1. The DEFENDANTS inability to produce evidence to successfully challenge these facts are evidenced by their:
   1. Attempts to redirect the COURTS attention away from their breech of the aforementioned GA laws governing property recordation, assignment and foreclosure
   2. Attempts to direct the COURT away from their wanton disregard for Federal Laws (FDCPA), 15 U.S.C. §§ 1692-1692p protecting Plaintiff’s right to debt verification- including knowing the actual secured creditor and holder in due course for his property
   3. Ignoring Judge TANGELA BARRIE’S standing order that followed the case with Removal
   4. Alleging that the Plaintiff defaulted on his mortgage payments and sought unjust court relief, in spite of the signed modification agreement that required the Plaintiff to be current on his mortgage at the time the Plaintiff started the action seeing debt verification under (FDCPA), 15 U.S.C. §§ 1692-1692p was commenced. (See Affidavit and ORIGINAL COMPLAINT)
   5. Attempts to redirect the COURT and restate the Plaintiff’s case as an Internet inspired “Produce the note scam.” In this regard the DEFENDANTS have even said “that Plaintiff cannot produce a Georgia law requiring “either a lender or its attorney conducting the foreclosure sale” to “Produce The Note.” (See DEFENDANTS MOTIONS FOR JUDGEMENT ON THE PLEADINGS)
2. The aforementioned attempts at redirection while ignoring their obligation to produce evidence that they did not break GA Law OCGA§ 44 – 14 – 162.2 (a-c) as alleged by the Plaintiff and ordered by DEKALB Superior Court Judge, Tangela Barrie proves that they cannot provide such evidence - now or in the future.