UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

CONSUMER FINANCIAL PROTECTION BUREAU, Plaintiff, v. THE MORTGAGE LAW GROUP, LLP, CONSUMER FIRST LEGAL GROUP, LLC, THOMAS G. MACEY, JEFFREY J. ALEMAN, JASON E. SEARNS and HAROLD E. STAFFORD, Defendants.	)	Case No. 3:14-cv-00513 Hon. William Conley

DEFENDANTS' SECOND AMENDED TRIAL EXHIBIT LIST
WITH PLAINTIFF'S OBJECTIONS

Pursuant the Court's January 26, 2017 Order (dkt. #224), Defendants Consumer First Legal Group ("CFLG"), Thomas Macey, Jeffrey Aleman, Jason Searns and Harold Stafford respectfully submit their Second Amended Exhibit List. This lists supersedes the lists filed on February 17, 2017 (dkt. # 263) and March 10, 2017 (dkt. 297)

Exhibit 671 is marked with a double asterisk (**). That exhibit is a collection of certified certificates of good standing issued by various states for various Class B members of CFLG and/or TMLG.

As the Court's January 26 Order requires, Defendants will continue to consult in good faith with the CFPB to eliminate duplicate exhibits, stipulate to the admissibility of exhibits, and otherwise streamline the parties' evidentiary presentations. The parties are continuing to work together in an effort to stipulate to the licensure status of some or all of TMLG and CFLC Class B attorneys.

Dated: April 17, 2017

Respectfully submitted,

/s/ Timothy D. Elliott

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CERTIFICATE OF SERVICE

I, Timothy D. Elliott, an attorney, do hereby certify that on April 17, 2017, I caused the foregoing to be filed and served via ECF notification on all counsel of record.

Dated: April 17, 2017 /s/ Timothy D. Elliott

Identification		**Defendants' Description**	**Record Reference**	**Offerings, Objections, Rulings, Exceptions**
No.	**Witness**			
501.		Limited Liability Partnership Agreement of The Mortgage Law Group, LLP ("TMLG")	CFPB037038-037109, Reiff Dep. Ex 16	
506.		Foreclosure Defense Handbook Binder	DEF01403-02553	
509.		Strategic Alliance Agreement between TMLG and Underwater Processing Solutions, LLC	DEF0700-0714	
510.		Strategic Alliance Agreement between TMLG and Client Attorney Processing Services, LLC	DEF0715-0730	
511.		Strategic Alliance Agreement between TMLG and Attorney Processing Solutions, LLC	DEF0735-0749	
513.		CFLG Welcome Packet	Aleman Dep. Ex. 8	
520.		NDS Database	NDS0534-0673	FRE 901,this document has not been authenticated; it appears incomplete and not in its native format.
522.		Assignment of Rights Under and Amendment to SAA	DEF0731-0734	
523.		TMLG Processing – Status and Disposition Workflow	KS0368	
524.		IARDC – Aleman/Macey Complaint	DEF02923-2935	
525.		IARDC – 11/10/14 Order - Dismissal	DEF02936-2938	FRE 401-2, disposition of an ARDC complaint is not relevant; document is not what it purports to be.

Identification		**Defendants' Description**	**Record Reference**	**Offerings, Objections, Rulings, Exceptions**
No.	**Witness**			
526.		Declaration of Nicole Winters with Exhibits (Dkt. 172)	Dkt. 172	FRE 802, Winters' declaration is hearsay; FRE 401-2, exhibits only show the licensing status of attorneys as of the dates stated, which are irrelevant to the time period when TMLG or CFLG was in business.
528.		TMLG 2011 Partnership Return	DEF01217-01286	
529.		TMLG 2012 Partnership Return	DEF01287-01366	
530.		TMLG 2012 P&L Statement	DEF01208-01214	
531.		TMLG 2013 Partnership Return	DEF01367-01402	
538.		Executed Client Waivers (Group Exhibit)	Group Exhibit	
542.		Brett Peterson - Correspondence	DEF08581-08584	
560.		Fadi Halwani - Retainer Agreement	DEF.08187-08200 DEF.09016	
576.		Saunders - Submission	DEF.12159-12207, 012529-012531	
577.		Saunders - Correspondence	DEF.12431-12434 DEF.12117-12118 DEF.12250-12251 DEF.12223 DEF.12227-12249 DEF.12224 DEF.12209 DEF.12297-12300 DEF.12526-12527 DEF.12352	

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No.	Witness			
581.		Halpin Retainer Agreement	DEF.11588-011600	
582.		Halpin Settlement Agreement	DEF.11586-11587	
583.		Halpin Client Notes	DEF.11608	
584.		Timothy Ledbetter Financial Information	DEF.08274	
585.		Timothy Ledbetter Submission	DEF.08275-8331, 8365-66, 08367-08397	
588.		06/11/12 Email from Banyon re Memo to be Distributed ot Phase 1	Delgado Dep. Ex. 3	
590.		5/15/2012 Email from Banyon re FL Loan Mod and Foreclosure Cases	Delgado Dep. Ex. 5	
592.		Class B Member Addendum (LHDR)	Murdock Dep. Ex. 4	
596.		10/20/11 Email from Weiss re Referral from Paul Hull	Murdock Dep. Ex. 17	
597.		02/29/12 Email from Sibert re TMLG Loan Mod Addendum	Murdock Dep. Ex. 18	
598.		04/24/12 Email from Sibert re Signature and Approval Request	Murdock Dep. Ex. 19	
599.		03/16/12 Email from Preshad re 316893 - Diane Brown - reminder: please review	Murdock Dep. Ex. 20	
600.		10/10/11 Email from Banyon re discovery in SC	Murdock Dep. Ex. 21	

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601.		10/12/11 Email from Banyon re Matzinger.. 2010 - CP - 0218	Murdock Dep. Ex. 22	
602.		10/17/11 Email from Arcure re XXX ..2010 - CP - 0218	Murdock Dep. Ex. 23	
603.		05/24/12 Email from Arcure re Matzinger	Murdock Dep. Ex. 24	
605.		03/08/11 Email from Banyon re Forclosure Defense Cases	JR028-030, Rammell Dep. Ex. 5	
608.		07/29/11 Email from Sibert re Loan Mod Client XXX - in Need of Your Review	JR036-040, Rammell Dep. Ex. 8	
614.		07/07/11 Email from Sibert	JR041-044, Rammell Dep. Ex. 21	
617.		6/29/12 Email from TMLG	DR052-067, 070-073, 079-091, 094-095, 0654, Reiff Dp. Ex. 19	
618.		11/17/2011 from P. Hull	DR0333-0334, Reiff Dep. Ex. 21	
619.		11/21/11 Email from P. Hull	DR0317-0326, Reiff Dep. Ex. 22	
620.		12/15/11 Email from D. Reiff	DR0327, Reiff Dep. Ex. 23	
621.		2/23/12 Email from P. Hull	DR0204-0239, Reiff Dep. Ex. 26	
622.		Attn: Team I Affidavit of Postponement, State of Minnesota	DR008-010, Reiff Dep. Ex. 27	
623.		2/14/12 Email from P. Hull	DR0438-0441, Reiff Dep. Ex. 25	

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625.		7/5/11 Email from D. Reiff	DR0427-0429, Reiff Dep. Ex 17	
629.		10/9/12 Email from C. Banyon	DR0453-0455, Reiff Dep. Ex. 7	
633.		11/4/11 Email from P. Hull	DR0348-0367, Reiff Dep. Ex. 18	
647.		Foreclosure Response Team Attorney Information Sheet	CFPB0087274, Trebbe Dep. Ex. 26	
649.		10/25/11 Email from K. Trebbe	CFPB0087322, Trebbe Dep. Ex. 23	
651.		Kevin Maniak Trebbe Resume	CFPB0087196, Trebbe Dep. Ex. 22	
652.		11/2/11 Email from P. Hull	CFPB0087142-0087144, Trebbe Dep. Ex. 25	
653.		1/26/12 Email from L. Preshad	CFPB0087035, Trebbe Dep. Ex. 34	
654.		1/2712-5/23/12 Emails from TMLG System	CFPB0087318, 87317, 87306, 87320, 87307, 87308, 87309, 87310, 87311, 87321, 87303, 87304, 87305, 87296, 87297, 87298, 87312, 87313, 87315, 87314, 87316, 87319, 87291, 87292, 87290, 87281, 87294, 87293, 87282, 87295, 87283, 87284, 87285, 87287, 87286, 87289, 87288, 87299, 87300, 87301, 87302, 87275, 87277, 87278, 87276, 87280, 87279; Trebbe Dep. Ex. 32	
655.		11/11/11 Email from P. Hull	CFPB0087357-0087360, Trebbe Dep. Ex. 28	
656.		12/21/11 Email from K. Sibert with attachments	CFPB0087137, 87204, 87200, 87201, 87202; Trebbe Dep. Ex. 31	

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657.		Short Sale Flowchart for TMLG	CFPB0087376-087382, Trebbe Dep. Ex. 35	
658.		12/8/11 Email from K. Sibert	CFPB0087100-0087125, Trebbe Dep. Ex. 29	
659.		12/21/11 - 6/21/12 Emails from TMLG	CFPB0087127, 87128, 87129, 87126, 87390, 87410, 87389, 87391, 87400, 87393, 87392, 87395, 87394, 87397, 87396, 87399, 87398, 87401, 87410, 87402, 87403, 87404, 87405, 87407, 87406, 87408, 87409; Trebbe Dep. Ex. 33	
662.		4/5/12 Email from K. Sibert	DR00167-00168, Daines Dep. Ex. 13	
663.		Spreadsheet	Daines Dep. Ex. 21	
664.		BOA ltr to Mortgage Law Group dated 5/7/12	DEF013902, Daines Ex. 22	
665.		06/09/11 Email	NDS081-083	FRE 401-2, document is not relevant, as e-mail references “Legal Helpers Foreclosure Defense.”
666.		06/27/11 Email	NDS0119-0121	FRE 401-2, document is not relevant, as e-mail references “Legal Helpers Foreclosure Defense.”
667.		06/28/11 Email	NDS0128-0130	FRE 401-2, document is not relevant, as e-mail references “Legal Helpers Foreclosure Defense.”
669.		Group Exhibit: Collection of previously filed attorney affidavits and declarations		FRE 802, the affidavits and declarations are hearsay; these documents conflict with or contradict some deposition testimony of declarants; FRE 1002, Best Evidence Rule, deposition testimony on the subjects is the best evidence;

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670.		Summary Chart of TMLG/CFLG Attorneys and Clients by State		Mischaracterizes evidence; FRE 1002, Best Evidence Rule, the best evidence are the underlying state bar documents.
671.**		Group Exhibit: Class B Member Certificates of Good Standing	DEF.16015-16194	To the extent defendants intend to use this exhibit to show good standing of these local attorneys, the Bureau disputes that the following attorneys whom defendants have identified as providers of services to TMLG or CFLG were in good standing for the elevant period: Pam Archibald (Arizona), Colin Banyon (Illinois), Jason Blust (Illinois), Burton Kliman (Rhode Island), Catherine Lena (California), Robert Raper (Ohio), Bruce Redman (Michigan), Joel Schwartz (New Jersey), Kevin Trebbe (Arizona), and Donya Zimmerman (Maryland).