

**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION – ESSEX VICINAGE**

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Deutsche Bank National Trust Company¹ as Trustee of
Argent Securities, Inc. Asset Backed Pass Through
Certificates, Series 2004-PW1

Civil Action

Docket No.: XXX

Plaintiff,

vs.

REQUEST FOR ADMISSIONS

XXX; John Doe
Husband Of XXX

XXX Avenue
Rosedale, NY 11422

Defendant(s) *Pro-Se*

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REQUEST FOR DISCOVERY: ADMISSIONS

XXX serves this Request for Admissions on Deutsche Bank National Trust Company, per Case Management Order dated September 30, 2009 by the Hon. XXX, P.J. Ch. As required by this Order, Deutsche Bank National Trust Company must serve an answer to each admission separately, fully, in writing and under oath within 15 days after service to: XXX, XXX Avenue, Rosedale, NY 11422.

INSTRUCTIONS

i) These requests for admissions are directed toward all information known or available to Deutsche Bank National Trust Company –not its lawyer, Ralph F. Casale, ESQ.- including information contained in the records and documents in Deutsche Bank National Trust Company’s custody or control or available to you upon reasonable inquiry. Where requests for admissions cannot be answered in full, they shall be answered as completely as possible and incomplete answers shall be accompanied by a specification of the reasons for the incompleteness of the answer and of whatever actual knowledge is possessed with respect to each unanswered or incompletely answered request for admission.

¹ The courts around the country are more and more forcing financial institutions to comply with the law: to introduce the original promissory note on the record or they have no case. Defendant is relying on the law. Produce the original note or you have no case <http://www.globalresearch.ca/index.php?context=va&aid=7413> and

ii) Each request for admission is to be deemed a continuing one. If, after serving an answer to any request for an admission, you obtain or become aware of any further information pertaining to that request for admission, you are requested to serve a supplemental answer setting forth such information.

iii) As to every request for an admission which an authorized officer of Deutsche Bank National Trust Company fails to answer in whole or in part, the subject matter of that admission will be deemed confessed and stipulated as fact to the Superior Court².

iv) Lawyers for the corporation must name an officer of the corporation to answer for Deutsche Bank National Trust Company. Said discovery cannot and should not be answered by any of the lawyers or any lawyer but by an officer of the corporation.

DEFINITIONS

v) "You" and "your" include Deutsche Bank National Trust Company and any and all persons acting for or in concert with Deutsche Bank National Trust Company.

vi) "Document" includes every piece of paper, computer or electronic records held in your possession or generated by you.

REQUEST FOR ADMISSIONS

1) Admit or deny that Deutsche Bank National Trust Company is regularly examined by employees of Thrift Supervision.

Admitted _____

Denied _____

2) Admit or deny that Deutsche Bank National Trust Company has never purchased XXX's mortgage account as a charged off-account³.

Admitted _____

Denied _____

² The same holds true if a competent fact witness is not named to corroborate compliance with discovery.

³ Please read the article of Mike Larson Latest article: FDIC Report Read Like a Horror Novel on 08-28-2008 at the following link: <http://www.moneyandmarkets.com/Issues.aspx>

3) Admit or deny that Argent Securities, Inc. (Depositor) delivered an assignment of mortgage **in blank** without recourse purportedly assigning the mortgage to the Trustee, Deutsche Bank National Trust Company, as custodians of the trust fund.

Admitted_____

Denied_____

4) Admit or deny that the “**undated**” Assignment of Mortgage signed by Tamara Price and recorded on June 25, 2008 is a nullity.

Admitted_____

Denied_____

5) Admit or deny that Deutsche Bank National Trust Company is NOT the holder in due course of the original note with allonges and showing the chain of endorsements (Argent Mortgage Company, LLC to Ameriquest Mortgage Company, to Argent Securities, Inc.).

Admitted_____

Denied_____

6) Admit or deny that Deutsche Bank National Trust Company is not in possession of any authenticated business records (certified copies of the ledger and initial balance sheet) relevant to this account that could be introduced into the record in open court.

Admitted_____

Denied_____

7) Admit or deny that Argent Mortgage Company, LLC **CANNOT** assign XXX’s mortgage loan to Deutsche Bank National Trust Company because after origination, Argent Mortgage Company, LLC **SOLD** the mortgage and note, relinquishing ALL their rights and title therein, to Ameriquest Mortgage Company during securitization, May 1, 2004 through June 7, 2004.

Admitted_____

Denied_____

8) Admit or deny that that Eileen Vasquez is not a competent fact witness because she does not have first-hand personal knowledge of the facts of the accounts/records in this instant case.

Admitted_____

Denied_____

9) Admit or deny that Deutsche Bank National Trust Company may not sell or otherwise liquidate the collateral security notes following a default without consent of the investors/certificate holders.

Admitted_____

Denied_____

10) Admit or deny that Deutsche Bank National Trust Company does not have a pecuniary interest in XXX's property, as in fact the Trustee is paid for its services at the Trustee Fee Rate of 0.0072% per annum on the aggregate principal balance of the mortgage loans, and will not benefit from any proceeds of sale of the property.

Admitted_____

Denied_____

11) Admit or deny that when a loan defaults, that the Servicer or Master Servicer or Depositor continues to make payments into the pool as if the loan never defaulted.

Admitted_____

Denied_____

12) Admit or deny that Deutsche Bank National Trust Company never at any time took physical possession of the original promissory note with allonges and endorsed chain of title obligating XXX and/or alienable in this instant case.

Admitted_____

Denied_____

13) Admit or deny that absent possession of the account and general ledger statement, authenticated by a competent fact witness, proving a deficiency owed by XXX, you cannot prove up your claim for amounts owing.

Admitted_____

Denied_____

14) Admit or deny that when mortgage loans in the trust fund become delinquent for 90 days, that claims on the insurance is made and payment received.

Admitted_____

Denied_____

15) Admit or deny that Deutsche Bank National Trust Company as a member of a National Association could sue in state courts exclusively where it has its charter or articles of association as required by the National Bank Act.

Admitted_____

Denied_____

16) Admit or deny that the Servicer has not responded appropriately to XXX's Qualified Written Requests (QWR) dated May 22, 2009 (2 requests), and July 16, 2009, under authority of 12 U.S.C. 2605(e).

Admitted_____

Denied_____

17) Admit or deny that i) an Assignment from Argent Mortgage Company, LLC to Ameriquest Mortgage Company, ii) an Assignment from Ameriquest Mortgage Company to Argent Securities Inc., and ii) an Assignment from Argent Securities Inc. to Deutsche Bank National Trust Company must all be in conformance with the strict rules and time frame of the Pooling and Servicing Agreement, as well as the requirements of Articles 3 and 9 of the Uniform Commercial Code with respect to mortgage notes.

Admitted_____

Denied_____

18) Admit or deny that all the parties to this instant case are not before the court.

Admitted_____

Denied_____

19) Admit or deny that despite three Qualified Written Requests to the Servicer, that they have not identified and advised XXX who is the **true** owner of the promissory note.

Admitted_____

Denied_____

20) Admit or deny that the filings with the Securities and Exchange Commission (File No. 333-112237-01) re Assignment of Mortgage is completely different from the Assignment of Mortgage recorded with the Essex County Register's Office.

Admitted_____

Denied_____

21) Admit or deny that it is the practice of Deutsche Bank National Trust Company to charge-off and sell evidence of indebtedness (after collecting insurance), the worthless⁴ commercial paper illustrating the duty between the mortgagor and mortgagee or assignee becomes legally uncollectible.

Admitted_____

Denied_____

22) Admit or deny that Deutsche Bank National Trust Company is not the real party in interest in this proceeding and has no equity in the original note.

Admitted_____

Denied_____

23) Admit or deny that Deutsche Bank National Trust Company has contracted with Ralph F. Casale, ESQ. to represent the Company in this instant case.

Admitted_____

Denied_____

24) Admit or deny that documents filed by Ralph F. Casale, ESQ. on the records in this instant case and authenticated by Mr. Casale are inadmissible, that these records cannot pass the *hearsay* exception test, therefore, are not business records.

Admitted_____

Denied_____

⁴ Please read the article of Mike Larson Latest article: FDIC Report Read Like a Horror Novel on 08-28-2008 at the following link: <http://www.moneyandmarkets.com/Issues.aspx>

25) Admit or deny that XXX was never advised that her promissory note would form part of a “trust” when there was no “trust” in the mortgage transaction, making it a completely different transaction, which demonstrates lack of material disclosure on the part of the lender.

Admitted _____

Denied _____

Prepared and Submitted by: XXX
XXX Avenue
Rosedale, NY 11422

FORECLOSUREPROPOSE.COM

