

**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.

ORAL ARGUMENT REQUESTED

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

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration of Helen Davis Chaitman, and the exhibits thereto, Plaintiffs S&A Capital Partners, Inc. (“S&A”), Mortgage Resolution Servicing, LLC (“MRS”) and 1<sup>st</sup> Fidelity Loan Servicing, LLC (“1st Fidelity”), through their attorneys, Chaitman LLP, move this Court, before the Honorable James C. Francis, United States District Courthouse, 500 Pearl Street, Courtroom 18D, as soon as counsel may be heard, pursuant to Federal Rule of Civil Procedure 26 and 37 and Local Civil Rule 37.1:

(a) to compel Defendants JPMorgan Chase Bank, N.A., JPMorgan Chase & Company, and Chase Home Finance LLC (collectively, “Chase” or “Defendants”), to produce documents in response to Plaintiffs’ document demands (“Plaintiffs’ Requests”) and

(b) to define the scope of discovery in this case.

The undersigned hereby certifies that Plaintiffs have used their best efforts to resolve the matters set forth in this motion, but have been unsuccessful. The parties have complied with their obligations to meet and confer.

Dated: New York, New York  
May 27, 2016

**CHAITMAN LLP**

By: /s/ Helen Davis Chaitman  
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