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## Request for Admissions to Plaintiff

IN THE CIRCUIT COURT OF THE  
11TH JUDICIAL CIRCUIT IN AND  
FOR MIAMI-DADE COUNTY, FLORIDA

WELLS FARGO BANK, N.A.  
CASE NO: 09-00xxxx-CA-(13)  
Plaintiff,

vs.

A.M and M.A., et. al.  
Defendants.

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### DEFENDANTS' REQUEST FOR ADMISSIONS TO PLAINTIFF

Defendants, A.M and M.A., is requested to admit or deny the following allegations pursuant to the appropriate Florida Rule of Civil Procedure:

1. It is Plaintiff's contention in this lawsuit that the sole reason that the most recent proposed HAMP modification (made after December, 2010 mediation) was denied or rejected by Plaintiff due to the existence of the HELOC loan from Bank of America on the subject property.

### CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on September 28, 2012, a true and correct copy of the foregoing was Fax: 813.251.1541; E-Mail: [eservice@wolfelawfl.com](mailto:eservice@wolfelawfl.com) to: Ron Pereira, Esq., Ronald R. Wolfe & Associates, P.L , Esq., 4919 Memorial Hwy, Ste 200, Tampa, Florida 33634-7500.

SACKRIN & TOLCHINSKY, P.A.  
Attorney for Defendant(s)  
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Hallandale Beach, FL 33009  
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By \_\_\_\_\_  
ALAN D. SACKRIN, ESQ. Florida Bar No. 349070  
LARRY TOLCHINSKY, ESQ. Florida Bar No 021997

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This is a sample document related to a specific set of facts and circumstances and should not be used or relied upon if any foreclosure, deficiency judgment, short sale or any other real estate matter. We recommend and urge you to consult with an experienced lawyer for professional advice as each case is unique.