

IN THE CIRCUIT COURT OF THE 9TH JUDICIAL CIRCUIT IN AND FOR
ORANGE COUNTY, FLORIDA

CASE NUMBER: 08-CA-20351-O

LASALLE BANK NATIONAL ASSOCIATION AS
TRUSTEE FOR FIRST FRANKLIN MORTGAGE
LOAN TRUST 2007—FF2, MORTGAGE LOAN
ASSET-BACKED CERTIFICATES, SERIES
2007-FF2,

Plaintiff,

vs.

MARTHA E. PARRA, et al.,

Defendants,

**DEFENDANT MARTHA E. PARRA'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, the Defendant, MARTHA E. PARRA, by and through the undersigned attorney, pursuant to Rule 1.350, Florida Rules of Civil Procedure, and requests Plaintiff to produce the documents listed herein for inspection and/or copying at the office of the Attorney for Plaintiff, 12934 Deertrace Avenue, Suite A, within the time allowed by law.

IN RESPONSE TO THIS REQUEST FOR PRODUCTION OF DOCUMENTS, PLAINTIFF MAY PROVIDE DEFENDANT WITH COPIES OF THE DOCUMENTS REQUESTED HEREIN.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. Mail to: Eric Michael Nordback, Esq., BUTLER & HOSCH, P.A., 3185 South Conway Road, Suite E, Orlando, FL 32812 this 18th day of September, 2008.


Charles P. Castellon
Florida Bar No.:0574287
12934 Deertrace Avenue, Suite A

FILED IN OFFICE
CIVIL DIVISION
2008 SEP 23 AM 9:26
LYDIA SANDOZ
CLERK - CIRCUIT COURT
ORANGE CO., FL.

Orlando, FL 32837
Tel.: (407) 851-0201
Fax: (407) 847-5618
Attorney for Defendant PARRA

REQUEST NO. 1: All documents in Plaintiff's possession or available to Plaintiff that establish the plaintiff's standing to bring this foreclosure action, including but not limited to:

A. Copies of all assignments, contracts, documents, agreements and other disclosure forms, written communications, notes, memoranda and records concerning the note and mortgage that are the subject of this action, including attorney fee contracts and a history of the assignments from the original lender to Plaintiff that would document the chain of title of the note and mortgage.

B. Copies of all receipts for payments made by or to and/or received by the plaintiff concerning the note and mortgage that are the subject of this foreclosure action.

REQUEST NO. 2: All documents in Plaintiff's possession or available to Plaintiff that establish that the plaintiff is the legal, beneficial or equitable owner of the promissory note that is the subject of this foreclosure action.

REQUEST NO. 3: All documents in Plaintiff's possession or available to Plaintiff that establish that plaintiff is the servicer of the loan that is the subject of this foreclosure action.

REQUEST NO. 4: All documents in Plaintiff's possession or available to Plaintiff that identify what entity or entities are the beneficial owner of the subject promissory note and mortgage that are the subject of this foreclosure action.

REQUEST NO. 5: Copies of any communications and/or documents evidencing instructions and/or directions that the Plaintiff has received concerning the filing of this foreclosure action.

REQUEST NO. 6: Copies of all internal memoranda, instructional or operational memoranda, training materials and any other materials or documents created or distributed by Plaintiff and/or in the plaintiff's possession relating to the filing of the subject foreclosure action by the Plaintiff.

REQUEST NO. 7: Copies of any other communication, notice, records, notes, internal memoranda, or other documents relating to the filing of this foreclosure action by the Plaintiff.

REQUEST NO. 8: All contracts between you and any person or entity responsible for servicing the Mortgage and/or the Note.

REQUEST NO. 9: All documents in Plaintiff's possession or available to Plaintiff that establish what entity, if not the plaintiff, that is the servicer of the loan that is the subject of this foreclosure action.

REQUEST NO. 10: Copies of all billing and accounting records pertaining to the imposition of all fees against the defendant borrower, including servicing and legal fees.

REQUEST NO. 11: Copies of all pooling and servicing agreements pertaining to the subject note and mortgage.