such document, the relationship of such person to you, whether such document contains facts, opinions, or both; and state the privilege you intend to claim.

**DOCUMENTS REQUESTED:**

- 1. Any and all promissory note(s).
- 2. Any and all allonges to note(s).
- 3. Any and all mortgage(s).
- 4. Any and all modified mortgage(s).
- 5. Payment history.
- 6. All notices of servicing transfer provided by all servicers who have serviced the subject debt.
- 7. All notices of transfer of ownership of the debt.
- 8. Payoff statement.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been furnished by email this 3rd day of May, 2022 via email pursuant to the Florida Rules of Judicial Administration to Ian Dolan, Diaz, Anselmo & Associates, PA, PO Box 19519, Fort Lauderdale, Florida 33318.

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