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The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON (SEATTLE)**

JESSICA SAEPOFF,

Plaintiff,

v.

NORTH CASCADE TRUSTEE SERVICES,
INC.; et al.,

Defendants,

HSBC BANK USA, N.A. AS TRUSTEE ON
BEHALF OF ACE SECURITIES CORP.
HOME EQUITY LOAN TRUST AND FOR
THE REGISTERED HOLDERS OF ACE
SECURITIES CORP. HOME EQUITY
LOAN TRUST, SERIES 2007-WM2, ASSET
BACKED PASS-THROUGH
CERTIFICATES;

Counterclaimant/Crossclaimant,

v.

JESSICA SAEPOFF; et al.

Counterdefendants/
Crossdefendants,

Case No.: 17-cv-00957-RSL

**STIPULATION FOR ENTRY OF
LIMITED JUDGMENT AND DECREE OF
FORECLOSURE BETWEEN HSBC BANK
USA, N.A. AND DEFENDANT MARTIN
VICTOR BRUNT, TRUSTEE OF THE
4003 92ND AVENUE SE LAND TRUST
(Erroneously named as Martin Victor
Brent)**

The parties to this action, by the signature of their counsel of record to this Stipulation, do stipulate and agree as follows:

**STIPULATED JUDGMENT AND DECREE OF
FORECLOSURE AS TO DEFENDANT MARTIN
VICTOR BRUNT- Page 1**

Wright, Finlay, & Zak, LLP
3600 15th Ave W, Ste 200
Seattle, WA 98119
PH: (206) 946-8109 / FAX: (949) 608-9142

I. RECITALS

1
2 1. Counsel for HSBC Bank USA, N.A. as trustee on behalf of Ace Securities Corp. Home
3 Equity Loan Trust and for the Registered Holders of Ace Securities Corp. Home Equity Loan
4 Trust, Series 2007-WM2, Asset Backed Pass-Through Certificates (“HSBC”) signs this
5 stipulation with authority required to bind HSBC and their successors, and assigns to the terms of
6 this Stipulation and any Judgment resulting from it.

7 2. Martin Victor Brunt, Trustee of the 4003 92nd Avenue SE Land Trust (erroneously
8 named as Martin Victor Brent) (“Defendant”) signs this stipulation pro se.

9 3. HSBC has filed a counter-complaint asserting numerous claims and theories of recovery
10 against Defendant.

11 4. The parties agree that the terms of the proposed judgment, as set out below, constitute a
12 full and fair settlement of all claims against Defendant raised in this matter and that could be
13 raised in this matter and should be entered as a limited judgment as to Defendant by the Court.
14 This judgment is intended to and will extinguish all claims that exist or that may exist between
15 HSBC and Defendant, known or unknown, as of the date of this Stipulation is signed.

II. TERMS OF JUDGMENT

16
17 1. The interest of HSBC in the property is superior to any interest or claim of Defendant in
18 the real property located at 4033 92nd Avenue Southeast, Mercer Island, WA 98040
19 (“Property”).

20 2. The interest of Defendant in the Property by virtue of the Quit Claim Deed recorded on
21 September 23, 2010 under King County Auditor’s file no. 20100923000012 and any other
22 paperwork on the Subject Property located at 4033 92nd Avenue Southeast, Mercer Island, WA
23 98040 is hereby foreclosed.

1 3. HSBC will not take a money judgment against Defendant.

2 4. Defendant is responsible for the payment of their attorney's fees and costs, if any.

3 **III. SIGNATURES**

4 This Stipulation was executed by HSBC on July 18, 2017 in Seattle, WA.

5 **WRIGHT, FINLAY & ZAK, LLP**

6 By: /s/Laura N. K. Coughlin
7 Laura N. K. Coughlin, WSBA #46124
8 3600 15th Ave. W., Suite 200
9 Seattle, WA 98119
10 (206) 946-8109
11 lcoughlin@wrightlegal.net
12 Attorneys for HSBC

13 **MARTIN VICTOR BRUNT, TRUSTEE OF THE 4003 92ND AVENUE SE LAND TRUST**

14 This Stipulation was executed by Martin Victor Brunt on June 28, 2017 in Bellevue, WA

15 By: /s/Martin Victor Brunt
16 Martin Victor Brunt, pro se
17 4885 Lakehurst Lane SE
18 Bellevue, WA 98006
19 (425)786-3352
20 solarcentrill@comcast.net

21 **IV. ORDER ON STIPULATION**

22 The Court has reviewed and accepted this Stipulation as a proper disposition of
23 Defendant's interest in this matter. Therefore,

24 IT IS ORDERED that the Clerk of this Court enter judgment against Martin Victor Brunt
(erroneously named as Martin Victor Brent), according to the provisions of FRCP 58 and in
accordance with the terms of this Stipulation. Judgment as to Defendant shall be so entered
forthwith.

Dated: July 24, 2017



HON. ROBERT S. LASNIK