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IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION

In Re:	§	
CYNTHIA CARRSOW-FRANKLIN	§	
	§	CHAPTER 13
DEBTOR	§	Bankruptcy Case No. 10-20010(RDD)
	§	
	§	
--	§	
CYNTHIA CARRSOW-FRANKLIN	§	
	§	
MOVANT.	§	
	§	SUPPLEMENT TO
V.	§	EMERGENCY MOTION TO REOPEN FOR
	§	ADDITIONAL EVIDENCE
WELLS FARGO BANK, N.A.	§	
	§	
RESPONDANT	§	

SUPPLEMENT TO EMERGENCY MOTION TO REOPEN AND FOR LEAVE TO PROPOUND SUPPLEMENTAL DISCOVERY TO DEFENDANT FOR ADDITIONAL EVIDENCE WITHHELD PRIOR TO TRIAL

NOW COMES Debtor / Movant Cynthia Carssow Franklin, by and through her attorney, Linda M. Tirelli, and moved the Court for by way of "Emergency Motion to Reopen and For Leave to Propound Supplemental Discovery to Defendant for Additional Evidence Withheld Prior to Trial" filed on or about February 7, 2014 and which appears as Dc. No. 93 on the court's ECF system, seeking permission to reopen the case to propound supplemental discovery to Defendant.

Since the time of filing the above mentioned Motuion, additional evidence of a procedutre for Note Indorsements was discovered by the undersigned as set forth below. the Movant/Debtor requests that the court accept the newly acquired supplemental documentation, namely a 150 page Attorney Manual setting forth in detail a procedure for processing notes without indorsements and obtaining indorsements and allonges. In the alternative to reopening discovery to include additional evidence discovered -again- by happen stance after the evidentiary hearing of December 3, 2013. In support hereof, Plaintiff states and alleges as follows:

1. This contested matter was filed via Objection to Proof of Claim on October 4, 2010.

2. An evidentiary hearing was held by this court on December 3, 2013.

3. Debtor/Movant discovered new evidence of an order form on Wells Fargo letterhead for ordering a note endorsement after a proof of claim was filed. Debtor/Movant filed an emergency motion on or about February 7, 2014 with the court to have this document considered and/or to reopen discovery, hereinafter "The Motion", (see ECF Doc. No. 93)

4. The Court did not render judgment as of the date and time of The Motion or as of the date and time of this Supplement to The Motion.

5. Prior to the evidentiary hearing, the Movant went to great lengths to obtain discovery including taking the deposition of a non-party witness, former Wells Fargo employee, Herman "John" Kennerty after being caused to defend a Motion for Protective Order in Charleston, South Carolina. Said Motion for Protective Order was filed by attorneys for Mr. Kennerty, paid for by Respondent, Wells Fargo.

6. At summary judgment hearing on March 1, 2012 this court determined the Assignment of Mortgage signed by Mr. Kennerty presented with the proof of claim in the instant case to be a fraudulent document.

7. Mr. Kennerty testified at deposition, in part, that there is an endorsement team in North Carolina which would endorse mortgage notes when requested to do so.[1]

[1] A complete copy of the John Kennerty Deposition Transcript is available to the court as part of the trial notebook joint exhibits provided to the court for the December 3, 2013 evidentiary hearing.

8. Wells Fargo presented Mr. Kyle Campbell as a 30(b)(6) witness for deposition on July 2, 2013. (copy of Campbell Transcript attached to The Motion as **Exhibit B**)

9. Mr. Campbell repeatedly denied any knowledge as to the existence of an endorsement team. (see transcript Pgs. 111-113)

10. At trial, the parties submitted the transcripts of both Mr. Campbell and Mr. Kennerty as joint exhibits.[2]

11. While Mr. Campbell was not able or perhaps willing to testify as to the nature and purpose of an endorsement team, opposing counsel seemed to have information regarding the same and addressed his comments the court . (see Evid. Hrg. Transcript Pgs. 115 – 116, attached as **Exhibit A** to The Motion) explaining on record that (paraphrasing) Wells Fargo only indorses notes it owns and it owns millions of loans hence the need for such a team.

12. The undersigned was retained to assist and consult in an unrelated contested matter <u>In re America Sanchez</u> 10-12490-shl. The gravamen of the objection to proof of claim filed by Debtor's counsel in the <u>America Sanchez</u> case, involved a similar fact pattern to that in the instant case where a proof of claim was filed by a Wells Fargo entity attaching an unendorsed note. After Debtor 's counsel sent a letter complaining about the lack of perfection and lack of standing she filed an Objection to Proof of Claim, and thereafter in discovery, an original note was produced together with an indorsement via an unattached. Said indorsement in blank is from the originator, "First Meridian Mortgage, A Limited Liability Company" which based on information and belief did not exist at the time the proof of claim was filed on or about .

13. On or about December 5, 2013, <u>two days after</u> the evidentiary hearing in the instant case, counsel for Wells Fargo (not the same firm as that representing Wells Fargo in the <u>Franklin</u> case)

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[2] After submitting the joint exhibits, opposing counsel at trial did argue they objected to the submission of the Kennerty deposition, but did not provide any basis for excluding the non-party witness's deposition testimony. Opposing counsel was present at the Kennerty deposition conducted in North Carolina.

produced documents in a trial notebook to the court which were not previously provided to the undersigned. The undersigned did not get the opportunity to fully review all the documents until a few days thereafter. Included in the document provided in the notebook is an order form on Wells Fargo stationary ordering a post petition indorsement from the Endorsement Team in 2012. A copy of said order form is attached to The Motion as **Exhibit C**.

14. The parties settled the Sanchez case at the time of the evidentiary hearing on December 10, 2013 before any witness was called to testify. Said settlement is still in the process of being reduced to paper.

15. As per Mr. Kennerty's testimony in the instant case, he was fired from Wells Fargo in the fall of 2010.

16. The submission of Wells Fargo's Note Endorsement Team's "order form" in the Sanchez case to the Hon Judge Lane is a judicial admission.

17. The existence of the endorsement team was not admitted by Mr. Campbell at deposition in the instant case, in fact the witness denied having any knowledge of the internal process and procedure for requesting an endorsement or of the existence of an endorsement team

18. Subsequent to filing The Motion, the undersigned as counsel to the Movant/Debtor acquired a copy of a Wells Fargo Attorney Manual in which is described a procedure for attorneys to request both endorsements to notes and allonges from a document team internal to Wells Fargo.

19. in an unrelated case pending before the Hon. Judge Gropper, Carlos Mota v. wells Fargo AP Case No. 13-01553, the undersigned as counsel to the Plaintiff, served a request for admissions as to the authenticity of the Attorney Manual and the procedures described on Page 17 thereof. A

COPY OF THE Request for admissions as to the Attorney Manual is attached hereto as **Supplemental Exhibit "S-A".**

20. By way of response, opposing counsel did not deny the authenticity of the Attorney Manual but does claim it to be a privileged document despite the the fact thatthis document in its entirety is already publically accessible. Attached hereto as **Supplemental Exhibit "S-B"** is a letter dated March 7, 2014 from Attorney Nicole Schiavo for Wells Fargo.

21. Attached hereto as **Supplemental Exhibit "S-C"** is Page 17 from the Attorney Manual describing a process of acquiring note endorsements and allonges in cases where the attorney determines an indorsement is needed.

22. The undersigned wishes to submit the Attorney Manual in its entirety to the court for further inspection for the purpose of determining its relevance to the instant case and for the purpose of determining the opposing counsel's claim of privilege, which the undersigned is fully prepared to dispute.

23. This newly acquired supplemental evidence of an endorsement team and the conspiracy to commit fraud as a general practice between Wells Fargo and its attorneys is relevant in that it corroborates Mr. Kennerty's testimony in the instant case.

24. This newly acquired supplemental evidence of the existence of the endorsement team as set forth in the Attorney Manual is relevant in that it may be used to impeach and discredit Mr. Campbell's credibility and competency to testify as a 30(b)(6) witness.

25. By allowing the Movant to present additional supplemental evidence will not cause any undue delay or hardship on the respondent.

26. The existence of an Endorsement Team Order Form or the existence of a written procedure inside an Attorney Manual were not predicted and came as a surprise to the Movant

and her attorney. There was simply no way to predict the existence of an internal form or a manual for attorneys to follow step by step instructions to request / order post-petition indorsements to a note the way one might paint by numbers in a first grade elementary classroom.

27. By allowing the case be reopened and for additional supplementary discovery to be sought, the Court would prevent a potential injustice and prejudice to the Movant.

28. The Movant respectfully requests the court reopen discovery so as to allow the Debtor additional supplemental discovery regarding the endorsement team, its existence, its function and its involvement in the manufacturing of "tah-dah" endorsements in the instant case. Alternatively, the Movant respectfully requests the Court consider the evidence of the Note Endorsement Team order form submitted under oath and subject to Rule 9011 in the Sanchez case in the instant case for the reasons stated above.

Argument

A Motion to Reopen for Additional Evidence is appropriate to give a party the opportunity to include additional evidence in the record when the moving party offers evidence as to the nature of the evidence to be introduced. See, e.g. Air et Chaleur v. Janeway, 757 F.2d 489, 495 (2d Cir. 1958) (movant offered no proof about the nature of the additional testimony) and when the party was diligent in producing its evidence but was reasonably and genuinely surprised by the need for additional evidence. See Rivera-Flores v. Puerto Rico Tel.Co., 64 F.3d 742,747(1st Cir 1995); Air et Chaleur, 757 F.2d at 495; Playboy Enters. V. Dumas, 960 F.Supp. 710, 723 (S.D.N.Y. 1997), aff'd, 159 F.3d 1347 (2d Cir 1998) (table case). As set forth above, the Movant fully describes the nature of the evidence and the surprising happen stance circumstamces by which the undersigned was made aware of the existence of the Note Endorsement Team order forms on Wells Fargo stationary.

In considering reopening a case for additional evidence, the evidence must be relevant , admissible, technically adequate and helpful. U.S. v. Parker, 73 F.3d 48, 53 (5th Cir. 1996) reh'g granted, 80 F.3d 1042 (5th Cir. 1996), reinstated in relevant part, 104 F.3d 72(5th Cir 1997). The evidence to be presented is relevant to the case at bar and is admissible as a statement of a party and judicial admission as to the existence of a Note Endorsement Team at Wells Fargo.

When ruling on a motion to reopen, the court should consider when the motion was made, the nature of the additional evidence and the prejudice in granting or denying the motion. Garcia v. Women's Hospital of Texas, 97 F.3d 810,814 (5th Cir. 1996); Blinzler v. Marriott International, 81 F.3d 1148, 1160 (1st Cir 1996); Joseph v. Terminix International Co., 17 F.3d 1282, 1285 (10th Cir. 1994); see 12 Moore's Federal Practice 3d §59.13[3][c]. The evidentiary hearing in the instant case was held in December 2013 and judgment has not yet been rendered as this court requires briefs on the issue of admissibility of the Respondent's electronic business records and Mr. Campbell's competency to testify to the same.

WHEREAS, For all the reasons set forth above, the Movant respectfully moves this court to

1. Grant its motion and reopen the case to permit supplemental additional discovery and presentment of evidence; and
2. Grant such other relief the court deems just and proper.

Respectfully Submitted,

This the 11th Day of March, 2014.

__/S/ Linda M. Tirelli________

Linda M. Tirelli, Esq.,
Counsel for the Debtor
Garvey Tirelli & Cushner, Ltd.
Westchester Financial Center
50 Main Street, Suite 390
White Plains, NY 10606
Ph. (914)946-2200
Emai:LindaTirelli@TheGTCFirm.com

<u>CERTIFICATE OF SERVICE</u>

Linda M. Tirelli, attorney for the debtor, hereby certifies to the Court as follows:

1. I am not a party for the foregoing proceeding;
2. I am not less than 18 years of age;
3. I have this day served a copy of the foregoing

"Supplemental Emergency Motion To Reopen And For Leave To Propound Supplemental Discovery To Defendant For Additional Evidence Withheld Prior To Trial"

on all parties in interest by placing the same in an envelope, first-class mail, postage prepaid, addressed to each person at his dwelling house or usual place of abode or to the place where he regularly conducts his business or profession as follows:

Cynthia C. Franklin
One Garrett Place, #5D
Bronxville, NY 10708

Nicole E. Schiavo, Esq.
David Dunn, Esq.
Hogan Lovells US LLP
875 Third Avenue
New York, NY 10022

Jeffrey Sapir, Esq.
Chapter 13 Trustee
399 Knollwood Road
White Plains, NY 10603

United States Department of Justice
Office of United States Trustee
Southern District of New York
Attn: Attorney Greg Zipes, and
Attorney Andy Velez-Rivera
201 Varick St. / Suite 1006
New York, NY 10014

4. To the best of my knowledge, information and belief, the parties in interest are not infants or incompetent persons;

5. Service as outlined herein was made within the United States of America.

This the 11th Day of February 2014.

__/S/ Linda M. Tirelli________
Linda M. Tirelli, Esq.,
Counsel for the Debtor
Garvey Tirelli & Cushner, Ltd.
Westchester Financial Center
50 Main Street, Suite 390
White Plains, NY 10606
Ph. (914)946-2200
Emai:LindaTirelli@TheGTCFirm.com

EXHIBIT S-A

LINDA TIRELLI, ESQ
GARVEY, TIRELLI & CUSHNER, LTD.
COUNSEL FOR DEBTOR
WESTCHESTER FINANCIAL CENTER
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WHITE PLAINS, NEW YORK 10606
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IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
MANHATTAN DIVISION

---X

IN THE MATTER OF

CARLOS R. MOTA

DEBTOR

---X

CHAPTER 13
CASE NO: 10-13989 (SHL)

REQUEST FOR ADMISSIONS

REQUEST FOR ADMISSIONS OF FACTS
FROM THE DEBTOR: CARLOS MOTA
TO THE RESPONDENT: WELLS FARGO BANK, NA

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, which is made applicable to this Adversary Proceeding by Rule 7036 of the Federal Rules of Bankruptcy Procedure, Debtor/Plaintiff hereby demands that the Defendant, **within thirty (30) days after service hereof**, admit or specifically deny for the purposes of the above-captioned Adversary Proceeding and subject to all pertinent objections as to admissibility which may be interposed during further proceedings, the truth of the following facts.

In the event that any request is denied in whole or in part, you should set forth the reasons for such denial and identify the persons having knowledge thereof and the documents relating thereto.

DEFINITIONS

1) "Document" is used in the broadest sense and includes, without limitation, all writings of any kind, including the originals, identical copies and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise (including without limitation correspondence; memoranda; personal notes; personal files, diaries, desk calendar or personal calendar entries; statistics; letters; telegrams; minutes; contracts; reports; articles; speeches; studies; checks; statements; confirmation slips; receipts; returns; summaries; pamphlets; books;

magazines; prospectuses; offers; notations of any sort of conversations, telephone calls, meetings or any other communications; bulletins; printed matter; computer printouts; invoices; worksheets; and all drafts, alterations, modifications, changes and amendments of any of the foregoing); graphic or other records or representations of any kind (including without limitation photographs; charts; graphs; microfiche; microfilm; video tape; recordings; motion pictures) and electronic, mechanical or electrical records or representations of any kind (including without limitation computer files; tapes; cassettes; disks; diskettes; and records) within the possession, custody or control of Creditor, or the possession, custody or control of any director, officer, employee, agent, including attorneys, accountants, financial or real estate consultants or advisors, of Creditor, or any other person acting or purporting to act on the behalf of Creditor.

2) The term "person" means and includes, without limitation, each natural person, sole proprietorship, partnership, corporate entity, association, trust, governmental body or agency, and all past and present officers, agents, members, employees or other people acting or purporting to act on such person's behalf.

3) "Relating to" shall mean consisting of, referring to, reflecting or in any way legally, logically or factually connected with the matter discussed. A document "relating to" a given subject is any document identifying, showing, referring to, dealing with, evidencing, commenting upon, having as a subject, describing, summarizing, analyzing, explaining, detailing, outlining, defining, interpreting, or pertaining to that subject, including, without limitation, documents referring to the presentation of other documents.

4) As used herein, the singular includes the plural and vice versa; the words "and" and "or" shall be both conjunctive and disjunctive; the word "all" means "any and all"; the word "any" means "any and all"; the word "each" means "each and every."

5) As used herein, the past tense shall include the present tense, and vice versa; the word

"including" means "including without limitation."

6) "Communication" or "Contact" includes any transmission or transfer of information of any kind, orally, in writing, or in any other manner, at any time or place, and under any circumstances whatsoever.

7) "And" as well as "or" shall be construed disjunctively as necessary in order to bring within the scope of the request all responses which might otherwise be construed to be outside its scope; the word "all" means "any and all"; the word "and" means "any and all"; the word "including" means "including, without limitation"; the past tense shall include the present tense and vice versa; and the word "he" or any other masculine pronoun includes any individual regardless of sex.

8) "You" or "your" refers to the party answering this request or any other person acting on the party's behalf or acting under the party's discretion or control.

9) "Court" means the United States Bankruptcy Court for the Southern District of New York, unless otherwise specified.

10) "Wells Fargo" means "Wells Fargo Bank, NA" and its affiliated and related entities.

11) "Creditor" means "Wells Fargo" a/k/a"Wells Fargo Bank, NA" and its affiliated and related entities.

12) "Debtor" means Mr. Carlos Mota.

REQUEST FOR ADMISSIONS

1. Admit that the attached Exhibit "A" is a true copy of the "Wells Fargo Mortgage Foreclosure Attorney Procedure Manual, Version 1"

RESPONSE:

2. Admit that the attached Exhibit "A" is a complete copy of the "Wells Fargo Mortgage Foreclosure Attorney Procedure Manual, Version 1"

RESPONSE:

3. Admit that the attached Exhibit "A" is an accurate copy of the "Wells Fargo Mortgage Foreclosure Attorney Procedure Manual, Version 1"

RESPONSE:

4. Admit that the heading "Note Endorsement" and ensuing chart described on page 17 of the attached Exhibit "A" is accurate as of the date of the "Wells Fargo Mortgage Foreclosure Attorney Procedure Manual, Version 1" marked as Exhibit "A".

RESPONSE:

LINDA TIRELLI, ESQ
GARVEY, TIRELLI & CUSHNER, LTD.
COUNSEL FOR DEBTOR
WESTCHESTER FINANCIAL CENTER
50 MAIN STREET, SUITE 390
WHITE PLAINS, NEW YORK 10606
PH(914) 946-2200 /FAX(914)946-1300

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
MANHATTAN DIVISION

---X

IN THE MATTER OF	
	CHAPTER 13
CARLOS R. MOTA	**CASE NO: 10-13989 (SHL)**
DEBTOR	**CERTIICATE OF SERVICE OF REQUEST FOR ADMISSIONS**

--------------------------------------X

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

Linda M. Tirelli, attorney for the debtor, hereby certifies to the Court as follows:

1. I am not a party for the foregoing proceeding;
2. I am not less than 18 years of age;
3. I have this day served a copy of the foregoing

FIRST REQUEST FOR ADMISSIONS OF FACTS FROM THE PLAINTIFF/ DEBTOR: CARLOS MOTA TO THE RESPONDENT: WELLS FARGO BANK, NA

on all parties in interest by placing the same in an envelope, first-class mail, postage prepaid, addressed to each person at his dwelling house or usual place of abode or to the place where he regularly conducts his business or profession on **February 21, 2014** as follows:

Nicole Schiavo, Esq.
David Dunn, Esq.
Hogan Lovells US LLP
875 3rd Ave
New York, NY 10022
Via First Class US Mail RRR# 70110470000151645501

David J. Babel, Esq.
2525 Eastchester Road
Bronx, NY 10469

Jeffrey Sapir, Esq.
Chapter 13 Trustee
399 Knollwood Road
White Plains, NY 10603

Greg Zipes, Esq.
U.S. Dept. of Justice / Office of the U.S. Trustee
201 Varick St., Suite 1006
New York, NY 10014

DATED: February 21, 2014

/S/ LINDA M. TIRELLI
Linda M. Tirelli, Esq.
GARVEY, TIRELLI & CUSHNER, LTD.
COUNSEL FOR DEBTOR
WESTCHESTER FINANCIAL CENTER
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EXHIBIT S-B

Hogan Lovells

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March 7, 2014

VIA Federal Express

Linda Tirelli, Esq.
Garvey Tirelli & Cushner, LTD
50 Main Street, Suite 390
White Plains, New York 10606

Re: *In re Mota, Case No. 10-13989 and Mota v. Wells Fargo Bank, N.A., et al., Case No. 13-01553*

Dear Ms. Tirelli:

As you know, we are counsel for secured creditor Wells Fargo Bank, N.A. ("Wells Fargo") in the above-referenced Chapter 13 case and counsel for Wells Fargo and HSBC Bank USA National Association as Trustee For Wells Fargo Asset Securities Corporation, Mortgage Pass-Through Certificates Series 2006-8 (the "Trust", together with Wells Fargo, the "Defendants") in the above referenced adversary proceeding. We are in receipt of your "Second Supplemental Request for Production of Documents" dated February 7, 2014 and "Request for Admissions" dated February 21, 2014. Defendants reject these requests.

Pursuant to order of the Court dated October 24, 2013 (docket no. 91) all discovery was to be completed by November 15, 2013. As both of these requests were made well after the discovery cutoff, Defendants have rejected these requests as untimely.

In addition and without prejudice to the issue of timeliness of these requests, the Request for Admissions annex as Exhibit A and refer to a document which, on its face, states that it is privileged, confidential and intended for internal use only. If the requests were timely, and if a response was required, we would object to any such request on the grounds that it concerns and relates to privileged information and materials. Further in that regard, we request that you inform us how and where you obtained a copy of this document. It's delivery to you (or to whoever you got if from) was not authorized, and was, we believe, a breach of the obligations to Wells Fargo. Please immediately return to us or destroy all copies of that document and withdraw your requests based upon a facially privileged document. Again without prejudice to each of the objections stated above, the document is dated November 9, 2011 and the proof of claim at issue in this case was filed on August 19, 2010 (with an updated copy of the note filed with the amended proof of claim on January 21, 2011). As such, the document clearly is irrelevant to any issue in dispute in this case.

Sincerely,

Nicole Schiavo
Associate
nicole.schiavo@hoganlovells.com
D 212-918-3019

EXHIBIT S-C

Note Endorsement

Please Note This process is only to be used if your office has already received the note. If you have not received the note, follow process for requesting the note listed in the <u>Missing Note Process</u> section of this manual.

STEP	ACTION
1	**Attorney:** Enter step Z02 (Endorsed Note Needed) to the FOR3 screen (if a loan is in foreclosure) or the BNK3 screen (if a loan is in Bankruptcy).
2	**WFHM Default Docs Team:** Research needed endorsement. • If the blank endorsement is in the file for an **original** state, execute the endorsement, send the original document to the attorney, and complete the Z02 step. • If needed endorsement is located for a **copy state**, execute the endorsement, send the original document to imaging, and complete the Z02 step.

Allonge

Please Note An allonge cannot be processed unless default docs or the attorney is in possession of the original note.

STEP	ACTION
1	**Attorney:** If an allonge is still needed after a note has been endorsed, forward the allonge attachment to Wells Fargo Default Docs area via email address <u>Defaultallongemailbox@wellsfargo.com</u> and add step Y44, ATTORNEY REQUESTED ALLONGE, to FOR3.
2	**WFHM Default Docs Team:** Once allonge attachment is received, enter **log code FCALGR** (ALLONGE REQUEST RECEIVED). If property is located in a copy state, determine if original note can be ordered to complete the endorsement on the note. • If the original note can be ordered, enter **log code of FCODAL** (FILE ORDERED FOR ALLONGE) and order the file from the custodian. There is a 14-business-day turnaround time for files to be ordered and received from the custodian.
3	**WFHM Default Docs Team:** If file was ordered and received, review FOR2 notes to determine what entities the attorney needs the note endorsement to reflect. • Type the appropriate endorsement directly to the note, and make a copy of the endorsed note to be faxed to the WFHM imaging department. • Enter **log code FCNRCS** (NOTE REQUEST COMPLETED/SENT TO ATTORNEY) and mail the attorney the original, endorsed note. • Complete the Y44 step with the actual date the note was returned to attorney.
4	**WFHM Default Docs Team:** If property is located in an original doc state and attorney has the original note, review the allonge attachment to determine if we have signing authority to execute internally. • If WFHM does have signing authority, enter **log code FCALGI** (ALLONGE SENT FOR INTERNAL SIGNATURE) • If WFHM does not have signing authority, enter **log code FCALGE** (ALLONGE SENT OUT FOR EXECUTION) and mail document for 3rd party signature. • After allonge has been executed, enter **log code FCALGA** (ALLONGE