IN THE DISTRICT COURT FOR THE SECOND JUDICIAL DISTRICT

FOR THE STATE OF IDAHO, IN AND FOR THE COUNTY OF NEZ PERCE

Jeremy L. Bass, Plaintiff,

vs.

BANK OF AMERICA, MICHAEL NEWELL, ESQ AT IDEA LAW GROUP LLC, and CARRINGTON MORTGAGE,

Defendants.

CIVIL ACTION NO. [XXX]

REQUEST FOR TEMPORARY RESTRAINING ORDER

Plaintiff Jeremy L. Bass respectfully requests that this Court issue a temporary restraining order (TRO) prohibiting Defendants from proceeding with the scheduled trustee's sale of the property located at 1515 21st ave. Lewiston ID 83501-3926.

As grounds for this request, Plaintiff alleges the following:

1. Plaintiff is the owner of the property located at 1515 21st ave. Lewiston ID 83501-3926.
2. In 2009, the note securing the Plaintiff’s property was recorded as being paid off and a letter of full reconveyance was filed with the title company but was never told to the Plaintiff.
3. Despite this, Defendant Bank of America has pushed forward with plans to sell the property at a trustee's sale.
4. Defendant Michael Newell, ESQ., the lead lawyer for the law firm, idea law group llc, has ignored Plaintiff's requests to halt the sale despite a cease and desist and being presented with all of the proper information that shows what the title company said was the last legal document, the letter of full reconveyance.
5. Defendant Carrington Mortgage, the servicing arm of the bank, tried to get the Plaintiff to sign back dated versions of a new contract as well as tried to bribe the Plaintiff showing they were aware the paid-off loan which made them responsible for the overpayments.
6. The Defendant Michael Newell, ESQ., has not provided any deed of trust that supersedes the letter of full reconveyance, where the last deed provided was in October 2009 and the letter of full reconveyance is for November 2009.
7. The sale of the property would cause irreparable harm to Plaintiff, as they would lose their home and their investment in the property.
8. There is no adequate remedy at law for the harm that Plaintiff will suffer if the sale is allowed to proceed.

Therefore, Plaintiff requests that this Court issue a TRO prohibiting the sale of the property and requiring Defendants to provide proof that the sale is authorized by law.

Dated: [DATE]

Jeremy L. Bass Plaintiff