

Jeremy L. Bass, Pro Se  
1515 21<sup>st</sup> ave  
Lewiston, ID 83501-3926  
Ph: 208-549-9584  
Quantum.J.L.Bass@RAWdeal.io

IN THE DISTRICT COURT FOR THE SECOND JUDICIAL DISTRICT  
FOR THE STATE OF IDAHO, IN AND FOR NEZ PERCE COUNTY

JEREMY L. BASS,  
  
Plaintiff,  
  
vs.  
  
MICHAEL NEWELL, ESQ AT IDEA LAW  
GROUP, LLC,  
CARRINGTON MORTGAGE  
SERVICES, LLC,  
AND BANK OF AMERICA, N.A.  
  
Defendants.

Case No. CV35221875

MOTION TO WAIVE  
BOND REQUIREMENT

COMES NOW, the Plaintiff, Jeremy L. Bass, and respectfully moves this court to waive the bond requirement for the temporary restraining order (TRO) issued in this case.

The Idaho Rules of Civil Procedure 65(b) provides that "the court shall require the party seeking the restraining order to give a bond in such sum as the court deems proper, payable to the adverse party, to the effect that the party so restrained shall not be injured by the order, and that the adverse party shall be compensated for any loss or damage sustained by the reason of the restraint if the court should finally determine that the restraint was wrongful or improper."

However, the Idaho rules also provide that a court may waive the bond requirement for parties constrained in financial hardship. In this case, Plaintiff is constrained in financial hardship and has no ability to post a bond. Requiring Plaintiff to post a bond would impose a severe financial hardship on Plaintiff.

The Plaintiff has gone over hindrances from legal access and funding in the MOTION FOR APPOINTMENT OF COUNSEL filing, but at this moment selling anything he has is the only mode of personal finance as he seeks stability, a bond would put undue stress on Mr. Bass. The balance of hardships weighs heavily in favor of Mr. Bass, as the harm that he will suffer if the sale is allowed to proceed far outweighs any harm that the Defendants may suffer by delaying and preventing the sale. A bond would have little effect one way or another to the defendants, but greatly impact the Plaintiffs ability to see this case be effectively litigated on his behalf given the complexity of this matter.

Therefore, Plaintiff respectfully requests that this court waive the bond requirement for the TRO issued in this case..

Dated this 25 day of January 2023.

Respectfully submitted,

Jeremy L. Bass  
Plaintiff

---

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 the Defendant on January 25, 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

Jeremy L. Bass  
Plaintiff

---

Signature