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9 Attorneys for Plaintiff  
NATIONSTAR MORTGAGE LLC

10  
11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

13  
14 NATIONSTAR MORTGAGE LLC,  
15 Plaintiff,  
16 vs.

CASE NO. 2:18-cv-03041 DSF (RAOx)  
JUDGE: Hon. Dale S. Fischer  
CTRM.: 7D

**DECLARATION OF NEIL BROOM**

17 PATRICK JOSEPH SORIA, an  
individual; WEST H&A, LLC, a  
18 Delaware Limited Liability Company;  
WARRANTED EFFECTUATION OF  
19 SUBSTITUTE TRANSFEREE INC,  
AKA W.E.S.T Inc., a Delaware  
20 Corporation; WESTWOOD LEGAL, a  
California Corporation; WESTWARD  
21 LEGAL, a California Corporation;  
BRIGHTON LEGAL GROUP, PC, a  
22 dissolved California Corporation; BLG  
PC NATIONAL BY BRIGHTON  
23 LEGAL GROUP, INC., a Delaware  
Corporation; DEUTSCHE MELLON  
24 NATIONAL ASSET, LLC, a Wyoming  
Limited Liability Company;  
25 CHRISTIANA WILMINGTON  
GLOBAL ASSET CORP., a Delaware  
26 Corporation; HBSC US IN ITS  
CAPACITY AS LEGAL TITLE  
27 HOLDER INCORPORATED, a  
Delaware Corporation; CAMDEN  
28 LEGAL GROUP, PC, a dissolved

DATE: June 6, 2018  
TIME: 3:00 p.m.  
CRTRM.: 7D

ACTION FILED: April 11, 2018  
TRIAL DATE: None Set

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1 California Corporation; TAMYRA  
2 WHITE, an individual; GEORGE  
3 WESLEY JR. PIERCE, an individual;  
4 GRICELA MENDOZA, an individual;  
5 BERNARD GERMANI, an individual;  
6 REBEKAH BROWN, an individual;  
7 MICHAEL C. JACKSON, an  
8 individual; CYNTHIA LARA, an  
9 individual; F. MARTINEZ, an  
10 individual; JENNY DE LEON, an  
11 individual; ELBA CHAVEZ, an  
12 individual; RYAN ALEXANDER  
13 UROUIZU, an individual; ROGER  
14 FRANKLIN, an individual; AND  
15 WHATEVER NAME THEY MAY DO  
16 BUSINESS UNDER; and DOES 1  
17 through 10 inclusive,

18 Defendants.

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DECLARATION OF NEIL BROOM

I, Neil Broom, declare as follows:

1. I am the President and Laboratory Director of the Technical Resource Center, Inc, a Computer and Cell Phone Forensics Lab. I have over 25 years of experience providing investigative, technical, educational, and security services. I have a Bachelor of Science in Computer Forensics and Digital Investigation and a Master of Science in Digital Forensics Management. I am co-author of the book Computer Forensics JumpStart. I have testified multiple times in both Federal and State Courts; in Criminal and well as Civil cases, and I am appointed to the Los Angeles Superior Court Panel of Expert Witnesses in Computer Forensics. A true and accurate copy of my Curriculum vitae is attached as Exhibit A to this declaration.

2. On May 31, 2018 at about 12 P.M., I received a call from the offices of Hall Griffin LLP regarding the retention of my services to do a full forensics analysis on an iPhone. I received the iPhone and at about 2:30 P.M. I performed a Logical Extraction of all available data from the iPhone using Cellebrite's UFED Physical Analyzer (version 7.5.0.82).

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1           3.     The UFED Physical Analyzer program allows you to extract data from  
2 a phone and create a report of the selected data found in the phone using keywords,  
3 sorting, and other examination methods. In cooperation with counsel, a report was  
4 generated showing all of the recovered (and, some partially recovered) activity that  
5 occurred on the phone on May 30, 2018 (“May 30 Activity Report”). A true and  
6 accurate copy of the May 30 Activity Report is attached as Exhibit B.

7           4.     The May 30 Activity Report clearly shows that many items, including  
8 text messages, Calendar entries, call logs, and photos/videos, were deleted after May  
9 30, 2018. The last deleted activity (location information) on the iPhone occurred on  
10 May 30, 2017 at 9:40 P.M.

11          5.     Further, while reviewing the May 30 Activity Report, it appears that on  
12 May 30, 2018 someone accessed Trulia, Text Messages, iTunes Account,  
13 Documents, Address Book, Mobile Notes, and Mobile iCalendar from 5:11 to 5:20  
14 P.M. (Starting on Row 152, page 6).

15          6.     When I received the iPhone on May 31<sup>st</sup>, 2018, I reviewed the  
16 “Applications” on the phone. When I reviewed the numerous forensics reports,  
17 including the May 30 Activity Report, it was clear that applications such as:  
18 Bumble, Trulia, RingCentral, Whatsapp, and OpenTable were all on the phone as of  
19 May 30, 2018, but were now no longer on the phone.

20          7.     When I received the iPhone on May 31<sup>st</sup>, 2018, I noticed that the phone  
21 did not have any contacts. When I obtained the forensics data on the phone I was  
22 able to see numerous contacts that were in fact deleted. A true and correct copy of  
23 the report showing the deleted contacts is attached to this Declaration as Exhibit C.

24          8.     When I received the iPhone, I was able to observe that there were no  
25 photographs on the phone, which was very strange, as someone typically has at least  
26 a few pictures saved. Once I reviewed the phone and conducted the forensics  
27 analysis, I was able to determine that a large number of photographs were in fact  
28 deleted.

1           9.     When I was first provided the iPhone, I was provided with the Apple  
2 ID, but could not get into the iCloud.com online account because two-step  
3 verification was enabled and the sim card had been removed from the phone.

4           10.    At or about at 6:10 P.M., May 31, 2018, I obtained the activation code  
5 for Patrick J. Soria's Apple I.D. When I went in and attempted to view the  
6 "backups" for the phone, it appeared that all of the backups were deleted from the  
7 system.

8           11.    After I conducted the full forensics report, I provided that report and  
9 the iPhone back to Hall Griffin LLP for review. It is my professional opinion that a  
10 large amount of information was in fact deleted from the phone prior to turning it  
11 over. Some of that information, including pictures, appeared to relate to real estate  
12 transactions and issues.

13           I declare under penalty of perjury that the foregoing is true and correct.

14           Executed on this 5th day of June, 2018, at Huntington Beach, California.

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Neil Broom

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