

FILED
ENDORSED
2014 MAR 27 PM 3:38
LEGAL PROCESS #6

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8 Attorneys for Plaintiffs,
9 **THADDEUS J. POTOCKI and KELLY R. DAVENPORT**

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12 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
13 **IN AND FOR THE COUNTY OF SACRAMENTO**

LAW OFFICES OF TED A. GREENE, INC.
1912 F Street, Suite 110, Sacramento, California 95811
Telephone (916) 442-6400

12 THADDEUS J. POTOCKI and KELLY R.
13 DAVENPORT,

14 Plaintiffs,

15 vs.

16 WELLS FARGO BANK, N.A.; FIRST
17 AMERICAN SERVICING SOLUTIONS, LLC;
18 U.S. BANK, N.A.; and DOES 1 through 100,
19 inclusive,

20 Defendants.

CASE NO.: 34-2014-00160873

**DECLARATION OF TED A. GREENE,
FOR GOOD CAUSE**

*[Filed concurrently with Plaintiff's Notice of
Ex Parte Application; Memorandum of
Points and Authorities in Support;
[Proposed] Temporary Restraining Order
and Order to Show Cause]*

Date: March 28, 2014
Time: 2:30 PM
Dept.: 53

1 I, Ted A. Greene, declare as follows:

2 I am a resident of the County of Sacramento. I am over the age of 18. I am an attorney at
3 the Law Offices of Ted A. Greene, Inc., and counsel of record for Plaintiffs herein.

4 My clients tried desperately to stop the foreclosure of the subject home. Because the bank
5 was not postponing the foreclosure sale (scheduled for Tuesday, April 1, 2014) they came to my
6 office on March 27, 2014 to seek the help of the Court.


7 We began preparing the required documents in an attempt to seek ex parte relief on
8 March 28, 2014, the last Court day before the sale.

9 Tomorrow, March 28, 2014, is the last day upon which the Plaintiffs can seek relief or his
10 home will be sold at auction on Tuesday, April 1, 2014.

11 I apologize to the Court that this was not completed within the timeframes established.
12 This matter is of grave importance to my clients and I humbly ask the Court to grant our request
13 for a hearing.

14 I do believe we made a good faith effort to meet the guidelines. We even notified the
15 defendants herein of our intent to appear ex parte.

16 I declare under the penalties of perjury and under the laws of the State of California that
17 the foregoing is true and correct to the best of my personal knowledge and that this declaration
18 was signed in Sacramento, California on March 27, 2014.

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21 Ted A. Greene, Esq.

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