

COPY

IN THE CIRCUIT COURT OF THE 4th JUDICIAL CIRCUIT
OF FLORIDA, IN AND FOR DUVAL COUNTY

FILED
AUG 08 2008
Kevin Fuller
CLERK CIRCUIT COURT

Deutsche Bank National Trust Company, as
Trustee for the registered holders of GSAMP
Trust 2005-SEA1, Mortgage Pass-Through
Certificates, Series 2005-SEA1

Plaintiff,

-vs.-

Margaret A. Massey, unmarried widow and
surviving Spouse of Edgar E. Massey,
Deceased; Unknown Parties in Possession #1;
Unknown Parties in Possession #2; If living,
and all Unknown Parties claiming by,
through, under and against the above named
Defendant(s) who are not known to be dead
or alive, whether said Unknown Parties may
claim an interest as Spouse, Heirs, Devisees,
Grantees, or Other Claimants

Defendant(s).

Case #: 07 CA 3840 (CV-G)

Division #: CV-G

UNC:

REQUEST FOR ADMISSIONS

PLAINTIFF, Deutsche Bank National Trust Company, as Trustee for the registered holders of GSAMP Trust 2005-SEA1, Mortgage Pass-Through Certificates, Series 2005-SEA1, by and through its undersigned counsel, hereby serves upon the Defendant, MARGARET A. MASSEY, its Request for Admissions and states that the Defendant shall file a written Answer and Objection addressed to the matter contained herein or said matter will be considered admitted pursuant to Florida Rules of Civil Procedure. The Answer to Request for Admissions shall specifically deny the matter set forth or set forth in detail the reason why the answering party cannot truthfully admit or deny the matter. A denial shall fairly meet the substance of the requested Admission and when good faith requires that a party qualify his answer or deny only a part of the matter of which an admission is requested, he shall specify so much of it as true and qualify or deny the remainder.

Further, an answering party may not give lack of information or knowledge as a reason for failure to admit or deny unless he states that he has made reasonable inquiry and that the information known or readily obtainable by him is insufficient to enable him to admit or deny.

1. Please admit that on July 10, 2003, EDGAR E. MASSEY, executed and delivered a Promissory Note in the amount of \$220,500.00, to Key Bank USA.

2. Please admit that the Promissory Note attached as Exhibit "A" and incorporated herein by reference is a true and correct copy of the original note executed by EDGAR E. MASSEY on July 10, 2003.

3. Please admit that EDGAR E. MASSEY's signature appears on the document attached as Exhibit "A" attached hereto and incorporated herein by reference.

4. Please admit that on July 10, 2003, EDGAR E. MASSEY executed and delivered to Key Bank USA, a Mortgage, recorded in Book 11241, Page 1934, of the Public Records of Duval County, Florida.

5. Please admit that the Mortgage attached as Exhibit "B" and incorporated herein by reference is a true and correct copy of the Mortgage executed by EDGAR E. MASSEY on July 10, 2003.

6. Please admit that EDGAR E. MASSEY's signature appears on the document attached as Exhibit "B" attached hereto and incorporated herein.

7. Please admit that on July 10, 2003, MARGARET A. MASSEY executed and delivered to Key Bank USA, a Mortgage, recorded in Book 11241, Page 1934, of the Public Records of Duval County, Florida.

8. Please admit that the Mortgage attached as Exhibit "B" and incorporated herein by reference is a true and correct copy of the Mortgage executed by MARGARET A. MASSEY on July 10, 2003.

9. Please admit that MARGARET A. MASSEY's signature appears on the document attached as Exhibit "B" attached hereto and incorporated herein.

10. Please admit that the Mortgage attached hereto as Exhibit "B" placed a security interest on the property located at 245 West 3rd Street, Jacksonville, Florida 32206.

11. Please admit that MARGARET A. MASSEY owns the property located at 245 West 3rd Street, Jacksonville, Florida 32206.

12. Please admit that subsequent to executing the Mortgage attached hereto as Exhibit "B", MARGARET A. MASSEY received written notification that the note and mortgage was transferred to the Plaintiff.

13. Please admit that Deutsche Bank National Trust Company, as Trustee for the registered holders of GSAMP Trust 2005-SEA1, Mortgage Pass-Through Certificates, Series 2005-SEA1, is the owner and holder of the Note and Mortgage referred to in the above paragraphs.

14. Please admit that the Mortgage of the Plaintiff is a First Mortgage being a lien superior in dignity to any prior or subsequent right, title, claim, lien or interest arising out of the mortgages of the mortgagors' predecessors in interest.

15. Please admit that there has been a default under the covenants, terms and agreements of the Note and mortgage in that the payment due January 1, 2007, and all subsequent payments have not been paid.

16. Please admit that the Plaintiff has declared the full amount payable under the Note and mortgage to be due.

17. Please admit that a principal balance of \$147,838.29 is due and owing to the Plaintiff with interest thereon at a rate of 8.375% per annum plus title search expense for ascertaining necessary parties to this action.

18. Please admit that in order to protect its security, the Plaintiff may be required to advance and payout during the pendency of this suit ad valorem taxes, premiums on insurance required by the mortgage and other necessary costs and that any search sums so paid will be due and owing to the Plaintiff.

19. Please admit that all conditions precedent to the acceleration of this mortgage and Note and to foreclosure of the mortgage have been fulfilled or have occurred.

20. Please admit that the record legal title to said mortgaged property is now vested in the Defendant, MARGARET A. MASSEY.

21. Please admit that for purposes of collection and foreclosure, the Plaintiff has retained the undersigned attorney and is obligated to pay said attorney a reasonable fee for his services.

22. Please admit that there has not been accord and satisfaction regarding the Note and Mortgage referred to in Paragraphs 1 and 4 above.

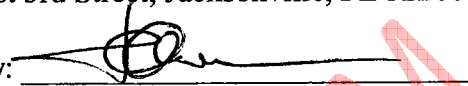
23. Please admit that the Defendant, MARGARET A. MASSEY, has not satisfied the obligation referred to in Paragraphs 1 and 4 above.

"THIS COMMUNICATION, FROM A DEBTOR COLLECTOR, IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE."

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail on this 5th day of August, 2008, to the following:

Margaret A. Massey, unremarried widow and surviving Spouse of Edgar E. Massey, Deceased,
c/o April Carrie Charney, Esquire; Attorney for Defendant, 126 West Adams Street,
Jacksonville, FL 32202; Unknown Parties in Possession #1, 245 West 3rd Street, Jacksonville,
FL 32206; Unknown Parties in Possession #2, 245 West 3rd Street, Jacksonville, FL 32206

By: 
IRA SCOT SILVERSTEIN
FL Bar # 0009636

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