

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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S&A CAPITAL PARTNERS, INC., :  
MORTGAGE RESOLUTION SERVICING, :  
LLC, and 1ST FIDELITY LOAN :  
SERVICING, LLC, :  
                                  *Plaintiffs,* :  
                                  : :  
                                  - v. - :  
                                  : :  
JPMORGAN CHASE BANK, N.A., CHASE :  
HOME FINANCE, LLC, and JPMORGAN :  
CHASE & CO., :  
                                  *Defendants.* X  
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No. 15-cv-00293-LTS-JCF

**DECLARATION OF MICHAEL J. ZEEB**

I, Michael J. Zeeb, declare as follows:

1. I am a Vice President of Mortgage Banking Recovery at JPMorgan Chase Bank, N.A. (“Chase”) in Phoenix, Arizona. Since 2015, my responsibilities have included managing business related to charged off loans at Chase and supervising input and retrieval of loan data from Chase’s Recovery One (“RCV1”) database. Except as otherwise stated, I make this declaration based on my own personal knowledge and experience at Chase and my review of Chase’s business records.

2. Chase maintains data regarding mortgage loans that have been charged off in the RCV1 database.

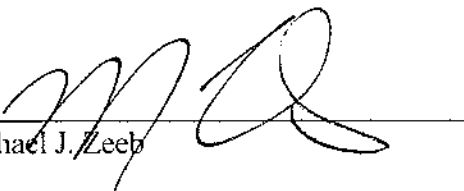
3. The RCV1 database is searchable using a limited set of search parameters. For instance, if Chase is given a loan number for a loan in the RCV1 database, it can use that loan number to query the RCV1 database and gather the relevant data and information relating to that

loan. If Chase is given certain other information about a loan, such as the borrower's name and social security number, it also can use that information to query the database and gather relevant data and information relating to the loan.

4. The RCV1 database cannot normally be queried using the identity of the entity to which a loan has been sold as a search parameter. In rare circumstances where a special Queue or other identifier was created at the time of a debt sale, it is possible to query RCV1 using that identifier. However, it was not Chase's usual practice to create such identifiers, and no such identifiers were created for any debt sales to the Plaintiffs in this case. In other words, it is not possible for Chase to query the RCV1 database to identify loans that were sold to Plaintiffs or that were offered for sale to Plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 12, 2016.

  
Michael J. Zeeb