Mr. and Mrs. Gary Barber
10 Allaire Road, Hewitt, New Jersey 07421
(973) 749-6612

December 7, 2013

VIA CERTIFIED MAIL and REGULAR MAIL

Honorable Margaret M. McVeigh, P.J.Ch
The Superior Court of New Jersey, Passaic County Courthouse
71 Hamilton Street, Chambers 100
Paterson, New Jersey

RE: Order to show cause: In re Application by JPMorgan Chase Bank, N.A. to issue Corrected Notices of Intent to Foreclose on Behalf of Identified Foreclosure Plaintiff's in Certain Uncontested Cases (Superior Court of New Jersey, Chancery Division, Passaic County, Docket No.: F-030403-13

Borrower Name: Gary W. Barber and Sandra L. Barber
Loan Number: 1749292584
Plaintiff Name in Foreclosure action: JP Morgan Chase Bank, N.A. ("JPMC")
Docket Number in Foreclosure action: F-030403-13

Dear Justice McVeigh,

We are defendants in the above captioned matter. Enclosed herewith, please find the following documents:

- Objection to: Order to Show Cause and Corrected NOI to Foreclose;
- Certification of Service;

Thanking you in advance.

Respectfully,

Gary W. Barber
Defendant

Mr. and Mrs. Gary Barber
10 Allaire Road
Hewitt, New Jersey 07421
(973) 749-6612
Defendants - Pro Se

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

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY

DOCKET NO.: F-030403-13

CIVIL ACTION

ORDER TO SHOW CAUSE

WE, GARY W. and SANDRA L. BARBER, the Defendants in the foreclosure matter hereby objects to the Plaintiff's filing of the Order to Show Cause Permitting Service of the Corrected Notice of Intention To Foreclose for the following specific reasons:

Objection: JPMorgan Chase Bank, N.A. is improperly using judicial resources to address an issue more properly determined by the legislature.

JPMorgan Chase Bank, N.A. is attempting to create a safe harbor form with judicial approval. The judiciary, however, should not be asked en masse to approve a business form for a private corporation in an effort to circumvent the normal judicial process. JPMorgan Chase Bank, N.A. has brought an action regarding hundreds of borrowers requiring significant time and resources of the judiciary to save their own resources by not bringing each action in the individual matter it affects and in the county in which the affected properties are situated. This does not constitute judicial efficiency, so much as corporate savings for the movant. He who seeks equity must do equity. JPMorgan Chase Bank, N.A. is seeking an equitable remedy permitting them to correct their own errors in violating the specific language and procedures of the Fair Foreclosure Act, which indicates the complying Notice of Intent shall be sent prior to the filing of a foreclosure action. If this action is permitted, the equities will not be balanced. Many homeowners will be harmed by this action unless the Order to Show Cause is denied or reformed to undo the entry of default and permit responsive pleadings as to all affected.

Objection: Defendants object to Plaintiff's filing of the Order to Show Cause Permitting Service of the Corrected Notice of Intention To Foreclose as to date, we have yet to be properly served with

a copy of the Plaintiff's original Complaint for Foreclosure. Defendants are confused and can only speculate as to what stage of the foreclosure process they are currently in. Defendants are unaware as to who actually is active counsel for JPMorgan Chase Bank, N.A. of the current note holder.

Objection: Defendants further object as we have been misled and confused by JPMorgan Chase Bank, N.A. communications with us regarding potential loan modification, refinancing and even short sale. Our attempts, over the past three years, to resolve our mortgage issues with Plaintiff have been continuously thwarted by Plaintiff. Defendants have provided Plaintiff with application documents, proof of income, hardship affidavit, bank statements, pay stubs, tax info, third party mediation attempts, etc. for modification programs on separate occasions and were denied by Plaintiff.

WHEREFORE, Defendants object to the Plaintiff's ability to continue in this Foreclosure Action and respectfully request that, pursuant to N.J.S.A. 2A:50-56(c)(11), the Plaintiff's Complaint be dismissed, with prejudice and Plaintiff's filing of the Order to Show Cause Permitting Service of the Corrected Notice of Intention To Foreclose is denied.

Respectfully submitted

Gary W. Barber

Sandra L. Barber

Certification of Service

We hereby certify that on December 9, 2013 we mailed a copy of the above and foregoing written Objection to Order to Show Cause upon the following, to-wit:

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

Morgan, Lewis and Bockius LLP
502 Carnigie Center
Princeton, NJ 08540-6241

Date 12/9/13

Gary W. Barber

Date 12/9/13

Sandra L. Barber