

NO: _____

IN THE

supreme court for the united States of America

:Fareed :Sepehry-Fard.

PETITIONER

v.

U.S. BANK NATIONAL ASSOCIATION,
As Trustee for Greenpoint Mortgage Trust
Mortgage Pass-Through Certificates, Series 2007-AR2, et. al.

RESPONDENT (s)

Motion to extend time to file a certiorari petition from the
California Court of Appeal, Sixth Appellate District Case Number
H052586, Supreme Court of California Case Number S287579.

IN THE SUPREME COURT OF CALIFORNIA, Case No.
S287579; Court of Appeal, Sixth Appellate District, No. H052586;
Superior Court of California, County of Santa Clara Case No.
17cv310716.

After an Unpublished Decision by the Court of Appeal

:Fareed :Sepehry-Fard., Beneficiary., *Sui Juris*.
C/o 12309 Saratoga Creek Dr.
Saratoga, the State of California, Santa Clara County
(Zip code Exempt DMM 602 sec 1.3(e))
Phone Number (408) 690-4612
Email: Ahuraenergysolarcells@msn.com

INDEX TO APPENDICES

APPENDIX A-Decision of California State Supreme Court- No.
S287579

APPENDIX B - Decision of 6th California State Court of Appeal-
No. H052586

APPENDIX C - Decision of California State Trial Court-No.
17cv310716

Dear Associate Justice Kagan,

Petitioner :Fareed :Sepehry-Fard., beneficiary., ("Petitioner") respectfully motions this court, pursuant to Rule 13.5, to extend time to file a certiorari petition on case numbers (from the California Court of Appeal, Sixth Appellate District Case Number H052586; and from Supreme Court of California Case Number S287579).

Rule 13.5 specifies for good cause, a Justice may extend the time to file a petition for a writ of certiorari for a period not exceeding 60 days.

Petitioner humbly moves this court to extend time to file a certiorari petition on California Sixth Appellate Court Case Number H052586 and Supreme Court of California Case Number S287579, by 60 days from the due date of the Petition or 60 days from 90 days from order dated January 29, 2025 in Case Number S287579 which is June 29, 2025.

Petitioner's motion is based on Petitioner's need finding and retaining a knowledgeable lawyer plus having enough time for the printing and binding.

The opinion of the highest state court for writ of review in Case Number S287579 appears at Appendix A to the petition and is unpublished, dated January 29, 2025.

The opinion of THE SIXTH APPELLATE DISTRICT IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA for a writ of prohibition/mandate in Case Number H052586 appears at Appendix B to the petition and is unpublished, dated 10-22-2024.

The opinion of the Superior Court of California, in case number 17cv310716 appears at Appendix C to the petition, dated 9-17-2024.

The last day for filing a certiorari petition, is 90 days from January 29, 2025 which is April 30th, 2025.

On or about May 17th, 2025, Petitioner received a USPS package incorporating a letter signed by Miss Pipa Fisher of this

Court, dated May 12, 2025 concerning the above case number explaining, inter alia, that Petitioner may file separate applications for extensions of time since previously Petitioner requested to consolidate three cases, two of which had different dates than Case Number S287579.

Petitioner humbly asks for your decision extending the time to file a certiorari petition on Case Number S287579, *Id.*, by 60 days from the due date to be or on or before June 29, 2025.

Respectfully presented,
All rights reserve waive none
DATED: May 19, 2025, 2025

By: Fareed :Sepehry-Fard, beneficiary.
:Fareed :Sepehry-Fard®, beneficiary.

DECLARATION

i: a man, :Fareed :Sepehry-Fard®, beneficiary., ("Petitioner"),
declare:

i: am a man of republic of California and an American National.
i: have personal first hand knowledge of the facts set forth in this
declaration. If called upon to testify as a witness re same, i: a
man, :Fareed :Sepehry-Fard®, could and would competently
testify to the facts in this declaration.

Everything that i, a man, :Fareed :Sepehry-Fard®, have stated in
" Motion to extend time to file a consolidated certiorari petition on
three case numbers (from the California Court of Appeal, Sixth
Appellate District Case Numbers H052586, H049806, H049652;
and from Supreme Court of California case numbers S288974,
S287579, S289032)" which is concurrently filed with this
Declaration are truth to the best of my (a man's) knowledge and
nothing but the truth.

i: a man, :Fareed :Sepehry-Fard®, declare under the penalty of
perjury under the laws of the united States of America, the State
of California and the california republic that the foregoing is true
and correct.

Executed and DATED: May 19, 2025 in Saratoga, California.

All Rights Reserve Waive None

Respectfully presented,

By: Fareed :Sepehry-Fard, beneficiary.
:Fareed :Sepehry-Fard®, beneficiary.

PROOF OF SERVICE

I, Parvin Heshmati, do hereby solemnly declare that on May 19, 2025, I did cause to be delivered by mail a true and correct copy of the foregoing instruments ("Motion to extend time to file a certiorari petition from the California Court of Appeal, Sixth Appellate District Case Number H052586, Supreme Court of California Case Number S287579."), including true and correct copies of all/any documents referenced therein as "attached hereto", to the parties and locations listed below except the one identified by the Petitioner, Petitioner served those:



Parvin Heshmati

12309 Saratoga Creek Dr., City of Saratoga, California republic
[near: CA 95070]
Tel: 408 873 8734

TO:

1. Delivery via U.S.P.S. courier mail with tracking number to:
supreme court for the united States of America
Attention: Justice Elena Kagan
1 First Street, NE
Washington, DC 20543
[1 original plus 3 copies]
2. Severson & Werson APC
Jan T. Chilton and or Mary Kate Sullivan
595 Market Street Suite 2600, San Francisco,
[near: CA 94105]
[By Petitioner through electronic filing in the California Supreme Court Portal and in the California Sixth District Court of Appeals through true filings and in the lower State Court, Superior Court of California, County of Santa Clara through efilng, and by email].
3. All others through email and electronic filing including to Mister Rudy, Mister Manoukian, Mister Kulkarni, Miss Arand, and others in the inferior state court: 191 North First Street, city of San Jose, California republic, [near: CA 95113].

APPENDIX A

True and correct indorsed copies of the opinion of the highest state court for writ of review in Case Number S287579 and is unpublished.

SUPREME COURT
FILED

Court of Appeal, Sixth Appellate District - No. H052586

JAN 29 2025

S287579

Jorge Navarrete Clerk

IN THE SUPREME COURT OF CALIFORNIA Deputy

En Banc

FAREED SEPEHRY-FARD, Petitioner,

v.

SUPERIOR COURT OF SANTA CLARA COUNTY, Respondent;

U.S. BANK NATIONAL ASSOCIATION, as Trustee, etc., Real Party in Interest.

The petition for review is denied.

GUERRERO

Chief Justice

Supreme Court of California
Clerk of the Court
350 McAllister Street
San Francisco, CA 94102-4797

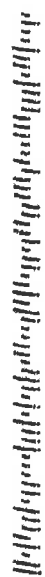
S287579
Fareed Sepelhy-Fard
12309 Saratoga Creek Drive
Saratoga, CA 95070

FIRST-CLASS



US POSTAGE  METRO BOXES
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APPENDIX B

True and correct indorsed copies of the opinion of THE SIXTH APPELLATE DISTRICT IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA for a writ of prohibition/mandate in Case Number H052586 and is unpublished.

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SIXTH APPELLATE DISTRICT

FAREED SEPEHRY-FARD,
Petitioner,

v.

THE SUPERIOR COURT OF SANTA CLARA COUNTY,
Respondent;
U.S. BANK NATIONAL ASSOCIATION, as Trustee, etc.,
Real Party in Interest.

H052586
Santa Clara County Super. Ct. No. 17CV310716

BY THE COURT:

The request to file new litigation by vexatious litigant is denied.

Date: 10/22/2024

 P.J.
10

APPENDIX C

The opinion of the Superior Court of California, County of Santa Clara in case number 17cv310716.

1 MARY KATE SULLIVAN (State Bar No. 180203)
mks@severson.com
2 SEVERSON & WERSON
A Professional Corporation
3 One Embarcadero Center, Suite 2600
San Francisco, California 94111
4 Telephone: (415) 398-3344
Facsimile: (415) 956-0439
5

Attorneys for Defendants
6 NATIONSTAR MORTGAGE LLC and U.S. BANK
NATIONAL ASSOCIATION, AS PURPORTED
7 TRUSTEE FOR GREENPOINT MORTGAGE
FUNDING TRUST MORTGAGE PASS-
8 THROUGH CERTIFICATES, SERIES 2007-AR2
9

10 SUPERIOR COURT OF CALIFORNIA
11 COUNTY OF SANTA CLARA

12 FAREED SEPEHRY-FARD,

13 Plaintiff,

14 vs.

15 NATIONSTAR MORTGAGE LLC, a
Delaware corporation; CLEAR RECON
16 CORP., a California corporation; U.S. BANK
NATIONAL ASSOCIATION, AS
17 PURPORTED TRUSTEE FOR
GREENPOINT MORTGAGE FUNDING
18 TRUST MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2007-AR2;
19 CAPITAL ONE, N.A., and DOES 1 through
20 100, inclusive,

21 Defendants.

Case No. 17CV310716

**[PROPOSED] JUDGMENT AND ORDER
EXPUNGING LIS PENDENS**

Date: January 16, 2024

Time: 9:00 a.m.

Dept.: 20

Judge: Hon. Socrates P. Manoukian

Action Filed: May 22, 2017

Trial Date: None Set

22 The motion of defendants Nationstar Mortgage LLC and U.S. Bank, National Association,
23 as Trustee to expunge the lis pendens duly came on for hearing before the Court on January 16,
24 2024 in Department 20 before the Honorable Socrates Manoukian, Judge of the Superior Court.
25 Plaintiff Fareed Sepehry-Fard appeared on his own behalf. Mary Kate Sullivan of Severson &
26 Werson, A Professional Corporation, appeared for the moving defendants. The Court has
27 considered the oral and written arguments of the parties and the evidence submitted on the motion
28 and issued a Minute Order granting the motion. A Notice of Entry of Order was filed and served

FILED
SEP 17 2024

Clerk of the Court
Superior Court of CA County of Santa Clara
BY [Signature] DEPUTY

RECEIVED
SEP 11 1953
CLERK OF THE COURT
Superior Court of California
BY _____

NOV 18 1953

1 on April 15, 2024. A Judgment and Order bearing the Court's signature is needed for purposes of
2 recording the Court's Order in the Recorder's Office. Good cause appearing,

3 IT IS HEREBY ADJUDGED AND ORDERED that

4 1. Defendants' request for judicial notice is granted.

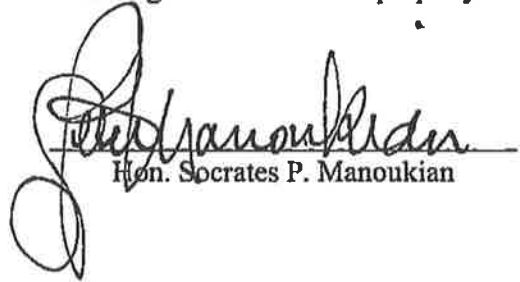
5 2. Defendants' motion to expunge the lis pendens is granted. The Court finds that
6 plaintiff Fareed Sepehry-Fard has not established by a preponderance of the evidence the probable
7 validity of any real property claim alleged in his complaint.

8 3. The Notice of Pendency of Action (Lis Pendens) recorded on May 25, 2017 as
9 Document No. 23658653 in the official records of the Santa Clara County Recorder's Office and
10 relating to the property located at 12309 Saratoga Creek Drive, Saratoga, California 95070, legally
11 described as "Lot 98, Tract No. 3739, filed June 24, 1964 in Book 181 of Maps, at Page(s) 26,
12 Santa Clara County Records, is **EXPUNGED**.

13 4. Pursuant to Code of Civil Procedure section 405.60, upon recordation of a certified
14 copy of this order, neither the Notice of Pendency of Action (Lis Pendens) described in para-
15 graph 3 nor any information derived from it shall constitute actual or constructive notice of any of
16 the matters contained, claimed, alleged, or contended therein, or of any of the matters related to
17 the action, or create a duty of inquiry in any person thereafter dealing with the affected property.

18
19 DATED: May ~~25~~, 2024

20 14 September
21 2024
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27
28


Hon. Socrates P. Manoukian

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO.: NAME: :Fareed :Sepehry-Fard@., beneficiary. FIRM NAME: ng STREET ADDRESS: C/O 12309 Saratoga Creek Dr., Rancho Quito CITY: of Saratoga STATE: Ca ZIP CODE: [95070] TELEPHONE NO.: 4086904612 FAX NO.: E-MAIL ADDRESS: ahuraenergysolarcells@msn.com ATTORNEY FOR (name): NA, Sui Juris		FOR COURT USE ONLY CASE NUMBER: 17cv310716 JUDICIAL OFFICER: Socrates Peter Manoukian DEPT: 20
SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: 191 North First Street MAILING ADDRESS: 191 North First Street CITY AND ZIP CODE: of San Jose, California Republic [near: CA 95113] BRANCH NAME: San Jose Court House		
PLAINTIFF/PETITIONER: Fareed :Sepehry-Fard@., beneficiary. DEFENDANT/RESPONDENT: NATIONSTAR MORTGAGE LLC, et. al. OTHER:		
PROPOSED ORDER (COVER SHEET)		

NOTE: This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

- Name of the party submitting the proposed order:
One of the People--:Fareed :Sepehry-Fard@., beneficairy.,Heir Apparent Not the strawman FAREED SEPEHRY-FARD.
- Title of the proposed order:
PROPOSED ORDER DENYING TO EXPUNGE LIS PENDES-OBJECTIONS TO PROPOSED ORDER EXPUNGING LIS PE NDENS
- The proceeding to which the proposed order relates is:
 - Description of proceeding: Violation of Article VI Clause 2 land patent and theft of sovereign land , racketeering , harboring and shielding Defendants' perfection of criminal misconduct
 - Date and time: January 16, 2024 at 9: 00 am
 - Place: Department 20 at 191 North First Street, City of San Jose, California Republic [near: CA 95113]
- The proposed order was served on the other parties in the case. (it was served on Sullivan without any authority).

Parvin Heshmati@

(TYPE OR PRINT NAME)

By Parvin Heshmati

(SIGNATURE OF PARTY OR ATTORNEY)

CASE NAME: Fareed :Sepehry-Fard@., v. NATIONSTAR MORTGAGE LLC, et.	CASE NUMBER: 17cv310716
--	-----------------------------------

al.

**PROOF OF ELECTRONIC SERVICE
PROPOSED ORDER**

1. I am at least 18 years old and not a party to this action.

a. My residence or business address is (specify):

c/o 12309 Saratoga Creek Dr., City of Saratoga, California Republic [near: CA 95070]

b. My electronic service address is (specify): ahuraenergysolarcells@msn.com

2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:

a. On (name of person served) (If the person served is an attorney, the party or parties represented should also be stated.):

Mary Kate Sullivan who does not have a power of attorney from the U.S. BANK NATIONAL ASSOCIATION AS TRUSTEE FOR GREENPOINT MORTGAGE TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-AR2 "the ghost;" but fake that they do, through racketeering and by bribing corrupt actors who do not have a judicial power at Article III Section 1.

b. To (electronic service address of person served): jtc@severson.com; mks@severson.com; anb@severson.com

c. On (date): May 14th, 2024

[KJ Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Date: May 14th, 2024

Parvin Heshmati

(TYPE OR PRINT NAME OF DECLARANT)



By: Parvin Heshmati

(SIGNATURE OF DECLARANT)

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SANTA CLARA

:Fareed :Sepehry-Fard., beneficiary.

Plaintiff,

vs.

NATIONSTAR MORTGAGE LLC, a
Delaware corporation; CLEAR RECON
CORP., a California corporation; U.S. BANK
NATIONAL ASSOCIATION, AS
PURPORTED TRUSTEE FOR
GREENPOINT MORTGAGE FUNDING
TRUST MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2007-AR2;
CAPITAL ONE, N.A., and DOES 1 through
100, inclusive,

Defendants.

Jurisdiction: Court of Record, under the
rules of Common Law¹; California
Article VI Section I (Court of Record)

Case No. 17CV310716

**[PROPOSED] ORDER DENYING
TO EXPUNGE LIS PENDENS -
OBJECTIONS TO "[PROPOSED]
ORDER EXPUNGING LIS
PENDENS"**

Date: January 16, 2024

Time: 9:00 a.m.

Dept.: 20

Action Filed: May 22, 2017

Trial Date: None Set

Court Administrator: Mister P. Manoukian

The motion of defendants Nationstar Mortgage LLC (the self proclaimed servicer without any authority) and what appears to be a rented name labeled as U.S. Bank, National Association as Perpetrated Trustee for Greenpoint Mortgage Funding Trust Mortgage Pass-Through Certificates, Series 2007-AR2 ('the ghost') to expunge the lis pendens did not duly come on for hearing before the Court on January 16, 2024 in Department 20 before Mister Manoukian, Court administrator of the Superior Court.

Plaintiff :Fareed :Sepehry-Fard., beneficiary specially and under duress appeared on behalf of his Trust as Trustee, full beneficiary and executor of Trust FAREED SEPEHRY-FARD. Plaintiff on records did not authorize neither Mister Manoukian nor any other court administrator nor anyone or anything else, from monetizing his Trust through CUSIP and or any other ruses. Mary Kate Sullivan of Severson & Werson, A Professional Corporation, appeared for herself, the ghost and the self proclaimed servicer Nationstar without any authority through a scheme of grand theft to steal Plaintiff's home through racketeering and conspiracy to steal private land, see Exhibit A. Mister Manoukian did not consider the oral and written arguments of the ghost since he could not (i.e. he was dealing with a ghost), but managed through racketeering with the ghost's attorney to disconnect Plaintiff from Zoom and did not let Plaintiff to speak before several witnesses who witnessed the unlawful acts committed and perfected and when Mister Manoukian was served with Quo Warranto prior to the so called hearing. Additionally, Mister Manoukian when he was on repeated notice and demand that the Court must have furnished a court reporter under California Supreme Court Decision and controlling authority at *Jameson v. Desta* Doctrine, refused to furnish a court reporter and in violation of controlling case law at *Jameson, Id.* Good cause appearing,

¹"A Court of Record is a judicial tribunal having attributes and exercising functions independently of the person of the magistrate designated generally to hold it, and proceeding according to the course of common law, its acts and proceedings being enrolled for a perpetual memorial". Jones v. Jones, 188 Mo.App. 220, 175 S.W. 227, 229; Ex parte Gladhill, 8 Metc. Mass., 171, per Shaw, C.J. See, also, Ledwith v. Rosalsky, 244 N.Y. 406, 155 N.E. 688, 689.

IT IS HEREBY ORDERED that

- 1) Defendants' request for judicial notice is **DENIED**, because based on proof positive on records, the ghost can not authorize any action by Sullivan and her culprits, therefore, all other derivative actions by all others are proof positive of racketeering to steal from Plaintiff.
- 2) Defendants' motion to expunge the lis pendens is **DENIED**. Respondents, Mister Manoukian and Mary Kate Sullivan have not complied with their mandatory duties under the Quo Warranto that was served on them on January 16th, 2024, see court files. Moreover, Mister Manoukian does not have judicial power at Article III Section I. Additionally, Mister Manoukian must have ensured that the alleged Defendant U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR GREENPOINT MORTGAGE TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-AR2 existed and exists, when based on proof positive on the records, it is a ghost. Accordingly, a ghost could not be used as a rented name through racketeering and conspiracy to steal a sovereign land protected by Land Patents at Article VI Clause 2 as to treaty's laws. In Supreme Court Case Law *Wilcox v. Jackson*, there was no land patent issued. Here, the act of Congress that operate to issue a land patent are controlling. The certificate in *Wilcox v. Jackson* did not say: "to all heirs and assigns forever", because it was not a land patent. The land patents issued for the Land claims confirmed after the Treaty of Guadalupe Hidalgo, pursuant to act of 1851, as with all true land patents of the united States says: "to all heirs and assigns forever".
- 3) Moreover, Mister Manoukian must have ensured, as part of his mandatory duties, that the ghost has standing to ask for anything, as to its existence, certificate holders, certificates, proof of payment to allegedly acquire the subject alleged debt, its formation (under what jurisdiction it was formed) to evidence any probable validity of any real land defense against the claim in the complaint.
- 4) The Notice of Pendency of Action (Lis Pendens) recorded on May 25, 2017 as Document No. 23658653 in the official records of the Santa Clara County Recorder's Office and relating to the land at 12309 Saratoga Creek Drive, City of Saratoga, california republic, aka as "Lot 98, Tract No. 3739, filed June 24, 1964 in Book 181 of Maps, at Page(s) 26, Santa Clara County Records, **CAN NOT BE EXPUNGED**.
- 5) Since Plaintiff's land is protected by Land Patents pursuant to Article VI Clause 2 as to treaty's laws, no lien and levy can be asserted against a sovereign land and therefore, none of the codes and civil procedures can lawfully be applied to a sovereign land that neither Mister Manoukian nor any other court administrator has jurisdiction over. To do otherwise, will be perfected admission to treason, mutiny conspiracy to overthrow the Government of this republic and clear convincing evidence for arrest, indictment and criminal prosecution of all racketeers including Mister Manoukian, Severson attorneys in their grand theft attempts of stealing Plaintiff's land and home, when they knew and know that not only they have not responded to the Quo Warranto but also, without jurisdiction, have conspired to steal sovereign land protected by international treaty's laws. Accordingly, upon recordation of a certified copy of any order, should the grand theft, labeled as [proposed] order granting to expunge lis pendens be signed by any court administrator, it shall be additional evidence of crimes committed under the color of law and in clear violation/of Article VI Clause 2, 18 USC Sections 241 and 242 as well as 18 USC § 1346 which is just one-line but was broadened to include just about any nefarious act committed by anyone such as Manoukian who collects a government paycheck, as well as treason, and violation of California Penal Code Sections 7, 92, 93, 94, 96.5, 98 and 182(a)(5), among others.

Denial of the expungement of the Lis Pendens is additionally and also supported by the color of law (i.e. the statutes) to wit: section 409.1, the principal statute at issue in this case, currently provides in pertinent part: "At any time after notice of pendency of an action has been recorded pursuant to section 409 or other law, the court in which the action is pending shall, upon motion *of a party* to the action *supported by affidavit*, and "(b) Insofar as the action affects title to or right of possession of the real property described in the notice, The court *shall* determine the matter on the *affidavits* and *counter affidavits* on file and upon such other proof as the court *may* permit."

6. Here, there are no affidavits from the ghost nor can there be any affidavit since the [ghost] Plaintiff in case number 17cv314286 and the Defendant in this case, does not exist and did not exist, but there is certified and notarized Petitioner's land patent together with its certified and notarized translation, under oath. Moreover, Mister Manoukian under California Law must take mandatory judicial notice of the English language and words "***shall***" (**which is Mandatory**) and "***may***" (which is discretionary-i.e. at the discretion of Mister Manoukian). Accordingly, Mister Manoukian, if he signs Sullivan's [Proposed] order, would perfect admission to treason, subversion and mutiny, all Federal crimes punishable by inter alia, 18 USC Section 2381-Treason, and proof positive of an advocate "judge" among others.

7) Moreover, Mister Manoukian in addition, would have admitted to violating the separation of powers doctrine in his attempts to overthrow our constitutional form of government in violation of, inter alia, 18 U.S. Code § 2385 - Advocating overthrow of Government , if he signs the void Sullivan's [Proposed] order because those acts would not only be in direct violation of section 409.1 to wit, no affidavits supported Sullivan's motion to expunge Lis Pendens, since Sullivan could not ask a ghost to sign an affidavit, but also in clear violation of Article VI Clause 2 as to the Federal Supremacy Clause in relation to Plaintiff's land patent.

8) Furthermore, since Mister Manoukian and many other actors such as Mister Kulkarni, Mister Rudy, Miss Hayashi and others were repeatedly noticed of ample evidence of criminal conduct committed and perfected by Defendants' and their attorneys at Severson's violations of inter alia, bid rigging, Sherman Anti Trust Act, Cal. Civ. Code 2924(h) Subdiv.(g), insider trading, self dealings and securities fraud, Cal. Civ. Code 115(a) and (b) among others, should Mister Manoukian sign Sullivan's void and not voidable [proposed] order, those acts would be squarely within the definitions of inter alia, 18 USC Sections 241 and 242-deprivation of rights under the color of law; Obstruction and impediment of administration of justice and tress pass; Racketeering; 18 USC Section 3-accessory after the fact; 18 USC section 1512-tampering with a victim, witness or an informant; 18 USC Section 1505-Obstruction of proceedings before departments, agencies and committees; 18 USC Section 1506-Alteration of records or process; 18 USC Section 1510-Obstruction of criminal investigation; 42 US Code 12203 - Retaliation Interference, coercion and intimidation; among others.

9. Accordingly, Plaintiff would be obligated to report Mister Manoukian's crimes, should Mister Manoukian sign Sullivan's void [proposed] order, to the foreman of the grand jury and others for arrest, indictment and criminal prosecution of Mister Manoukian and others at inter alia, 18 USC Section 4 - misprison of a felony, and at Maxim of Law 4b. He who does a thing by another is considered as doing it himself [i.e., the acts of an agent are the acts of the principal.] Broom, Max. 817, 818, et seq.; A Collection Maxims of Law by Charles A. Weisman.

10) Also, California Code of Civil Procedure - CCP § 1211 clearly differentiates between a judge, and a Court, " (a) When a contempt is committed in the immediate view and presence of the court, or of the judge , ", CCP § 1211, which further corroborates that Mister Manoukian is not the court.

DATED: May____, 2024

Mister P. Manoukian,
Superior Court Administrator at Article III Section I

Exhibit A

Proof positive and evidence that Severson attorneys have been attempting to steal my home for their own financial greed and their culprit such as Nationstar and not to pay down any alleged debt, request for mandatory judicial notice.

Note: FSF in this article is Petitioner, of numerous attorneys and people who participated in the Quiz given by Dr. Garfield of livinglies.com, Petitioner was the only one who completely and correctly answered all three questions correctly.

Further Note: BAR in 26 states, including in California, gave CLES (continuing education credits to BAR members attending the course by Dr. Garfield, to wit: Bar agreed :

1. How many different entities named in the assignment could claim ownership of the mortgage lien?

Answer: none , because the trust agreement says so.

2. Which one has the highest likelihood of establishing the right to foreclose?

Answer: none

3. In a foreclosure, which of the entities named in the assignment, if any, will likely receive the cash proceeds from the final liquidation (sale to third party) of the foreclosed property?

Answer: none , it becomes revenue for the servicer (and Severson attorneys).

IT IS SEVERSON ATTORNEYS AND NATIONSTAR WHO ARE TRYING TO STEAL MY HOME AND BAR AGREED.

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Support Neil
Garfield's Efforts to
stop Foreclosure
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[Trustees: Deed, Pool, Certificate-Holders,](#)[Substitutions and Beneficiaries](#)

[MORTGAGE BROKER AND LENDER](#)

CLE CONTEST RESULTS: 2 WINNERS ONE PRIZE! KELLY E (AGAIN) AND FSF

Posted on September 10, 2021 by Neil Garfield
[LEARN HOW TO FIGHT WITH HONOR AND WIN!](#)

For review, here were the questions:

#2 CHALLENGE: Free Attendance at 9/29/21 CLE Lawyers Webinar to the First Lawyer or Homeowner Who Correctly Answers the Question

Here is the "word problem" A document has been recorded bearing the title "Assignment of Mortgage." The assignee is identified as "U.S. Bank, not on its own behalf but as trustee for the CWABS, Inc. Pass-through Trust Series 2006-A1C, on behalf of the holders of CWABS, Inc. Pass-through Trust Series 2006-A1C Certificates." Assume that value ... Continue reading



Livinglies's Weblog

2

QUESTIONS:

1. How many different entities named in the assignment could claim ownership of the mortgage lien?
2. Which one has the highest likelihood of establishing the right to foreclose?
3. In a foreclosure, which of the entities named in the assignment, if any, will likely receive the cash proceeds from the final liquidation (sale to third party) of the foreclosed property?

All 3 must be answered. Essay answers will not be accepted.

FSF posted the following:

- 1 none , because the trust agreement says so
2 none

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3 none, it becomes revenue for the servicer

This wasn't the answer I was looking for but on reflection it was correct. No entity COULD make a claim if there was a document in existence that said they could not and which governed the actions of the referenced entities.

The trust agreement in REMIC trusts states explicitly that the named Trustee gets nothing except temporary bare naked title without any rights as to any payment, underlying obligation, debt, note or mortgage. All claims of entitlement or authority derived from the presumed ownership of a "loan" are therefore without foundation and could not be made, except in the procedural sense anyone can claim anything until challenged.

So the answer from FSF is better actually than mine or Kelly E (see below)

FSF will get a free pass to the seminar on 9/29/21 at 3 PM EDT. Upon request, FSF may pick a licensed practicing attorney to attend also for no admission fee. The attending attorney will receive 2.5 credits in Florida and probably 2.0-2.5 in any of 26 other states that previously approved my presentation for CLE credit.

Kelly E also posted a correct result:

- 1) 4 possible names, perhaps more if you dissect the trust and trustee name further than I already did in my mind, which they like to do.
- 2) I don't believe any would have the right to foreclose.
- 3) None. It will go to pay self-proclaimed servicer(s), attorneys, etc.

Kelly gave the answer I had in mind. If you look at the referenced entities they are provide a list of entities that might or could make claim (based on the face of the instrument:

- U.S. Bank N.A.
- CWABS, Inc.
- CWABS Inc. Trust
- Holders of certificates, even though both the holders and the certificates are unidentified.

So the answer to my question as I meant it is 4. But FSF got it right because of the way I wrote it. I asked the question using the word "Could."

Neither FSF nor Kelly got the answer to the second question entirely correct although they both have the right idea. The one with the highest likelihood of "establishing" the right to foreclose, given the current climate, is U.S. Bank even though it a claim without foundation or merit. But they are both right because the claim is false.

Both FSF and Kelly E hit the answer to the third question dead on right. It was a trick question. Both of them recognized it. The proceeds of foreclosure based on a claim derived from an asserted or implied securitization of an alleged debt goes only to the bookrunner investment bank who pays the servicer (and others) for their good work in obtaining the money. The question was which entity named in the assignment will get the money? The answer is NONE.

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4 Responses

ANON, on [September 11, 2021 at 9:25 am](#) said:



I think Ian won the first contest, and Java the second (did Neil not see Java's post — none, none none? Or did someone cheat and use that? Hah. But, the assumptions Neil gave were only assumptions. Courts do not accept assumptions. I have been saying here for a long time — collection is reported as revenue — and not necessarily for stated "servicer" — who is not likely any servicer with even claimed authority. Specifically, money is collected, but because there was no accounting, collection is debt collection from onset and payments are reported under "income" revenue statement. Like, Java, I been saying unsecured. And, Ian has the answer — question the authority. Trustees never get assets/payments unless they are also a security investor. However, it is incorrect to state that trustee hold only "bare legal title." Trustees are the only LEGAL HOLDER according to ALL law. We all know that. The questions answer then goes deeper into the character of the debt that was claimed sold to Depositors to said trusts — with legal rights held by trustee. Have scoured PSAs — and not one says "bare legal title." They hold title to trust assets — and are legally responsible for fraud. Who has the right to collect? Who has the right to collect is different from foreclosure. There is no right to collect because loans were procured by fraud, and no right to foreclosure as loans are not secured. The only way the answers will come out is by looking at authority and what was intended to be conveyed, and servicer, and most important — Master Servicer Rights. So — I don't have any prizes — but if I did — Ian and Java would get them. No offense to Kelly or FSF — and I may be wrong but I never seen them post with any input on Neil's blog. They read what Neil and others post — and we all have been here a long time. But, like everything else — that's the system!!!

Loading...

Javagold, on [September 10, 2021 at 9:45 pm](#) said:

Thanks Anon.

Where's my free pass to the class ????

None..None. None !!!

Loading...

ANON, on [September 10, 2021 at 5:22 pm](#) said:



Yeah — didn't Java have NONE NONE NONE — first? And, does anyone understand — if the trustee has no Legal Holder claim (which I agree) — there is NO Mortgagee. NO legal holder — None — meaning no mortgagee — no mortgage — and although mortgage follows the note according to "law" — If there is no mortgagee — there is no mortgage — and there is no note. But you have to get past — that you have no STANDING to challenge. You don't do that — you are finished. Whining does not count.

Loading...

Ian, on [September 10, 2021 at 2:30 pm](#) said:

Well it looks like no one mentioned in the recorded document has any authority to do anything, let alone get paid any money.

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i:, Fareed :Sepehry-Fard[®], do hereby solemnly declare that on May 14th, 2024, i: did cause to be delivered by USPS mail or fax where identified a true and correct copy of the foregoing instruments ("[PROPOSED] ORDER DENYING TO EXPUNGE LIS PENDENS - OBJECTIONS TO "[PROPOSED] ORDER EXPUNGING LIS PENDENS"") including true and correct copies of all/any documents referenced therein as "attached hereto", to the parties and locations listed below except the ones identified by the Petitioner, Petitioner served those:



Fareed Sepehry-Fard
By: _____

Fareed :Sepehry-Fard[®].

c/o 12309 Saratoga Creek Dr.

City of Saratoga, Rancho Quito, California Republic,

(Zip code Exempt DMM 602 sec 1.3(e))

Tel: 408 690-4612

TO:

1. Clerk of SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF SANTA CLARA
191 North 1st Street,
City of San Jose, CA 95113
By Petitioner through e filing and by email
2. Respondent Mary Kate Sullivan
Severson and Werson, APC.
595 Market Street Suite 2600, San Francisco, California
CA 94105]
[through e filling and email]
3. Respondent Mister Peter Manoukian
191 North First Street, City of San Jose, California, CA 95113.
[through e filling and email]
4. And several others

MARY KATE SULLIVAN (State Bar No. 180203)
mks@severson.com
SEVERSON & WERSON
A Professional Corporation
One Embarcadero Center, Suite 2600
San Francisco, California 94111
Telephone: (415) 398-3344
Facsimile: (415) 956-0439

Attorneys for Defendants
NATIONSTAR MORTGAGE LLC and U.S. BANK
NATIONAL ASSOCIATION, AS PURPORTED
TRUSTEE FOR GREENPOINT MORTGAGE
FUNDING TRUST MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2007-AR2

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SANTA CLARA

FAREED SEPEHRY-FARD,

Plaintiff,

vs.

NATIONSTAR MORTGAGE LLC, a
Delaware corporation; CLEAR RECON
CORP., a California corporation; U.S. BANK
NATIONAL ASSOCIATION, AS
PURPORTED TRUSTEE FOR
GREENPOINT MORTGAGE FUNDING
TRUST MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2007-AR2;
CAPITAL ONE, N.A., and DOES 1 through
100, inclusive,

Defendants.

Case No. 17CV310716

**[PROPOSED] JUDGMENT AND ORDER
EXPUNGING LIS PENDENS**

Date: January 16, 2024

Time: 9:00 a.m.

Dept.: 20

Judge: Hon. Socrates P. Manoukian

Action Filed: May 22, 2017

Trial Date: None Set

The motion of defendants Nationstar Mortgage LLC and U.S. Bank, National Association, as Trustee to expunge the lis pendens duly came on for hearing before the Court on January 16, 2024 in Department 20 before the Honorable Socrates Manoukian, Judge of the Superior Court. Plaintiff Fareed Sepehry-Fard appeared on his own behalf. Mary Kate Sullivan of Severson & Werson, A Professional Corporation, appeared for the moving defendants. The Court has considered the oral and written arguments of the parties and the evidence submitted on the motion and issued a Minute Order granting the motion. A Notice of Entry of Order was filed and served

1 on April 15, 2024. A Judgment and Order bearing the Court's signature is needed for purposes of
2 recording the Court's Order in the Recorder's Office. Good cause appearing,

3 IT IS HEREBY ADJUDGED AND ORDERED that

4 1. Defendants' request for judicial notice is granted.

5 2. Defendants' motion to expunge the lis pendens is granted. The Court finds that
6 plaintiff Farcid Sepehry-Fard has not established by a preponderance of the evidence the probable
7 validity of any real property claim alleged in his complaint.

8 3. The Notice of Pendency of Action (Lis Pendens) recorded on May 25, 2017 as
9 Document No. 23658653 in the official records of the Santa Clara County Recorder's Office and
10 relating to the property located at 12309 Saratoga Creek Drive, Saratoga, California 95070, legally
11 described as "Lot 98, Tract No. 3739, filed June 24, 1964 in Book 181 of Maps, at Page(s) 26,
12 Santa Clara County Records, is **EXPUNGED**.

13 4. Pursuant to Code of Civil Procedure section 405.60, upon recordation of a certified
14 copy of this order, neither the Notice of Pendency of Action (Lis Pendens) described in para-
15 graph 3 nor any information derived from it shall constitute actual or constructive notice of any of
16 the matters contained, claimed, alleged, or contended therein, or of any of the matters related to
17 the action, or create a duty of inquiry in any person thereafter dealing with the affected property.

18
19 DATED: May ____, 2024

20 _____
Hon. Socrates P. Manoukian



**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA**
DOWNTOWN COURTHOUSE
191 NORTH FIRST STREET
SAN JOSE, CALIFORNIA 95113
CIVIL DIVISION

Filed
September 17, 2024
Clerk of the Court
Superior Court of CA
County of Santa Clara
17CV310716
By: MJacobo

**Fareed Sepehry-Fard
12309 Saratoga Creek DR
SARATOGA CA 95070**

RE: Fareed Sepehry-Fard v. Nationstar Mortgage, LLC, et al
Case Number: 17CV310716

PROOF OF SERVICE

Judgment and Order Expunging Lis Pendens was delivered to the parties listed below the above entitled case as set forth in the sworn declaration below.

If you, a party represented by you, or a witness to be called on behalf of that party need an accommodation under the American with Disabilities Act, please contact the Court Administrator's office at (408) 882-2700, or use the Court's TDD line (408) 882-2690 or the Voice/TDD California Relay Service (800) 735-2822.

DECLARATION OF SERVICE BY MAIL: I declare that I served this notice by enclosing a true copy in a sealed envelope, addressed to each person whose name is shown below, and by depositing the envelope with postage fully prepaid, in the United States Mail at San Jose, CA on 09/17/2024. CLERK OF THE COURT, by Maida Jacobo, Deputy.

cc: Clear Recon Corp No Known Address
Mary K. Sullivan Severson & Werson 595 Market Street, Suite 2600 SAN FRANCISCO, CA 94105

Capital One, N.A. No Known Address



**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA**
DOWNTOWN COURTHOUSE
191 NORTH FIRST STREET
SAN JOSE, CALIFORNIA 95113
CIVIL DIVISION

Filed
September 17, 2024
Clerk of the Court
Superior Court of CA
County of Santa Clara
17CV310716
By: MJacobo

**Mary K. Sullivan
Severson & Werson
595 Market Street Suite 2600
SAN FRANCISCO CA 94105**

RE: Fareed Sepehry-Fard v. Nationstar Mortgage, LLC, et al
Case Number: 17CV310716

PROOF OF SERVICE

Judgment and Order Expunging Lis Pendens was delivered to the parties listed below the above entitled case as set forth in the sworn declaration below.

If you, a party represented by you, or a witness to be called on behalf of that party need an accommodation under the American with Disabilities Act, please contact the Court Administrator's office at (408) 882-2700, or use the Court's TDD line (408) 882-2690 or the Voice/TDD California Relay Service (800) 735-2922.

DECLARATION OF SERVICE BY MAIL: I declare that I served this notice by enclosing a true copy in a sealed envelope, addressed to each person whose name is shown below, and by depositing the envelope with postage fully prepaid, in the United States Mail at San Jose, CA on 09/17/2024. CLERK OF THE COURT, by Maida Jacobo, Deputy.

cc: Fareed Sepehry-Fard 12309 Saratoga Creek DR SARATOGA, CA 95070