

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TINA BELLINO, on behalf of herself and all others  
similarly situated,

Plaintiff,

- against -

JPMORGAN CHASE BANK, N.A.,

Defendant.

13 Civ. 656 (NSR) (JCM)

DECLARATION OF  
ERIKA LANCE

ERIKA LANCE declares as follows:

1. I am the Chief Information Officer at Nationwide Title Clearing, Inc. ("NTC"). My responsibilities include, but are not limited to, oversight of the creation, storage, and security of all electronic business records. This declaration is made based on my personal knowledge and my review of NTC's business records.
2. NTC provides document-processing services to JPMorgan Chase Bank, N.A. ("Chase") for certain residential mortgage loans. For those loans, NTC's responsibilities include sending mortgage satisfactions to the appropriate recording officers after the loan is paid off.
3. In my role as Chief Information Officer, I regularly work with and consult NTC's business records relating to Chase residential mortgage loans. I am familiar with the manner in which those records are created and maintained.

4. Attached as Exhibit A is a true and correct excerpt from NTC's records relating to Tina Bellino's Chase mortgage loan. Exhibit A shows that the satisfaction of mortgage for Ms. Bellino's loan was sent by NTC on June 13, 2012, for delivery to the Westchester County Clerk via Federal Express.

5. Exhibit A is a business record of NTC. It was prepared and maintained in the course of NTC's regularly conducted business activity. It was made at or near the time of the events it records and was made by a person with knowledge of those events.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 7, 2015  
in Palm Harbor, Florida

  
Erika Lance, Chief Information Officer