

<p style="text-align: right;">Page 1</p> <p>1 UNITED STATES DISTRICT COURT 2 WESTERN DISTRICT OF WASHINGTON 3 AT SEATTLE</p> <hr/> <p>5 In Re: Case No. 07-13346-KAO 6 Steven C. Bateman and 7 Virginia T. Lee, 8 Debtors.</p> <hr/> <p>10 Edmund J. Wood, solely in his capacity as 11 Chapter 7 Trustee for the Bankruptcy Estate 12 Of Steven C. Bateman and Virginia T. Lee, 13 Plaintiff, 14 vs. 15 Deutsche Bank National Trust Company as Trustee for 16 Long Beach Mortgage Loan Trust 2006-1; Long Beach 17 Mortgage Company; Washington Mutual Bank, as successor- 18 In-interest to Long Beach Mortgage Company by operation 19 Of law and/or as its attorney in fact; JPMorgan Chase 20 Bank, N.A.; Lender's Processing Services, Inc. ; 21 Platinum Homes, Inc.; Northwest Trustee Services, Inc., 22 Defendants.</p> <hr/> <p>24 DEPOSITION OF AMY L. WEIS 25 Taken January 13, 2010</p>	<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES (Continued): 2 3 ON BEHALF OF DEFENDANT LENDER PROCESSING SERVICES: 4 Richard E. Spoonemore, Esq. 5 SIRIANNI YOUTZ MEIER & SPOONEMORE 6 1100 Millennium Tower 7 719 Second Avenue 8 Seattle, Washington 98104 9 206.223.0303 10 r Spoonemore@sylaw.com 11 and 12 Ross Gloudeman, Esq. 13 LENDER PROCESSING SERVICES 14 Suite 200 15 1270 Northland Drive 16 Mendota Heights, Minnesota 55120 17 651.234.3662 18 ross.gloudeman@lpsdefaultsolutions.com 19 20 21 22 23 NOTE: The original transcript will be filed 24 with the Law Offices of Melissa A. Huelsman pursuant to 25 the applicable Rules of Civil Procedure.</p>
<p style="text-align: right;">Page 2</p> <p>1 The deposition of AMY L. WEIS, taken on 2 January 13, 2010, commencing at 2:44 p.m., taken at 3 1400 Rand Tower, 527 Marquette Avenue, South, 4 Minneapolis, Minnesota, before Cindy L. Schultz, 5 Registered Merit Reporter, Certified Realtime Reporter, 6 Certified LiveNote Reporter, and Notary Public of and 7 for the State of Minnesota.</p> <p>8 A P P E A R A N C E S 9 ON BEHALF OF PLAINTIFF KRISTIN BAIN: 10 Melissa A. Huelsman, Esq. 11 LAW OFFICES OF MELISSA A. HUELSMAN, P.S. 12 Suite 1050 13 705 Second Avenue 14 Seattle, Washington 98104 15 206.447.0103</p> <p>17 TELEPHONICALLY ON BEHALF OF DEUTSCHE BANK NATIONAL 18 TRUST COMPANY AND JPMORGAN CHASE BANK (Wood v. 19 Deutsche Bank National Trust Company, et al.): 20 Josh Rataezky, Esq. 21 DAVIS WRIGHT TREMAINE LLP 22 Suite 2200 23 1201 Third Avenue 24 Seattle, Washington 98101 25 206.622.3150</p>	<p style="text-align: right;">Page 4</p> <p>1 I N D E X 2 3 WITNESS: AMY L. WEIS 4 5 EXAMINATION BY PAGE 6 Mr. Huelsman. 5 7 8 INSTRUCTIONS NOT TO ANSWER 9 None 10 11 DOCUMENT REQUESTS 12 None 13 14 PLAINTIFF MARKED/REFERRED TO 15 No. 20: Assignment of Successor Trustee. . 20, 25 16 LPS WOOD 0151 17 No. 21: Assignment of Deed of Trust. . . 20, 27 18 19 20 21 22 23 24 25</p>

<p style="text-align: right;">Page 5</p> <p>1 AMY L. WEIS, 2 being first duly sworn, was examined and testified as 3 follows: 4 EXAMINATION 5 BY MS. HUELSMAN: 6 Q. Can you state your name for the record, 7 please? 8 A. Amy, A-M-Y, Weis, W-E-I-S. 9 Q. And your business address, please? 10 A. 1270 Northland Drive, Mendota Heights. And 11 I'm not sure of the ZIP code. 12 Q. Okay. 13 And you are currently an employee of LPS? 14 A. I am. 15 Q. And can you please state what your position 16 is? 17 A. I am an assistant vice president. 18 Q. Have you ever had your deposition taken 19 before? 20 A. I have not. 21 Q. Okay. I'm sure Mr. Spoonmore has gone over 22 the rules with you. I'm just going to remind you of a 23 few things before we get started. The first is that 24 you need to articulate your answers clearly so that the 25 court reporter can take them down, and we need to make</p>	<p style="text-align: right;">Page 7</p> <p>1 background, starting after you completed high school. 2 A. I have an associate degree in hospitality 3 management from Johnson and Wales University in 4 Providence, Rhode Island. 5 Q. And can you give me your employment history 6 following high school? 7 A. I was a nanny for--I have to think about the 8 number of years--for probably seven or eight years 9 after high school. I worked for the Marriott in 10 Providence, Rhode Island. I worked for -- I worked for 11 LPS. I'm sure there are little jobs in there that I 12 don't remember. 13 Q. Okay. Do you know when you began working for 14 LPS? 15 A. My hire date was in March. It will be six 16 years this year. 17 Q. So March of 2004? 18 A. Yeah, if the math is correct. 19 Q. Okay. I think so. Okay. 20 And when you began with LPS, what was your 21 role? 22 A. I began as a foreclosure specialist. 23 Q. And can you tell me what that job entails? 24 A. At the time we took information provided by 25 the attorneys and provided it to the clients.</p>
<p style="text-align: right;">Page 6</p> <p>1 sure we don't talk over each other. It's really common 2 in conversation to do that, but for court reporters, it 3 makes their life crazy. So you need to make sure and 4 answer with clearly audible answers and say "yes" or 5 "no." Do not say "mm-hmm" or "un-unh," because that's 6 vague on a deposition transcript. 7 I'm going to ask you questions which you 8 might not know the answer to. I'm going to strongly 9 encourage you not to guess at an answer. If you don't 10 know, "I don't know" is a perfectly acceptable answer. 11 If, however, I ask you to make your best estimate and 12 you can, then that's different than guessing, and I 13 want you to do so. 14 I'm not here to trick you into answering 15 questions any particular way, I just want your 16 truthful, best, and most accurate testimony. So if you 17 don't understand my question, tell me, and I'll ask it 18 again. I don't want you to -- You know, if you answer 19 a question and you didn't understand what I was asking, 20 that leads to confusion and misinformation for both of 21 us. So feel free to make me ask the question again if 22 you don't understand it. Okay? 23 A. Okay. 24 Q. All right. 25 Can you please give me your educational</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. And which clients are those? 2 A. At the time I think it was Bank of America, 3 Wilshire, and a few -- Those are the two that I 4 remember. 5 Q. So, I'm sorry, and I meant, actually, was it 6 the clients in the attorney network or the clients in 7 the lender servicer side of the business? 8 A. It was the banks that had the -- that were -- 9 that had the foreclosures. 10 Q. Okay. And when you use the phrase "banks," 11 you're also including servicers and lenders that 12 weren't banks; is that correct? 13 A. I don't think I understand the question. 14 Q. Okay. You used the word "banks" were 15 initiating the foreclosure. So when you used that 16 word, did you always -- did you mean all you ever 17 worked with was true banks, or were you also working 18 with other lenders and servicers? 19 A. We were working for -- we were working with 20 anyone who was using our system. 21 Q. Okay. 22 A. So I wouldn't be able to say -- I guess I'd 23 have to really think back about it and go back to who 24 was in the network at the time. 25 Q. Okay. All right. And were you communicating</p>

<p style="text-align: right;">Page 9</p> <p>1 at all with the attorneys that were handling the 2 foreclosure? 3 A. Yes. 4 Q. And what were you communicating with them 5 about? 6 A. Things that were happening on their loans -- 7 their individual loans. 8 Q. The loans that they were foreclosing? 9 A. Mm-hmm. Correct. 10 Q. Okay. All right. And any other job duties 11 that you had in that role? 12 A. That was the primary job. 13 Q. Okay. And how long did you stay in that job? 14 A. I think I was there about a year and a 15 half -- 16 Q. Okay. 17 A. -- in that role. 18 Q. Okay. And then did you take on a new job at 19 LPS? 20 A. I was promoted to a lead position in the same 21 department. 22 Q. Okay. And so did you have a different title? 23 A. My title was lead. 24 Q. Okay. In the foreclosure department? 25 A. Correct.</p>	<p style="text-align: right;">Page 11</p> <p>1 A. I think at that time I had eight to ten 2 associates. 3 Q. Okay. And how long did you stay in that 4 role? 5 A. About eight months. 6 Q. And what was your next job at LPS? 7 A. And then I was promoted to supervisor in the 8 special assets department. 9 Q. And what are special assets? 10 A. In special assets, our goal is to focus on 11 the communication directly related to problems on files 12 to make sure that the information is going back and 13 forth between the client and the attorney so that if 14 there are any questions, we can help route out that 15 information. 16 Q. So the special asset department is like the 17 problem child department? 18 A. Correct. 19 Q. Okay. So does it handle foreclosures as well 20 as bankruptcy files, or . . . 21 A. Special assets handles mainly foreclosure, 22 very small amount of bankruptcy, not really much to 23 speak of. 24 Q. Okay. So when something goes wrong and the 25 lender or servicer is not effectively communicating</p>
<p style="text-align: right;">Page 10</p> <p>1 Q. Okay. And what were your job duties in that 2 role? 3 A. To assist the associates who needed -- who 4 had questions, who didn't understand things that were 5 going on. If I needed to call firms to confirm 6 information or ask questions to support the information 7 going back and forth. Just line of communication. 8 Q. And so in that role you were also 9 communicating with banks and/or servicers or lenders as 10 well as attorneys handling the foreclosure? 11 A. Sometimes. The primary role was really 12 working with the attorney firms to gather information. 13 Q. Okay. But the initial referral to initiate 14 the foreclosure came from the banks, lenders, or 15 servicers, correct? 16 A. In that particular role, I wasn't involved in 17 the referral process -- 18 Q. Okay. So -- 19 A. -- just within the communication. 20 Q. Okay. So it already existed, it was in the 21 system, and now your job is to help make this process 22 go smoothly? 23 A. Correct. 24 Q. Okay. All right. And how many employees did 25 you manage?</p>	<p style="text-align: right;">Page 12</p> <p>1 with the attorney out of the attorney network, the file 2 gets transferred to special assets, and you guys are 3 going to be the handlers; is that correct? 4 A. When the attorney finds a problem on the 5 file, they're going to notify -- they're going to put 6 that into our system, and we're going to support the 7 processes and the way the information flows through the 8 system. 9 Q. And what kind of problems would the attorneys 10 have to identify before they got to the special assets 11 department? 12 A. They identify things like title problems, 13 something didn't go right, they need to file a title 14 claim. That's our primary information. Or they might 15 need additional fees, more money to handle something 16 that's outside of the foreclosure action, and they'll 17 ask for that kind of information -- they'll ask for 18 that kind of -- of item -- 19 Q. Okay. 20 A. -- to say stuff. 21 Q. Okay. 22 So let's take those two categories. So in 23 the event that they need to ask for more money because 24 it's gone outside, I think you said, the scope of the 25 foreclosure, that request is made through LPS; is that</p>

<p style="text-align: right;">Page 13</p> <p>1 correct?</p> <p>2 A. The request is made into the system --</p> <p>3 Q. Okay.</p> <p>4 A. -- and our associates make sure that all of</p> <p>5 the detailed information is available so the client can</p> <p>6 make an educated decision.</p> <p>7 Q. So, for instance, there's a foreclosure in</p> <p>8 process, somebody files a lawsuit and tries to stop the</p> <p>9 foreclosure, so there might need to be additional work</p> <p>10 done, is that the kind of thing you're talking about?</p> <p>11 A. No.</p> <p>12 Q. Oh, okay.</p> <p>13 A. That can happen; not in the area that I work</p> <p>14 in.</p> <p>15 Q. Oh, okay.</p> <p>16 A. What generally happens is the foreclosure is</p> <p>17 proceeding along and they have to do additional</p> <p>18 service, as an example --</p> <p>19 Q. Oh, okay.</p> <p>20 A. -- because they found somebody had passed</p> <p>21 away and they have to serve the heirs, and so the</p> <p>22 attorney would like additional money to do that work.</p> <p>23 And so they funnel that request through the system to</p> <p>24 get to the client.</p> <p>25 Q. And then the other function of the department</p>	<p style="text-align: right;">Page 15</p> <p>1 A. Correct.</p> <p>2 Q. Okay. But do special assets also get</p> <p>3 involved in execution of documents in order to clear up</p> <p>4 title?</p> <p>5 A. Our department does not get involved in the</p> <p>6 execution. If the attorney says they need a document</p> <p>7 executed, our associates will see if they've raised the</p> <p>8 proper processes or ask -- or requested those things to</p> <p>9 be executed and will kind of watch what's going on</p> <p>10 until they can move to the next level of cure.</p> <p>11 Q. Okay. So that would be, like, an Assignment</p> <p>12 of Deed of Trust or something like that?</p> <p>13 A. It just depends on what they need to cure the</p> <p>14 problem.</p> <p>15 Q. Could it be an assignment document?</p> <p>16 A. When -- If the problem is simply an</p> <p>17 assignment is needed, the attorney would not raise that</p> <p>18 as a title problem.</p> <p>19 Q. Okay. It needs to be something more complex</p> <p>20 or more important than that?</p> <p>21 A. Well, that's important, but, yes, it has to</p> <p>22 be more complex to raise our processes.</p> <p>23 Q. All right. For it to be in the special</p> <p>24 assets department?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 14</p> <p>1 is -- my mind just went blank, and I didn't write it</p> <p>2 down. What is the other function of the department,</p> <p>3 again?</p> <p>4 A. The -- You're talking about the title</p> <p>5 problems?</p> <p>6 Q. Yes. Thank you. Sorry. I was listening to</p> <p>7 you and not typing, taking notes. Go ahead, title</p> <p>8 problems.</p> <p>9 A. The attorney will notice the system of</p> <p>10 problems, and our associates will make sure all of the</p> <p>11 information is there. If the attorney believes</p> <p>12 there's -- you know, if they tell us in the system that</p> <p>13 there's a document that they received telling us about</p> <p>14 the problem, our associates will make sure that the</p> <p>15 document's been uploaded. If it hasn't, they'll go</p> <p>16 back and they'll ask them to do so just to make sure</p> <p>17 the system's maintained.</p> <p>18 Q. Okay. And I believe when you first told me</p> <p>19 about this--my memory has come back--you said it has to</p> <p>20 do with making title claims; is that correct?</p> <p>21 A. There are times where the attorney has to</p> <p>22 file a title claim to make sure the interest of the</p> <p>23 client is protected.</p> <p>24 Q. So that's actually making a claim with the</p> <p>25 title insurance company?</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. If it's just your run-of-the-mill Assignment</p> <p>2 of Deed of Trust, that stays in the regular process?</p> <p>3 A. There are other processes for that, correct,</p> <p>4 that are not handled in our department.</p> <p>5 Q. So that's in the customer support department?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. All right. And I actually have to</p> <p>8 say, I didn't intend to ask her -- intend to ask her</p> <p>9 this because we didn't talk about it, but I thought I</p> <p>10 would ask her about that letter regarding the title</p> <p>11 insurance. She said that. . .</p> <p>12 MR. SPOONEMORE: If we can go off the</p> <p>13 record, I can explain to you something.</p> <p>14 MS. HUELSMAN: We can go off the record.</p> <p>15 (A discussion was had off the record.)</p> <p>16 BY MS. HUELSMAN:</p> <p>17 Q. So is that your current role, is supervisor</p> <p>18 on the special assets department?</p> <p>19 A. My current role is as an assistant vice</p> <p>20 president.</p> <p>21 Q. Okay. And what do you do in your job as</p> <p>22 assistant vice president?</p> <p>23 A. I work with the attorneys if they have</p> <p>24 questions on how to document the system.</p> <p>25 Q. What do you mean by that?</p>

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<p>1 A. Sometimes when a firm comes on or they've 2 been -- they get new associates, they'll wonder what 3 the best button is to click in the system. We support 4 the technology. And so we'll go in and say, This would 5 be the right thing to choose if you have this problem 6 in the system. So we're directing them how to 7 effectively communicate within Desktop.</p> <p>8 Q. So it's kind of a training role or mentoring? 9 A. It can be sometimes.</p> <p>10 Q. Okay. And, I'm sorry, what department is 11 that? 12 A. Special assets.</p> <p>13 Q. Oh, so it's still special assets? 14 A. Correct.</p> <p>15 Q. Oh, okay. So that's another function that 16 the special assets department performs? 17 A. Depending on the level, and to work with the 18 attorneys to help them, and then sometimes get my 19 manager involved to help them if they need it.</p> <p>20 Q. Okay. 21 I'm sorry, you were starting to tell me the 22 other tasks that you performed. 23 A. I also work with the clients, if they have 24 any questions in the system, creating processes that 25 will help them get the information the best way and the</p>	<p>1 A. I have gone to a couple of our clients and 2 helped them to understand how to read the system, yes.</p> <p>3 Q. And how many employees do you supervise as an 4 assistant VP? 5 A. I think I have 85 right now.</p> <p>6 Q. Okay. And those are all in the special 7 assets department? 8 A. Correct.</p> <p>9 Q. Okay. And those employees perform the 10 functions that you performed previously and described 11 to me a few minutes ago; is that correct? 12 A. As a supervisor?</p> <p>13 Q. Yes. 14 A. As a supervisor, I did higher-level work. 15 The associates --</p> <p>16 Q. Okay. 17 A. -- under me perform low-level work, working 18 between the attorneys and the clients.</p> <p>19 Q. Okay. But it still was limited to the issues 20 that you described to me as being handled by the 21 special assets department, correct? 22 A. Correct.</p> <p>23 Q. Okay. All right. And you also have signing 24 authority to sign on behalf of some banks and lenders 25 and servicers; is that correct?</p>
<p>1 smoothest way possible, work on creating reports based 2 on information in the system so that the clients can 3 gather data in a timely manner, things like that.</p> <p>4 Q. Okay. So it sounds like you have a lot of 5 client interaction? 6 A. I do.</p> <p>7 Q. And is it -- it seems -- What I'm gathering 8 from what you're saying is, it seems to be most of that 9 is with the attorneys in the attorney network? 10 A. Correct.</p> <p>11 Q. Do you also work at all with the lenders or 12 servicers? 13 A. As an example?</p> <p>14 Q. I don't know. It's your job. 15 A. I mean, I work with the banks that have -- 16 that have the foreclosures that they assign to the 17 attorneys --</p> <p>18 Q. Okay. 19 A. -- so those are the two parties.</p> <p>20 Q. Okay. So you're communicating directly, 21 then, with also the lenders and servicers, correct? 22 A. Correct.</p> <p>23 Q. Okay. And you've performed -- do you perform 24 any of the training or mentoring that you were talking 25 about a few minutes ago for their employees as well?</p>	<p>1 A. I do.</p> <p>2 Q. Okay. And when is it that you get involved 3 to sign documents on behalf of somebody? 4 A. When the department that handles the 5 documents bring them over to me, I sign them.</p> <p>6 Q. Oh, okay. So it's not because the file is in 7 the special assets department, per se -- 8 A. Correct.</p> <p>9 Q. -- it can be just for some reason somebody 10 else needs you to sign it from some other department? 11 A. Correct.</p> <p>12 Q. Okay. Do you know why you were designated as 13 a signer, given that you're not in those departments? 14 A. I don't know.</p> <p>15 Q. Okay. 16 (Plaintiff Exhibit Nos. 20-21 were 17 marked.) 18 Q. Have you ever seen either one of those 19 documents before? 20 A. I saw the Appointment of Successor Trustee 21 yesterday when we were reviewing it.</p> <p>22 Q. Okay. And is that your signature on the 23 document? 24 A. It is.</p> <p>25 Q. Okay. So you saw it when you signed it also?</p>

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<p>1 A. I'm assuming.</p> <p>2 Q. Okay. You just don't remember it?</p> <p>3 A. I don't remember --</p> <p>4 Q. Okay.</p> <p>5 A. -- signing it.</p> <p>6 Q. Sure.</p> <p>7 Do you know how often you're asked to sign</p> <p>8 documents? Can you give me, like, a weekly average or</p> <p>9 daily, whichever is easier?</p> <p>10 A. I sign almost every day I'm in the office, so</p> <p>11 it just depends on if I'm in the office that day.</p> <p>12 Q. Okay. And do you about how many, on average,</p> <p>13 you sign a day?</p> <p>14 A. I don't.</p> <p>15 Q. Can you give me your best estimate?</p> <p>16 A. Probably five to ten.</p> <p>17 Q. Okay. Kind of a standard day is five to ten?</p> <p>18 A. Right now five to ten is about standard.</p> <p>19 Q. Okay. And can you describe the process by</p> <p>20 which you engage in the signing?</p> <p>21 A. The department that prepares the documents to</p> <p>22 be signed brings them over to me and hand them over to</p> <p>23 me, and I review them, make sure the client -- I have a</p> <p>24 book that tells me who I'm assigned -- or who I'm</p> <p>25 authorized to sign for, double-check that that client</p>	<p>1 A. No. We sat on the same floor.</p> <p>2 Q. Ah. Okay.</p> <p>3 A. So in the same building, on the same floor.</p> <p>4 Q. So is it a big, giant room with lots of</p> <p>5 people with desks in it, or is it individualized</p> <p>6 offices?</p> <p>7 A. It's a large space with desks --</p> <p>8 Q. Okay. So you --</p> <p>9 A. -- or groups.</p> <p>10 Q. Okay. So you and Ms. Freeman would have sat</p> <p>11 in cubes in the same large area?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. And when you sign documents, do you do</p> <p>14 so in the physical presence of a notary?</p> <p>15 A. The notaries are there, so I would say yes.</p> <p>16 Q. Okay. But when you're signing -- Are you</p> <p>17 doing the signing at your desk typically?</p> <p>18 A. I am.</p> <p>19 Q. Okay. Is there a notary in front of your</p> <p>20 desk watching you sign when you sign?</p> <p>21 A. I don't know if the -- When I sign, the</p> <p>22 people that are bringing me the documents, I'm not sure</p> <p>23 if they're the notary. So I couldn't say yes or no.</p> <p>24 Q. When they bring them to you, do they usually</p> <p>25 bring them to you and stand there and wait for you to</p>
<p>1 and I match, and then I sign the document.</p> <p>2 Q. Okay. So do you look at the document to make</p> <p>3 certain that the information in it is correct or</p> <p>4 double-check it against anything else?</p> <p>5 A. We have a department that runs all of that</p> <p>6 information, does all the checking. So what I'm really</p> <p>7 checking for is just to make sure I have the authority</p> <p>8 to sign it by the client. So I don't -- that -- that's</p> <p>9 where the check goes. I trust that the department that</p> <p>10 creates -- that puts them together has run through all</p> <p>11 the checks.</p> <p>12 Q. Okay. And is Jacquelyn Freeman also employed</p> <p>13 with LPS?</p> <p>14 A. She's not at this time.</p> <p>15 Q. Was she when you signed this document?</p> <p>16 A. She was.</p> <p>17 Q. And do you know what her role was?</p> <p>18 A. She worked in the documents execution</p> <p>19 department.</p> <p>20 Q. Which is separate from the special assets</p> <p>21 department --</p> <p>22 A. Yes.</p> <p>23 Q. -- is that correct? Okay.</p> <p>24 And was her office physically separate from</p> <p>25 your office?</p>	<p>1 sign them?</p> <p>2 A. Yes.</p> <p>3 Q. And you don't know if that -- on -- Obviously</p> <p>4 we're speaking about a general process. You don't know</p> <p>5 if that person is the notary or not?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. Do you ever sign a notary logbook?</p> <p>8 A. I'm not sure what that is.</p> <p>9 Q. Okay.</p> <p>10 Do you ever keep track of what documents you</p> <p>11 sign on any particular day through any computer system</p> <p>12 or anywhere else?</p> <p>13 A. I do not track that. It is tracked for our</p> <p>14 system, but I don't track it.</p> <p>15 Q. Okay. Do you recall ever signing documents</p> <p>16 in front of Jacquelyn Freeman?</p> <p>17 A. I do.</p> <p>18 Q. Okay. You just don't know when in</p> <p>19 particular? You don't remember this one in particular?</p> <p>20 A. Correct.</p> <p>21 Q. Okay. Was Jacquelyn one of the people who</p> <p>22 would bring you documents to sign?</p> <p>23 A. She did.</p> <p>24 Q. Okay. Do you know who else does that on a</p> <p>25 fairly regular basis for you?</p>

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<p>1 A. There are a number of people.</p> <p>2 Q. Okay.</p> <p>3 A. So I hate to say this, but I don't know</p> <p>4 everybody's name, because there's a lot of people.</p> <p>5 Q. Yeah, I understand. Okay.</p> <p>6 So I want to describe for you -- I'm sorry.</p> <p>7 I want to go through this with specificity for you. So</p> <p>8 this document, the Appointment of Successor Trustee</p> <p>9 document that we're looking at that bears your</p> <p>10 signature, it indicates that you are signing as an</p> <p>11 assistant vice president, and it says it's for Deutsche</p> <p>12 Bank National Trust Company, as Trustee for Long Beach</p> <p>13 Mortgage Loan Trust 2006-1, by Washington Mutual Bank,</p> <p>14 as Successor in Interest to Long Beach Mortgage</p> <p>15 Company, its attorney in fact. Do you see that?</p> <p>16 A. I do.</p> <p>17 Q. Okay. So can you tell me on whose behalf</p> <p>18 you're signing this document? Is it Deutsche Bank or</p> <p>19 Washington Mutual?</p> <p>20 A. Washington Mutual.</p> <p>21 Q. Okay. And that's what it says down below</p> <p>22 where Ms. Freeman filled it in; is that correct?</p> <p>23 Somebody filled it in. Washington Mutual Bank?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. And -- well, actually I should ask, is</p>	<p>1 A. Correct.</p> <p>2 Q. And this is an Appointment of Successor</p> <p>3 Trustee document. Are you also authorized to sign</p> <p>4 Assignment of Deed of Trust documents for Washington</p> <p>5 Mutual?</p> <p>6 A. I don't know.</p> <p>7 Q. So you, basically, just are to look at your</p> <p>8 list every time and see if that's --</p> <p>9 A. Correct.</p> <p>10 Q. -- listed? Okay.</p> <p>11 And on your list does it indicate just the</p> <p>12 name of the lender entity, or does it also have</p> <p>13 identification of particular documents that you can</p> <p>14 sign or not sign?</p> <p>15 A. I don't know. I'd have to look at it.</p> <p>16 Q. Okay. All right. I think that that is the</p> <p>17 extent of my questions for you.</p> <p>18 MR. SPOONEMORE: Okay. Are you done?</p> <p>19 MS. HUELSMAN: Well, actually, no. Let me</p> <p>20 just ask her about Exhibit 21, just in case.</p> <p>21 Q. So take a look at Exhibit 21. And I'm</p> <p>22 assuming that is not your signature since you are not</p> <p>23 Peter Read, correct?</p> <p>24 A. I am not.</p> <p>25 Q. Okay.</p>
<p>1 that your writing in the certification section?</p> <p>2 A. No.</p> <p>3 Q. Do you normally fill out that section?</p> <p>4 A. I do not.</p> <p>5 Q. Okay. And do you have any idea why</p> <p>6 Ms. Freeman would have dated the signature block as</p> <p>7 May 23, 2003?</p> <p>8 A. She made an error. I believe it was just</p> <p>9 human error.</p> <p>10 Q. Okay. Because you didn't sign this in 2003,</p> <p>11 correct?</p> <p>12 A. No.</p> <p>13 Q. Because you weren't an employee of LPS in</p> <p>14 2003, right?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. And then do you know what you would</p> <p>17 have done with this document once you signed it?</p> <p>18 A. I would hand it back to the person who</p> <p>19 brought it to me, and they would take it back to where</p> <p>20 they had to do whatever they needed to do with it next.</p> <p>21 Q. And you don't have any further involvement</p> <p>22 with it --</p> <p>23 A. No.</p> <p>24 Q. -- involvement with this document, or ones</p> <p>25 like it, after you've signed it?</p>	<p>1 A. I have met him.</p> <p>2 Q. Do you recall ever seeing this document in</p> <p>3 conjunction with your signing of the Appointment of</p> <p>4 Successor Trustee?</p> <p>5 A. No.</p> <p>6 Q. Okay. And Matthew Banaszewski, the notary,</p> <p>7 is he still employed with LPS?</p> <p>8 A. I don't know.</p> <p>9 Q. You don't know. He's one of the people you</p> <p>10 don't know?</p> <p>11 A. Yeah.</p> <p>12 MS. HUELSMAN: Okay. All right. Thank</p> <p>13 you.</p> <p>14 MR. SPOONEMORE: Thanks. We'll read and</p> <p>15 sign. Thank you.</p> <p>16</p> <p>17 (The deposition was terminated at 3:14 p.m.)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

1 STATE OF MINNESOTA)
2 COUNTY OF HENNEPIN) : ss CERTIFICATE

3
4 I, Cindy L. Schultz, RMR, CRR, CLR, a notary public in
5 and for the County of Hennepin, certify that I reported
6 the deposition of AMY L. WEIS, who was first duly sworn
7 by me, having been taken on January 13, 2010, at 1400
8 Rand Tower, 527 Marquette Avenue, South, Minneapolis,
9 Minnesota;

10 I further certify that I am not a relative or employee
11 or attorney or counsel of any of the parties or a
12 relative or employee of such attorney or counsel;

13 That I am not financially interested in the action and
14 have no contract with the parties, attorneys, or
15 persons with an interest in the action that affects or
16 has a substantial tendency to affect my impartiality;
17 that all parties who ordered copies have been charged
18 at the same rate for such copies;

19 That the right to read and sign the deposition by the
20 Witness was not waived.

21 IN WITNESS WHEREOF, I have hereunto set my hand and
22 affixed my seal of office at Minneapolis, Minnesota,
23 this 20th day of January 2010.

24
25

Cindy L. Schultz, RMR, CRR, CLR
My commission expires 1/31/2010