



Orange County Bar Association  
**BANKING & LENDING SECTION**

**LIVE WEBINAR: Tuesday, May 17, 2022 | 12:00 – 1:00 p.m.**

*Speakers:*

**Richard L. Antognini, Esq.**  
*Law Office of Richard L. Antognini*

**Steven M. Dailey, Esq.**  
*Kutak Rock LLP*

**Jonathan D. Fink, Esq.**  
*Wright Finlay & Zak LLP*

**Safora Nowrouzi, Esq.**  
*Now Law Firm, APLC*

Moderated by Sanford Shatz, Esq., *McGlinchey Stafford*

# ***Sheen v. Wells Fargo Bank - A Change in Mortgage Foreclosure Litigation***

On March 7, 2022, the California Supreme Court resolved a split among the appellate courts holding that a mortgage lender does not owe a borrower a tort duty sounding in general negligence principles to process, review, and respond carefully and completely to a loan modification application. This panel will explore the case, its background and its effects on mortgage litigation in particular, and litigation in the consumer financial services space in general.

OCBA Banking & Lending Section Members: \$0  
OCBA Attorney Member (non-section): \$25  
Non-OCBA Member (Attorney): \$35

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**Register at [www.ocbar.org](http://www.ocbar.org)**

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