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**SUPERIOR COURT
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ROBERTO A. REVERÓN, ESQ.
710 West 190th Street
Suite D
New York, New York 10040-2903
(917) 687-4278
Attorney for Defendants
Ramseyer & Alice Awuku

IN RE APPLICATION BY JPMORGAN
CHASE BANK, N.A. TO ISSUE
CORRECTED NOTICES OF INTENT
TO FORECLOSE ON BEHALF OF
IDENTIFIED FORECLOSURE
PLAINTIFFS IN CERTAIN
UNCONTESTED CASES

SUPERIOR COURT OF NEW JERSEY
PASSAIC COUNTY
CHANCERY DIVISION - FAMILY PART

Docket #: F-002979-13

CIVIL ACTION

**DEFENDANTS' OPPOSITION TO
PLAINTIFF'S ORDER TO SHOW CAUSE**

Defendants Ramseyer Awuku and Alice Awuku, through their attorney, Roberto A. Reverón, Esq., hereby state:

1. Defendants are among the named defendants included in the above captioned Summary Action and related Order To Show Cause.
2. Defendants hereby object to a Summary Action in their case, based on the fact that defendants assert that they were never served with a Summons and Complaint in the Foreclosure Action bearing Docket Number F-16859-10.
3. Based on defendants' assertion of lack of service, the default entered against defendants must be vacated.
4. Defendants assert that they first became aware of an Action in Foreclosure against them when they received a copy of the Verified Complaint In Support of Summary Action and a copy of the Order To Show Cause.
5. Defendants additionally point to the defective NOI (Notice of Intent to Foreclose), a

defect to which the plaintiff readily admits.

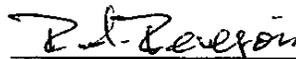
6. Based on plaintiff's lack of service upon defendants, the ensuing lack of personal jurisdiction over the defendants in the corresponding action and, most importantly, the absence of notice to the defendants of the Foreclosure Action filed against them, This Honorable Court must vacate the defendants' default and dismiss the Action in Foreclosure against defendants Ramseyer Awuku and Alice Awuku.
7. In consequence of the cumulative effect of the defects in plaintiff's prosecution of its Foreclosure Action against the defendants—i.e., defective NOI and lack of service of the Summons and Complaint upon defendants—plaintiff must not be allowed to proceed under the Foreclosure Action identified with Docket Number F-16859-10.

Based on the foregoing, defendants Ramseyer Awuku and Alice Awuku respectfully request that this Honorable Court issue and Order:

- a) vacating the default judgment against defendants; and
- b) estopping the plaintiff from proceeding against defendants Awuku in the form of Summary Action; and
- c) dismissing the Foreclosure Action.

Dated: April 20, 2013

LAW OFFICE OF ROBERTO A. REVERÓN



By: Roberto Antonio Reverón, Esq.

CERTIFICATION

I hereby certify pursuant to R. 4:5.1 that the matter in controversy is not the subject of any other action pending in court or of a pending arbitration proceeding, and no other court action of arbitration proceeding is presently contemplated. Moreover, I am presently unaware of any other party who should be joined in the action. I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7.



Roberto Antonio Reverón, Esq.

Dated: April 20, 2013

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**ATTORNEY'S AFFIRMATION
IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFF'S
ORDER TO SHOW CAUSE**

1. I, ROBERTO A. REVERÓN, am an attorney duly admitted to practice law before the Courts of the State of New Jersey.
2. I am a solo practitioner.
3. I am the attorney for defendants RAMSEYER AWUKU and ALICE AWUKU.
4. I have read the foregoing AFFIRMATION IN OPPOSITION, and know the contents thereof. Such contents are true to my own knowledge, except as to the matters therein alleged to be on information and belief, and as to those matters I believe them to be true.
5. The reason this verification is made by me, and not by the defendants, is that the defendants do not reside in the County where I maintain my office.
6. The grounds of my belief as to all matters not stated upon my own knowledge are as follows:
 - a. Records and information in the file maintained in my office, a thorough interview of defendant Ramseyer Awuku and telephone conversations with Mr. Awuku.

7. I affirm that the foregoing statements are true to the best of my knowledge, under the penalty of perjury.

Dated: April 20, 2013



Roberto Antonio Reverón
Attorney At Law

ROBERTO A. REVERÓN, ESQ.
 710 West 190th Street
 Suite D
 New York, New York 10040-2903
 (917) 687-4278
 Attorney for Defendants
 Ramseyer & Alice Awuku

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**DEFENDANT'S AFFIDAVIT IN
 SUPPORT OF HIS OPPOSITION
 TO PLAINTIFF'S ORDER
 TO SHOW CAUSE**

RAMSEYER AWUKU, of full age, being duly sworn, states:

1. I am a defendant in plaintiff's Verified Complaint In Support of Summary Action and its related Order To Show Cause.
2. I am a named defendant in the Foreclosure Action with docket number F-16859-10.
3. I first became aware of the Foreclosure Action and my (and my wife's) default in said action when I received the Order To Show Cause captioned herein above.
4. I was never served with a copy of the Summons and Complaint in the Foreclosure Action. Upon information and belief, neither was my wife, ALICE AWUKU, served with process.
5. Plaintiff has committed various errors in the prosecution of its Foreclosure Action against me. Plaintiff (i) admits to having issued a defective Notice of Intent to Foreclose, (ii) failed to properly serve me and/or my wife with process, and (iii) selected an inappropriate county of venue.

6. I have read the foregoing OPPOSITION TO PLAINTIFF'S ORDER TO SHOW CAUSE, and know the contents thereof. Such contents are true to my own knowledge, except as to the matters therein alleged to be upon information and belief, and as to those matters I believe them to be true.

Based on the foregoing, I respectfully request that this Honorable Court issue and Order:

- a) vacating the default judgment against my wife and me;
- b) estopping the plaintiff from proceeding against us in the form of Summary Action; and
- c) dismissing the Foreclosure Action against us.

Dated: April 22, 2013



 Ramseyer Awuku
 Defendant

STATE OF CT)
)
 COUNTY OF New London) ss:

On this 22 day of April in the year 2013, before me, the undersigned, personally appeared Ramseyer Awuku, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument, and acknowledged to me that he/she executed the same in his/her capacity; and that by his/her signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed and signed the instrument.



 Notary Public



ROBERTO A. REVERÓN, ESQ.

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Attorney for Defendants

Ramseyer & Alice Awuku

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**ATTORNEY'S AFFIRMATION OF
SERVICE**

ROBERTO ANTONIO REVERÓN, an attorney duly admitted to the practice of law in the State of New Jersey, affirms the following under penalty of perjury:

1. That I am not a party to this action, I am over 18 years of age, reside in The Bronx, N.Y, and maintain my professional office in the City, County and State of New York.
2. That on April 22, 2013, I served a copy of the within Defendants' Objection to Plaintiff's Order To Show Cause and attorney's Affirmation in Support, by depositing a true copy thereof in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within the State of New Jersey, addressed to each of the following persons at the last known address set forth after each name:

Christopher C. Loeber, Esq.
Morgan, Lewis & Bockius LLP
502 Carnegie Center
Princeton, NJ 08540-6241

Dated: April 22, 2013



Roberto Antonio Reverón, Esq.