

Claim lender scheduled a trustee's sale of property and refused to postpone it while a borrower's loan modification application was pending stated a claim for abusive foreclosure practices under a California statute prohibiting "dual tracking," as well as California's Unfair Competition Law. Even though the sale never took place, the purpose of the statute was to require lenders to give borrowers a clear answer regarding modification before commencing foreclosure. *Foronda v. Wells Fargo Home Mortgage, Inc.*, United States District Court for the Northern District of California.