

NOTIFICATION OF DISCOVERY SERVICE

TO: THE CLERK OF COURT:

Address:

This is to notify you that the following discovery papers were served on the Plaintiff's lawyer in the manner and on the date indicated:

First Request for Production of Documents was served by mailing a true and accurate copy of this notice and the below attached request to the plaintiff's lawyer at the address provided on the Summons and Complaint.

STATE OF MAINE

SUPERIOR/DISTRICT COURT (circle one)

Location:

Case No.:

(Name of Investor)	Plaintiff
v.	
(your name)	Defendant

**FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS
(Title to Real Estate Involved)**

Defendant requests, pursuant to Rule 26 of the Maine Rules of Civil Procedure, that Plaintiff produce and permit the Defendant to copy within thirty (30) days, the documents requested herein.

The definition of "document" as used herein means every writing and record of every type and description, including but not limited to, electronic communication (such as "email"), receipts, work orders, contracts, correspondence, memoranda and written notes, reports, invoices, bills, account statements, checks, check registers, books of accounting, computer cards, printouts, tapes, discs and records of all types, minutes of meetings, studies, books, pamphlets, pictures and voice recordings or any other item or record of any type.

1. Please produce a complete copy of the loan file including the inside and outside covers of the file.
2. Please produce a complete copy of the foreclosure file including the inside and outside covers of the file.
3. A complete copy of all documents establishing, reflecting, or indicating ownership of each note and each mortgage such that a chain of ownership can be established for each.
4. A complete copy of the pooling and servicing agreement.
5. A complete copy of all documents evidencing, reflecting, or establishing any and all efforts to engage in foreclosure prevention or workout measures including but not limited to notices, phone logs, correspondence, email records (internal as well external to your operations), memos, and any other document. This request includes any documents reflecting on decisions and the basis of those decisions to grant or deny any assistance or relief.
6. A complete copy of all documents reflecting, evidencing, or establishing in any way the value of the property that is the subject of the mortgage in this case including but not limited to any and all appraisals, broker price opinions, or property inspections.
7. A complete copy of the loan history from the date of inception to the date of this request. This request includes a glossary for all terms and symbols such that the loan history is understandable to any person.
8. A complete copy of any and all contracts or agreements with any person or entity involved in this loan including but not limited to any mortgage broker and/or appraiser.

Date: _____

Name: _____

Address: _____

Phone No.: _____