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SUPERIOR COURT
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SPECK LAW OFFICES, LLC

MICHAEL R. SPECK, ESQ.

80 E. MAIN ST.

SOMERVILLE, NJ 08876

(908) 428-4190 / Fax (908) 300-8219

Attorney for Defendants, Rock Bloodgood and Danielle Bloodgood

IN RE APPLICATION BY BENEFICIAL
FINANCIAL I, INC., ET AL., TO ISSUE
CORRECTED NOTICE OF INTENT TO
FORECLOSE ON BEHALF OF IDENTIFIED
FORECLOSURE PLAINTIFFS IN UNCONTESTED
CASES

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY

Docket No.: F-15390-13

Civil Action

**OBJECTION TO ORDER
TO SHOW CAUSE**

Michael R. Speck, Esq., attorney for Defendants, Rock Bloodgood and Danielle Bloodgood in the foreclosure matter of Household Finance Corporation III v. Rock Bloodgood, et al. Docket No.: OCN-F-33495-10 hereby object to the Plaintiff's Order to Show Cause for the following specific reasons:

1. On August 2, 2013, my office filed an Answer on behalf of Defendants, Rock Bloodgood and Danielle Bloodgood in the matter of Household Finance Corporation III v. Rock Bloodgood, et al. Docket No.: OCN-F-33495-10.
2. On or about August 2, 2013, Interrogatories and a Notice to Produce Documents were served on Plaintiff in the matter of Household Finance Corporation III v. Rock Bloodgood, et al. Docket No.: OCN-F-33495-10.
3. Until such time as Plaintiff responds to the discovery requests in the matter of Household Finance Corporation III v. Rock Bloodgood, et al. Docket No.: OCN-F-33495-10, Defendants object to the Order to Show Cause in the above captioned matter.

I hereby certify that the foregoing statements made by me are true. I understand that if any of the statements made by me are willfully false, I am subject to punishment.


Michael R. Speck, Esq.

Dated: August 2, 2013

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CERTIFICATION OF SERVICE

Theresa E. Kelly does hereby certify that:

1. On August 2, 2013 I sent an original and two copies of the within Objection to Notice of Intention to Foreclose via Lawyer’s Service to Superior Court Clerk’s Office, Foreclosure Processing Services, Attention: Objection to Notice of Intention to Foreclosure, 25 Market St., Trenton, NJ 08625-0971.
2. On August 2, 2013 I sent a copy of the within Objection to Notice of Intention to Foreclose via regular mail to The Honorable Paul Innes, J.S.C., Mercer County Civil Courthouse, 175 South Broad St., PO Box 8068, Trenton, NJ 08650-0068.
3. On August 2, 2013 I sent a copy of the within Objection to Notice of Intention to Foreclose to D. Brian O’Dell, Esq. at Bradley Arant Boult Cummings LLP via regular mail to One Federal Place, 1819 Fifth Avenue North, Birmingham, AL 35203.
4. On August 2, 2013 I sent a copy of the within Objection to Notice of Intention to Foreclose to Ian S. Marx, Esq. at Greenberg Traurig LLP via regular mail to 200 Park

Ave., P.O. Box 677, Florham Park, NJ 07932.

I hereby certify that the foregoing statements made by me are true. I understand that if any of the statements made by me are willfully false, I am subject to punishment.


Theresa E. Kelly

Dated: August 2, 2013



SPECK LAW OFFICES, LLC

E-Mail: MSpeck@SpeckLawOffice.com

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SUPERIOR COURT
CLERK'S OFFICE

August 2, 2013

Via Lawyer's Service

Superior Court Clerk's Office

Foreclosure Processing Services

Attn: Objection to Notice of Intention to Foreclosure

25 Market St.

Trenton, NJ 08625-0971.

**RE: In Re Application by Beneficial Financial I, Inc., et al.
Docket No.: MER-F-15390-13**

Dear Sir/Madam

Enclosed please find an original and two copies of an Objection to Order to Show Cause and supporting papers with respect to the above mentioned matter. Kindly file and return a filed copy to the undersigned in the enclosed self-addressed stamped envelope.

I thank you in advance for your anticipated courtesies and cooperation.

Very truly yours,
SPECK LAW OFFICES

By: Michael R. Speck
Michael R. Speck

MRS/tk

cc: The Honorable Paul Innes, J.S.C. (via regular mail)
D. Brian O'Dell, Esq. (via regular mail)
Ian S. Marx, Esq. (via regular mail)
Clients