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Attorneys for Plaintiff

IN RE NOTICES OF INTENTION TO
FORECLOSE SENT FOR NEW
JERSEY HOUSING & MORTGAGE
FINANCE AGENCY

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:
:

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY

CIVIL ACTION

~~VERIFIED COMPLAINT~~
028198413

Plaintiff, NEW JERSEY HOUSING & MORTGAGE FINANCE AGENCY (“NJHMFA”), by and through DOVENMUEHLE MORTGAGE, INC., their current subservicer (“Subservicer”), by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing, pursuant to the April 4, 2012, Order of the New Jersey Supreme Court (the “April 4th Order”), that was entered following the Court’s decision in U.S. Bank, N.A. v. Guillaume, 209 N.J. 449 (2012), (“Guillaume”), respectfully states as follows:

1. NJHMFA holds and services mortgages (the “Mortgages”) encumbering residential properties (the “Mortgaged Properties”) and Dovenmuehle is NJHMFA’s current Subservicer that has taken and will take various actions relating to this matter as directed by NJHMFA pursuant to their power of attorney. NJHMFA respectfully submits this application in their capacity as Servicer of loans (the “Loans”) secured by the Mortgages.

2. The Servicer/Subservicer of a Loan undertakes payment collection/application, facilitates loss mitigation at the direction of NJHMFA, and, when necessary, facilitates the institution and

prosecution of foreclosure actions in the Superior Court of New Jersey (the “Foreclosures”) on behalf of NJHMFA. As an entity collecting and processing payments for the NJHMFA, the Subservicer maintains information regarding the payments received and applied, escrow deposits/disbursements, amounts due, whether a loan is in default and, if so, the constituent components of such delinquency. This information (the “Loan Records”) is maintained in the Subservicer’s systems in the regular course of their business.

3. Among the actions taken when a residential mortgage encumbering a New Jersey property is in default, is to prepare and serve the Notice of Intent to Foreclose (the “NOI”) as required by the Fair Foreclosure Act of 1995 (the “FFA”), N.J.S.A. 2A:50-56, et seq. The NOI is predicated upon the Loan Records for the subject Loan and includes, among other information, the amount due or other performance that is required to cure the delinquency/default and reinstate the Loan, and the date by which such cure and reinstatement must occur.

4. On February 27, 2012, the New Jersey Supreme Court published their Opinion in Guillaume holding that a Court adjudicating a foreclosure action in which the NOI was not strictly compliant with the notice provisions of the Fair Foreclosure Act has the discretion to determine the appropriate remedy, including allowing remediation of a noncompliant NOI by granting leave to serve a Remediated NOI.

5. Following its decision in Guillaume, the New Jersey Supreme Court entered the April 4th Order which authorizes the Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage, and the Hon. Paul Innes, P.J.Ch., Mercer Vicinage, to entertain summary actions by Orders to Show

Cause such as this (the "OTSC") as to why Plaintiffs in any uncontested residential mortgage foreclosure actions filed on or before April 27, 2012 and in which Final Judgment has not been entered, who caused NOIs to be served that are not strictly compliant with the NOI provisions of the Fair Foreclosure Act, should not be allowed to serve Remediated NOIs on defendants/mortgagors and/or parties obligated on the debt (the "Foreclosure Defendants") as described by the Loan documents and defined by the Fair Foreclosure Act..

6. The April 4th Order further provides that any Remediated NOI must be accompanied by a letter to the Foreclosure Defendants (the "Explanatory Letter") containing the reasons why the Remediated NOI is being served, the procedure to follow in the event a Foreclosure Defendant wishes to object to the relief requested via this OTSC or a particular Remediated NOI, the name of a person to contact with any questions, and that the receipt of the Remediated NOI allows Foreclosure Defendants 30 days in which to object or to cure the default.

7. NJHMFA, by and through their Subservicer, reviewed their pending Foreclosures with local counsel to identify those Foreclosures in which a Remediated NOI is appropriate because the Lender and/or the Lender's address were not included in the previously served NOIs, or such NOIs were otherwise not strictly compliant with the Fair Foreclosure Act as recently interpreted. Attached hereto is a list (the "Remediated NOI List") of Foreclosures in which NJHMFA respectfully requests remediation in the form of leave to serve remediated NOIs (the "Remediated NOIs") upon the Foreclosure Defendants. See Exhibit "A," Remediated NOI List.

8. Specifically, the Remediated NOI List includes the following:
 - a. Foreclosures that were initiated on or before February 27, 2012 and which NJHMFA holds and services the mortgage; and
 - b. in which Final Judgment has not been entered; and
 - c. regarding which leave is sought to serve a Remediated NOI.

9. The Remediated NOI List contains information required by the Court, i.e., (1) the abbreviated Caption of the Foreclosure, (2) the Foreclosure Docket Number, (3) the Vicinage, and (4) the nature of deviation from strict compliance, as well as other available and potentially relevant information.

10. Pursuant to the April 4th Order, attached as Exhibit "B" to this Verified Complaint is the proposed form the Explanatory Letter (the "Explanatory Letter Template") that NJHMFA, by and through their Subservicer, will send to each Foreclosure Defendant. As instructed by the Supreme Court in the April 4th Order, the proposed form of Explanatory Letter contains the following explanations:
 - a. the reason why the Remediated NOI is being served;
 - b. the procedure to follow in the event a Foreclosure Defendant wishes to object to the relief requested via this OTSC and/or a particular Remediated NOI;
 - c. the individual(s) a Foreclosure Defendant should contact with any questions;
 - d. that the Foreclosure Defendant has the right to object to the Remediated NOI as well as the right to cure the default within 30 days of the date of the Remediated NOI;

and

e. that the Remediated NOIs will exclude attorneys' fees and costs incurred in the pending Foreclosures from the calculation of the amount due to cure the default.

11. Attached as Exhibit "C" to the Verified Complaint is the proposed form of Remediated NOI (the "Remediated NOI Template") that NJHMFA, by and through their Subservicer, will send to each of the Foreclosure Defendants identified on the Remediated NOI List. Each Foreclosure Defendant will be served with a Remediated NOI in the form of the Remediated NOI Template that includes, *inter alia*, the information specific to their Mortgage Loan derived from the Loan Records, their default, the Lender/Holder's name and address and the amount due or other performance required to cure their default, as described in the Order To Show Cause, without attorneys' fees or costs incurred in the pending Foreclosures.

12. To promote economy, avoid waste, and to afford Foreclosure Defendants the earliest opportunity to cure their defaults by providing the amount due before more monthly payments and other charges accrue, NJHMFA, by and through their Subservicer, will send to each of the Foreclosure Defendants identified on the Remediated NOI List a complete package (the "OTSC Package") consisting of this Verified Complaint, a conformed copy of this OTSC if/when entered, supporting Certification and Letter Memorandum, Explanatory Letter in the form of the Explanatory Letter Template and Remediated NOI in the form of the Remediated NOI Template and containing substantive information pertaining to the subject Loan in each Foreclosure. See Exhibit "D," sample OTSC Package.

13. Service of the Verified Complaint, OTSC, Explanatory Letter and Remediated NOI as a complete OTSC Package may be inconsistent with certain provisions contained in the Explanatory Letter, created by the Court before conception of the single mailing procedure (the “Single Mailing Procedure”) authorized by the Court in In re Notices of Intention to Foreclose Served by MidFirst Bank, Docket No. F-12399-12. To the extent that such an inconsistency exists in this regard only, NJHMFA requests that the provisions of the Pleadings herein shall be deemed to amend and supersede the Explanatory Letter.

14. NJHMFA respectfully submits that the Single Mailing Procedure accomplishes the salutary purposes of applicable authorities while avoiding the expense and delay of a duplicate mailing to all Foreclosure Defendants if/when a Final Order/Judgment is entered herein. In the alternative, if the Court is not inclined to the foregoing, then NJHMFA requests leave to have the OTSC Package and/or Remediated NOI sent as otherwise directed by the Court.

WHEREFORE, NJHMFA respectfully requests that this Court enter an Order providing,

a. That this Court schedule a Hearing (the “Hearing”) in 60-90 days to consider the relief requested hereby and any Objections tendered in compliance with the terms of the Order to Show Cause;

b. That this Court determine and find that NOIs in the form of the Remediated NOI Template that contain accurate substantive information regarding the subject Loan from the subject Loan Records are fully compliant with the Fair Foreclosure Act:

c. That NJHMFA, by and through their Subservicer, may send to each Foreclosure Defendant an OTSC Package consisting of this Verified Complaint, supporting

Certification and Brief, conformed copy of the Order to Show Cause, Explanatory Letter (as amended/superseded by the Pleadings herein) and Remediated NOI without attorneys' fees or costs incurred in the Foreclosure;

d. That the Final Order/Judgment entered herein need be served only upon any Parties who appeared and any Foreclosure Defendant to whom was not previously sent a Remediated NOI by the Hearing date;

e. Requiring that NJHMFA, by and through their Subservicer, send another OTSC Package or Remediated NOI only to those Foreclosure Defendants to whom an OTSC Package was not mailed by the date of entry of the Final Order/Judgment herein;

f. Allowing NJHMFA to refrain from sending an OTSC Package to Foreclosure Defendants in Foreclosures subject to the Automatic Stay in any bankruptcy proceedings and authorizing NJHMFA, by and through their Subservicer, to remediate NOIs in such Foreclosures by having sent an OTSC Package at such time when the Automatic Stay no longer enjoins such action; and

g. Such other or further relief the Courts deems equitable and just.

COUNT I: New Jersey Housing & Mortgage Agency ("NJHMFA")

15. NJHMFA hereby incorporates by reference paragraphs 1 through 14 as if set forth herein.

16. NJHMFA services Loans that are the subject of Foreclosures predicated upon NOIs that were not strictly statutorily compliant for the reason(s) described in the Remediated NOI List.

17. Attached as Exhibit "A" is the Remediated NOI List of uncontested residential foreclosures actions including those in which the entity identified in this Court is the Plaintiff and the Servicer requests relief from this Court to issue an Order to Show Cause consistent with the Supreme Court's April 4, 2012 Order.

WHEREFORE, NJHMFA respectfully requests Judgment:

- (a) Deeming NOIs in the form of the Remediated NOI Template that contain accurate information derived from the Loan Records to be compliant with the requirements of the Fair Foreclosure Act;
- (b) Approving the sending of an OTSC Package, consisting of the OTSC herein, supporting Certification and Letter Memorandum, Explanatory Letter and Remediated Notice of Intention to Foreclose, in the form of the Remediated NOI Template and containing accurate information regarding the Loan derived from the Loan Records including the amount presently required to reinstate the Mortgage without attorneys' fees or costs incurred in the pending Foreclosure, to the Foreclosure Defendants at the Mortgaged Property or last known address, if different in the Foreclosures identified in the Remediated NOI List;
- (c) Deeming the Explanatory Letter amended and superseded by the Pleadings herein to the extent of any inconsistency between the Explanatory Letter and the Single Mailing Procedure described herein;
- (d) Requiring that NJHMFA, by and through their Subservicer, mail the Final Order/Judgment herein only to those Parties who appeared in these proceedings pursuant to the procedure specified by the Court in the OTSC;
- (e) Requiring that an OTSC Package be mailed after entry of the Final Order/Judgment

only to those Foreclosure Defendants to whom an OTSC Package was not mailed by the date of entry of the Final Order/Judgment herein;

(f) Allowing NJHMFA, to refrain from sending an OTSC Package to Foreclosure Defendants in Foreclosures subject to the Automatic Stay in any bankruptcy proceedings and authorizing NJHMFA, by and through their Subservicer, to remediate NOIs in such Foreclosures by having sent an OTSC Package at such time when the Automatic Stay no longer enjoins such action; and

(g) for such other and further relief as this Court deems just and equitable.

Respectfully Submitted.

PLUESE, BECKER & SALTZMAN, LLC

By: _____

Rob Saltzman, Esquire

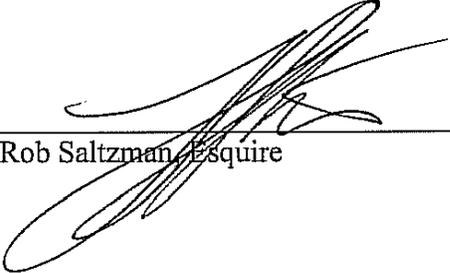
Dated: July 3, 2013

CERTIFICATION

I certify pursuant to Rule 4:5-1 that, to the best of my knowledge, this matter is not the subject of any other action pending in any court or of a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated, other than the pending foreclosure actions on the Remediated NOI List attached hereto and any pending, separate actions initiated outside

of the uncontested foreclosure proceedings in which Foreclosure Defendants may have raised claims concerning, *inter alia*, their NOIs but which are not at issue in this application. I further certify that I am unaware of any non-party who should be joined in this action pursuant to Rule 4:28 or who is subject to joinder pursuant to Rule 4:29-1 (b) because of potential liability to any party based on the same transactional facts.

Dated: July 3, 2013



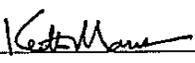
Rob Saltzman, Esquire

VERIFICATION

I, Keith Manson, of full age, certify as follows:

1. I am a Vice President of Dovenmuehle Mortgage, Inc., Attorney In Fact for New Jersey Housing & Mortgage Finance Agency.
2. I have read the contents of the Verified Complaint and verify that the statements contained therein are true to the best of my knowledge and personal information.
3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

New Jersey Housing and Mortgage Finance Agency, by Dovenmuehle Mortgage, Inc., its Attorney-in-Fact

By: 
Name: Keith Manson
Title: Vice President
Dated: 6/20/13

PLUESE, BECKER & SALTZMAN, LLC
Attorneys At Law
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
Attorneys for Plaintiff

**IN RE NOTICES OF INTENTION
TO FORECLOSE SENT FOR NEW
JERSEY HOUSING & MORTGAGE
AGENCY**

**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY
DOCKET NO. F-**

CIVIL ACTION

**ORDER TO SHOW CAUSE
SUMMARY PROCEEDING
PURSUANT TO R. 4:67-2**

THIS MATTER being brought before the Court by NEW JERSEY HOUSING & MORTGAGE AGENCY (“NJHMFA”, the “Lender” or the “Servicer), by and through DOVENMUEHLE MORTGAGE, INC., their current subservicer (“Subservicer”) in pending foreclosure cases (“the Foreclosures”), by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing, pursuant to the April 4, 2012 Order of the New Jersey Supreme Court (the “April 4th Order”) and based upon the facts and circumstances described in the Verified Complaint filed herewith and incorporated herein by reference, including defined terms; and the Court having determined that this matter is appropriately commenced by Order To Show Cause as a summary proceeding pursuant to R. 4:67-2, and for good cause shown:

IT IS on this _____ day of _____, 2013,

ORDERED that Foreclosure Defendants identified in Exhibit “A” of the Verified Complaint (the “Remediated NOI List”) appear and show cause on the _____ day of _____, 2013 before the Honorable Margaret Mary McVeigh, P.J.Ch., Superior Court, Passaic County, Chancery Division, at 71 Hamilton Street, Paterson, NJ 07505 at _____ o’clock (the “Hearing”),

why a Final Order/Judgment should not be entered as follows:

- A. Declaring the Servicer's Remediated NOIs in the form of the Remediated NOI Template that contain accurate information regarding each subject Loan derived from the Loan Records to be compliant with the requirements of the Fair Foreclosure Act; and

- B. Allowing Remediated Notices of Intention to Foreclose (the "Remediated NOI") to be sent, affording Foreclosure Defendants at least thirty (30) days from the date the Remediated NOI is mailed to cure the default on their Mortgage without attorneys' fees or costs incurred in the pending Foreclosure; and

- C. Granting such other relief as the Court deems equitable and just.

IT IS FURTHER ORDERED that:

1. A complete package (the "OTSC Package") consisting of a conformed copy of this Order To Show Cause, Verified Complaint without Exhibits, Supporting Certification, Letter Memorandum, Explanatory Letter and Remediated NOI shall be served upon each Foreclosure Defendant.

2. Service of the OTSC Package shall be effectuated by simultaneous certified mail, return receipt requested, and regular mail to the subject Mortgaged Property's address and the Foreclosure Defendant's last known address if different. In the event of a deceased Foreclosure Defendant, the OTSC Package will be mailed to the Address of the Estate if known or available.

3. A copy of this Order To Show Cause and Verified Complaint shall be posted on the Judiciary's Web Page at the following link: <http://www.judiciary.state.nj.us> within _____ days from the date of entry of this OTSC where it can be viewed by the general public.
4. A proof of service of the OTSC Package shall be filed no later than nine (9) days before the Hearing Date.
5. Regarding any Foreclosure Defendant involved in a Bankruptcy case wherein the Automatic Stay enjoins prosecution of the Foreclosure,
 - a. The Servicer may serve a copy of this Order to Show Cause and Verified Complaint, but may defer serving a Remediated NOI if it believes that doing so may violate the Automatic Stay.
 - b. If the Court grants final relief on the return date of this Order To Show Cause and the Servicer has not already sent a Remediated NOI, then the Servicer may send the Remediated NOI once the Automatic Stay is vacated, modified or otherwise inapplicable. In the alternative, Plaintiff may apply to the United States Bankruptcy Court for relief from the Automatic Stay to effectuate service of the Remediated NOI pursuant to this Order.
 - c. In the event that the Servicer does not serve a Remediated NOI with this Order To Show Cause, Plaintiff's Foreclosure action may not proceed until such Remediated NOI is served pursuant to this Court's Order and the time provided therein to cure the default has passed without the default having

been cured.

- d. If the Servicer believes that service of this Order To Show Cause may be a violation of the Automatic Stay, then once the Stay is vacated, modified or otherwise no longer enjoins service of a Remediated NOI, then the Servicer may send an OTSC Package to the Foreclosure Defendant(s) and the Foreclosure(s) may proceed where more than 35 days have passed after such OTSC Package was sent without the default having been cured. Plaintiff shall not be required to file another Order To Show Cause to Remediate NOIs at issue in Foreclosures subject to the Automatic Stay.

6. Plaintiff shall publish legal notices of this OTSC as on at least two days prior to

_____ in the following newspapers:

- a. Star Ledger
- b. Bergen Record
- c. The Press of Atlantic City
- d. The Gloucester County Times

7. The Court will only entertain objections (the "Objections") to the process provided for by the April 4th Order. Any Party who wishes to object to the process shall file the Objection under the Docket Number for this Order to Show Cause, **in writing**, with the:

Clerk of the Superior Court, Foreclosure Processing Services
Attn: Objection to Notice of Intention to Foreclose
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625-0971

A copy of the Objection must also be sent to:

Honorable Margaret Mary McVeigh, P.J.Ch.

Passaic County Courthouse
71 Hamilton Street, Chambers 100
Paterson, New Jersey 07505

A copy of the Objection must also be served upon the attorney for the Plaintiff:

Rob Saltzman, Esquire
Pluese, Becker & Saltzman, LLC
20000 Horizon Way, Suite 900
Mt. Laurel, New Jersey 08054

Objections must state with specificity the basis for the Objection and must be filed no later than _____, 2013.

8. Any objection regarding a particular Remediated NOI in a particular Foreclosure case must be filed in writing under the Docket Number of that particular Foreclosure action, NOT this Order To Show Cause. Any such Objection must state the basis for the objection with specificity and be filed and served as set forth in Paragraph 6 above. Objections to a particular Remediated NOI will be referred for resolution to the Chancery Judge in the Vicinage where the Mortgaged Property is located.
9. Foreclosure Defendants are hereby informed that a telephone call to the Plaintiff, to the Plaintiff's attorney, to the Servicer, to the Superior Court Clerk's Office, or to this Court, will not protect your rights nor constitute a valid Objection; you must file and serve your written Objection as provided for by in this Order.
10. If you cannot afford an attorney, you may call the Legal Services office in the County in which you live. If you do not have an attorney or are not eligible for free legal assistance through the Legal Services office (or such office does not provide services for this

particular type of proceeding), you may obtain a referral to an attorney by calling one of the Lawyer Referral Services.

11. If written Objection is properly filed and served, the Plaintiff's written reply (the "Reply") shall be filed and served by _____, 2013. A copy of the Reply, if any, shall be served upon the Clerk of Superior Court, with a courtesy copy to the Honorable Margaret Mary McVeigh, P.J.Ch. The Reply need only be served upon the particular Foreclosure Defendant who properly filed and served his/her/their Objection.
12. Plaintiff shall submit to the Court an original and two copies of a proposed form of Final Order/Judgment incorporating the relief sought no later than _____ days before the Hearing.
13. A Certificate of Service of the Verified Complaint, this Order to Show Cause and all supporting documents shall be filed with the Clerk of Superior Court no later than nine (9) days before the Hearing.
14. The Court will entertain argument, but not testimony, at the Hearing, unless the Court otherwise directs.

By The Court,

Hon. Margaret Mary McVeigh, P.J.Ch.

EXHIBIT D

PLUESE, BECKER & SALTZMAN, LLC
Attorneys At Law
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
Attorneys for Plaintiff

IN RE NOTICES OF INTENTION TO
FORECLOSE SENT FOR NEW
JERSEY HOUSING & MORTGAGE
FINANCE AGENCY

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
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CIVIL ACTION

VERIFIED COMPLAINT

Plaintiff, NEW JERSEY HOUSING & MORTGAGE FINANCE AGENCY (“NJHMFA”), by and through DOVENMUEHLE MORTGAGE, INC., their current subservicer (“Subservicer”), by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing, pursuant to the April 4, 2012, Order of the New Jersey Supreme Court (the “April 4th Order”), that was entered following the Court’s decision in U.S. Bank, N.A. v. Guillaume, 209 N.J. 449 (2012), (“Guillaume”), respectfully states as follows:

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- a. Foreclosures that were initiated on or before February 27, 2012 and which NJHMFA holds and services the mortgage; and
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10. Pursuant to the April 4th Order, attached as Exhibit "B" to this Verified Complaint is the proposed form the Explanatory Letter (the "Explanatory Letter Template") that NJHMFA, by and through their Subservicer, will send to each Foreclosure Defendant. As instructed by the Supreme Court in the April 4th Order, the proposed form of Explanatory Letter contains the following explanations:

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WHEREFORE, NJHMFA respectfully requests that this Court enter an Order providing,

- a. That this Court schedule a Hearing (the “Hearing”) in 60-90 days to consider the relief requested hereby and any Objections tendered in compliance with the terms of the Order to Show Cause;
- b. That this Court determine and find that NOIs in the form of the Remediated NOI Template that contain accurate substantive information regarding the subject Loan from the subject Loan Records are fully compliant with the Fair Foreclosure Act;
- c. That NJHMFA, by and through their Subservicer, may send to each Foreclosure Defendant an OTSC Package consisting of this Verified Complaint, supporting

Certification and Brief, conformed copy of the Order to Show Cause, Explanatory Letter (as amended/superseded by the Pleadings herein) and Remediated NOI without attorneys' fees or costs incurred in the Foreclosure;

d. That the Final Order/Judgment entered herein need be served only upon any Parties who appeared and any Foreclosure Defendant to whom was not previously sent a Remediated NOI by the Hearing date;

e. Requiring that NJHMFA, by and through their Subservicer, send another OTSC Package or Remediated NOI only to those Foreclosure Defendants to whom an OTSC Package was not mailed by the date of entry of the Final Order/Judgment herein;

f. Allowing NJHMFA to refrain from sending an OTSC Package to Foreclosure Defendants in Foreclosures subject to the Automatic Stay in any bankruptcy proceedings and authorizing NJHMFA, by and through their Subservicer, to remediate NOIs in such Foreclosures by having sent an OTSC Package at such time when the Automatic Stay no longer enjoins such action; and

g. Such other or further relief the Courts deems equitable and just.

COUNT I: New Jersey Housing & Mortgage Agency ("NJHMFA")

15. NJHMFA hereby incorporates by reference paragraphs 1 through 14 as if set forth herein.

16. NJHMFA services Loans that are the subject of Foreclosures predicated upon NOIs that were not strictly statutorily compliant for the reason(s) described in the Remediated NOI List.

17. Attached as Exhibit "A" is the Remediated NOI List of uncontested residential foreclosures actions including those in which the entity identified in this Count is the Plaintiff and the Servicer requests relief from this Court to issue an Order to Show Cause consistent with the Supreme Court's April 4, 2012 Order.

WHEREFORE, NJHMFA respectfully requests Judgment:

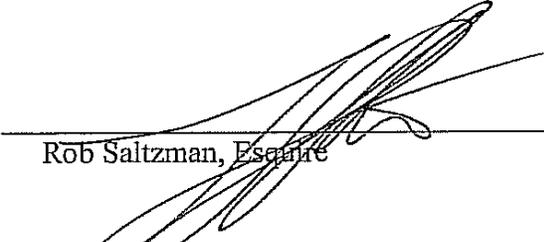
- (a) Deeming NOIs in the form of the Remediated NOI Template that contain accurate information derived from the Loan Records to be compliant with the requirements of the Fair Foreclosure Act;
- (b) Approving the sending of an OTSC Package, consisting of the OTSC herein, supporting Certification and Letter Memorandum, Explanatory Letter and Remediated Notice of Intention to Foreclose, in the form of the Remediated NOI Template and containing accurate information regarding the Loan derived from the Loan Records including the amount presently required to reinstate the Mortgage without attorneys' fees or costs incurred in the pending Foreclosure, to the Foreclosure Defendants at the Mortgaged Property or last known address, if different in the Foreclosures identified in the Remediated NOI List;
- (c) Deeming the Explanatory Letter amended and superseded by the Pleadings herein to the extent of any inconsistency between the Explanatory Letter and the Single Mailing Procedure described herein;
- (d) Requiring that NJHMFA, by and through their Subservicer, mail the Final Order/Judgment herein only to those Parties who appeared in these proceedings pursuant to the procedure specified by the Court in the OTSC;
- (e) Requiring that an OTSC Package be mailed after entry of the Final Order/Judgment

only to those Foreclosure Defendants to whom an OTSC Package was not mailed by the date of entry of the Final Order/Judgment herein;

- (f) Allowing NJHMFA, to refrain from sending an OTSC Package to Foreclosure Defendants in Foreclosures subject to the Automatic Stay in any bankruptcy proceedings and authorizing NJHMFA, by and through their Subservicer, to remediate NOIs in such Foreclosures by having sent an OTSC Package at such time when the Automatic Stay no longer enjoins such action; and
- (g) for such other and further relief as this Court deems just and equitable.

Respectfully Submitted.

PLUESE, BECKER & SALTZMAN, LLC

By: 
Rob Saltzman, Esquire

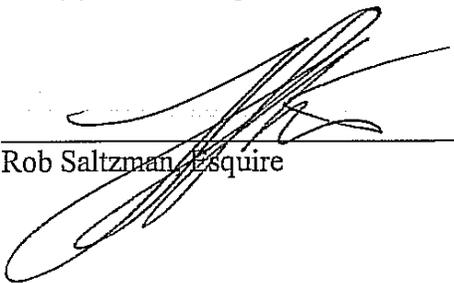
Dated: July 3, 2013

CERTIFICATION

I certify pursuant to Rule 4:5-1 that, to the best of my knowledge, this matter is not the subject of any other action pending in any court or of a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated, other than the pending foreclosure actions on the Remediated NOI List attached hereto and any pending, separate actions initiated outside

of the uncontested foreclosure proceedings in which Foreclosure Defendants may have raised claims concerning, *inter alia*, their NOIs but which are not at issue in this application. I further certify that I am unaware of any non-party who should be joined in this action pursuant to Rule 4:28 or who is subject to joinder pursuant to Rule 4:29-1 (b) because of potential liability to any party based on the same transactional facts.

Dated: July 3, 2013



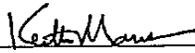
Rob Saltzman, Esquire

VERIFICATION

I, Keith Manson, of full age, certify as follows:

1. I am a Vice President of Dovenmuehle Mortgage, Inc., Attorney In Fact for New Jersey Housing & Mortgage Finance Agency.
2. I have read the contents of the Verified Complaint and verify that the statements contained therein are true to the best of my knowledge and personal information.
3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

New Jersey Housing and Mortgage Finance Agency, by Dovenmuehle Mortgage, Inc., its Attorney-in-Fact

By: 
Name: Keith Manson
Title: Vice President
Dated: 6/20/13

PLUESE, BECKER & SALTZMAN, LLC
Attorneys At Law
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
Attorneys for Plaintiff

**IN RE NOTICES OF INTENTION
TO FORECLOSE SENT FOR NEW
JERSEY HOUSING & MORTGAGE
AGENCY**

**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY
DOCKET NO. F-**

CIVIL ACTION

**ORDER TO SHOW CAUSE
SUMMARY PROCEEDING
PURSUANT TO R. 4:67-2**

THIS MATTER being brought before the Court by NEW JERSEY HOUSING & MORTGAGE AGENCY (“NJHMFA”, the “Lender” or the “Servicer), by and through DOVENMUEHLE MORTGAGE, INC., their current subservicer (“Subservicer”) in pending foreclosure cases (“the Foreclosures”), by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing, pursuant to the April 4, 2012 Order of the New Jersey Supreme Court (the “April 4th Order”) and based upon the facts and circumstances described in the Verified Complaint filed herewith and incorporated herein by reference, including defined terms; and the Court having determined that this matter is appropriately commenced by Order To Show Cause as a summary proceeding pursuant to R. 4:67-2, and for good cause shown:

IT IS on this _____ day of _____, 2013,

ORDERED that Foreclosure Defendants identified in Exhibit “A” of the Verified Complaint (the “Remediated NOI List”) appear and show cause on the _____ day of _____, 2013 before the Honorable Margaret Mary McVeigh, P.J.Ch., Superior Court, Passaic County, Chancery Division, at 71 Hamilton Street, Paterson, NJ 07505 at _____ o’clock (the “Hearing”),

why a Final Order/Judgment should not be entered as follows:

- A. Declaring the Servicer's Remediated NOIs in the form of the Remediated NOI Template that contain accurate information regarding each subject Loan derived from the Loan Records to be compliant with the requirements of the Fair Foreclosure Act; and

- B. Allowing Remediated Notices of Intention to Foreclose (the "Remediated NOI") to be sent, affording Foreclosure Defendants at least thirty (30) days from the date the Remediated NOI is mailed to cure the default on their Mortgage without attorneys' fees or costs incurred in the pending Foreclosure; and

- C. Granting such other relief as the Court deems equitable and just.

IT IS FURTHER ORDERED that:

1. A complete package (the "OTSC Package") consisting of a conformed copy of this Order To Show Cause, Verified Complaint without Exhibits, Supporting Certification, Letter Memorandum, Explanatory Letter and Remediated NOI shall be served upon each Foreclosure Defendant.

2. Service of the OTSC Package shall be effectuated by simultaneous certified mail, return receipt requested, and regular mail to the subject Mortgaged Property's address and the Foreclosure Defendant's last known address if different. In the event of a deceased Foreclosure Defendant, the OTSC Package will be mailed to the Address of the Estate if known or available.

3. A copy of this Order To Show Cause and Verified Complaint shall be posted on the Judiciary's Web Page at the following link: <http://www.judiciary.state.nj.us> within _____ days from the date of entry of this OTSC where it can be viewed by the general public.
4. A proof of service of the OTSC Package shall be filed no later than nine (9) days before the Hearing Date.
5. Regarding any Foreclosure Defendant involved in a Bankruptcy case wherein the Automatic Stay enjoins prosecution of the Foreclosure,
 - a. The Servicer may serve a copy of this Order to Show Cause and Verified Complaint, but may defer serving a Remediated NOI if it believes that doing so may violate the Automatic Stay.
 - b. If the Court grants final relief on the return date of this Order To Show Cause and the Servicer has not already sent a Remediated NOI, then the Servicer may send the Remediated NOI once the Automatic Stay is vacated, modified or otherwise inapplicable. In the alternative, Plaintiff may apply to the United States Bankruptcy Court for relief from the Automatic Stay to effectuate service of the Remediated NOI pursuant to this Order.
 - c. In the event that the Servicer does not serve a Remediated NOI with this Order To Show Cause, Plaintiff's Foreclosure action may not proceed until such Remediated NOI is served pursuant to this Court's Order and the time provided therein to cure the default has passed without the default having

been cured.

- d. If the Servicer believes that service of this Order To Show Cause may be a violation of the Automatic Stay, then once the Stay is vacated, modified or otherwise no longer enjoins service of a Remediated NOI, then the Servicer may send an OTSC Package to the Foreclosure Defendant(s) and the Foreclosure(s) may proceed where more than 35 days have passed after such OTSC Package was sent without the default having been cured. Plaintiff shall not be required to file another Order To Show Cause to Remediate NOIs at issue in Foreclosures subject to the Automatic Stay.

6. Plaintiff shall publish legal notices of this OTSC as on at least two days prior to _____ in the following newspapers:

- a. Star Ledger
- b. Bergen Record
- c. The Press of Atlantic City
- d. The Gloucester County Times

7. The Court will only entertain objections (the "Objections") to the process provided for by the April 4th Order. Any Party who wishes to object to the process shall file the Objection under the Docket Number for this Order to Show Cause, **in writing**, with the:

Clerk of the Superior Court, Foreclosure Processing Services
Attn: Objection to Notice of Intention to Foreclose
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625-0971

A copy of the Objection must also be sent to:

Honorable Margaret Mary McVeigh, P.J.Ch.

Passaic County Courthouse
71 Hamilton Street, Chambers 100
Paterson, New Jersey 07505

A copy of the Objection must also be served upon the attorney for the Plaintiff:

Rob Saltzman, Esquire
Pluese, Becker & Saltzman, LLC
20000 Horizon Way, Suite 900
Mt. Laurel, New Jersey 08054

Objections must state with specificity the basis for the Objection and must be filed no later than _____, 2013.

8. Any objection regarding a particular Remediated NOI in a particular Foreclosure case must be filed in writing under the Docket Number of that particular Foreclosure action, NOT this Order To Show Cause. Any such Objection must state the basis for the objection with specificity and be filed and served as set forth in Paragraph 6 above. Objections to a particular Remediated NOI will be referred for resolution to the Chancery Judge in the Vicinage where the Mortgaged Property is located.
9. Foreclosure Defendants are hereby informed that a telephone call to the Plaintiff, to the Plaintiff's attorney, to the Servicer, to the Superior Court Clerk's Office, or to this Court, will not protect your rights nor constitute a valid Objection; you must file and serve your written Objection as provided for by in this Order.
10. If you cannot afford an attorney, you may call the Legal Services office in the County in which you live. If you do not have an attorney or are not eligible for free legal assistance through the Legal Services office (or such office does not provide services for this

particular type of proceeding), you may obtain a referral to an attorney by calling one of the Lawyer Referral Services.

11. If written Objection is properly filed and served, the Plaintiff's written reply (the "Reply") shall be filed and served by _____, 2013. A copy of the Reply, if any, shall be served upon the Clerk of Superior Court, with a courtesy copy to the Honorable Margaret Mary McVeigh, P.J.Ch. The Reply need only be served upon the particular Foreclosure Defendant who properly filed and served his/her/their Objection.
12. Plaintiff shall submit to the Court an original and two copies of a proposed form of Final Order/Judgment incorporating the relief sought no later than _____ days before the Hearing.
13. A Certificate of Service of the Verified Complaint, this Order to Show Cause and all supporting documents shall be filed with the Clerk of Superior Court no later than nine (9) days before the Hearing.
14. The Court will entertain argument, but not testimony, at the Hearing, unless the Court otherwise directs.

By The Court,

Hon. Margaret Mary McVeigh, P.J.Ch.

PLUESE, BECKER & SALTZMAN, LLC

Attorneys at Law

ROB SALTZMAN ♦
RSaltzman@pbslaw.org

SANFORD J. BECKER
SBecker@pbslaw.org

ROBERT T. PLUESE
RPluese@pbslaw.org

ROBERT F. THOMAS ♦
RThomas@pbslaw.org

STUART H. WEST ♦
SWest@pbslaw.org

MICHAEL GOUDA ♦
MGouda@pbslaw.org

MOUNT LAUREL OFFICE:
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
phone:(856) 813-1700; fax: (856) 813-1720

PENNSYLVANIA OFFICE:
721 Dresher Road, Suite 1050
Horsham, PA. 19044
phone:(215) 653-7450; fax: (215) 653-7454

OF COUNSEL:

The Law Offices of Barbara A. Fein, P.C. ♦
BarbaraF@lobaf.com

Glen-David Schwarzschild, Esq. ♦
Glens@glenslaw.com

♦ PA and NJ Bars

Please reply to:
MOUNT LAUREL, NJ

[Defendant Name(s)] [Defendant Address] [Defendant City, State ZIP]
[Date]

Re: *In re Notices of Intention to Foreclose Sent for New Jersey Housing & Mortgage Finance Agency*
Docket No.:

Dear [Defendant Name(s)]:

Please be advised that the New Jersey Supreme Court recently held in *U.S. Bank NA. v. Guillaume*, 209 N.J. 449 (2012) that, prior to the commencement of a residential mortgage foreclosure action ("Foreclosure"), mortgage lenders ("Lenders") seeking to foreclose must comply with the New Jersey Fair Foreclosure Act's (the "FFA") requirement that a Notice of Intention to Foreclose ("NOI") set forth the name and address of the Lender.

Why You Are Receiving This Letter

You are receiving this letter because you are a defendant in a pending Foreclosure, and it is believed that the NOI served upon you prior to the commencement of the Foreclosure did not comply with the requirements of the FFA.

By the court's Order to Show Cause dated [month] [d~], 2013, and in compliance with the Supreme Court's opinion in *U.S. Bank NA. v. Guillaume*, [Hon. Paul Innes, P.J.Ch., Mercer Vicinage or Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage], gave permission to New Jersey Housing and Mortgage Finance Agency ("NJHMFA") to serve, along with the Order to Show Cause and Verified Complaint, corrected NOIs on all defendant Mortgagors/Parties obligated on the debt in pending Foreclosures filed before February 28, 2012.

Information About the Order to Show Cause and Verified Complaint

Enclosed with this letter are copies of the Order to Show Cause and Verified Complaint. The Verified Complaint lists the following Lenders in the following counts of the Verified Complaint:

Count 1- New Jersey Housing and Mortgage Finance Agency

The attachments to the Verified Complaint, which list the Foreclosure(s) in which NJHMFA is the Plaintiff, will be made available on the New Jersey Courts website at <http://www.judiciary.state.nj.us/>. If you are unsure of the docket number for your Foreclosure, you can access that information on the Court's website using the exhibits attached to the Verified Complaint by entering your name into the automatic search field on the website. If you do not have access to a computer or have trouble locating that information on the Court's website, you can contact a representative from [*plaintiff or servicer name*] at [*telephone number*] who can assist you with locating the information about your Foreclosure.

Information About the Corrected Notice of Intention to Foreclose

Also enclosed with this letter is the corrected NOI. It allows you an additional 30 days in which to cure the default without having to pay the Plaintiff's court costs and attorneys' fees. It also sets forth important information about your loan, including information on how you can cure the default; the consequences of failing to cure the default; contact information for the Plaintiff; and information about retaining counsel and borrower assistance. If you fail to cure the default by the date set forth in the corrected NOI, the Foreclosure against you will proceed.

With the passage of time since the Foreclosure was filed against you, the Lender on your loan may have changed from the named Plaintiff in the Foreclosure. The corrected NOI lists the name and address of the current Lender on your loan.

Questions about the Notice of Intention to Foreclose

Should you have questions with regard to your loan or the corrected NOI, please contact [*plaintiff or servicer name*] at [*telephone number*]. Additional contact information is provided in the corrected NOI.

How to File an Objection

You have the right to object to the enclosed Order to Show Cause (the process by which the Court gave the Plaintiff permission to serve the corrected NOI). To do so, you must file a written objection under the docket number for the Order to Show Cause.

You also have the right to object to the enclosed corrected NOI. To do so, you must file a written Objection under the docket number for the foreclosure action in your individual case.

For either type of objection, you must set forth with specificity the basis of the objection, and file the objection with the Superior Court Clerk's Office at the following address within 30 days:

Superior Court Clerk's Office, Foreclosure Processing Services
Attention: Objection to Notice of Intention to Foreclose
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625

You must also serve a copy of the objection on the Plaintiff's attorney, Pluese, Becker & Saltzman, LLC, at 20000 Horizon Way, Suite 900, Mount Laurel, New Jersey 08054, and mail a copy of the objection to [Judge Innes or Judge McVeigh] at [address].

Your personal appearance at the Superior Court Clerk's Office or your local courthouse will not qualify as an objection. A telephone call will not protect your rights; you must file your objection and serve it on the Plaintiff's attorney if you want the Court to hear your objection to the relief the Plaintiff is seeking. If you file a specific written objection, the case will be sent to a Judge for resolution. You will be informed by the Judge of the time and place of the Hearing on your objection.

Questions about Filing an Objection

Should you have questions related to the procedure for filing an objection, please visit the New Jersey Courts On-Line Self-Help Center at <http://www.judiciary.state.nj.us/prose/indcx.htm>. You may also contact the Superior Court Clerk's Office at (609) 421-6100, or at SCCOForeclosure.Mailbox@judiciary.state.nj.us.

Thank you for your attention to this matter. Should you have questions related to the contents of the materials enclosed herein, please contact the undersigned.

Respectfully,

PLUESE, BECKER & SALTZMAN, LLC

By _____
Rob Saltzman, Esquire

PLUESE, BECKER & SALTZMAN, LLC

Attorneys at Law

ROB SALTZMAN ♦
RSaltzman@pbslaw.org

SANFORD J. BECKER
SBecker@pbslaw.org

ROBERT T. PLUESE
RPluese@pbslaw.org

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(856) 813-1700
FACSIMILE: (856) 813-1720

PENNSYLVANIA OFFICE:
721 Dresher Road, Suite 1050
Horsham, PA 19044
(215) 653-7450
Fax (215) 653-7454

MORRISTOWN OFFICE:
18 Bank Street
Morristown, NJ 07960
(973) 540-0808
FACSIMILE: (973) 540-0489

OF COUNSEL:

The Law Offices of Barbara A. Fein, P.C. ♦
BarbaraF@lobaf.com

The Law Offices of Mallary Steinfeld, Esq.
Mallary@msteinfeldlaw.com

Glen-David Schwarzschild, Esq. ♦
Glens@glenlaw.com

♦ PA and NJ Bars

Our File #

Please reply to our MOUNT LAUREL office

DATE

KEYBOARD(Notice must go separately to all obligors at all known addresses)FIELD(1)FIELD(2)

RE: Original Mortgage to KEYBOARD(delete last "and")
Dated FIELD(4)
Current Mortgage Holder ("Lender"):KEYBOARD()
Address: KEYBOARD(address of Lender)
Mortgage Servicer ("Servicer"):KEYBOARD()
Loan No.FIELD(5)
Location of Mortgaged Property: FIELD(6)

NOTICE OF INTENTION TO FORECLOSE MORTGAGE

Dear KEYBOARD(delete the last "and"):

The Mortgage held or serviced by KEYBOARD(Servicer/client's name), on your property located at FIELD(6) is in default. **This situation is serious and your Lender, in their own name or by and through their Servicer, Assignee or other authorized representative, intends to institute a foreclosure lawsuit against you.** Please be advised of the following:

1. The Mortgage at issue is dated FIELD(4), was given to secure a loan in the original principal amount of FIELD(20), and is a lien on property located at FIELD(6).
2. The said Mortgage is in default because regular monthly payments have not been maintained according to the terms of the Mortgage contract. Specifically, the following payments and/or other contractual charges are due, unpaid and owing:

KEYBOARD() Monthly payments @ FIELD(15) = \$ KEYBOARD()
KEYBOARD() Late charges @ \$ KEYBOARD() = \$ KEYBOARD()
KEYBOARD() Escrow deposits @ \$ KEYBOARD() = \$ KEYBOARD()
KEYBOARD(any other expenses?)

TOTAL DUE as of KEYBOARD(), 200KEYBOARD() = \$ KEYBOARD()

Because of Interest, Late Charges and other charges that vary from day to day, the amount due on the day you pay may be greater. Hence, if you pay the amount shown above, an adjustment may be necessary after your payment is received, in which event you will be informed before depositing your check for collection. For further information, write to the undersigned or contact our Client's representative identified in paragraph 11 of this letter.

3. You have the right to cure the default, together with any payments or other charges which may subsequently become due, at any time up to the entry of a Final Judgment in Foreclosure or Order of Redemption if you pay or tender all sums which would have been due in the absence of default at the time of such payment; perform any other obligation which you would have been bound to perform in the absence of default or the exercise of an acceleration clause; pay or tender Court costs, if any, and attorneys' fees in amount not to exceed the amount permitted under the Rules Governing the Courts of the State of New Jersey; and, pay all contractual late charges as provided for in the Note or Mortgage.
4. You may cure the default by paying or tendering the sum of \$ KEYBOARD() , as itemized above, on or before KEYBOARD() , 200KEYBOARD().
5. You must cure the default as stated above by KEYBOARD() , 200KEYBOARD() in order to avoid institution of foreclosure proceedings. Payment or tender shall be made to the Lender's authorized representative:

KEYBOARD(Client's Name mailing address, phone number)

6. If the default is not cured by the date stated in Paragraph 5 of this letter, KEYBOARD(Servicer/client's name) may take steps to terminate your ownership in the mortgaged property by initiating foreclosure proceedings in a Court of competent jurisdiction. You could lose your home as a result of the Mortgage default.
7. If foreclosure proceedings are instituted, you still have the right to cure the default, but you will be required to pay Court costs and attorneys' fees as provided for by law.
8. You have the right to transfer the mortgaged property to another person subject to the Mortgage and any such transferee may have the right to cure the default as provided for by law, subject to the provisions of the Mortgage documents.
9. You should seek counsel from an attorney at law of your own choice concerning your residential Mortgage default situation. If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association or Lawyer Referral Service in the county in which the residential property securing the Mortgage loan is located. If you are unable to afford an attorney, you may be eligible for free subsidized legal assistance and you may communicate with the Legal Services Office in the county in which the mortgaged property is located.

10. You may be eligible for financial assistance for curing the default from programs operated by the State or Federal governments, or non-profit organizations, if any, identified by the Commissioner of Banking of the State of New Jersey, whose telephone number is (609) 292-3420. Annexed hereto is a list of such Financial Assistance Agencies which may help you.

11. If you disagree with KEYBOARD(Servicer/client's name)'s assertion that the Mortgage is in default, or if you disagree with the calculations of the amount required to cure the default as stated in this letter, you may contact the Lender's authorized representative:

KEYBOARD(Client address and phone number)

If full payment of the amount in default is not made as stated in this letter, a Mortgage foreclosure lawsuit against you will be instituted. If the Mortgage is foreclosed, the mortgaged property will be sold by the Sheriff or other officer authorized by law and the proceeds of Sale applied to the Mortgage debt. If you have not been discharged in a bankruptcy and/or otherwise remain personally obligated on the debt, you may also be sued personally for all sums due under the Note or other instrument evidencing your personal obligation to repay the loan, as provided for by law. Payment must be in cash, cashier's check, certified check or money order and payable to us at the address stated in this letter. Please include your loan number or mortgage account number on any payment or correspondence.

If foreclosure proceedings are instituted against you, you have the right to assert in such proceedings the non-existence of default or any other defenses you may have to acceleration or foreclosure, as provided for by applicable law. In addition, you may have other rights provided for by State by Federal Law, or by the mortgage contract documents.

If you cure the default, the Mortgage will be restored to the same position as if no default had occurred. However, you are not entitled to this right as a matter of law more than once every 18 months.

If you received a discharge of the debt in Bankruptcy proceedings and if the debt has not been reaffirmed, the acceleration of the debt and foreclosure proceedings will not result in your being held personally liable for the debt. This letter is not an attempt to collect a personal debt. However, failure to pay the delinquent balance is necessary to avoid foreclosure.

Sincerely,

PLUESE, BECKER & SALTZMAN, LLC

BY: _____
Sanford J. Becker, Esquire

SJB/FIELD(17)

**NOTICE REQUIRED BY THE
FAIR DEBT COLLECTION
PRACTICES ACT, (the act),
15 U.S.C. SECTION 1692, et seq.**

To the extent the Act may apply, please be advised of the following:

1. The amount of the original debt is stated in paragraph one of the Notice of Intention to Foreclose Mortgage attached hereto.
2. The Entity who is named in the attached Notice of Intention to Foreclose Mortgage is the Creditor to whom the debt is owed.
3. The debt described in the Notice attached hereto will be assumed to be valid by the Creditor's law firm, unless the Debtor(s), within thirty days after receipt of this Notice, disputes the validity of the debt or some portion thereof.
4. If the Debtor notifies the Creditor's law firm within thirty days of the receipt of this Notice that the debt or any portion thereof is disputed, the Creditor's law firm will obtain verification of the debt and a copy of the verification will be mailed to the Debtor by the Creditor's law firm.
5. If the Creditor is not the original creditor, and if the Debtor makes a request to the Creditor's law firm within thirty days from the receipt of this notice, the name and address of the original Creditor will be mailed to the Debtor by the Creditor's law firm.
6. The request should be addressed to Pluese, Becker & Saltzman, LLC, 20000 Horizon Way, Suite 900, Mt. Laurel, NJ 08054. Attention: Sanford J. Becker, Esquire.

This letter is an attempt to collect a debt and any information obtained will be used for that purpose.

The following is a list of governmental and non-profit entities that may provide financial assistance or counseling to borrowers in foreclosure. It is recommended that you consult with your attorney.

American Credit Alliance, Inc.
26 South Warren Street
Trenton, NJ 08608
(609) 393-5400

Atlantic Human Resources, Inc.
1 South New York Avenue
Atlantic City, NJ 08401
(609) 348-4131

Citizen Action (Offices statewide)
400 Main Street
Hackensack, NJ 07601
1-800-NJ OWNER
(201) 488-2804

Consumer Credit Counseling Service of Central New Jersey
253 Nassau Street
Princeton, NJ 08540
(609) 924-2896

Consumer Credit Counseling Service of New Jersey
185 Ridgedale Avenue
Cedar Knolls, NJ 07927-1812
(973) 267-4324

Fair Housing Council of North em New Jersey
131 Main Street
Hackensack, NJ 07601
(201) 489-3552

Garden State Consumer Credit Counseling, Inc.
225 Willowbrook Road
Freehold, NJ 07728
1-800-992-4557

Housing Coalition of Central Jersey
78 New Street
New Brunswick, NJ 08901
(732) 249-9700

Jersey Counseling & Housing Development, Inc.
29 South Black Horse Pike
Blackwood, NJ 08012
(856) 227-3683

Jersey Counseling & Housing Development, Inc.
1840 South Broadway
Camden, NJ 08104
(856) 541-1000

Mercer County Hispanic Association
200 E. State Street - 2nd Floor
Trenton, NJ 08607
(609) 392-2446

Middlesex County Economic Opportunities Corporation
1215 Livingston Avenue
North Brunswick, NJ 08902
(732) 846-6600, ext. 226

**Monmouth County Human Services
Housing Services Unit**
P.O. Box 3000
Freehold, NJ 07728
(732) 431-7998

Morris County Fair Housing Council
65 Spring Street
Morristown, NJ 07963
(973) 538-2975

Ocean Community Economic Action Now, Inc.
10 Washington Street
Toms River, NJ 08753-0773
(732) 244-2351, ext. 14

Paterson Coalition for Housing, Inc.
262 Main Street, 5th Floor
Paterson, NJ 07505
(973) 684-5998

Paterson Task Force for Community Action, Inc.
155 Ellison Street
Paterson, NJ 07505
(973) 279-2333

Tn-County Community Action Agency, Inc.
110 Cohansey Street
Bridgeton, NJ 08302
(856) 451-6330

Urban League for Bergen County
106 West Palisade Avenue
Englewood, NJ 07631
(201) 568-4988

Urban League for Essex County
508 Central Avenue
Newark, NJ 07101
(973) 624-9535

Urban League of Union County
288 North Broad Street
Elisabeth, NJ 07208
(908) 351-7200

**Homelessness Prevention Program
New Jersey Department of Community Affairs**
(609) 633-6204*

***Basic eligibility is limited to: (a) single family owner/occupied dwellings with all those on the deed and mortgage occupying the house; (b) no more than one mortgage or lien encumbrance on the property; (c) no initiated or ongoing bankruptcy. Assistance will be in the form of a loan, and a lien will be placed on the property. The family must document the financial reason for nonpayment. At the time of the eligibility decision, the household must have and document sufficient income to support the household and repay the loan. There is a fee for the credit check and property search.**

ATLANTIC COUNTY

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Floor
Atlantic City, NJ 08401
LAWYER REFERRAL: 609-345-3444
LEGAL SERVICES: 609-348-4200

BERGEN COUNTY

Deputy Clerk of the Superior Court
Case Processing Section,
Rm. 119
Justice Center, 10 Main Street
Hackensack, NJ 07601-0769
LAWYER REFERRAL: 201-488-0044
LEGAL SERVICES: 201-487-2166

BURLINGTON COUNTY

Deputy Clerk of the Superior Court
Central Processing Section
Attn: Judicial Intake, First Floor
Courts Facility
49 Rancocas Road
Mt. Holly, NJ 08060
LAWYER REFERRAL: 609-261-4862
LEGAL SERVICES: 609-261-1088

CAMDEN COUNTY

Deputy Clerk of the Superior Court
Civil Processing Office
1st Floor, Hall of Justice,
101 S. 5th Street,
Camden, NJ 08103
LAWYER REFERRAL: 609-964-4520
LEGAL SERVICES: 609-964-2010

CAPE MAY COUNTY

Deputy Clerk of the Superior Court
Central Processing Office
9 N. Main Street, Box DN-209
Cape May Court House, NJ 08210
LAWYER REFERRAL: 609-463-0313
LEGAL SERVICES: 609-465-3001

CUMBERLAND COUNTY

Deputy Clerk of the Superior Court
Civil Case Management Office
Broad and Fayette Streets
P.O. Box 615, Bridgeton, NJ 08302
LAWYER REFERRAL: 609-692-6207
LEGAL SERVICES: 609-451-0003

ESSEX COUNTY

Deputy Clerk of the Superior Court
237 Hall of Records
465 Dr. Martin Luther King, Jr. Blvd.
Newark, NJ 07102
LAWYER REFERRAL: 973-622-6207
LEGAL SERVICES: 973-624-4500

GLOUCESTER COUNTY

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
1st Floor, Court House
Woodbury, NJ 08096
LAWYER REFERRAL: 609-848-4589
LEGAL SERVICES: 609-848-5360

HUDSON COUNTY

Deputy Clerk of the Superior Court
Civil Records Dept.
Brennan Court House, 1st Floor
583 Newark Avenue
Jersey City, NJ 07306
LAWYER REFERRAL: 201-798-2727
LEGAL SERVICES: 201-792-6363

HUNTERDON COUNTY

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Civil Division
65 Park Avenue
Flemington, NJ 08862
LAWYER REFERRAL: 908-735-2611
LEGAL SERVICES: 908-782-7979

MERCER COUNTY

Deputy Clerk of the Superior Court
Local Filing Office
Courthouse, 175 S. Broad Street
P.O. Box 8068
Trenton, NJ 08650
LAWYER REFERRAL: 609-890-6200
LEGAL SERVICES: 609-695-6249

MIDDLESEX COUNTY

Deputy Clerk of the Superior Court,
Administration Building, Third floor
1 Kennedy Square
P.O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL: 732-828-0053
LEGAL SERVICES: 732-249-7600

MONMOUTH COUNTY

Deputy Clerk of the Superior Court
71 Monument Park
P.O. Box 1262
Courthouse, East Wing
Freehold, NJ 07728-1262
LAWYER REFERRAL: 732-431-5544
LEGAL SERVICES: 732-866-0020

MORRIS COUNTY

Deputy Clerk of the Superior Court
Civil Division
30 Schuyler Place
P.O. Box 910
Morristown, NJ 07960-0910
LAWYER REFERRAL: 973-267-5882
LEGAL SERVICES: 973-285-6911

OCEAN COUNTY

Deputy Clerk of the Superior Court
Court House, Room 119
118 Washington Street
Toms River, NJ 08754
LAWYER REFERRAL: 732-240-3666
LEGAL SERVICES: 732-341-2727

PASSAIC COUNTY

Deputy Clerk of the Superior
Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL: 973-
278-9223
LEGAL SERVICES: 973-345-
7171

SALEM COUNTY

Deputy Clerk of the Superior
Court
92 Market Street
P.O. Box 18
Salem, NJ 08079
LAWYER REFERRAL: 609-
678-8363
LEGAL SERVICES: 609-451-
0003

SOMERSET COUNTY

Deputy Clerk of the Superior
Court
Civil Division Office
New Court House, 3rd Floor
P.O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL: 908-
685-2323
LEGAL SERVICES: 908-231-
0840

SUSSEX COUNTY

Deputy Clerk of the Superior
Court
Sussex County Judicial
Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL: 973-
267-5882
LEGAL SERVICES: 973-383-
7400

UNION COUNTY

Deputy Clerk of the Superior
Court
1st Floor, Court House
2 Broad Street
Elizabeth, NJ 07207
LAWYER REFERRAL: 908-
353-4715
LEGAL SERVICES: 908-527-
4769

WARREN COUNTY

Deputy Clerk of the Superior
Court
Civil Division Office
Court House
Belvidere, NJ 07823-1500
LAWYER REFERRAL: 201-
267-5882
LEGAL SERVICES: 908-475-
2010

EXHIBIT C

PLUESE, BECKER & SALTZMAN, LLC

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MOUNT LAUREL OFFICE:
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
FACSIMILE: (856) 813-1720

PENNSYLVANIA OFFICE:
721 Dresher Road, Suite 1050
Horsham, PA 19044
(215) 653-7450
Fax (215) 653-7454

MORRISTOWN OFFICE:
18 Bank Street
Morristown, NJ 07960
(973) 540-0808
FACSIMILE: (973) 540-0489

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Glens@gdenslaw.com

♦ PA and NJ Bars

Our File #

Please reply to our MOUNT LAUREL office

DATE

KEYBOARD(Notice must go separately to all obligors at all known addresses)FIELD(1)FIELD(2)

RE: Original Mortgage to KEYBOARD(delete last "and")
Dated FIELD(4)
Current Mortgage Holder ("Lender"):KEYBOARD()
Address: KEYBOARD(address of Lender)
Mortgage Servicer ("Servicer"):KEYBOARD()
Loan No.FIELD(5)
Location of Mortgaged Property: FIELD(6)

NOTICE OF INTENTION TO FORECLOSE MORTGAGE

Dear KEYBOARD(delete the last "and"):

The Mortgage held or serviced by KEYBOARD(Servicer/client's name), on your property located at FIELD(6) is in default. **This situation is serious and your Lender, in their own name or by and through their Servicer, Assignee or other authorized representative, intends to institute a foreclosure lawsuit against you.** Please be advised of the following:

1. The Mortgage at issue is dated FIELD(4), was given to secure a loan in the original principal amount of FIELD(20), and is a lien on property located at FIELD(6).
2. The said Mortgage is in default because regular monthly payments have not been maintained according to the terms of the Mortgage contract. Specifically, the following payments and/or other contractual charges are due, unpaid and owing:

KEYBOARD() Monthly payments @ FIELD(15) = \$ KEYBOARD()
KEYBOARD() Late charges @ \$ KEYBOARD() = \$ KEYBOARD()
KEYBOARD() Escrow deposits @ \$ KEYBOARD() = \$ KEYBOARD()
KEYBOARD(any other expenses?)

TOTAL DUE as of KEYBOARD(), 200KEYBOARD() = \$ KEYBOARD()

Because of Interest, Late Charges and other charges that vary from day to day, the amount due on the day you pay may be greater. Hence, if you pay the amount shown above, an adjustment may be necessary after your payment is received, in which event you will be informed before depositing your check for collection. For further information, write to the undersigned or contact our Client's representative identified in paragraph 11 of this letter.

3. You have the right to cure the default, together with any payments or other charges which may subsequently become due, at any time up to the entry of a Final Judgment in Foreclosure or Order of Redemption if you pay or tender all sums which would have been due in the absence of default at the time of such payment; perform any other obligation which you would have been bound to perform in the absence of default or the exercise of an acceleration clause; pay or tender Court costs, if any, and attorneys' fees in amount not to exceed the amount permitted under the Rules Governing the Courts of the State of New Jersey; and, pay all contractual late charges as provided for in the Note or Mortgage.
4. You may cure the default by paying or tendering the sum of \$ KEYBOARD() , as itemized above, on or before KEYBOARD() , 200KEYBOARD().
5. You must cure the default as stated above by KEYBOARD() , 200KEYBOARD() in order to avoid institution of foreclosure proceedings. Payment or tender shall be made to the Lender's authorized representative:

KEYBOARD(Client's Name mailing address, phone number)

6. If the default is not cured by the date stated in Paragraph 5 of this letter, KEYBOARD(Servicer/client's name) may take steps to terminate your ownership in the mortgaged property by initiating foreclosure proceedings in a Court of competent jurisdiction. You could lose your home as a result of the Mortgage default.
7. If foreclosure proceedings are instituted, you still have the right to cure the default, but you will be required to pay Court costs and attorneys' fees as provided for by law.
8. You have the right to transfer the mortgaged property to another person subject to the Mortgage and any such transferee may have the right to cure the default as provided for by law, subject to the provisions of the Mortgage documents.
9. You should seek counsel from an attorney at law of your own choice concerning your residential Mortgage default situation. If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association or Lawyer Referral Service in the county in which the residential property securing the Mortgage loan is located. If you are unable to afford an attorney, you may be eligible for free subsidized legal assistance and you may communicate with the Legal Services Office in the county in which the mortgaged property is located.

10. You may be eligible for financial assistance for curing the default from programs operated by the State or Federal governments, or non-profit organizations, if any, identified by the Commissioner of Banking of the State of New Jersey, whose telephone number is (609) 292-3420. Annexed hereto is a list of such Financial Assistance Agencies which may help you.

11. If you disagree with KEYBOARD(Servicer/client's name)'s assertion that the Mortgage is in default, or if you disagree with the calculations of the amount required to cure the default as stated in this letter, you may contact the Lender's authorized representative:

KEYBOARD(Client address and phone number)

If full payment of the amount in default is not made as stated in this letter, a Mortgage foreclosure lawsuit against you will be instituted. If the Mortgage is foreclosed, the mortgaged property will be sold by the Sheriff or other officer authorized by law and the proceeds of Sale applied to the Mortgage debt. If you have not been discharged in a bankruptcy and/or otherwise remain personally obligated on the debt, you may also be sued personally for all sums due under the Note or other instrument evidencing your personal obligation to repay the loan, as provided for by law. Payment must be in cash, cashier's check, certified check or money order and payable to us at the address stated in this letter. Please include your loan number or mortgage account number on any payment or correspondence.

If foreclosure proceedings are instituted against you, you have the right to assert in such proceedings the non-existence of default or any other defenses you may have to acceleration or foreclosure, as provided for by applicable law. In addition, you may have other rights provided for by State or Federal Law, or by the mortgage contract documents.

If you cure the default, the Mortgage will be restored to the same position as if no default had occurred. However, you are not entitled to this right as a matter of law more than once every 18 months.

If you received a discharge of the debt in Bankruptcy proceedings and if the debt has not been reaffirmed, the acceleration of the debt and foreclosure proceedings will not result in your being held personally liable for the debt. This letter is not an attempt to collect a personal debt. However, failure to pay the delinquent balance is necessary to avoid foreclosure.

Sincerely,

PLUESE, BECKER & SALTZMAN, LLC

BY: _____
Sanford J. Becker, Esquire

SJB/FIELD(17)

**NOTICE REQUIRED BY THE
FAIR DEBT COLLECTION
PRACTICES ACT, (the act),
15 U.S.C. SECTION 1692, et seq.**

To the extent the Act may apply, please be advised of the following:

1. The amount of the original debt is stated in paragraph one of the Notice of Intention to Foreclose Mortgage attached hereto.
2. The Entity who is named in the attached Notice of Intention to Foreclose Mortgage is the Creditor to whom the debt is owed.
3. The debt described in the Notice attached hereto will be assumed to be valid by the Creditor's law firm, unless the Debtor(s), within thirty days after receipt of this Notice, disputes the validity of the debt or some portion thereof.
4. If the Debtor notifies the Creditor's law firm within thirty days of the receipt of this Notice that the debt or any portion thereof is disputed, the Creditor's law firm will obtain verification of the debt and a copy of the verification will be mailed to the Debtor by the Creditor's law firm.
5. If the Creditor is not the original creditor, and if the Debtor makes a request to the Creditor's law firm within thirty days from the receipt of this notice, the name and address of the original Creditor will be mailed to the Debtor by the Creditor's law firm.
6. The request should be addressed to Pluese, Becker & Saltzman, LLC, 20000 Horizon Way, Suite 900, Mt. Laurel, NJ 08054. Attention: Sanford J. Becker, Esquire.

This letter is an attempt to collect a debt and any information obtained will be used for that purpose.

The following is a list of governmental and non-profit entities that may provide financial assistance or counseling to borrowers in foreclosure. It is recommended that you consult with your attorney.

American Credit Alliance, Inc.
26 South Warren Street
Trenton, NJ 08608
(609) 393-5400

Atlantic Human Resources, Inc.
1 South New York Avenue
Atlantic City, NJ 08401
(609) 348-4131

Citizen Action (Offices statewide)
400 Main Street
Hackensack, NJ 07601
1-800-NJ OWNER
(201) 488-2804

Consumer Credit Counseling Service of Central New Jersey
253 Nassau Street
Princeton, NJ 08540
(609) 924-2896

Consumer Credit Counseling Service of New Jersey
185 Ridgedale Avenue
Cedar Knolls, NJ 07927-1812
(973) 267-4324

Fair Housing Council of North em New Jersey
131 Main Street
Hackensack, NJ 07601
(201) 489-3552

Garden State Consumer Credit Counseling, Inc.
225 Willowbrook Road
Freehold, NJ 07728
1-800-992-4557

Housing Coalition of Central Jersey
78 New Street
New Brunswick, NJ 08901
(732) 249-9700

Jersey Counseling & Housing Development, Inc.
29 South Black Horse Pike
Blackwood, NJ 08012
(856) 227-3683

Jersey Counseling & Housing Development, Inc.
1840 South Broadway
Camden, NJ 08104
(856) 541-1000

Mercer County Hispanic Association
200 E. State Street - 2nd Floor
Trenton, NJ 08607
(609) 392-2446

Middlesex County Economic Opportunities Corporation
1215 Livingston Avenue
North Brunswick, NJ 08902
(732) 846-6600, ext. 226

**Monmouth County Human Services
Housing Services Unit**
P.O. Box 3000
Freehold, NJ 07728
(732) 431-7998

Morris County Fair Housing Council
65 Spring Street
Morristown, NJ 07963
(973) 538-2975

Ocean Community Economic Action Now, Inc.
10 Washington Street
Toms River, NJ 08753-0773
(732) 244-2351, ext. 14

Paterson Coalition for Housing, Inc.
262 Main Street, 5th Floor
Paterson, NJ 07505
(973) 684-5998

Paterson Task Force for Community Action, Inc.
155 Ellison Street
Paterson, NJ 07505
(973) 279-2333

Tn-County Community Action Agency, Inc.
110 Cohansey Street
Bridgeton, NJ 08302
(856) 451-6330

Urban League for Bergen County
106 West Palisade Avenue
Englewood, NJ 07631
(201) 568-4988

Urban League for Essex County
508 Central Avenue
Newark, NJ 07101
(973) 624-9535

Urban League of Union County
288 North Broad Street
Elisabeth, NJ 07208
(908) 351-7200

Homelessness Prevention Program
New Jersey Department of Community Affairs
(609) 633-6204*

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Civil Records Dept.
Brennan Court House, 1st Floor
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LEGAL SERVICES: 908-782-7979

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Local Filing Office
Courthouse, 175 S. Broad Street
P.O. Box 8068
Trenton, NJ 08650
LAWYER REFERRAL: 609-890-6200
LEGAL SERVICES: 609-695-6249

MIDDLESEX COUNTY

Deputy Clerk of the Superior Court,
Administration Building, Third floor
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LAWYER REFERRAL: 732-828-0053
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MONMOUTH COUNTY

Deputy Clerk of the Superior Court
71 Monument Park
P.O. Box 1262
Courthouse, East Wing
Freehold, NJ 07728-1262
LAWYER REFERRAL: 732-431-5544
LEGAL SERVICES: 732-866-0020

MORRIS COUNTY

Deputy Clerk of the Superior Court
Civil Division
30 Schuyler Place
P.O. Box 910
Morristown, NJ 07960-0910
LAWYER REFERRAL: 973-267-5882
LEGAL SERVICES: 973-285-6911

OCEAN COUNTY

Deputy Clerk of the Superior Court
Court House, Room 119
118 Washington Street
Toms River, NJ 08754
LAWYER REFERRAL: 732-240-3666
LEGAL SERVICES: 732-341-2727

PASSAIC COUNTY

Deputy Clerk of the Superior
Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL: 973-
278-9223
LEGAL SERVICES: 973-345-
7171

WARREN COUNTY
Deputy Clerk of the Superior
Court
Civil Division Office
Court House
Belvidere, NJ 07823-1500
LAWYER REFERRAL: 201-
267-5882
LEGAL SERVICES: 908-475-
2010

SALEM COUNTY
Deputy Clerk of the Superior
Court
92 Market Street
P.O. Box 18
Salem, NJ 08079
LAWYER REFERRAL: 609-
678-8363
LEGAL SERVICES: 609-451-
0003

SOMERSET COUNTY
Deputy Clerk of the Superior
Court
Civil Division Office
New Court House, 3rd Floor
P.O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL: 908-
685-2323
LEGAL SERVICES: 908-231-
0840

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Deputy Clerk of the Superior
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Sussex County Judicial
Center
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Newton, NJ 07860
LAWYER REFERRAL: 973-
267-5882
LEGAL SERVICES: 973-383-
7400

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Deputy Clerk of the Superior
Court
1st Floor, Court House
2 Broad Street
Elizabeth, NJ 07207
LAWYER REFERRAL: 908-
353-4715
LEGAL SERVICES: 908-527-
4769

EXHIBIT B

PLUESE, BECKER & SALTZMAN, LLC

Attorneys at Law

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MOUNT LAUREL OFFICE:
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
phone:(856) 813-1700; fax: (856) 813-1720

PENNSYLVANIA OFFICE:
721 Dresher Road, Suite 1050
Horsham, PA. 19044
phone:(215) 653-7450; fax: (215) 653-7454

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BarbaraF@lobaf.com

Glen-David Schwarzschild, Esq. ♦
Glens@gdcslaw.com

♦ PA and NJ Bars

Please reply to:
MOUNT LAUREL, NJ

[Defendant Name(s)] [Defendant Address] [Defendant City, State ZIP]
[Date]

Re: *In re Notices of Intention to Foreclose Sent for New Jersey Housing & Mortgage Finance Agency*
Docket No.:

Dear [Defendant Name(s)]:

Please be advised that the New Jersey Supreme Court recently held in *U.S. Bank NA. v. Guillaume*, 209 N.J. 449 (2012) that, prior to the commencement of a residential mortgage foreclosure action (“Foreclosure”), mortgage lenders (“Lenders”) seeking to foreclose must comply with the New Jersey Fair Foreclosure Act's (the “FFA”) requirement that a Notice of Intention to Foreclose (“NOI”) set forth the name and address of the Lender.

Why You Are Receiving This Letter

You are receiving this letter because you are a defendant in a pending Foreclosure, and it is believed that the NOI served upon you prior to the commencement of the Foreclosure did not comply with the requirements of the FFA.

By the court's Order to Show Cause dated [month] [d~], 2013, and in compliance with the Supreme Court's opinion in *U.S. Bank NA. v. Guillaume*, [Hon. Paul Innes, P.J.Ch., Mercer Vicinage or Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage], gave permission to New Jersey Housing and Mortgage Finance Agency (“NJHMFA”) to serve, along with the Order to Show Cause and Verified Complaint, corrected NOIs on all defendant Mortgagors/Parties obligated on the debt in pending Foreclosures filed before February 28, 2012.

Information About the Order to Show Cause and Verified Complaint

Enclosed with this letter are copies of the Order to Show Cause and Verified Complaint. The Verified Complaint lists the following Lenders in the following counts of the Verified Complaint:

Count 1- New Jersey Housing and Mortgage Finance Agency

The attachments to the Verified Complaint, which list the Foreclosure(s) in which NJHMFA is the Plaintiff, will be made available on the New Jersey Courts website at <http://www.judiciary.state.nj.us/>. If you are unsure of the docket number for your Foreclosure, you can access that information on the Court's website using the exhibits attached to the Verified Complaint by entering your name into the automatic search field on the website. If you do not have access to a computer or have trouble locating that information on the Court's website, you can contact a representative from [*plaintiff or servicer name*] at [*telephone number*] who can assist you with locating the information about your Foreclosure.

Information About the Corrected Notice of Intention to Foreclose

Also enclosed with this letter is the corrected NOI. It allows you an additional 30 days in which to cure the default without having to pay the Plaintiff's court costs and attorneys' fees. It also sets forth important information about your loan, including information on how you can cure the default; the consequences of failing to cure the default; contact information for the Plaintiff; and information about retaining counsel and borrower assistance. If you fail to cure the default by the date set forth in the corrected NOI, the Foreclosure against you will proceed.

With the passage of time since the Foreclosure was filed against you, the Lender on your loan may have changed from the named Plaintiff in the Foreclosure. The corrected NOI lists the name and address of the current Lender on your loan.

Questions about the Notice of Intention to Foreclose

Should you have questions with regard to your loan or the corrected NOI, please contact [*plaintiff or servicer name*] at [*telephone number*]. Additional contact information is provided in the corrected NOI.

How to File an Objection

You have the right to object to the enclosed Order to Show Cause (the process by which the Court gave the Plaintiff permission to serve the corrected NOI). To do so, you must file a written objection under the docket number for the Order to Show Cause.

You also have the right to object to the enclosed corrected NOI. To do so, you must file a written Objection under the docket number for the foreclosure action in your individual case.

For either type of objection, you must set forth with specificity the basis of the objection, and file the objection with the Superior Court Clerk's Office at the following address within 30 days:

Superior Court Clerk's Office, Foreclosure Processing Services
Attention: Objection to Notice of Intention to Foreclose
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625

You must also serve a copy of the objection on the Plaintiff's attorney, Pluese, Becker & Saltzman, LLC, at 20000 Horizon Way, Suite 900, Mount Laurel, New Jersey 08054, and mail a copy of the objection to [Judge Innes or Judge McVeigh] at [address].

Your personal appearance at the Superior Court Clerk's Office or your local courthouse will not qualify as an objection. A telephone call will not protect your rights; you must file your objection and serve it on the Plaintiff's attorney if you want the Court to hear your objection to the relief the Plaintiff is seeking. If you file a specific written objection, the case will be sent to a Judge for resolution. You will be informed by the Judge of the time and place of the Hearing on your objection.

Questions about Filing an Objection

Should you have questions related to the procedure for filing an objection, please visit the New Jersey Courts On-Line Self-Help Center at <http://www.judiciary.state.nj.us/prose/indx.htm>. You may also contact the Superior Court Clerk's Office at (609) 421-6100, or at SCCOForeclosure.Mailbox@judiciary.state.nj.us.

Thank you for your attention to this matter. Should you have questions related to the contents of the materials enclosed herein, please contact the undersigned.

Respectfully,

PLUESE, BECKER & SALTZMAN, LLC

By _____
Rob Saltzman, Esquire

EXHIBIT A

Plaintiff's Counsel	Loan Number	Decket Number	Cave Caption	Victims	Nature of Defect	Defendant's Last Known Address	Lender's Counsel	Active Bankruptcy	Special Circumstances
Phuse, Becker & Solzman, LLC	0017386578	F-13474-10	New Jersey Housing and Mortgage Finance Agency v. Ramon A. Gomez, et al.	MERCER	NO LIST OF HUD APPROVED COUNSELLORS PROVIDED	RAMON A. GOMEZ - 631 LANBERTON ST., THENTON, NJ 08611	N/A	N/A	N/A
Phuse, Becker & Solzman, LLC	0017363962	F-21673-10	New Jersey Housing and Mortgage Finance Agency v. Justin Lowe, et al.	GLOUCESTER	NO LIST OF HUD APPROVED COUNSELLORS PROVIDED	JUSTIN LOWE - 124 MENDMOUTH RD, WOODBURY, NJ 08696; DANIELLE LOWE - 748 KINGS HWY, WOODBURY, NJ 08096	N/A	N/A	N/A
Phuse, Becker & Solzman, LLC	0017368168	F-036335-10	New Jersey Housing and Mortgage Finance Agency v. Tony Ianni, et al.	BURLINGTON	NO LIST OF HUD APPROVED COUNSELLORS PROVIDED	TRACY HARRIS - 236 DEL MAR RD, FENBERTON, NJ 08668	N/A	N/A	N/A
Phuse, Becker & Solzman, LLC	001737839	F-24937-09	New Jersey Housing and Mortgage Finance Agency v. Allen Sorrell, et al.	CUMBERLAND	NO LIST OF HUD APPROVED COUNSELLORS PROVIDED	ALLEN SORRELL - 25 VICTORY ROAD, BRIDGEFORD, NJ 08812	N/A	N/A	N/A
Phuse, Becker & Solzman, LLC	0015628829	F-0217-09	New Jersey Housing and Mortgage Finance Agency v. Jennifer J. Hines, et al.	CAMDEN	NO LIST OF HUD APPROVED COUNSELLORS PROVIDED	JENNIFER HILTNER - 17 EAST PARK AVE., HADDON TWP., NJ 08107	N/A	N/A	N/A
Phuse, Becker & Solzman, LLC	0014896180	F-39556-08	New Jersey Housing and Mortgage Finance Agency v. John F. Kinley, et al.	GLOUCESTER	NO LIST OF HUD APPROVED COUNSELLORS PROVIDED	LEON J. PASCARELLI, JR., Esquire Law Office of Thibault Dubouat - 4280 Route 42, Turnersville, NJ 08012	N/A	N/A	N/A

PLUESE, BECKER & SALTZMAN, LLC
Attorneys At Law
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
Attorneys for Plaintiff

**IN RE NOTICES OF INTENTION
TO FORECLOSE SENT FOR NEW
JERSEY HOUSING & MORTGAGE
AGENCY**

**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY
DOCKET NO. F-**

CIVIL ACTION

**ORDER TO SHOW CAUSE
SUMMARY PROCEEDING
PURSUANT TO R. 4:67-2**

THIS MATTER being brought before the Court by NEW JERSEY HOUSING & MORTGAGE AGENCY (“NJHMFA”, the “Lender” or the “Servicer), by and through DOVENMUEHLE MORTGAGE, INC., their current subservicer (“Subservicer”) in pending foreclosure cases (“the Foreclosures”), by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing, pursuant to the April 4, 2012 Order of the New Jersey Supreme Court (the “April 4th Order”) and based upon the facts and circumstances described in the Verified Complaint filed herewith and incorporated herein by reference, including defined terms; and the Court having determined that this matter is appropriately commenced by Order To Show Cause as a summary proceeding pursuant to R. 4:67-2, and for good cause shown:

IT IS on this _____ day of _____, 2013,

ORDERED that Foreclosure Defendants identified in Exhibit “A” of the Verified Complaint (the “Remediated NOI List”) appear and show cause on the _____ day of _____, 2013 before the Honorable Margaret Mary McVeigh, P.J.Ch., Superior Court, Passaic County, Chancery Division, at 71 Hamilton Street, Paterson, NJ 07505 at _____ o’clock (the “Hearing”),

why a Final Order/Judgment should not be entered as follows:

- A. Declaring the Servicer's Remediated NOIs in the form of the Remediated NOI Template that contain accurate information regarding each subject Loan derived from the Loan Records to be compliant with the requirements of the Fair Foreclosure Act; and

- B. Allowing Remediated Notices of Intention to Foreclose (the "Remediated NOI") to be sent, affording Foreclosure Defendants at least thirty (30) days from the date the Remediated NOI is mailed to cure the default on their Mortgage without attorneys' fees or costs incurred in the pending Foreclosure; and

- C. Granting such other relief as the Court deems equitable and just.

IT IS FURTHER ORDERED that:

1. A complete package (the "OTSC Package") consisting of a conformed copy of this Order To Show Cause, Verified Complaint without Exhibits, Supporting Certification, Letter Memorandum, Explanatory Letter and Remediated NOI shall be served upon each Foreclosure Defendant.

2. Service of the OTSC Package shall be effectuated by simultaneous certified mail, return receipt requested, and regular mail to the subject Mortgaged Property's address and the Foreclosure Defendant's last known address if different. In the event of a deceased Foreclosure Defendant, the OTSC Package will be mailed to the Address of the Estate if known or available.

3. A copy of this Order To Show Cause and Verified Complaint shall be posted on the Judiciary's Web Page at the following link: <http://www.judiciary.state.nj.us> within _____ days from the date of entry of this OTSC where it can be viewed by the general public.
4. A proof of service of the OTSC Package shall be filed no later than nine (9) days before the Hearing Date.
5. Regarding any Foreclosure Defendant involved in a Bankruptcy case wherein the Automatic Stay enjoins prosecution of the Foreclosure,
 - a. The Servicer may serve a copy of this Order to Show Cause and Verified Complaint, but may defer serving a Remediated NOI if it believes that doing so may violate the Automatic Stay.
 - b. If the Court grants final relief on the return date of this Order To Show Cause and the Servicer has not already sent a Remediated NOI, then the Servicer may send the Remediated NOI once the Automatic Stay is vacated, modified or otherwise inapplicable. In the alternative, Plaintiff may apply to the United States Bankruptcy Court for relief from the Automatic Stay to effectuate service of the Remediated NOI pursuant to this Order.
 - c. In the event that the Servicer does not serve a Remediated NOI with this Order To Show Cause, Plaintiff's Foreclosure action may not proceed until such Remediated NOI is served pursuant to this Court's Order and the time provided therein to cure the default has passed without the default having

been cured.

- d. If the Servicer believes that service of this Order To Show Cause may be a violation of the Automatic Stay, then once the Stay is vacated, modified or otherwise no longer enjoins service of a Remediated NOI, then the Servicer may send an OTSC Package to the Foreclosure Defendant(s) and the Foreclosure(s) may proceed where more than 35 days have passed after such OTSC Package was sent without the default having been cured. Plaintiff shall not be required to file another Order To Show Cause to Remediate NOIs at issue in Foreclosures subject to the Automatic Stay.

6. Plaintiff shall publish legal notices of this OTSC as on at least two days prior to

_____ in the following newspapers:

- a. Star Ledger
- b. Bergen Record
- c. The Press of Atlantic City
- d. The Gloucester County Times

7. The Court will only entertain objections (the "Objections") to the process provided for by the April 4th Order. Any Party who wishes to object to the process shall file the Objection under the Docket Number for this Order to Show Cause, **in writing**, with the:

Clerk of the Superior Court, Foreclosure Processing Services
Attn: Objection to Notice of Intention to Foreclose
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625-0971

A copy of the Objection must also be sent to:

Honorable Margaret Mary McVeigh, P.J.Ch.

Passaic County Courthouse
71 Hamilton Street, Chambers 100
Paterson, New Jersey 07505

A copy of the Objection must also be served upon the attorney for the Plaintiff:

Rob Saltzman, Esquire
Pluese, Becker & Saltzman, LLC
20000 Horizon Way, Suite 900
Mt. Laurel, New Jersey 08054

Objections must state with specificity the basis for the Objection and must be filed no later than _____, 2013.

8. Any objection regarding a particular Remediated NOI in a particular Foreclosure case must be filed in writing under the Docket Number of that particular Foreclosure action, NOT this Order To Show Cause. Any such Objection must state the basis for the objection with specificity and be filed and served as set forth in Paragraph 6 above. Objections to a particular Remediated NOI will be referred for resolution to the Chancery Judge in the Vicinage where the Mortgaged Property is located.
9. Foreclosure Defendants are hereby informed that a telephone call to the Plaintiff, to the Plaintiff's attorney, to the Servicer, to the Superior Court Clerk's Office, or to this Court, will not protect your rights nor constitute a valid Objection; you must file and serve your written Objection as provided for by in this Order.
10. If you cannot afford an attorney, you may call the Legal Services office in the County in which you live. If you do not have an attorney or are not eligible for free legal assistance through the Legal Services office (or such office does not provide services for this

particular type of proceeding), you may obtain a referral to an attorney by calling one of the Lawyer Referral Services.

11. If written Objection is properly filed and served, the Plaintiff's written reply (the "Reply") shall be filed and served by _____, 2013. A copy of the Reply, if any, shall be served upon the Clerk of Superior Court, with a courtesy copy to the Honorable Margaret Mary McVeigh, P.J.Ch. The Reply need only be served upon the particular Foreclosure Defendant who properly filed and served his/her/their Objection.
12. Plaintiff shall submit to the Court an original and two copies of a proposed form of Final Order/Judgment incorporating the relief sought no later than _____ days before the Hearing.
13. A Certificate of Service of the Verified Complaint, this Order to Show Cause and all supporting documents shall be filed with the Clerk of Superior Court no later than nine (9) days before the Hearing.
14. The Court will entertain argument, but not testimony, at the Hearing, unless the Court otherwise directs.

By The Court,

Hon. Margaret Mary McVeigh, P.J.Ch.

PLUESE, BECKER & SALTZMAN, LLC
Attorneys At Law
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
Attorneys for Plaintiff

**IN RE NOTICES OF INTENTION
TO FORECLOSE SENT FOR NEW
JERSEY HOUSING & MORTGAGE
AGENCY**

**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY
DOCKET NO. F-**

CIVIL ACTION

**ORDER TO SHOW CAUSE
SUMMARY PROCEEDING
PURSUANT TO R. 4:67-2**

THIS MATTER being brought before the Court by NEW JERSEY HOUSING & MORTGAGE AGENCY (“NJHMFA”, the “Lender” or the “Servicer), by and through DOVENMUEHLE MORTGAGE, INC., their current subservicer (“Subservicer”) in pending foreclosure cases (“the Foreclosures”), by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing, pursuant to the April 4, 2012 Order of the New Jersey Supreme Court (the “April 4th Order”) and based upon the facts and circumstances described in the Verified Complaint filed herewith and incorporated herein by reference, including defined terms; and the Court having determined that this matter is appropriately commenced by Order To Show Cause as a summary proceeding pursuant to R. 4:67-2, and for good cause shown:

IT IS on this _____ day of _____, 2013,

ORDERED that Foreclosure Defendants identified in Exhibit “A” of the Verified Complaint (the “Remediated NOI List”) appear and show cause on the _____ day of _____, 2013 before the Honorable Margaret Mary McVeigh, P.J.Ch., Superior Court, Passaic County, Chancery Division, at 71 Hamilton Street, Paterson, NJ 07505 at _____ o’clock (the “Hearing”),

why a Final Order/Judgment should not be entered as follows:

- A. Declaring the Servicer's Remediated NOIs in the form of the Remediated NOI Template that contain accurate information regarding each subject Loan derived from the Loan Records to be compliant with the requirements of the Fair Foreclosure Act; and

- B. Allowing Remediated Notices of Intention to Foreclose (the "Remediated NOI") to be sent, affording Foreclosure Defendants at least thirty (30) days from the date the Remediated NOI is mailed to cure the default on their Mortgage without attorneys' fees or costs incurred in the pending Foreclosure; and

- C. Granting such other relief as the Court deems equitable and just.

IT IS FURTHER ORDERED that:

1. A complete package (the "OTSC Package") consisting of a conformed copy of this Order To Show Cause, Verified Complaint without Exhibits, Supporting Certification, Letter Memorandum, Explanatory Letter and Remediated NOI shall be served upon each Foreclosure Defendant.

2. Service of the OTSC Package shall be effectuated by simultaneous certified mail, return receipt requested, and regular mail to the subject Mortgaged Property's address and the Foreclosure Defendant's last known address if different. In the event of a deceased Foreclosure Defendant, the OTSC Package will be mailed to the Address of the Estate if known or available.

3. A copy of this Order To Show Cause and Verified Complaint shall be posted on the Judiciary's Web Page at the following link: <http://www.judiciary.state.nj.us> within _____ days from the date of entry of this OTSC where it can be viewed by the general public.
4. A proof of service of the OTSC Package shall be filed no later than nine (9) days before the Hearing Date.
5. Regarding any Foreclosure Defendant involved in a Bankruptcy case wherein the Automatic Stay enjoins prosecution of the Foreclosure,
 - a. The Servicer may serve a copy of this Order to Show Cause and Verified Complaint, but may defer serving a Remediated NOI if it believes that doing so may violate the Automatic Stay.
 - b. If the Court grants final relief on the return date of this Order To Show Cause and the Servicer has not already sent a Remediated NOI, then the Servicer may send the Remediated NOI once the Automatic Stay is vacated, modified or otherwise inapplicable. In the alternative, Plaintiff may apply to the United States Bankruptcy Court for relief from the Automatic Stay to effectuate service of the Remediated NOI pursuant to this Order.
 - c. In the event that the Servicer does not serve a Remediated NOI with this Order To Show Cause, Plaintiff's Foreclosure action may not proceed until such Remediated NOI is served pursuant to this Court's Order and the time provided therein to cure the default has passed without the default having

been cured.

- d. If the Servicer believes that service of this Order To Show Cause may be a violation of the Automatic Stay, then once the Stay is vacated, modified or otherwise no longer enjoins service of a Remediated NOI, then the Servicer may send an OTSC Package to the Foreclosure Defendant(s) and the Foreclosure(s) may proceed where more than 35 days have passed after such OTSC Package was sent without the default having been cured. Plaintiff shall not be required to file another Order To Show Cause to Remediate NOIs at issue in Foreclosures subject to the Automatic Stay.

6. Plaintiff shall publish legal notices of this OTSC as on at least two days prior to

_____ in the following newspapers:

- a. Star Ledger
- b. Bergen Record
- c. The Press of Atlantic City
- d. The Gloucester County Times

7. The Court will only entertain objections (the "Objections") to the process provided for by the April 4th Order. Any Party who wishes to object to the process shall file the Objection under the Docket Number for this Order to Show Cause, **in writing**, with the:

Clerk of the Superior Court, Foreclosure Processing Services
Attn: Objection to Notice of Intention to Foreclose
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625-0971

A copy of the Objection must also be sent to:

Honorable Margaret Mary McVeigh, P.J.Ch.

Passaic County Courthouse
71 Hamilton Street, Chambers 100
Paterson, New Jersey 07505

A copy of the Objection must also be served upon the attorney for the Plaintiff:

Rob Saltzman, Esquire
Pluese, Becker & Saltzman, LLC
20000 Horizon Way, Suite 900
Mt. Laurel, New Jersey 08054

Objections must state with specificity the basis for the Objection and must be filed no later than _____, 2013.

8. Any objection regarding a particular Remediated NOI in a particular Foreclosure case must be filed in writing under the Docket Number of that particular Foreclosure action, NOT this Order To Show Cause. Any such Objection must state the basis for the objection with specificity and be filed and served as set forth in Paragraph 6 above. Objections to a particular Remediated NOI will be referred for resolution to the Chancery Judge in the Vicinage where the Mortgaged Property is located.
9. Foreclosure Defendants are hereby informed that a telephone call to the Plaintiff, to the Plaintiff's attorney, to the Servicer, to the Superior Court Clerk's Office, or to this Court, will not protect your rights nor constitute a valid Objection; you must file and serve your written Objection as provided for by in this Order.
10. If you cannot afford an attorney, you may call the Legal Services office in the County in which you live. If you do not have an attorney or are not eligible for free legal assistance through the Legal Services office (or such office does not provide services for this

particular type of proceeding), you may obtain a referral to an attorney by calling one of the Lawyer Referral Services.

11. If written Objection is properly filed and served, the Plaintiff's written reply (the "Reply") shall be filed and served by _____, 2013. A copy of the Reply, if any, shall be served upon the Clerk of Superior Court, with a courtesy copy to the Honorable Margaret Mary McVeigh, P.J.Ch. The Reply need only be served upon the particular Foreclosure Defendant who properly filed and served his/her/their Objection.
12. Plaintiff shall submit to the Court an original and two copies of a proposed form of Final Order/Judgment incorporating the relief sought no later than _____ days before the Hearing.
13. A Certificate of Service of the Verified Complaint, this Order to Show Cause and all supporting documents shall be filed with the Clerk of Superior Court no later than nine (9) days before the Hearing.
14. The Court will entertain argument, but not testimony, at the Hearing, unless the Court otherwise directs.

By The Court,

Hon. Margaret Mary McVeigh, P.J.Ch.

PLUESE, BECKER & SALTZMAN, LLC
Attorneys At Law
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
Attorneys for Plaintiff

**IN RE NOTICES OF INTENTION
TO FORECLOSE SENT FOR NEW
JERSEY HOUSING & MORTGAGE
AGENCY**

**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY
DOCKET NO. F-**

CIVIL ACTION

**ORDER TO SHOW CAUSE
SUMMARY PROCEEDING
PURSUANT TO R. 4:67-2**

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IT IS on this _____ day of _____, 2013,

ORDERED that Foreclosure Defendants identified in Exhibit “A” of the Verified Complaint (the “Remediated NOI List”) appear and show cause on the _____ day of _____, 2013 before the Honorable Margaret Mary McVeigh, P.J.Ch., Superior Court, Passaic County, Chancery Division, at 71 Hamilton Street, Paterson, NJ 07505 at _____ o’clock (the “Hearing”),

why a Final Order/Judgment should not be entered as follows:

- A. Declaring the Servicer's Remediated NOIs in the form of the Remediated NOI Template that contain accurate information regarding each subject Loan derived from the Loan Records to be compliant with the requirements of the Fair Foreclosure Act; and

- B. Allowing Remediated Notices of Intention to Foreclose (the "Remediated NOI") to be sent, affording Foreclosure Defendants at least thirty (30) days from the date the Remediated NOI is mailed to cure the default on their Mortgage without attorneys' fees or costs incurred in the pending Foreclosure; and

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Attn: Objection to Notice of Intention to Foreclose
25 Market Street
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A copy of the Objection must also be sent to:

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Passaic County Courthouse
71 Hamilton Street, Chambers 100
Paterson, New Jersey 07505

A copy of the Objection must also be served upon the attorney for the Plaintiff:

Rob Saltzman, Esquire
Pluese, Becker & Saltzman, LLC
20000 Horizon Way, Suite 900
Mt. Laurel, New Jersey 08054

Objections must state with specificity the basis for the Objection and must be filed no later than _____, 2013.

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particular type of proceeding), you may obtain a referral to an attorney by calling one of the Lawyer Referral Services.

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14. The Court will entertain argument, but not testimony, at the Hearing, unless the Court otherwise directs.

By The Court,

Hon. Margaret Mary McVeigh, P.J.Ch.