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6
7 **IN THE DISTRICT COURT FOR THE SECOND JUDICIAL DISTRICT**
8 **FOR THE STATE OF IDAHO, IN AND FOR NEZ PERCE COUNTY**

JEREMY L. BASS,

Plaintiff,

vs.

MICHAEL J. NEWELL, c/o IDEA Law Group, LLC,
ESQ,
CARRINGTON MORTGAGE SERVICES, LLC,
BANK OF AMERICA, N.A.,
RECONTRUST COMPANY, N.A.,
DOE I-X

Defendants.

Case No. CV35221875

MOTION FOR RECONSIDERATION

DEMAND FOR JURY

9
10 COMES NOW Plaintiff, JEREMY L. BASS (hereinafter "Mr. Bass"), and respectfully moves
11 this Court to retain this case on the docket based on the additional evidence, expert witness
12 report, and the belief that there are sufficient grounds for Civil RICO claims. Mr. Bass also seeks
13 the Court's permission to amend his pleading to provide a more accurate and comprehensive
14 account of the facts and allegations pertaining to the proceedings over the property located at
15 **1515 2nd AVE. LEWISTON ID 83501-3926** (hereinafter "THE PROPERTY" or "HOUSE" fully described in
16 further reading). In support of this motion, Mr. Bass respectfully asks the Court to consider the
17 following arguments and legal authorities:

18
19 I. Introduction

20
21 1.1 The original case was dismissed due to filing technicalities and the inability to obtain legal
22 representation as a pro se litigant with the defendants controlling the clock forcing me to file

1 earlier at then I was ready for. Mr. Bass has since diligently researched and gathered additional
2 evidence, secured an expert witness, and identified potential Civil RICO claims.

3
4 1.2 Mr. Bass is making this motion to retain the case on the docket to fulfill the need for justice.
5 Despite the challenges he has faced as a pro se litigant, he has made great strides in
6 understanding the legal process and presenting his case more effectively.

7
8 1.3 In light of the newly gathered evidence, expert witness report, and potential Civil RICO claims,
9 Mr. Bass respectfully requests that the Court retain the case on the docket and grant him the
10 opportunity to amend his pleading to provide a more accurate and comprehensive account of
11 the facts and allegations.

12 1.4 In pursuant to I.R.C.P. Rule 39(b) "When No Demand is Made. Issues on which a jury trial is not
13 properly demanded are to be tried by the court. But the court may, on motion, order a jury trial
14 on any issue for which a jury might have been demanded." Mr. Bass is

15 16 II. Legal Authority

17
18 2.1 The Court has the discretion to allow amendments to pleadings under Rule 15(a) of the
19 Federal Rules of Civil Procedure, which states that "[a] party may amend its pleading once as a
20 matter of course within 21 days after serving it, or if the pleading is one to which a responsive
21 pleading is required, 21 days after service of a responsive pleading or 21 days after service of a
22 motion under Rule 12(b), (e), or (f), whichever is earlier."

1 2.2 In the interest of justice and fairness, the Court should permit Mr. Bass to amend his pleading
2 to provide a more accurate and comprehensive account of the facts and allegations. As a pro se
3 litigant, Mr. Bass has faced significant challenges in navigating the legal process and
4 understanding the intricacies of civil procedure.

5
6 2.3 The legal authority to grant leave to amend a pleading can be found in similar rulings within
7 this district, such as *Jesinoski v. Countrywide Home Loans, Inc.*, 574 U.S. 259 (2015), which said: "a
8 district court should grant leave to amend even if no request to amend the pleading was made
9 unless it determines that the pleading could not possibly be cured by the allegation of other
10 facts." *Cook, Perkiss & Liehe v. N. Cal. Collection Serv.*, 911 F.2d 242, 247 (9th Cir. 1990).

11
12 III. Conclusion

13
14 For the foregoing reasons, Mr. Bass respectfully requests that the Court retain the case on the
15 docket, grant him the opportunity to amend his pleading, and consider the newly gathered
16 evidence, expert witness report, and potential Civil RICO claims in pursuit of justice.

17
Dated this 30 day of March 2023.

Respectfully submitted,
Jeremy L. Bass
Plaintiff/ Pro Se

Signature

CERTIFICATE OF MAILING

I certify that I have sent by email and first-class mail this OPPOSITION TO DEFENDANT'S MOTION TO DISMISS AND STRIKE SUMMONS AND COMPLAINT to Defendants on March 30th, 2023, at the following email address and postal address:

Email: mnewell@idealawgroupllc.com
Postal: Michael J. Newell ISBA #1953
IDEA Law Group, LLC
4530 S. Eastern Ave., Ste. 10
Las Vegas, NV 89119

Postal: Randall Szabo #10901
IDEA Law Group, LLC
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C T CORPORATION SYSTEM
1555 W SHORELINE DR
STE 100
BOISE, ID 83702

Postal: CARRINGTON MORTGAGE SERVICES
C T CORPORATION SYSTEM
1555 W SHORELINE DR
STE 100
BOISE, ID 83702

Jeremy L. Bass
Plaintiff

Signature

ACKNOWLEDGMENT

STATE OF IDAHO)

: ss.

County of NEZ PERCE COUNTY)

On the _21_ day of __FEBRUARY__, 2023, before me, the undersigned Notary Public, personally appeared __Jeremy Bass__, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that s/he executed the same.

IN WITNESS WHEREOF, I have set my hand and seal the day and year as above written.

Notary Public for Idaho

Residing at _____

Commission Expires: _____

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