

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MORTGAGE RESOLUTION SERVICING,  
LLC, 1ST FIDELITY LOAN SERVICING, LLC,  
and S & A CAPITAL PARTNERS, INC.,

Plaintiffs,

v.

JPMORGAN CHASE BANK, N.A., CHASE  
HOME FINANCE, LLC, and JPMORGAN  
CHASE & CO.,

Defendants.

No. 15-cv-00293(LTS)(JCF)

**REPLY DECLARATION OF HELEN DAVIS CHAITMAN**

HELEN DAVIS CHAITMAN, ESQ. hereby declares under penalties of perjury as follows:

1. I am an attorney duly licensed to practice in the State of New York. I am a partner at Chaitman LLP, attorneys for Plaintiffs S&A Capital Partners, Inc. (“S&A”), Mortgage Resolution Servicing, LLC (“MRS”) and 1<sup>st</sup> Fidelity Loan Servicing, LLC (“1st Fidelity”).

2. I submit this declaration in reply to Defendants’ Opposition to Plaintiffs’ Motion to Compel and in opposition to Defendants’ cross-motion for a protective order.

3. Attached hereto as **Exhibit A** is the Relator’s Memorandum in Opposition to Defendants’ Motion to Dismiss Relator’s Second Amended Complaint, filed in the District Court for the District of Columbia, in the case now captioned *United States of America et al ex rel. Lawrence Schneider v. J.P. Morgan Chase Bank, National Association, et al.*, 114-CV-01047-RMC (the “*qui tam* Case”) December 16, 2015, together with its single Exhibit.

Dated: New York, New York  
June 17, 2016

/s/ Helen Davis Chaitman  
Helen Davis Chaitman