

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR BREVARD COUNTY, FLORIDA

WELLS FARGO BANK, N.A. AS TRUSTEE
UNDER THE POOLING AND SERVICING
AGREEMENT RELATING TO IMPAC SECURED
ASSETS CORP., MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2005-2,

Case No.: 05-2009-CA-0XXXX

Plaintiff,

v.

MELISSA A. Doe, ET AL.

Defendants,

DEFENDANT MELISSA Doe'S REQUEST FOR PRODUCTION OF DOCUMENTS

Defendant, Melissa Doe, by and through his undersigned counsel, 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 the offices of the undersigned. Plaintiff may mail true and correct copies of all documents to Defendant's counsel at 400 Orange St., Titusville, FL 32796.

1. Provide copies of all documents identified in the Defendants First Set of Interrogatories served concurrently with this document.
2. Regarding Plaintiffs constructive possession of the original wet ink promissory note, provide all notes, emails, notices, documents, or otherwise which evidence the names and addresses of each of Plaintiff's servicers, agents and/or representatives who had actual physical possession of the original wet ink promissory note and the dates of such actual possession.

3. Regarding Plaintiff's actual possession of the original wet ink promissory note, provide copies of all documents, ledgers, emails, logs, notes, notices, or otherwise which evidence the date Plaintiff received that note.
4. Provide all transfer logs, notes, emails, notices, documents, or otherwise which evidence all physical transfers of the original promissory note while in the constructive custody of the Plaintiff and/or its servicers and/or agents.
5. Provide copies of all assignments of note.
6. Provide copies of the entire payment history for the life of this loan, including a break down of all late charges.
7. Provide copies of the default letters and/or breach letters Plaintiff intends to rely upon at trial.

/s/ George M. Gingo
George M. Gingo, FBN 879533
400 Orange Street
Titusville, FL 32796
Telephone: (321) 223-1831
GEORGEGINGO@GMAIL.COM

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing is being furnished by this 25th day of August, 2014 via email pursuant to the Florida Rules of Judicial Administration to

Brock and Scott, 1501 N.W. 49th Street, Suite 200, Fort Lauderdale, FL 33309 via email at stephen.wilson@brockandscott.com FLCourtDoes@brockandscott.com; and to Greenspoon Marder P.A., 100 West Cypress Creek Road, Suite 700, Fort Lauderdale, FL 33309.

/s/ George M. Gingo
George M. Gingo, FBN 879533