Lawrence J. Dreyfuss, Bar No. 76277 1 Bruce W. Dannemeyer, Bar No. 107243 2 THE DREYFUSS FIRM A Professional Law Corporation 3 7700 Irvine Center Drive, Suite 710 Irvine, California 92618 (949) 727-0977; Facsimile (949) 450-0668 5 Attorneys for defendant WELLS FARGO BANK, N.A. 6 7 8 9 10

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LOS ANGELES SUPERIOR COURT

JAN 242012

SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES, EAST DISTRICT

Ì	CABRERA, MIGUEL A.,) Case No.: KC 062236
١) Judge Salvatore Sirna
I	Plaintiff,) Department G
	VS. UNIVERSAL AMERICAN MORTGAGE COMPANY OF CALIFORNIA; WELLS FARGO BANK, N.A.; and all persons or) REPLY OF WELLS FARGO BANK, N.A BASED UPON NON-OPPOSITION TO DEMURRER TO COMPLAINT)
	entities unknown, claiming any legal or equitable right, title, estate, lien or interest in the property described in this Complaint adverse to Plaintiff's title, or any cloud upon Plaintiff's title thereto; and DOES 1 through 25,))))) DATE: January 31, 2012) TIME: 8:30 a.m.) DEPT: G
	Defendants.	
)

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

The hearing on the demurrer of Wells Fargo Bank, N.A. is set for January 31, 2012. Pursuant to CCP § 1005, any opposition papers were due to be served and filed on or before January 18, 2012, nine court days prior to the hearing. No such opposition has been received. Since the demurrer is well founded and unopposed, it should be sustained.

DATED: January 20, 2012 THE DREYFUSS FIRM, plc

> By: LAWRENCE J. DREYFUSS Attorneys for defendant Wells Fargo Bank, N.A.

PROOF OF SERVICE (By Mail) (CCP Section 1013a(3))

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I am over the age of 18, and I am not a party to the within action. I am employed by THE DREYFUSS FIRM. PLC, in the County of Orange, at 7700 Irvine Center Drive, Suite 710, Irvine, CA 92618.

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On January 23, 2012, I served the attached: Reply of Wells Fargo Bank based upon non-opposition to demurrer on the interested parties in this action by placing true copies thereof in sealed envelopes, addressed as follows:

7 Al West

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Law Offices of West & Associates 700 N. Pacific Coast Highway, Ste. 201 Redondo Beach, CA 90277 Attorneys for Plaintiffs

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[X] (By Mail) I placed said envelopes for collection and mailing, following ordinary business practices, at the business offices of THE DREYFUSS FIRM, PLC at the address set forth above, for deposit in the United States Postal Service. I am readily familiar with the practice of THE DREYFUSS FIRM, PLC for collection and processing of correspondence for mailing with the United States Postal Service, and said envelopes will be deposited with the United States Postal Service on said date in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

(By Facsimile Transmission) I served the above-described document on the interested parties in this action by sending a true copy thereof by facsimile transmission pursuant to California rules of Court, Rule 2009(i)2, from facsimile machine number (949) 450-0668. The facsimile machine I used complied with California Rules of Court, Rule 2003(3), and no error was reported by the machine. Pursuant to Rule 2009(i)4, I caused the machine to print a transmission record of the transmission

I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare, under penalty of perjury under the laws of the State of California, that the above is true and correct.

Executed on January 23, 2012, at Irvine, California.

	ATHOUT ATTORNEY (Name, State Bar number, and address):	TON GOOM OUL ONE!		
Allen D. West, J	oast Hwy, Suite 201	dath each		
Redondo Beach,		新原理、新原理		
TELEPHONE N	O: 310-374 4141 FAX NO. (Optional): 310-372 4.			
E-MAIL ADDRESS (Option ATTORNEY FOR (Name	e). Plaintiff, Miguel A. Cabrera	DEC 1 4 2011 3		
SUPERIOR COURT	Plaintiff, Miguel A. Cabrera of California, County of LOS ANGELESC 400 Civic Center Plaza 400 Civic Center Plaza	JOHNA, CLARISE, CLERK		
MAILING ACCRESS	400 Civic Center Plaza	1 AZUM M. Showard		
CITY AND ZIP CODE BRANCH NAME	Pomona, CA 91766 East District - Pomona Courthouse	JOHNA, CLARICE, CLERK JOHNA, CLARICE, CLERK BY M. THOMAS DEPUTY CASE NUMBER V. CO62226		
PLAINTIFF/PET	TIONER: Miguel A. Cabrera EAS	CASE NUMBER:		
DEFENDANT/RESPO	DNDENT: Universal American Mortgage Comp	NU02230		
	PROOF OF SERVICE OF SUMMONS	Ref. No. or Fig No.:		
	(Separate proof of service is required	d for each party served.)		
 At the time of service I was at least 18 years of age and not a party to this action. 				
I served copies of:				
a. ✓ summons				
b. 🗸 cor	nplaint			
c. 🔽 Alt	ernative Dispute Resolution (ADR) package			
	il Case Cover Sheet (served in complex cases only)			
	ss-complaint			
		lendum and Statement of Location; Notice of Lis Pendens	s.	
i. V ou	Attachment # 1.	endum and oratement of Escation, House of Els Ferrasin	0,	
a. Party served (specify name of party as shown on documents served):				
Wells Far	go Bank, N. A.			
b. Pers	on (other than the party in item 3a) served on behalf of	f an entity or as an authorized agent (and not a person		
unde	ritem 5b on whom substituted service was made) (spe	ecify name and relationship to the party named in item 3a	1):	
Cor	poration Service Company, authorized agents	s to accept service of process.		
	the party was served:			
	Avenue, Helena, MT 59624-1691 rty (check proper box)			
□ bu		nts listed in item 2 to the party or person authorized to		
	eive service of process for the party (1) on (date):	(2) at (time):		
	substituted service. On (date): at (to the presence of (name and title or relationship to person	ime): I left the documents listed in item 2 with on indicated in item 3):	or	
(1)	(business) a person at least 18 years of age a	apparently in charge at the office or usual place of busine	ess	
()	of the person to be served. I informed him or h			
(2)	(home) a competent member of the household	d (at least 18 years of age) at the dwelling house or usua	d	
	place of abode of the party. I informed him or i			
(3)		ist 18 years of age apparently in charge at the usual mail		
	address of the person to be served, other than him or her of the general nature of the papers.	n a United States Postal Service post office box. I inform	ed	
(4)		paid) copies of the documents to the person to be served		
(4)		Civ. Proc., § 415.20). I mailed the documents on		
	(date): from (city):	or a declaration of mailing is attached	1.	
(5)	I attach a declaration of diligence stating ac			
			ege 1 of	