

work product or contain attorney/client communications or that are otherwise privileged documents. Inadvertent production of any such document shall not constitute a waiver or any privilege or any other grounds for objecting to discovery with respect to such document or any other document, or with respect to the subject matter thereof or the information contained therein, and shall not waive the Plaintiff's right to object to the use of any such document or the information contained therein during any subsequent proceeding.

10. The Plaintiff objects to the Request to the extent it seeks documents that are unavailable or are not in the Plaintiff's possession, custody or control on the grounds that they exceed the permissible scope of discovery under the rules of civil procedure.

11. The general objections set forth above are hereby incorporated into the responses set forth below, which are made without waiver of any of the general objections.

RESPONSES

Plaintiff will produce a copy of the original Note.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S. mail on this 4<sup>th</sup> day of November, 2009 to [REDACTED] and [REDACTED]  
[REDACTED]

GREENSPOON MARDER, P.A.  
Counsel for the Plaintiff  
100 West Cypress Creek Road, Suite 700  
Fort Lauderdale, Florida 33309  
954.491.1120 (Telephone)  
954.343-6974 (Facsimile)

By:   
EVAN S. GLASSER  
Florida Bar No. 0643777

- (h) Examination of Pleadings of opposing counsel, where filed;
- (i) Preparation of Motion for Summary Final Judgment, Affidavit of Indebtedness, Affidavits of Attorneys' Fees, Notice of Hearing, Summary Final Judgment, and Notice of Sale;
- (j) Travel to courthouse and attend hearings; and
- (k) Prepare for foreclosure sale.

4. In addition to the above-referenced services, undersigned was also required to engage in litigation with counsel for the Defendant, which required additional legal fees and costs. Said time is reflected below.

5. The hourly rate charged by GREENSPOON MARDER, P.A. for representing mortgagees in foreclosure actions ranges from \$125.00 to \$175.00 per hour.

6. The undersigned has an agreement with the Plaintiff regarding payment of attorney's fees. For uncontested cases, the agreed upon fee is \$1,300.00

7. The undersigned has agreed to charge an hourly fee of \$125.00 per hour for services related to the contested issues. In this particular case, the file is contested and Plaintiff's attorney has performed additional services and billed a total amount of \$250.00.

8. Affiant certifies that there are no reasons for either reduction or enhancement of the fee pursuant to Florida Patient's Compensation Fund v. Rowe, 472 So. 2d 1145 (Fla.1985).

FURTHER AFFIANT SAYETH NAUGHT.

*E. G.*

EVAN S. GLASSER  
 FLORIDA BAR # 0643777  
 GREENSPOON MARDER, P.A.  
 Trade Centre South, Suite 700  
 100 West Cypress Creek Road  
 Fort Lauderdale, FL 33309  
 Attorney for Plaintiff

SWORN TO AND SUBSCRIBED before me this 10<sup>th</sup> day of November, 2009 by EVAN S. GLASSER, who took an oath and is personally known to me.

NOTARY PUBLIC-STATE OF FLORIDA  
 Raymond O'Brien Denny  
 Commission # DD725248  
 Expires: OCT. 15, 2011  
 BONDED THROUGH ATLANTIC BONDING CO., INC.

*[Signature]*  
 NOTARY PUBLIC, STATE OF FLORIDA  
 My Commission expires:  
 (Notary Seal)

CLASSIC HOME LENDING, INC., A TEXAS CORPORATION  
C/O NRAI SERVICES, INC.  
2731 EXECUTIVE PARK DR., STE 4  
WESTON, FL 33331

UNKNOWN TENANT [REDACTED]  
[REDACTED]  
[REDACTED]



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EVAN S. GLASSER  
FLORIDA BAR NO.: 0643777  
GREENSPOON MARDER, P.A.  
TRADE CENTRE SOUTH, SUITE 700  
100 WEST CYPRESS CREEK ROAD  
FORT LAUDERDALE, FL 33309  
Telephone: (954)491-1120  
Hearing Line: (888)491-1120  
Facsimile: (954)343-6974  
Attorneys for Plaintiff

This law firm may be deemed a "debt collector" under the Fair Debt Collections Practices Act. Any information obtained will be used for the purpose of collecting a debt.

[REDACTED]