











1 advertise, market, offer to sell, and sell such services using the name “Loss  
2 Mitigation Department.” Beginning in or about April 2008, Direct Lender  
3 purported to transfer its loss mitigation operations to LMS. Following the  
4 purported transfer, LMS remained at the same location where Direct Lender had  
5 been, and maintained the same personnel and phone numbers, and used







1 less of a modification or short sale than you could really get.” The website further  
2 has claimed that “[m]any times we can substantially improve your loan  
3 modification or short sale. We know how to communicate with your lender.”

4 *Inbound Telemarketing Sales*





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- “[W]e have a team of lawyers here and we have over 300 employees that do this. I mean, it’s a major, major operation here.”
- “[E]ach modification is approximately 100 man-hours.”



















