

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

BRUCE CRAIGIE, an individual, and
BARBARA CRAIGIE, an individual,

Plaintiffs,

v.

NATIONSTAR MORTGAGE, LLC, a
limited liability company, and JOHN DOES
1-5, unnamed individuals,

Defendants.

Case No. 1:15-cv-441

Hon. Janet T. Neff

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PLAINTIFFS' FOURTH DISCOVERY REQUESTS TO DEFENDANT
NATIONSTAR MORTGAGE, LLC

Plaintiffs Bruce and Barbara Craigie, by and through their attorneys, request that Defendant Nationstar Mortgage, LLC (“Nationstar”) provide responses to the following Requests for Admission, Interrogatories and Requests for Production of Documents within 30 days pursuant to Federal Rules of Civil Procedure 26, 33, 34 and 36.

DEFINITIONS AND INSTRUCTIONS

Unless otherwise stated, the following are applicable to all Requests for Production of Documents, Interrogatories and Requests for Admission:

A. “You” and “Your” shall mean Nationstar and the agents, employees and attorneys, past and present, of Nationstar.

B. The term “Document” as used herein is intended to have the broadest possible definition under Federal Rule of Civil Procedure 34 and should be read to include, but not be limited to: all writings or visible images of any kind, whether in final or draft form, now or at any time in Your possession, custody or control, and including all copies of each document if the copies contain any additional writing or are not identical copies of the original. The term “Document” includes, but is not limited to, letters, invoices, contracts, agreements, receipts, correspondence, electronic mail, memoranda, notes, photographs, diary and calendar entries, records of meetings, minutes or statistical compilations, statements, tape or other audio recordings, summaries or records of telephone calls, summaries or records of meetings or conferences, summaries or records of personal conversations or interviews, records of other conversations or communications, reports, computer programs, electronic data compilations and electronic files.

C. The term “Identify,” when used in reference to documents, means to state the following with respect to each document: (1) its date; (2) the identity of the person(s) who authored it; (3) the identity of the person(s) to whom it was addressed and who are known or believed to

have received copies of it; (4) the form of the document (that is, letter, memorandum, invoice, etc.); (5) its title; (6) its length (in number of pages); (7) the identity of the person(s) whom You know of believe to have a copy or draft of the document; and (8) a description of the subject matter of the document.

D. The term “Lake Drive” shall refer to 1625 Lake Drive, East Grand Rapids, Michigan.

E. The term “Scenic Drive” shall refer to 2985 Scenic Drive, Fruitland Township, Michigan.

F. The term “Modification Requests” shall mean any request or attempt by the Plaintiffs or their agents to secure a modification of either of the Mortgage Loans.

G. The term “Mortgage Loan(s)” shall refer to the Mortgages, Notes and related closing Documents executed in April, 2006 for refinancing of the Lake Drive and the Scenic Drive properties.

H. The term “Foreclosures” shall refer to the process, including procedures leading up to, and following the completion of the sheriff’s sales of the Lake Drive and the Scenic Drive properties.

I. If You decline to answer any Request for Production of Documents on the grounds of burdensomeness, identify the number and nature of documents needed to be searched, the location of the documents, and the number of person hours and costs required to conduct a search of the documents.

J. If You claim a privilege not to answer any Request for Production of Documents, Request for Admission, or Interrogatory, You should identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for such claim.

REQUESTS FOR ADMISSION

1. Admit that You provided remittance reports to Bank of New York Mellon regarding the Lake Drive Mortgage Loan and Scenic Drive Mortgage Loan.

ADMIT OR DENY:

2. Admit that the remittance reports You provided to Bank of New York Mellon regarding the Lake Drive Mortgage Loan referenced "loan number" 57306391.

ADMIT OR DENY:

3. Admit that the remittance reports You provided to Bank of New York Mellon regarding the Scenic Drive Mortgage Loan referenced "loan number" 57307274.

ADMIT OR DENY:

4. Admit that the remittance reports You provided to Bank of New York Mellon regarding the Lake Drive Mortgage Loan indicate whether that Mortgage Loan was modified.

ADMIT OR DENY:

5. Admit that You communicated, directly or indirectly, to Bank of New York Mellon that the Lake Drive Mortgage Loan was modified.

ADMIT OR DENY:

6. Admit that You communicated, directly or indirectly, to Bank of New York Mellon that the Lake Drive Mortgage Loan modification had an effective date of March 25, 2014.

ADMIT OR DENY:

7. Admit that You communicated, directly or indirectly, to Bank of New York Mellon that the modified amount of the Lake Drive Mortgage Loan was \$177,466.94.

ADMIT OR DENY:

8. Admit that You communicated, directly or indirectly, to Bank of New York Mellon that the balance owing on the Lake Drive Mortgage Loan was \$180,400.81 as of March of 2014.

ADMIT OR DENY:

9. Admit that You communicated, directly or indirectly, to Bank of New York Mellon that the balance owing on the Lake Drive Mortgage Loan was \$180,400.81 as of April of 2014.

ADMIT OR DENY:

10. Admit that You communicated, directly or indirectly, to Bank of New York Mellon that the balance owing on the Lake Drive Mortgage Loan was \$180,400.81 as of May of 2014.

ADMIT OR DENY:

11. Admit that You communicated, directly or indirectly, to Bank of New York Mellon that the balance owing on the Lake Drive Mortgage Loan was \$180,400.81 as of January of 2015.

ADMIT OR DENY:

12. Admit that You communicated, directly or indirectly, to Bank of New York Mellon that subsequent to modification, the monthly principal and interest payment on the Lake Drive Mortgage Loan was \$1,016.74.

ADMIT OR DENY:

13. Admit that You communicated, directly or indirectly, to Bank of New York Mellon that the Lake Drive Mortgage Loan was "current," i.e., not in default, as of June of 2016.

ADMIT OR DENY:

14. Admit that You communicated, directly or indirectly, to Bank of New York Mellon that the Lake Drive Mortgage was paid off in the amount of \$180,400.80 on January 25, 2015.

ADMIT OR DENY:

15. Admit that you communicated, directly or indirectly, to the U.S. Department of Treasury that the Lake Drive Mortgage had been modified.

ADMIT OR DENY:

16. Admit that you obtained a payment, directly or indirectly, from the U.S. Department of Treasury in connection with the purported modification of the Lake Drive Mortgage.

ADMIT OR DENY:

INTERROGATORIES

1. To the extent your answer to any of the foregoing Requests for Admission is anything other than an unqualified admission, describe and state with particularity the factual basis for Your denial or failure to admit, and Identify any and all documents which support Your denial or failure to admit.

ANSWER:

2. State the date and amount of any payment(s) received by You, directly or indirectly, from the U.S. Department of Treasury in connection with a purported modification of the Lake Drive Mortgage Loan.

ANSWER:

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce any and all documents identified in response to the foregoing Requests for Admission and Interrogatories.

RESPONSE:

2. Produce any and all remittance reports provided by You to Bank of New York Mellon in connection with the Lake Drive Mortgage Loan.

RESPONSE:

3. Produce any and all remittance reports provided by You to Bank of New York Mellon in connection with the Scenic Drive Mortgage Loan.

RESPONSE:

4. Produce any and all Documents evidencing Your receipt of a payment from the U.S. Department of Treasury in connection with a purported modification of the Lake Drive Mortgage Loan.

RESPONSE:

Dated: August 29, 2016

Respectfully submitted,

/s/Theodore J. Westbrook
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