

**IN THE CIRCUIT COURT FOR THE 15TH JUDICIAL CIRCUIT,  
IN AND FOR PALM BEACH COUNTY, FLORIDA**

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE FOR JPMAC  
2007-CH5 - J.P. MORGAN CHASE  
BANK NATIONAL ASSOCIATION,

GENERAL JURISDICTION DIVISION

CASE NO.  
50 2008 CA 018964XXXX MB

Plaintiff,

Division: AW

vs.

ROBERT H. OBRIEN; THE UNKNOWN  
SPOUSE OF ROBERT H. OBRIEN; ANY  
AND ALL UNKNOWN PARTIES  
CLAIMING BY, THROUGH, UNDER,  
AND AGAINST THE HEREIN NAMED  
INDIVIDUAL DEFENDANT(S) WHO  
ARE NOT KNOWN TO BE DEAD OR  
ALIVE, WHETHER SAID UNKNOWN  
PARTIES MAY CLAIM AN INTEREST  
AS SPOUSES, HEIRS, DEVISEES,  
GRANTEES OR OTHER CLAIMANTS;  
CHASE BANK USA, NATIONAL  
ASSOCIATION; TENANT #1, TENANT  
#2, TENANT #3, and TENANT #4 the  
names being fictitious to account for parties  
in possession,

**NOTICE OF TAKING  
DEPOSITION  
(DUCES TECUM)**

Defendants.

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PLEASE TAKE NOTICE that the undersigned attorney will take the deposition (duces tecum) of:

**NAME:** Angela Nolan, Assistant Vice-President J.P. Morgan  
Chase Bank National Association

**DATE:** September 16, 2009

**TIME:** 10:00 a.m.

**PLACE:** Consor & Associates Reporting & Transcription  
1655 Palm Beach Lakes Blvd Suite 500  
West Palm Beach, Florida

upon oral examination before, **CONSOR & ASSOCIATES REPORTING & TRANSCRIPTION**, Notary Public, or any other Notary Public or officer authorized by

law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. The deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Rules of Court or Applicable Statutes.

The Deponent is to have with him or her at the time of the deposition all documents listed in Exhibit A.

IF YOU ARE A PERSON WITH A DISABILITY WHO NEEDS ANY ACCOMMODATION IN ORDER TO PARTICIPATE IN THIS DEPOSITION, YOU MAY REQUEST SUCH ASSISTANCE BY CONTACTING THOMAS E. ICE, 1975 SANSBURYS WAY, SUITE 115, WEST PALM BEACH, FL 33411, TELEPHONE: (561) 793-5658 WITHIN 2 WORKING DAYS OF YOUR RECEIPT OF THIS SUBPOENA; IF YOU ARE HEARING OR VOICE IMPAIRED, CALL 711.

Dated: August 7, 2009.

**ICE LEGAL, P.A.**  
Counsel for Defendants  
1975 Sansburys Way, Suite 104  
West Palm Beach, FL 33411  
Telephone (561)793-5658  
Facsimile (866) 507-9888


By: 

THOMAS E. ICE  
Florida Bar No. 0521655

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by mail this August 7, 2009 to all parties on the attached service list.

**ICE LEGAL, P.A.**  
Counsel for Defendants  
1975 Sansburys Way, Suite 104  
West Palm Beach, FL 33411  
Telephone (561)793-5658  
Facsimile (866) 507-9888

By:   
THOMAS E. ICE  
Florida Bar No. 0521655

**SERVICE LIST**

Joseph Mancilla, Esq.  
Florida Default Law Group, P.L.  
9119 Corporate Lake Dr., Suite 300  
Tampa, FL 33634  
(305) 662-4110  
*Plaintiff's counsel*

**Court Reporter:**  
Conzor & Associates Reporting & Transcription  
1655 Palm Beach Lakes Blvd Suite 500  
West Palm Beach, Florida 33401

**EXHIBIT A**

1. The deponent's most recent *curriculum vitae*.
2. The corporate resolution or other official action of Chase Home Finance, LLC directors making deponent an assistant vice-president of Chase Home Finance, LLC.
3. The corporate resolution or other official action of JP Morgan Chase Bank, N.A., directors making deponent an assistant vice-president of JP Morgan Chase Bank, N.A.
4. The corporate resolution or other official action of Chase Home Finance, LLC directors giving authority to execute the allonge in this case.
5. All documents, computer entries, digital images, electronic correspondence or other written materials instructing deponent to execute the endorsement in blank on the allonge to the promissory note in this case.
6. All documents, computer entries, digital images, electronic correspondence or other written materials disclosing when deponent executed the endorsement in blank on the allonge to the promissory note in this case.
7. All documents, computer entries, digital images, electronic correspondence, requests for release, interoffice mail tracking or other written materials demonstrating the removal of the promissory note from the storage area for purposes of endorsing it in blank on the allonge, or attaching the allonge to the promissory note, and the return of the promissory note and allonge to the storage area.

8. All documents, computer entries, digital images, electronic correspondence or other written materials disclosing the reason deponent was instructed to execute the endorsement in blank on the allonge to the promissory note in this case.
9. All documents, computer entries, digital images, electronic correspondence or other written materials explaining the means (i.e. personal signature, stamp, electronic reproduction of signature, etc.) by which the endorsement was accomplished.
10. All documents, computer entries, digital images, electronic correspondence or other written materials received from JP Morgan Chase Bank, N.A. upon which Plaintiff relied as evidence of:
  - a. The authority of A. Young to endorse the subject promissory note (by way of allonge) on behalf of JP Morgan Chase Bank, N.A.
  - b. The authenticity of the signature of A. Young.
11. All documents, computer entries, digital images, electronic correspondence or other written materials which show the sale of the promissory note to another entity.
12. All documents, computer entries, digital images, electronic correspondence or other written materials which show the current owner of the promissory note.

13. All documents, computer entries, digital images, electronic correspondence or other written materials regarding the “diligent search” for the lost note, as alleged in the original Complaint, including but not limited to any documents cataloging or discussing:

- the locations searched;
- the identity (name, present or last known address and present or last known place of employment) of persons performing the search;
- the identity (name, present or last known address and present or last known place of employment) of all persons queried in the search;
- the expected location of the Promissory Note;
- the last known location of the Promissory Note;
- the date the search began; and
- the total time in person-hours spent searching.