

May 25, 2010

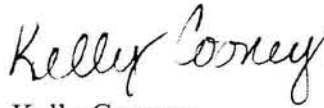
Kerry Walker
142 Medina Lane
Evansville, TN 37332

RE: Kerry Walker v Wells Fargo Bank, et al.
Superior Court of Cherokee County
Civil Action File No. 09-CV-3373-JH

Dear Kerry:

Enclosed please find a copy of Defendant Wells Fargo's Objections and Responses to Plaintiff's First Interrogatories to Defendant in the above matter.

Sincerely,



Kelly Cooney
Paralegal

Enclosure

IN THE SUPERIOR COURT OF CHEROKEE COUNTY

STATE OF GEORGIA

KERRY WALKER a/k/a)	
KERRONE GRAIG WALKER,)	
)	
Plaintiff,)	
)	
-vs-)	CIVIL ACTION
)	FILE NO. 09-CV-3373-JH
)	
WELLS FARGO BANK,)	
NATIONAL ASSOCIATION, as)	
Indenture Trustee Under the)	
Indenture Relating to IMH Assets)	
Corp., Collateralized Asset-Backed)	
Bonds, Series 2004-9, and)	
LOUIS TOBACK,)	
)	
Defendants.)	

**DEFENDANT WELLS FARGO'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S
FIRST INTERROGATORIES TO DEFENDANT**

COMES NOW Defendant Wells Fargo Bank, N.A. (hereinafter "Wells Fargo" or "Defendant") and hereby objects and responds to Plaintiff's First Interrogatories to Defendant, showing the Court as follows:

GENERAL OBJECTIONS APPLICABLE TO ALL INTERROGATORIES

1. Defendant Wells Fargo objects to all Interrogatories to the extent they demand information protected by the attorney-client privilege, common interest privilege or application of the attorney work product doctrine, or any other applicable privilege or immunity.
2. Defendant Wells Fargo objects to all Interrogatories to the extent they seek information that is a matter of public record, is equally available to Plaintiff, or is already in Plaintiff's possession.

3. Defendant Wells Fargo objects to all Interrogatories to the extent they are vague, overbroad or unduly burdensome and not reasonably calculated to lead to the discovery of admissible and/or relevant evidence.
4. Defendant Wells Fargo objects to all Interrogatories to the extent that they exceed the scope of permissible discovery under the Georgia Civil Practice Act.
5. Defendant Wells Fargo objects to all Interrogatories as discovery for Defendant Wells Fargo expired six months after the filing of Defendant's answer on November 9, 2009.
6. Defendant Wells Fargo objects to all Interrogatories to the extent that they seek information which is the work-product of Defendant and/or Defendant's attorneys, and/or which was prepared in anticipation of litigation or for trial by or for another party or by or for that other party's representative (including its attorney, consultant, surety, indemnitor, insurer, or agent) without a prior showing that Plaintiff has a substantial need of the materials in the preparation of its case, and without a showing that it is unable without undue hardship to obtain the substantial equivalent of the materials by other means.
7. Defendant Wells Fargo objects to all Interrogatories to the extent that they seek to obtain the disclosure of the mental impressions, conclusions, opinions, or legal theories of an attorney or other representative of Defendant concerning this litigation.
8. Defendant Wells Fargo objects to all Interrogatories to the extent that they are currently the subject of a Motion for Protective Order.
9. Each of these General Objections is incorporated without further reference in each of the following specific responses made by Defendant to the specific interrogatory propounded by Plaintiff.