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Counsel for Plaintiffs

## DOC # 0757089 01/13/2010 01:51 PM Deputy: SG OFFICIAL RECORD Requested By: MICHAEL MCKEON

Douglas County - NV Karen Ellison - Recorder

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BK-0110 PG-2319 RPTT: 0.00

18.00



## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

LACY J. DALTON (aka JILL L. ANDERSON), NELLIE AGUILAR and ZENAIDO JACINTO, DEAN ANDERSON, EMILY ANDREWS, JOSE AURELIO APOLINAR, JESUS L. AREVALO. RICHARD AUFIERO AND SYLVIA T. AUFIERO, CHRISTOPHER L BALLENGEE and SAMANTHA P. ANDERSON, RICHARD and LESLIE BEAUCHEMIN, PETER M. BEEKHOFF, JAMES V. BELL, JUSTIN and NANCY E. BENNETT, VALERIE R. BRANCA, RAMIRO M. BRENES and AURELIO APOLINAR-LOPEZ, BETTY J. BURSON, KAREN L. CELONE, HARRY R. COUSINS, DAVID DOUGLAS and KAY DAHL, CHARLES A. and KIMBERLY A. DIMINO, DIMITRI O. DINTCHEV, MICHAEL T. EPPS, DARRYL J. and VIVIAN M. FEEMSTER, CASIMIRO JIMENEZ GRANADOS, JONI ANN HAMMITT (aka JONI ANN KROPF), GARY W. HEMBREE and CHARLENE E. HEMBREE, DAVID HUTLER, NEIL M. JOHNSON, HOLLY A. KINNEY, JAMES M. and TERESA R. KOSCHELLA, MARIA R. LEONARD, JENNIFER LOPEZ, (aka JENNIFER MENDOZA), JOHN V. and RONICA LYNCH, JAMI D. MCHENRY and STEVEN WALLACE, BRIAN and LAWRENCE D. McKAY, MICHAEL MCKEON, WILFREDO G. and AGNES

Case No.: 3:09-cv-00534

NOTICE OF LIS PENDENS

MARIANO, JOHN and BIANCA MASON, GILBERT J. and GABRIELA T. MENDOZA, JEAN MERKELBACH and CHAD SMITTKAMP, CHRISTOPHER L. NELSON, GARY A. NEWTON, PAMELA PENNY (aka PAMELA RUTHERFORD) and PHIL RUTHERFORD, NORMA PIZZUTO and DARREN DISMUKE, WOJCIECH and MARIOLA POLANSKI, RANDALL H. and JUNE ANN REES, CHARISE K. and TODD C. ROBERTS, NIGEL RUDLIN, EFRAIN DELAROSA SALDANA, ANTONIO SERVIDIO, SALLY SERVIDIO. JASWINDER SINGH and VARINDER KAUR, KIP M. THOMPSON, HELEN T. THOMPSON and GABRIELLE C. THOMPSON (aka GABRIELLE C. MCELROY), DIMITRITZA TOROMANOVA. LENORA M. and JOSEPH T. VAETH, LAURO C. and YESENIA VIZCARRA.

Plaintiffs,

VS.

CITIMORTGAGE, INC.

MERSCORP, INC., a Virginia corporation; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., a subsidiary of MERSCORP, Inc., a Delaware corporation; AIG UNITED GUARANTY CORPORATION a foreign corporation, AMERICAN HOME MORTGAGE SERVICING, INC.

AURORA LOAN SERVICES, LLC dba
AURORA HOME LOANS or AURORA
HOME MORTGAGE or AURORA LOAN
SERVICES, AZTEC FORECLOSURE
CORPORATION, BANK OF AMERICA, NA
and BANK OF AMERICA doing business as
LASALLE BANK AS TRUSTEE FOR
WASHINGTON MUTUAL MORTGAGE
PASS-THROUGH CERTIFICATES WMALT
SERIES 2006-AR5 TRUST, BANK OF NEW
YORK MELLON dba BANK OF NEW YORK,
AS TRUSTEE FOR THE CERTIFICATE
HOLDERS CWALT, INC. ALTERNATIVE
LOAN TURST 2005-45 MORTGAGE PASS-

THROUGH CERTIFICATES, SERIES 2005-45, CALIFORNIA RECONVEYANCE COMPANY, CAL-WESTERN RECONVEYANCE COMPANY CENTRAL MORTAGE COMPANY, J.P. MORGAN CHASE dba CHASE BANK. CHASE HOME FINANCE, LLC., CHASE MORTGAGE, COUNTRYWIDE HOME LOANS, INC., CR TITLE SERVICES, INC., EMC CORPORATION dba EMC MORTGAGE CORP., EXECUTIVE TRUSTEES SERVICES, INC., FEDERAL HOME LOAN MORTGAGE CORPORATION, a Virginia corporation; FEDERAL NATIONAL MORTGAGE ASSOCIATION, a District of Columbia corporation, FIDELITY NATIONAL TITLE INSURANCE COMPANY, FIRST FRANKLIN LOAN SERVICES. FIRST HORIZON HOME LOAN CORPORATION, MET LIFE GROUP, INC. QUALITY LOAN SERVICE CORP., SAXON MORTGAGE, INC., GE MONEY BANK, an Ohio corporation, GMAC MORTGAGE, L.L.C., a Delaware corporation, aka GMAC MORTGAGE, CORPORATION and GMAC, HOUSEKEY FINANCIAL CORPORATION, HSBC MORTGAGE CORPORATION, U.S.A. a Delaware corporation or HSBC BANK USA, LANDMÂRK ONESTOP, INC., aka LAND AMERICA DEFAULT SERVICES. LITTON LOAN SERVICING, MET LIFE GROUP, INC., MIDFIRST BANK, NDEX WEST, LLC., MIDLAND MORTGAGE CO., NATIONAL CITY MORTGAGE, a foreign company and a division of NATIONAL ČITY BANK, a subsidiary of National City Corporation, NATIONAL CITY CORPORATION, a Delaware corporation and a subsidiary of PNC Financial Services, Inc., NATIONAL DEFAULT SERVICING CORPORATION, OPTION ONE MORTGAGE CORPORATION. PNC FINANCIAL SERVICES, INC., a Pennsylvania corporation, QUALITY LOAN SERVICE CORPORATION RECONTRUST COMPANY, SAXON MORTGAGE CORPORATION, SUNTRUST MORTGAGE, T.D. SERVICE CORPORATION, CASTLE COOPER LAW FIRM, LLP, DEUTSCH BANK NATIONAL TRUST COMPANY, AMERICAN BROKER'S CONDUIT,

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AMERICA'S HOME SERVICING, HOMECOMINGS FINANCIAL, THE BANK OF NEW YORK MELLON dba THE BANK OF NEW YORK, POWER DEFAULT SERVICES, INC F/K/A AHMSI DEFAULT SERVICES, INC., and WELLS FARGO BANK, N.A., a California corporation, dba WELLS FARGO HOME EQUITY and dba WELLS FARGO HOME MORTGAGE, a division of WELLS FARGO BANK, N.A., a California corporation;

Defendants.

NOTICE IS HEREBY GIVEN that a Complaint for fraudulent and predatory lending practices perpetrated on Plaintiff by the actions of each of the Defendants in violation of MICHAEL F. MCKEON's rights and claims under the wrongful foreclosure, unjust enrichment, conspiracy to commit wrongful foreclosure by creation, operation, and use of the MERS System, conspiracy to commit fraud by creation, operation and use of the MERS System, injunctive relief, declaratory relief have been filed in the above-entitled Court by the foregoing Plaintiffs agains the foregoing named Defendants, BANK OF AMERICA, to keep the property in the name of MICHAEL F. MCKEON.

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The said premises affected by this action are situate in the County of Douglas, State of Nevada, described as follows:

## 1418 PURPLE SAGE DRIVE GARDNERVILLE, NEVADA COUNTY OF DOUGLAS

The legal description of the home is as follows:

LOT 20, OF IDLE ACRES SUBDIVISION, AS SHOWN ON THE OFFICIAL MAP THEREOF, FILED IN THE OFFICE OF THE COUNTY RECORDER OF DOUGLAS COUNTY, NEVADA, ON APRIL 5, 1960, IN BOOK 1 OF MAPS, DOCUMENT NO. 15812.

APN: 1220-22-211-009

DATED this 5th day of January, 2010.

RESPECTFULLY SUBMITTED.

LAW OFFICES OF HAGER &

HEARNE

BY: TREVA J. HEARNE, ESQ.

SBN: 4450

245 E. Liberty St., Ste. 110

Reno, NV 89501 Tele: (775) 329-5800 Attorneys for Plaintiff

STATE OF NEVADA ) )ss COUNTY OF WASHOE )

On the 5<sup>th</sup> day of January, 2010, Treva J. Hearne, personally appeared before me, who is personally known to me, to be the signer of the above instrument, and she acknowledged that she signed it.

MERCEDESE I. WITTY
Notary Public - State of Neveda
Appointment Recorded in Washoe County
No: 93-1586-2 - Expires July 15, 2013

Merceden Lutter NOTARY PUBLIC

My commission expires 7-15-2013