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SUPERIOR COURT  
CLERK'S OFFICE

**Plaintiff or Filing Attorney Information:**

Name Diane A Bettino, Esquire

NJ Attorney ID Number \_\_\_\_\_

Address Princeton Forrestal Village 136 Main St. , Suite  
250 Princeton, New Jersey

Telephone Number (609) 987-0050

Superior Court of New Jersey

Chancery Division Burlington County

County where the property is located or "Mercer" for an objection to the Order to Show Cause

General Equity Part

Docket No F- 36680-13

Wells Fargo Bank, N.A. ,

Plaintiff,

(Name of company or bank that filed the foreclosure complaint)

v.

Gregory Thomas ,

Defendant.

(Name of first defendant listed on the complaint)

**CIVIL ACTION**

**OBJECTION TO: (select one)**

Order to Show Cause

Corrected Notice of Intention to Foreclose

I/We Gregory Thomas , the defendant(s) in the foreclosure matter

(filing party or parties)

hereby object

(caption and docket number if different from above)

to the Plaintiff's filing of the (select one)

Order to Show Cause  Corrected Notice of Intention to Foreclose for the following specific reasons:

(Describe specific objections in numbered paragraphs. Please attach additional pages if necessary.)

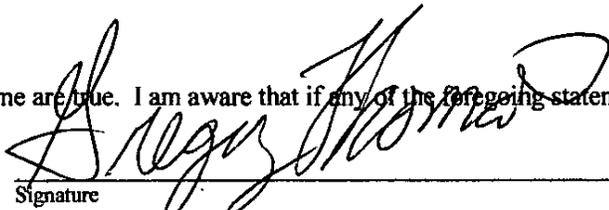
Defendant is unaware of any pending foreclosure case and contest (object) to any actions taken by the plaintiff. Defendant denies all allegations and demands that Plaintiff completely validate and verify the alleged debt and prove lawful standing to foreclose. The Defendants hereby exercise their lawful right to demand proof of claim.

- 1) Produce a competent witness with first-hand knowledge of the facts.
- 2) Produce the true Plaintiff and injured party.
- 3) Produce the original unaltered promissory note and mortgage or deed of trust and ALL assignments.
- 4) Produce the account and general ledger statement showing the full accounting of the alleged obligation that you are now attempting to collect. Such as; SEE ATTACHED

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

12/13/2013

Date



Signature

GREGORY THOMAS

Print or Type Name

- a) FR 2046 balance sheet (OMB #'s 2046, 2049, 2099)
- b) FAS 95 Cash Flow Statements
- c) 1099 OID report
- d) CUSIP number
- e) SEC Registration # of the pooled trust
- f) FWP (free writing prospectus)

5) Please provide a **written affidavit under penalty of perjury** from the Plaintiff with firsthand knowledge of the facts that stipulate the following:

- a) That alleged debt is valid and no discharge or settlement has occurred.
- b) That your company is a real party of interest.
- c) That your company or firm has the authority to collect the alleged debt.
- d) That you are not in possession of / profiting from an unregistered security.

6) Demand is made that counsel provide proof of authority to collect this alleged debt on behalf of and under the name of Plaintiff. NOTE: It is res judicata that contracts between attorneys and their clients are not privileged information. See *Clarke v. American Commerce National Bank*:

Clarke v. American Commerce National Bank, 974 F.2d 127 (9th Cir. 1992), [T]he identity of the client, the amount of the fee, the identification of payment by case file name, and the general purpose of the work performed are usually not protected from disclosure by the attorney-client privilege. Id. at 129 (citations omitted).

**Certification of Service**

I hereby certify that on 12/13/13 I sent my objection to the following parties by: (Select which mailing method you chose. If you sent it by both regular and certified mail, check both.

regular mail                       certified mail                       other \_\_\_\_\_

List each party to the lawsuit; send your opposition to the attorney if the party is represented by counsel; if the party is pro se you may send the papers directly to that individual.

Name Diane A. Bettino Esquire

Name \_\_\_\_\_

Address Princeton Forrestal Village

Address \_\_\_\_\_

136 Main Street, Suite250

\_\_\_\_\_

Princeton, New Jersey 08540

\_\_\_\_\_

Attorney for Wells Fargo Bank , N.A.

Attorney for \_\_\_\_\_

12/13/2013  
Date



Signature

GREGORY THOMAS

Print or Type Name