**STATE OF FLORIDA**

 **IN THE PALM BEACH COUNTY**

**CIVIL DIVISION CASE No. -MB**

CREDIT CORP SOLUTIONS, INC.

 Plaintiff

-vs-

**DEFENDANT WITNESS**

**AND EXHIBIT LIST**

Defendant.

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POLLACK & ROSEN, P.A.

Jeffrey W. Blacher (FL. Bar No. 8168)

Attorney for Plaintiff Attorney for Defendant

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**DEFENDANT WITNESS LIST**

 NOW COMES , By and Through his Attorneys, The Law Offices of Brian P. Parker, P.C. and Brian P. Parker (FL. Bar No. ) and States the Following will make up his Witness List:

1. Records Custodian of any document proving an assignment of the specific debt of Defendant.
2. Lynne Fisher who signed the Bill of Sale for each assignor/assignee in the Bill of Sale between, Synchrony Bank, RFS Holding, LLC, Synchrony Card Funding, LLC and Retail Finance Credit Services, LLC.
3. Records Custodian for the Forward Flow Purchase Agreement (the Agreement).
4. Records Custodian with proof of the above 1-3 documents actually transferred the debt of the Defendant.
5. Assignment witness of Plaintiff showing how the debt passed between each entity in the Bill of Sale.
6. Custodian of Records for the Notification Files in the Bill of Sale.
7. Witnesses of Plaintiff.
8. Any Rebuttal and Impeachment Witnesses.
9. Defendant reserves the Right to Amend this Witness List.

**DEFENDANT EXHIBIT LIST**

NOW COMES , By and Through his Attorneys, The Law Offices of Brian P. Parker, P.C. and Brian P. Parker (FL. Bar No. ) and States the Following will make up his EXHIBIT List:

1. All documents possessed by Plaintiff proving an assignment of the specific debt of Defendant.
2. All documents possessed by Plaintiff granting Lynne Fisher authorization to Sign the Bill of Sale between Synchrony Bank, RFS Holding, LLC, Synchrony Card Funding, LLC and Retail Finance Credit Services, LLC.
3. The Forward Flow Purchase Agreement (the Agreement) possessed by Plaintiff from the Bill of Sale.
4. The Notification Files in the Bill of Sale and proof of the connection with the Bill of Sale possessed by Plaintiff.
5. Assignments showing how the debt passed between each entity in the Bill of Sale that is possessed by Plaintiff.
6. Contract between the Original Creditor and Defendant.
7. Assignment of the specific debt between the Original Creditor and Defendant.
8. Documents of Plaintiff’s Exhibit List.
9. Any Rebuttal and Impeachment Documents.
10. All documents such as an Answer, Affidavit and/or complaint paperwork of Plaintiff.
11. Defendant reserves the Right to Amend this Exhibit List.

**CERTIFICATE OF SERVICE**

The Above Documents were served upon the Court and Counsel for Plaintiff on January 27, 2025 by EFILING to the Court and Counsel email portals.

/s/

 *Attorney for Defendant Perez*