

STERN LAVINTHAL & FRANKENBERG LLC
105 Eisenhower Parkway - Suite 302
Roseland, NJ 07068
(973) 797-1100
Attorneys for Investors Bank

IN RE APPLICATION OF INVESTORS
BANK TO ISSUE CORRECTIVE NOTICES
OF INTENTION TO FORECLOSE IN
PENDING UNCONTESTED
FORECLOSURE ACTIONS

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
CIVIL ACTION

Docket No: F-16805-13

AMENDED VERIFIED
COMPLAINT IN SUPPORT OF
SUMMARY ACTION TO ISSUE
CORRECTIVE NOTICES OF
INTENT TO FORECLOSE

Plaintiff Investors Bank, through their attorneys, Stern, Lavinthal & Frankenberg, LLC, by way of Amended Verified Complaint, brings this action pursuant to the April 4, 2012 Order of the New Jersey Supreme Court that was entered following the Court's decision in U.S. Bank, N.A. v Guillaume, 209 N.J.449 (2012), and hereby says as follows:

FACTS:

1. Investors Bank (hereinafter "Investors") is a state chartered savings bank with an office at 101 John F. Kennedy Parkway, Short Hills, NJ 07078.
2. Investors services residential and commercial mortgage loans primarily in the Northeast, including in the States of Delaware, Pennsylvania, New York, Connecticut and New Jersey. Investors services some of its own

loans as well as those held by other entities, including the Federal National Mortgage Association (hereinafter "FNMA"). Some loans held by Investors are serviced by other entities.

3. Investors is involved in default servicing of residential mortgages for three categories of loans: i) loans held by other entities but serviced by Investors; ii) loans held by Investors and serviced by Investors; iii) Loans held by Investors, but serviced by others. This action pertains only to loans serviced by Investors. For loans which are held by Investors but serviced by other entities, the servicer will bring any necessary actions pursuant to the April 2, 2012 Order of the Court.

4. Among the duties performed by Investors as servicer of a loan is the collection and application of monthly mortgage payments from borrowers, the payment of any escrows, the negotiation of loss mitigation resolutions, (including loan modifications, short sales, repayment plans and deeds in lieu of foreclosure) and default servicing. If a loan is held by another entity, Investors undertakes these efforts in accordance with the contracts that govern its relationship with the owner of the loan as well as the loan documents, Rules of court and applicable law. In order to meet its obligations in servicing loans it holds and loans owned by FNMA, Investors maintains business records which reflect the status and activity of each loan. These records include the payments made, escrows paid, amounts due and the extent, if any, of default. In cases in which the loan is held by FNMA and serviced by Investors, FNMA will not have possession of these records, but rather Investors will have possession of

these records. Investors makes this application to the Court on its own behalf, as well as on behalf of FNMA for the loans Investors services for FNMA. The servicing agreement it has with FNMA grants it the authority to make this application.

5. For all of the loans serviced by Investors, it is Investors' policy to aggressively address default by contacting borrowers in an effort to resolve the default. Prior to the referral of an action to foreclosure counsel, contact is attempted with the borrower. One of the duties of a servicer following default on a mortgage loan in New Jersey is to prepare and serve a Notice of Intention to Foreclose in accordance with its contracts with the holder of the loan and with the Fair Foreclosure Act, N.J.S.A. 2A:50-56. The Notice of Intention to Foreclose is prepared based upon current loan information held by Investors, and includes information about the amount that is required to reinstate the loan, and the date by which reinstatement must occur.

6. The Supreme Court of New Jersey issued its opinion in the case of U.S. Bank National Association v Guillaume, 209 NJ. 449 (2012) in February, 2012. That case established that strict compliance with the terms of the Fair Foreclosure Act is required. The Court further held that should a Notice of Intention to Foreclose not strictly comply with the statute, the Court adjudicating a foreclosure action has the discretion to fashion an appropriate remedy, including permitting the cure of the deficient Notice of Intention.

7. On April 4, 2012, the Supreme Court of New Jersey issued an Order which set forth the procedure for addressing any errors or omissions in a Notice of

Intent to Foreclose in actions which were filed on or before February 27, 2012, and in which Final Judgment had not been entered. That procedure allows for the filing of summary actions by Orders to Show Cause as to why Plaintiffs in any uncontested residential mortgage foreclosure actions should not be allowed to serve corrected Notices of Intention to Foreclose on parties obligated under the terms of the Note. This action is being filed in accordance with the procedure set forth by the Court in that Order.

8. The Court's Order of April 4, 2012 also states that any corrected Notice of Intention to Foreclose must be accompanied by a letter to the borrower setting forth the reasons why the corrected Notice of Intent is being served, the procedure to follow in the event a defendant wishes to object to the Notice of Intent, the name of the person to contact with any questions and that the receipt of the Notice of Intent allows the borrower at least 30 days in which to object or to cure the default.

9. Investors is currently handling either as servicer for FNMA or as servicer of its own loans, 65 pending residential foreclosure actions in the State of New Jersey. Of those matters, there are a few pre final judgment matters in which the Notice of Intention to Foreclose was issued by Investors, which services the loans for FNMA, but did not identify the involvement of FNMA. In each of these cases, the NOI was sent to the property address as well as the last known address of the obligor via Certified and Regular Mail. None of the loans on this Exhibit has been reinstated. These cases are listed at Exhibit A.

10. Investors currently has pending matters which contain possible deficiencies in the reinstatement dates on the Notices of Intention to foreclose, such that a Certification of Diligent Inquiry cannot be executed on these files. These cases are

listed at Exhibit B. On each of these matters, the complaint has been served upon the obligors at the property address and the last known address of the obligor. In none of these cases was the complaint filed prior to the expiration of 30 days from the date of the mailing of the NOI.

11. Investors currently services pre final Judgment matters in which the loans may not have been clearly described on the Notice of Intention to Foreclose, and/or in which Investors may lack sufficient information to verify fees which may have been included on the Notice of Intention to Foreclose and/or in which it may lack sufficient proofs that the list of current programs promulgated by the Department of Banking and Insurance was attached to the Notice of Intention to Foreclose. The NOIs in these cases were sent to the property address as well as to the last known address of the obligors by certified and regular mail. These cases are listed as Exhibit C.

12. Investors has revised its Notices of Intention to Foreclose to comply with current law. Attached as Exhibit D are true and accurate copies of the revised forms of Notices of Intention to Foreclose that Investors proposes to serve. Version One is the form which will be utilized in matters in which Investors is servicing the loans it holds. Version Two is the form in which Investors is servicing loans for other entities which hold them. Investors respectfully requests that the Court authorize it to serve the appropriate form of notice upon the borrowers noted in Exhibits A, B and C. Investors will not include attorney fees or costs for the currently pending foreclosure action in the newly issued Notice of Intention to Foreclose.

13. To comply with the April 4, 2012 Order of the Court, Investors seeks the Court's permission to provide an explanatory letter to each obligor, along with the Notice of Intention to Foreclose. Attached as Exhibit E is a true and accurate copy of

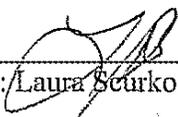
the form of Explanatory letter which Investors will cause to be sent to each of the obligor borrowers on the files listed in Exhibits A, B and C. The Explanatory letter sets forth the following information:

- a. explains the reason why the corrected Notice of Intention is being served;
- b. explains the procedure to follow in the event a Defendant wishes to object to the NOI;
- c. sets forth the borrower name, loan number, plaintiff and docket number for the underlying foreclosure action;
- d. identifies a contact for questions in the event that the defendant has any questions;
- e. advises the Defendant of the right to object to the corrected Notice of Intention as well as the right to cure the default within a certain time, which is more than 30 days from the date of the corrected Notice of Intention.

WHEREFORE, Investors Bank respectfully requests that the Court enter an Order permitting Investors to issue corrective Notices of Intent to foreclose for certain pending uncontested foreclosure actions as are listed on Exhibits A – C hereto, as permitted in the April 4, 2012 Order of the Court and for such other relief as the Court deems equitable and just.

Stern, Lavinthal & Frankenberg, LLC
Attorneys for INVESTORS BANK

DATED: 7/18/13


By: Laura Scurko, Esq.

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 as to each of the matters listed on Exhibits A, B and C, and applicable pending Bankruptcy matters where filed by the Defendant obligor/mortgagors. 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.

Stern, Laventhal & Frankenberg, LLC
Attorneys for Plaintiff INVESTORS
BANK



By: Laura Scurko, Esq

DATED: 7/18/13

VERIFICATION

I, Paul Granski of full age certify as follows:

1. I am the Vice President and Collections Manager for Investors Bank.
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. The Exhibits attached to the Verified Complaint are true to the best of my knowledge and belief.
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.

Dated:

7-11-13



Paul Granski

EXHIBIT A

The following is a list of files in which the Plaintiff lender is FNMA

VICINAGE	DOCKET NUMBER	PLAINTIFF	Was matter contested?	DEFENDANT NAME
SUSSEX	F-09677-10	FEDERAL NATIONAL MORTGAGE ASSOCIATION	No	PATTI, JEFFREY
UNION	F-10465-10	FEDERAL NATIONAL MORTGAGE ASSOCIATION	No	AGUERO-JIMENEZ, JOSE
MORRIS	F-09680-10	FEDERAL NATIONAL MORTGAGE ASSOCIATION	No	ALEX, VIJAYAMMA
UNION	F-16537-10	FEDERAL NATIONAL MORTGAGE ASSOCIATION	No	VELARDE, CESAR
HUNTERDON	F-10449-10	FEDERAL NATIONAL MORTGAGE ASSOCIATION	No	LEE, KATHERINE F.

EXHIBIT B

The following is a list of pending pre final judgment actions brought in the name of Investors Bank, in which there is an issue with the reinstatement date

VICINAGE	DOCKET NUMBER	PLAINTIFF	Was matter contested?	DEFENDANT NAME
UNION	F-047362-10	INVESTORS BANK	No	SERGINYENKO, DMYTRO M. AND SERGIYENKO, JULIA Y.
MIDDLESEX	F-051242-10	INVESTORS BANK	No	KROUT, JAMES AND WOOD, KATHRYN
UNION	F-049233-10	INVESTORS SAVINGS BANK	No	FERRIGNO, DOUGLAS

EXHIBIT C

VICINAGE	DOCKET NUMBER	PLAINTIFF	DEFENDANT	Was matter contested?	ISSUE
UNION	F-11231-10	FEDERAL NATIONAL MORTGAGE ASSOCIATION	ARCANJO, JULIO	No	IDENTIFICATION OF LENDER
OCEAN	F-050648-10	INVESTORS BANK	BAIAMONTE, CHRISTOPHER J AND MICHELLE M. BAIAMONTE	No	IDENTIFICATION OF DEBT; NJSA 2A:50-56 ©(1), (10)
HUNTERDON	F-049433-10	INVESTORS BANK	FERRARO, MAUREEN AND FERRARO, JOSEPH	No	IDENTIFICATION OF DEBT; NJSA 2A:50-56 ©(1), (10)
SUSSEX	F-059386-10	INVESTORS BANK	GIBBS, DONALD J. AND GIBBS, HEATHER ANN	No	IDENTIFICATION OF DEBT; NJSA 2A:50-56 ©(1), (10)
WARREN	F-006793	INVESTORS BANK	GORDON, SABRINA	No	IDENTIFICATION OF DEBT; NJSA 2A:50-56 ©(1), (10)
UNION	F-049343-10	INVESTORS SAVINGS BANK	GRAZIADEL, KIMBERLY	No	IDENTIFICATION OF DEBT; NJSA 2A:50-56 ©(1), (10)
PASSAIC	F-053156-10	INVESTORS BANK	JOUSTRA, MARK	Yes	IDENTIFICATION OF DEBT; NJSA 2A:50-56 ©(1), (10)
OCEAN	F-052963-10	INVESTORS SAVINGS BANK	KELLIHER, DENIS F.	No	IDENTIFICATION OF DEBT/FEEES INCLUDED IDENTIFICATION OF DEBT; NJSA 2A:50-56 ©(1), (10)
MIDDLESEX	F-049614-10	INVESTORS SAVINGS BANK	KELLIHER, DENNIS	No	IDENTIFICATION OF DEBT; NJSA 2A:50-56 ©(1), (10)
HUNTERDON	F-049637-10	INVESTORS BANK	LEE, KATHERINE F.	No	IDENTIFICATION OF DEBT; NJSA 2A:50-56 ©(1), (10)
OCEAN	F-055109-10	INVESTORS BANK	MANLULU, EDDIE J. AND MANLULU, BEATRIZ V.	No	IDENTIFICATION OF DEBT/FEEES INCLUDED IDENTIFICATION OF DEBT; NJSA 2A:50-56 ©(1), (10)
MONMOUTH	F-9625-10	INVESTORS BANK	NASTI, JOHN AND NASTI, IRIS L.	No	IDENTIFICATION OF DEBT; NJSA 2A:50-56 ©(1), (10)
ESSEX	F-055447-10	INVESTORS BANK	NUTTER, LAMONT AND NUTTER, KIM	No	IDENTIFICATION OF DEBT; NJSA 2A:50-56 ©(1), (10)

EXHIBIT D

PROPOSED COPY OF NOTICE OF INTENT TO FORECLOSE

VERSION ONE



investors Bank

DATE

Via Certified Mail RRR # XXXXXXXX

Debtor

DEBTOR ADDRESS

TOWN, STATE ZIP

Re: Investors Bank

Loan # xx-xxxxxx-x

ADDRESS OF SECURED PROPERTY

NOTICE OF INTENTION TO FORECLOSE

(N.J.S.A. 2A:50-56)

Dear _____.

The Note you executed on _____ which is secured by a mortgage on the above referenced property dated _____ in the principal amount of \$_____ is in default, because we have not received the installments due for the months of _____ through _____.

RIGHT TO CURE DEFAULT

You may cure your default by paying or tendering \$_____ to us, on or before _____. An itemization for the amount due is attached hereto. This amount includes any other scheduled installment and late charge, which will become due to us during this period, even though such installment may not presently be due. Your payment must be mailed to David Hedgeman, at Investors Bank; 101 Wood Ave. South, Iselin, NJ 08830 his telephone number is 1-800-252-8119, extension 67669.

FAILURE TO CURE

If you do not cure the default _____ we may initiate foreclosure proceedings against you and take steps to terminate your ownership in the property by commencing a foreclosure suit in a court of competent jurisdiction.

Corporate Office

101 JFK Parkway • Short Hills, NJ • 07078

855-iBank4U (422-6548) • myinvestorsbank.com



RIGHT TO CURE AFTER FORECLOSURE COMMENCED

In the event that we commence a foreclosure action against you, you will still have a right to cure the default prior to entry of the foreclosure judgment pursuant to Section 5 of the "Fair Foreclosure Act;" however, you will be responsible for our court costs and attorneys' fees in an amount not to exceed that amount permitted pursuant to the Rules Governing the Courts of the State of New Jersey.

RIGHT TO TRANSFER OWNERSHIP

In the event that you transfer the real estate to another person, the transfer is still subject to our rights in the mortgage covering the property. The new owner of the property may have the right to cure the default as provided in the "Fair Foreclosure Act," subject to the mortgage documents.

RIGHT TO SEEK LEGAL COUNSEL

You are advised to seek counsel from an attorney of your own choosing concerning your 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 mortgaged premises is located. If you are unable to afford an attorney, you may communicate with the Legal Services Office in the county in which the mortgaged premises is located. These numbers are listed on the attached Schedule.

POSSIBLE FINANCIAL ASSISTANCE

You are advised that there may be the possible availability of financial assistance for curing a default from programs operated by the State or federal government or non-profit organizations, if any, as identified by the Commissioner of Banking. The "Fair Foreclosure Act" provides that this requirement may be satisfied by attaching a list of such programs promulgated by the commissioner. Such a list is attached.

IF YOU DISAGREE WITH US

If you disagree with our assertion that (1) a default has occurred or (2) the correctness or our calculation of the amount required to cure the default, you may contact David Hedgeman, at Investors Bank, 101 Wood Ave, South, Iselin, NJ 08830 his telephone number is 1-800-252-8119, extension 67669.



Yours truly,

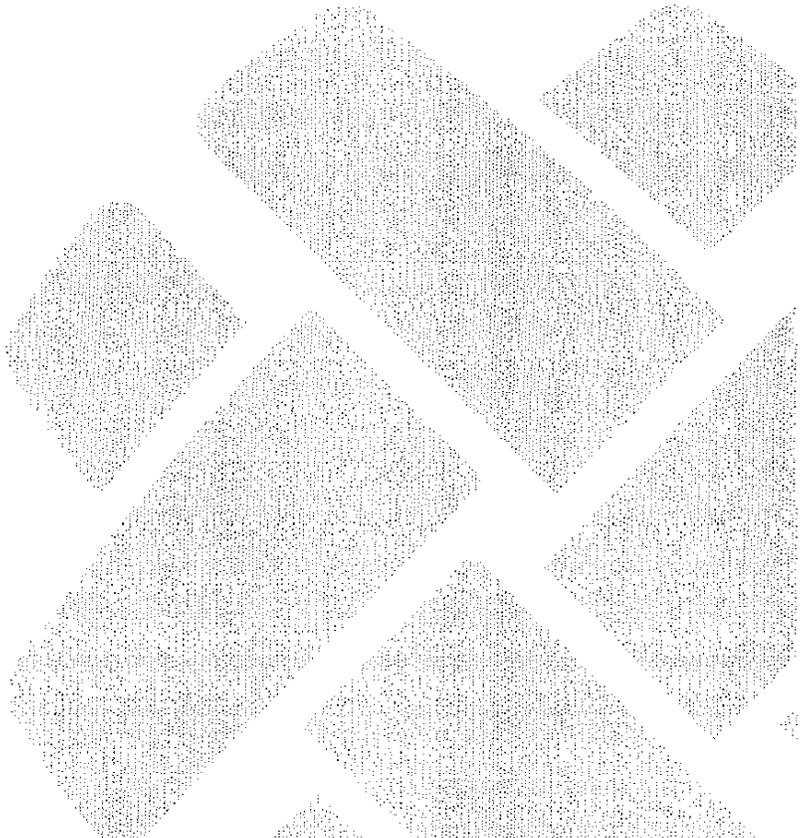
INVESTORS BANK

William G. Poole
Collections Manager

sv

Enc. Debtor 1(via regular mail and certified mail)
Debtor 2(via regular mail and certified mail)

Corporate Office
101 JFK Parkway • Short Hills, NJ • 07078
855-iBank4U (422-6548) • myinvestorsbank.com



SCHEDULE A

**LIST OF NEW JERSEY STATE BAR ASSOCIATION, LAWYER REFERRAL
SERVICE, OR LEGAL SERVICES OFFICE**

New Jersey State Bar Association – Tel. 732-249-5000

Lawyer Referral Service

Following is a listing of county bar associations that offer lawyer referral services. Locate your county of residence and contact the appropriate service. Do not contact referral services that are outside of your local county.

Atlantic County Bar Association

1201 Bacharach Boulevard

Atlantic City, NJ 08401

609-345-3444

E-Mail: atcobara@aol.com

Internet: www.atcobar.org

Exec. Dir.: Mary Williams Berard

Bergen County Bar Association

15 Bergen Street

Hackensack, NJ 07601

201-488-0044

Internet: www.bergenbar.org

Exec. Dir.: Frank O'Marra Jr.

Burlington County Bar Association

45 Grant Street

Mount Holly, NJ 08060

609-261-4862 or 609-261-4863

Email: bcba@buricobar.org

Internet: www.buricobar.org

Director: Kara E. Edens

Camden County Bar Association

1040 North Kings Highway, Suite 201

Cherry Hill, NJ 08034

856-482-0618

Internet: www.camdencountybar.org

Exec. Dir.: Laurence B. Pelletier

Cape May County Bar Association

9 North Main Street

Cape May Courthouse, NJ 08210

609-463-0313

E-Mail: cmcba@comcast.net

Exec. Dir.: Michele Devine-Hartnett

Cumberland County Bar Association

PO Box 2374

Vineland, NJ 08362

856-453-7000

E-Mail: info@cumbnjbarassoc.org

Internet: www.cumbnjbarassoc.org

Exec. Dir.: Lou Ann Ferrari-Brooks

Essex County Bar Association

470 Martin Luther King Jr. Boulevard

Newark, NJ 07102

973-533-6775

E-mail: info@essexbar.com

Internet: www.essexbar.com

Exec. Dir.: Wendy E. Deer

Gloucester County Bar Association

PO Box 338

Woodbury, NJ 08096

856-848-4589

Email: baroffice@gcbanj.org

Internet: www.gcbanj.org

Exec. Dir.: Lynn Silverstein

Hudson County Bar Association

583 Newark Avenue

Jersey City, NJ 07306

201-798-4708

Internet: www.hcbalaw.com

Exec. Dir.: Lisa Burke

Hunterdon County Bar Association

PO Box 573

Annandale, NJ 08801

908-236-6109

E-mail: director@huncolaw.org

Internet: www.huncolaw.org

Exec. Dir.: Jeannine A. Gorman

Mercer County Bar Association

1245 White Horse Mercerville Road, Suite 420

Mercerville, NJ 08619

609-885-8200

E-mail: cbrennan@mercerbar.com

Internet: www.mercerbar.com

Exec. Dir.: Christine S. Brennan

Middlesex County Bar Association

87 Bayard Street

New Brunswick, NJ 08901

732-828-0053 ext. 100

E-mail: admin@mcbalaw.com

Internet: www.mcbalaw.com
Exec. Dir.: Jonathan P. Cowles

Monmouth Bar Association
Monmouth County Court House
Freehold, NJ 07728
732-431-5644
Email: tmadewicz.monmouthbar@verizon.net
Internet: www.monmouthbarassociation.com
Exec. Dir.: Tracy A. Settipane

Morris County Bar Association
28 Schuyler Place
Morristown, NJ 07960
973-267-5882
Email: y.perez@morriscountybar.com
Internet: www.morriscountybar.com
Exec. Dir.: Nancy M. Bangiola

Ocean County Bar Association
PO Box 381
Toms River, NJ 08754
732-240-3566
Email: kern@oceancountybar.org
Internet: www.oceancountybar.org

Passaic County Bar Association
401 Grand Street, 3rd Floor
Paterson, NJ 07505
973-345-4885
Internet: www.passaicbar.org
Exec. Dir.: Karen A. Corsi

Salem County Bar Association
856-935-5829
Internet: www.salemcountybar.org

Somerset County Bar Association
20 North Bridge Street HCH 325
Somerville, NJ 08876
908-685-2323
Email: cawinder@somersetbar.com
Internet: www.somersetbar.com
Exec. Dir.: Carol Ann Winder

Union County Bar Association
2 Broad Street 1st Floor
Elizabeth, NJ 07207
908-353-4715
Internet: www.uclaw.com
Exec. Dir.: Jeffrey M. Clar

Warren County Bar Association
413 Second Street
Belvidere, NJ 07823
908-387-1835
Email: warrencountylbar@yahoo.com

LEGAL SERVICES OFFICE

Atlantic County	Tel. 609-348-4200
Bergen County	Tel. 201-487-2166
Burlington County	Tel. 800-496-4570
Camden County	Tel. 856-964-2010
Cape May County	Tel. 609-465-3001
Cumberland County	Tel. 856-691-0494
Essex County	Tel. 973-624-4500
Gloucester County	Tel. 856-848-5360
Hudson County	Tel. 201-792-6363
Hunterdon County	Tel. 908-782-7979
Mercer County	Tel. 609-695-6249
Middlesex County	Tel. 732-249-7600
Monmouth County	Tel. 732-866-0020
Morris County	Tel. 973-285-6911
Ocean County	Tel. 732-341-2727
Passaic County	Tel. 973-523-2900
Salem County	Tel. 856-451-0003
Somerset County	Tel. 908-231-0840
Sussex County	Tel. 973-383-7400
Union County	Tel. 908-354-4340
Warren County	Tel. 908-475-2010
Legal Services of New Jersey, Inc.	Tel. 732-572-9100

No guarantee as to the accuracy of the telephone numbers set forth above is assumed implied. Consult your telephone directory.

SCHEDULE B

Fair Foreclosure Act Notice of Intention to Foreclose - List of Entities Providing Assistance

The following is a list of governmental and non-profit entities that may provide financial assistance or counseling to borrowers in foreclosure.

American Credit Alliance, Inc. 26 S. Warren St. Trenton, NJ 08608 609-393-5400	Atlantic Human Resources, Inc. 1 S. New York Ave. Atlantic City, NJ 08401 609-348-4131	Consumer Credit Counseling Service of Central New Jersey 1931 Nottingham Way Hamilton, NJ 08619 609-586-2574
Consumer Credit Counseling Service of New Jersey 185 Ridgedale Ave. Cedar Knolls, NJ 07927-1812 973-267-4324	Fair Housing Council of Northern New Jersey 131 Main St. Hackensack, NJ 07601 201-489-3552	Garden State Consumer Credit Counseling, Inc. 225 Willowbrook Road Freehold, NJ 07728 1-800-992-4557
Jersey Counseling & Housing Development, Inc. 29 S. Blackhorse Pike Blackwood, NJ 08012 856-227-3683	Jersey Counseling & Housing Development, Inc. 1840 S. Broadway Camden, NJ 08104 856-541-1000	Mercer County Hispanic Association 200 E. State St., 2nd Floor Trenton, NJ 08607 609-392-2446
Middlesex County Economic Opportunities Corporation 1215 Livingston Ave. North Brunswick, NJ 08902 732-790-3344	Monmouth County Human Services Housing Services Unit P.O. Box 3000 Freehold, NJ 07728 732-431-7998	NJ Citizen Action (main office/financial education center) 744 Broad St., Suite 2080 Newark, NJ 07102 973-643-8800 1-800-NJ-OWNER (loan counseling) 1-888-TAXES-11 (free tax preparation assistance)
NJ Citizen Action (Central Jersey) 85 Raritan Ave., Suite 180 Highland Park, NJ 08904 732-246-4772	NJ Citizen Action (South Jersey) 2 Riverside Drive, Suite 362 Camden, NJ 08103 856-966-3091	Ocean Community Economic Action Now, Inc. 22 Hyers St. Toms River, NJ 08753-0773 732-244-2351, ext. 2
Paterson Coalition for Housing, Inc. 262 Main St., 5th Floor Paterson, NJ 07505 973-684-5998	Paterson Task Force for Community Action, Inc. 155 Ellison St. Paterson, NJ 07505 973-279-2333	Puerto Rican Action Board Housing Coalition Unit 90 Jersey Ave. New Brunswick, NJ 08903 732-249-9700
Tri-County Community Action Agency, Inc. 110 Cohansey St. Bridgeton, NJ 08302 856-451-6330	Urban League for Bergen County 106 W. Palisade Ave. Englewood, NJ 07631 201-568-4988	Urban League for Essex County 508 Central Ave. Newark, NJ 07101 973-624-9535
Urban League of Union County 288 N. Broad St. Elizabeth, NJ 07208 908-351-7200	Homelessness Prevention Program New Jersey Department of Community Affairs (866) 889-6270*	

*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 income sufficient to support the household and repay the loan. There is a fee for the credit check and property search.

DOBI Licensed Debt Adjusters

The following is a list of State licensed debt adjusters that may provide debt adjustment.

<p>American Credit Alliance, Inc. Reference # 9201158 25 S. Warren St. Trenton, NJ 08608 609-393-5400</p> <p>www.americancreditalliance.com</p>	<p>Clearpoint Financial Solutions Inc/Credit Counselors Reference # 9947115 8000 Franklin Farm Drive Richmond, VA 23229 1-877-422-9040 or 804-222-4660</p> <p>www.clearpointfs.org</p>	<p>Community Credit Counseling Corp Reference # 9923779 5 Professional CIR Route 34 Colts Neck, NJ 07722 1-800-220-9654 or 1-800-663-4416</p> <p>www.commcrcr.com</p>
<p>Consolidated Credit Counseling Services Inc Reference # 9826107 5701 W. Sunrise Blvd., Suite 200 Fort Lauderdale, FL 33313 1-800-728-3632 or 954-377-9102</p> <p>www.debtfree.org</p>	<p>Consumer Credit and Budget Counseling Inc Reference # 9023498 299 South Shore Road US Route 9 PO Box 866 Marmora, NJ 08223 609-390-9652 or 1-888-738-8233 Se Habla Español 1-888-5 DUDAS</p> <p>www.cc-bc.com</p>	<p>Consumer Credit and Debt Counseling Inc Reference # 9600120 95 North Lakeview Drive, PO Box 38 Gibbsboro, NJ 08026 856-566-1666 or 1-800-720-2232</p>
<p>Consumer Credit Counseling Service of Delaware Valley Inc Reference # 9108890 One Cherry Hill Suite 215 Cherry Hill, NJ 08002 1-800-989-CCCS (2227) or 215-563-5665</p> <p>www.cccsdv.org</p>	<p>Consumer Credit Counseling Service of Greater Atlanta Inc Reference # 9945985 991 US Hwy 22, Suite 200 Bridgewater, NJ 08807 1-800-251-CCCS (2227)</p> <p>www.cccsatl.org</p>	<p>Consumer Credit Counseling Service of Maryland and Delaware Inc. Reference # 0759927 203 East Broadway Salem, NJ 08079 410-747-2050</p> <p>www.cccsnj.org</p>
<p>Consumer Credit Counseling Service of New Jersey Inc Reference # 8303159 185 Ridgedale Ave Cedar Knolls, NJ 07927 1-888-726-3260 or 973-267-4324</p> <p>www.cccsnj.org</p>	<p>Consumer Credit Counseling Service of San Francisco Reference # 0402042 811 Church Road, Suite 105 Cherry Hill, NJ 08002 1-800-777-7526</p> <p>www.cccssf.org</p>	<p>Consumer Education Services Inc Reference # 9922598 3801 Lake Boone Trail, Suite 400 Raleigh, NC 27607 1-888-590-2374 or 919-838-8211</p> <p>www.mycesl.org</p>
<p>Credit Guard of America Inc Reference # 9906663 111 Cornelia St. Boonton, NJ 07005 1-800-500-6489 or 961-241-5828</p> <p>www.creditguard.org</p>	<p>Credit Management and Counseling Services Inc Reference # 9915899 46 Fawn Hollow Lane Mullica Hill, NJ 08062 856-262-0645</p>	<p>Debt Counseling Corp Reference # 0512435 One Gateway Center, Suite 2600 Newark, NJ 07102 1-888-354-6332 or 973-622-8212</p> <p>www.debtcounselingcorp.org</p>
<p>Family Financial Education Foundation Inc Reference # 9936037 724 Front St., Suite 346, PO Box 2125 Evanston, WY 82931 1-877-292-8444 or 307-769-2010</p> <p>www.fffef.org</p>	<p>Family Guidance Center Corporation Reference # 9500845 1931 Nottingham Way Hamilton, NJ 08619 609-586-8574</p> <p>http://abstaining.net/fccorp/</p>	<p>Garden State Consumer Credit Counseling Inc (Novadebt) Reference # 9101211 225 Willowbrook Road, PO Box 5012 Freehold, NJ 07728 1-800-99-BILLS or 732-409-6281</p> <p>www.novadebt.org</p>
<p>Greenpath Inc (Greenpath Debt Solutions) Reference # 9915964 847 Meadows Office Complex, 301 Route 17 North Rutherford, NJ 07070</p>	<p>Incharge Debt Solutions Reference # 9914761 3000 Atrium Way, Suite 235 Mount Laurel, NJ 08054 1-800-565-8953 or 407-532-5553</p>	<p>Lighthouse Credit Foundation Inc Reference # 0504452 151 W Passaic Street Rochelle Park, NJ 07862 1-800-339-2361 or 727-450-1082</p>

<p>1-800-550-1961 or 248-553-5400 www.greenpath.com</p>	<p>www.incharge.org</p>	<p>www.lighthousecredit.org</p>
<p>Money Management International Inc Reference # 9951553 106 Apple Street, Suite 105 Tinton Falls, NJ 07724 1-866-889-9347 or 713-394-3139 www.moneymanagement.com</p>	<p>North Seattle Community College Foundation D/B/A American Financial Solutions Reference # 9925870 One Green Tree Center, Suite 201 Marlton, NJ 08053 1-888-282-5494 or 206-374-8839</p>	<p>Take Charge America Inc Reference # 0635379 One Greentree Center, Suite 201 Marlton, NJ 08053 1-800-823-7396 or 623-266-6152 www.takechameamerica.org</p>

EXHIBIT D

PROPOSED COPY OF NOTICE OF INTENT TO FORECLOSE

VERSION TWO



investors Bank

DATE

Via Certified Mail RRR # xxxxxxxxxxxxxxxxxxxxxxxx

Debtor

ADDRESS OF DEBTOR

CITY, STATE ZIP

Re: Investors Bank

Loan # xx-xxxxxx-x

SECURED PROPERTY ADDRESS

NOTICE OF INTENTION TO FORECLOSE

(N.J.S.A. 2A:50-56)

Dear _____,

Investors Bank, as Servicer for owner of the loan, Federal National Mortgage Association, FANNIE MAE ADDRESS GOES HERE, hereby notifies you that your loan is currently Ninety (60) days past due. The Total due is \$_____.

The Note you executed on _____ which is secured by a mortgage on the above referenced property dated _____ in the principal amount of \$_____ is in default, because we have not received the installments due for the months of _____ through _____. An itemization of the amount due is attached hereto.

RIGHT TO CURE DEFAULT

You may cure your default by paying or tendering \$_____ to us, on or before _____. This amount includes any other scheduled installment and late charge, which will become due to us during this period, even though such installment may not presently be due. Your payment must be mailed to David Hedgeman, at Investors Bank, 101 Wood Ave. South, Iselin, NJ 08830, his telephone number is 1-800-252-8119, extension 67669.

FAILURE TO CURE

If you do not cure the default by _____ we may initiate foreclosure proceedings against you and take steps to terminate your ownership in the property by commencing a foreclosure suit in a court of competent jurisdiction.

Corporate Office

101 JFK Parkway • Short Hills, NJ • 07078

855-iBank4U (422-6548) • myinvestorsbank.com



RIGHT TO CURE AFTER FORECLOSURE COMMENCED

In the event that we commence a foreclosure action against you, you will still have a right to cure the default prior to entry of the foreclosure judgment pursuant to Section 5 of the "Fair Foreclosure Act;" however, you will be responsible for our court costs and attorneys' fees in an amount not to exceed that amount permitted pursuant to the Rules Governing the Courts of the State of New Jersey.

RIGHT TO TRANSFER OWNERSHIP

In the event that you transfer the real estate to another person, the transfer is still subject to our rights in the mortgage covering the property. The new owner of the property may have the right to cure the default as provided in the "Fair Foreclosure Act," subject to the mortgage documents.

RIGHT TO SEEK LEGAL COUNSEL

You are advised to seek counsel from an attorney of your own choosing concerning your 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 mortgaged premises is located. If you are unable to afford an attorney, you may communicate with the Legal Services Office in the county in which the mortgaged premises is located. These numbers are listed on the attached Schedule.

POSSIBLE FINANCIAL ASSISTANCE

You are advised that there may be the possible availability of financial assistance for curing a default from programs operated by the State of federal government or non-profit organizations, if any, as identified by the Commissioner of Banking. The "Fair Foreclosure Act" provides that this requirement may be satisfied by attaching a list of such programs promulgated by the commissioner. Such a list is attached.

IF YOU DISAGREE WITH US

If you disagree with our assertion that (1) a default has occurred or (2) the correctness or our calculation of the amount required to cure the default, you may contact David Hedgeman, at Investors Bank, 101 Wood Ave. South, Iselin, NJ 08830, his telephone number is 1-800-252-8119, extension 67669.



Yours truly,

INVESTORS BANK

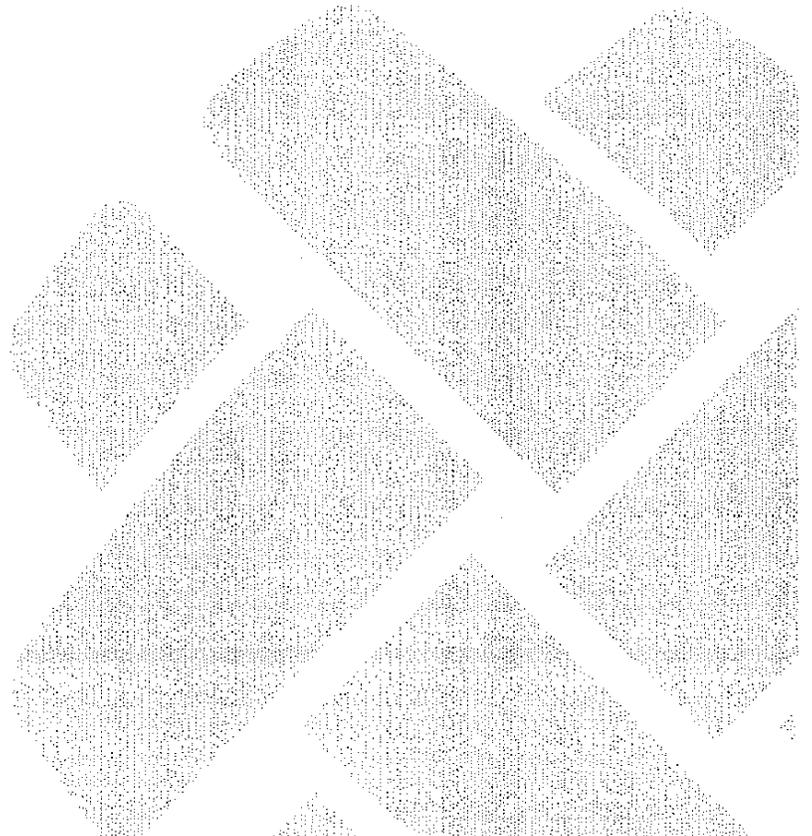
William G. Poole??
Collections Manager

sv

Enc.

Debtor 1 (via regular mail and certified mail)
Debtor 2 (via regular mail certified mail)

Corporate Office
101 JFK Parkway • Short Hills, NJ • 07078
855-iBank4U (422-6548) • myinvestorsbank.com



SCHEDULE A

**LIST OF NEW JERSEY STATE BAR ASSOCIATION, LAWYER REFERREL
SERVICE, OR LEGAL SERVICES OFFICE**

New Jersey State Bar Association -- Tel. 732-249-5000

Lawyer Referral Service

Following is a listing of county bar associations that offer lawyer referral services. Locate your county of residence and contact the appropriate service. Do not contact referral services that are outside of your local county.

Atlantic County Bar Association

1201 Bacharach Boulevard

Atlantic City, NJ 08401

609-345-3444

E-Mail: atcobar@aol.com

Internet: www.atcobar.org

Exec. Dir.: Mary Williams Berard

Bergen County Bar Association

15 Bergen Street

Hackensack, NJ 07601

201-488-0044

Internet: www.bergenbar.org

Exec. Dir.: Frank O'Marra Jr.

Burlington County Bar Association

45 Grant Street

Mount Holly, NJ 08060

609-261-4862 or 609-261-4863

Email: bcba@burlicobar.org

Internet: www.burlicobar.org

Director: Kara E. Edens

Camden County Bar Association

1040 North Kings Highway, Suite 201

Cherry Hill, NJ 08034

856-482-0518

Internet: www.camdencountybar.org

Exec. Dir.: Laurence B. Pelletier

Cape May County Bar Association

9 North Main Street

Cape May Courthouse, NJ 08210

609-463-0313

E-Mail: cmcoba@comcast.net

Exec. Dir.: Michele Devine-Hartnett

Cumberland County Bar Association

PO Box 2374

Vineland, NJ 08362

856-453-7800

E-Mail: info@cumbnjbarassoc.org

Internet: www.cumbnjbarassoc.org

Exec. Dir.: Lou Ann Ferrari-Brooks

Essex County Bar Association

470 Martin Luther King Jr. Boulevard

Newark, NJ 07102

973-533-6775

E-mail: Info@essexbar.com

Internet: www.essexbar.com

Exec. Dir.: Wendy E. Deer

Gloucester County Bar Association

PO Box 338

Woodbury, NJ 08096

856-848-4589

Email: baroffice@gcbanj.org

Internet: www.gcbanj.org

Exec. Dir.: Lynn Silverstein

Hudson County Bar Association

583 Newark Avenue

Jersey City, NJ 07306

201-798-4708

Internet: www.hcbalaw.com

Exec. Dir.: Lisa Burke

Hunterdon County Bar Association

PO Box 573

Annandale, NJ 08801

908-236-6109

E-mail: director@huntcolaw.org

Internet: www.huntcolaw.org

Exec. Dir.: Jeannine A. Gorman

Mercer County Bar Association

1245 White Horse Mercerville Road, Suite 420

Mercerville, NJ 08619

609-585-6200

E-mail: cbrennan@mercerbar.com

Internet: www.mercerbar.com

Exec. Dir.: Christine S. Brennan

Middlesex County Bar Association

87 Bayard Street

New Brunswick, NJ 08901

732-828-0953 ext. 100

E-mail: admin@mcbalaw.com

Internet: www.mcbalaw.com
Exec. Dir.: Jonathan P. Cowles

Monmouth Bar Association
Monmouth County Court House
Freehold, NJ 07728
732-431-5644
Email: tmaclewicz.monmouthbar@verizon.net
Internet: www.monmouthbarassociation.com
Exec. Dir.: Tracy A. Settiple

Morris County Bar Association
28 Schuyler Place
Morristown, NJ 07960
973-267-5882
Email: y.perez@morriscountybar.com
Internet: www.morriscountybar.com
Exec. Dir.: Nancy M. Bangiola

Ocean County Bar Association
PO Box 381
Toms River, NJ 08754
732-240-3666
Email: kam@oceancountybar.org
Internet: www.oceancountybar.org

Passaic County Bar Association
401 Grand Street, 3rd Floor
Paterson, NJ 07505
973-346-4885
Internet: www.passaicbar.org
Exec. Dir.: Karen A. Corsi

Salem County Bar Association
856-935-5529
Internet: www.salemcountybar.org

Somerset County Bar Association
20 North Bridge Street HCH 325
Somerville, NJ 08876
908-685-2323
Email: cawinder@somersetbar.com
Internet: www.somersetbar.com
Exec. Dir.: Carol Ann Winder

Union County Bar Association
2 Broad Street 1st Floor
Elizabeth, NJ 07207
908-353-4715
Internet: www.uclaw.com
Exec. Dir.: Jeffrey M. Clar

Warren County Bar Association
413 Second Street
Belvidere, NJ 07823
908-387-1835
Email: warrencountybar@yahoo.com

LEGAL SERVICES OFFICE

Atlantic County	Tel. 609-348-4200
Bergen County	Tel. 201-487-2166
Burlington County	Tel. 800-496-4570
Camden County	Tel. 856-964-2010
Cape May County	Tel. 609-465-3001
Cumberland County	Tel. 856-691-0494
Essex County	Tel. 973-624-4500
Gloucester County	Tel. 856-848-5360
Hudson County	Tel. 201-792-6363
Hunterdon County	Tel. 908-782-7979
Mercer County	Tel. 609-695-6249
Middlesex County	Tel. 732-249-7600
Monmouth County	Tel. 732-866-0020
Morris County	Tel. 973-285-6911
Ocean County	Tel. 732-341-2727
Passaic County	Tel. 973-523-2900
Salem County	Tel. 856-451-0003
Somerset County	Tel. 908-231-0840
Sussex County	Tel. 973-383-7400
Union County	Tel. 908-354-4340
Warren County	Tel. 908-475-2010
Legal Services of New Jersey, Inc.	Tel. 732-572-9100

No guarantee as to the accuracy of the telephone numbers set forth above is assumed implied. Consult your telephone directory.

SCHEDULE B

Fair Foreclosure Act Notice of Intention to Foreclose - List of Entities Providing Assistance

The following is a list of governmental and non-profit entities that may provide financial assistance or counseling to borrowers in foreclosure.

<p>American Credit Alliance, Inc. 26 S. Warren St. Trenton, NJ 08608 609-393-5400</p>	<p>Atlantic Human Resources, Inc. 1 S. New York Ave. Atlantic City, NJ 08401 609-348-4131</p>	<p>Consumer Credit Counseling Service of Central New Jersey 1931 Nottingham Way Hamilton, NJ 08619 609-586-2574</p>
<p>Consumer Credit Counseling Service of New Jersey 185 Ridgedale Ave. Cedar Knolls, NJ 07927-1012 973-267-4324</p>	<p>Fair Housing Council of Northern New Jersey 131 Main St. Hackensack, NJ 07601 201-489-3552</p>	<p>Garden State Consumer Credit Counseling, Inc. 225 Willowbrook Road Freehold, NJ 07728 1-800-992-4557</p>
<p>Jersey Counseling & Housing Development, Inc. 29 S. Blackhorse Pike Blackwood, NJ 08012 856-227-3683</p>	<p>Jersey Counseling & Housing Development, Inc. 1840 S. Broadway Camden, NJ 08104 856-541-1000</p>	<p>Mercer County Hispanic Association 200 E. State St., 2nd Floor Trenton, NJ 08607 609-392-2446</p>
<p>Middlesex County Economic Opportunities Corporation 1215 Livingston Ave. North Brunswick, NJ 08902 732-790-3344</p>	<p>Monmouth County Human Services Housing Services Unit P.O. Box 3000 Freehold, NJ 07728 732-431-7998</p>	<p>NJ Citizen Action (main office/financial education center) 744 Broad St., Suite 2080 Newark, NJ 07102 973-643-8800 1-800-NJ-OWNER (loan counseling) 1-888-TAXES-11 (free tax preparation assistance)</p>
<p>NJ Citizen Action (Central Jersey) 85 Raritan Ave., Suite 100 Highland Park, NJ 08904 732-246-4772</p>	<p>NJ Citizen Action (South Jersey) 2 Riverside Drive, Suite 362 Camden, NJ 08103 856-966-3091</p>	<p>Ocean Community Economic Action Now, Inc. 22 Hyers St. Toms River, NJ 08753-0773 732-244-2351, ext. 2</p>
<p>Paterson Coalition for Housing, Inc. 262 Main St., 5th Floor Paterson, NJ 07505 973-684-5998</p>	<p>Paterson Task Force for Community Action, Inc. 155 Ellison St. Paterson, NJ 07505 973-279-2333</p>	<p>Puerto Rican Action Board Housing Coalition Unit 90 Jersey Ave. New Brunswick, NJ 08903 732-249-9700</p>
<p>Tri-County Community Action Agency, Inc. 110 Cohanse St. Bridgeport, NJ 08302 856-451-6330</p>	<p>Urban League for Bergen County 106 W. Palisade Ave. Englewood, NJ 07631 201-568-4988</p>	<p>Urban League for Essex County 508 Central Ave. Newark, NJ 07101 973-624-9535</p>
<p>Urban League of Union County 288 N. Broad St. Elizabeth, NJ 07208 908-351-7200</p>	<p>Homelessness Prevention Program New Jersey Department of Community Affairs (866) 889-6270*</p>	

*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 income sufficient to support the household and repay the loan. There is a fee for the credit check and property search.

DOBI Licensed Debt Adjusters

The following is a list of State licensed debt adjusters that may provide debt adjustment.

<p>American Credit Alliance, Inc. Reference # 9201158 25 S. Warren St. Tranton, NJ 08608 609-393-5400</p> <p>www.americancreditalliance.com</p>	<p>Clearpoint Financial Solutions Inc/Credit Counselors Reference # 9947115 8000 Franklin Farm Drive Richmond, VA 23229 1-877-422-9040 or 804-222-4660</p> <p>www.clearpointfs.org</p>	<p>Community Credit Counseling Corp Reference # 9923779 5 Professional CIR Route 34 Colts Neck, NJ 07722 1-800-220-9654 or 1-800-663-4416</p> <p>www.commcrcr.org</p>
<p>Consolidated Credit Counseling Services Inc Reference # 9826107 5701 W. Sunrise Blvd., Suite 200 Fort Lauderdale, FL 33313 1-800-728-3632 or 954-377-9102</p> <p>www.debtfree.org</p>	<p>Consumer Credit and Budget Counseling Inc Reference # 9823498 299 South Shore Road US Route 9 PO Box 866 Marmora, NJ 08223 609-390-9652 or 1-888-738-8233 Se Habla Espanol 1-888-5 DUDAS</p> <p>www.cc-bc.com</p>	<p>Consumer Credit and Debt Counseling Inc Reference # 9600120 95 North Lakeview Drive, PO Box 38 Gibbsboro, NJ 08026 856-566-1666 or 1-800-720-2232</p>
<p>Consumer Credit Counseling Service of Delaware Valley Inc Reference # 9100890 One Cherry Hill, Suite 215 Cherry Hill, NJ 08002 1-800-989-CCCS (2227) or 215-563-5665</p> <p>www.cccsdv.org</p>	<p>Consumer Credit Counseling Service of Greater Atlanta Inc Reference # 9945985 991 US Hwy 22, Suite 200 Bridgewater, NJ 08807 1-800-251-CCCS (2227)</p> <p>www.cccsati.org</p>	<p>Consumer Credit Counseling Service of Maryland and Delaware Inc. Reference # 0753927 203 East Broadway Salem, NJ 08079 410-747-2050</p> <p>www.cccsnj.org</p>
<p>Consumer Credit Counseling Service of New Jersey Inc Reference # 8303159 185 Ridgedale Ave Cedar Knolls, NJ 07927 1-888-726-3260 or 973-267-4324</p> <p>www.cccsnj.org</p>	<p>Consumer Credit Counseling Service of San Francisco Reference # 0402042 811 Church Road, Suite 105 Cherry Hill, NJ 08002 1-800-777-7526</p> <p>www.cccssf.org</p>	<p>Consumer Education Services Inc Reference # 9922598 3801 Lake Boone Trail, Suite 400 Raleigh, NC 27607 1-888-590-2374 or 919-838-8211</p> <p>www.nycesl.org</p>
<p>Credit Guard of America Inc Reference # 9906663 111 Cornelia St. Boonton, NJ 07005 1-800-500-6489 or 961-241-5828</p> <p>www.creditguard.org</p>	<p>Credit Management and Counseling Services Inc Reference # 9915899 46 Fawn Hollow Lane Mullica Hill, NJ 08062 856-262-0645</p>	<p>Debt Counseling Corp Reference # 0512435 One Gateway Center, Suite 2600 Newark, NJ 07102 1-888-354-6332 or 973-622-8212</p> <p>www.debtcounselingcorp.org</p>
<p>Family Financial Education Foundation Inc Reference # 9930037 724 Front St., Suite 340, PO Box 2125 Evanston, WY 82931 1-877-292-8444 or 307-789-2010</p> <p>www.fffef.org</p>	<p>Family Guidance Center Corporation Reference # 9500845 1931 Nottingham Way Hamilton, NJ 08619 609-586-8574</p> <p>http://abstaining.net/fccorp/</p>	<p>Garden State Consumer Credit Counseling Inc (Novadebt) Reference # 9101211 225 Willowbrook Road, PO Box 5012 Freehold, NJ 07728 1-800-99-BILLS or 732-409-6281</p> <p>www.novadebt.org</p>
<p>Greenpath Inc (Greenpath Debt Solutions) Reference # 9915964 847 Meadows Office Complex, 301 Route 17 North Rutherford, NJ 07070</p>	<p>Incharge Debt Solutions Reference # 9914761 3000 Atrium Way, Suite 235 Mount Laurel, NJ 08054 1-800-565-8953 or 407-532-5553</p>	<p>Lighthouse Credit Foundation Inc Reference # 0504452 151 W Passaic Street Rochelle Park, NJ 07962 1-800-339-2361 or 727-450-1082</p>

<p>1-800-550-1961 or 248-553-5400 www.greenpath.com</p>	<p>www.incharge.org</p>	<p>www.loftthousecredit.org</p>
<p>Money Management International Inc Reference # 9951553 106 Apple Street, Suite 105 Tinton Falls, NJ 07724 1-866-889-9347 or 713-394-3139 www.moneymanagement.org</p>	<p>North Seattle Community College Foundation D/B/A American Financial Solutions Reference # 9925870 One Green Tree Center, Suite 201 Marlton, NJ 08053 1-888-282-5494 or 206-374-8839</p>	<p>Take Charge America Inc Reference # 0635379 One Greentree Center, Suite 201 Marlton, NJ 08053 1-800-823-7396 or 623-266-6152 www.takechargeamerica.org</p>

EXHIBIT E

EXPLANATORY LETTER

STERN, LAVINTHAL & FRANKENBERG LLC

COUNSELLORS AT LAW

105 Eisenhower Parkway, Suite 302

Roseland, New Jersey 07068

(973) 797-1100

Telecopier (973) 228-2679

DATE

**PLEASE READ THIS LETTER AND THE ENCLOSED DOCUMENTS CAREFULLY, AS THEY CONTAIN
IMPORTANT INFORMATION CONCERNING YOUR RIGHTS**

Defendant Name
Defendant Address
Defendant City, State Zip Code

RE: Order to Show Cause and Docket Number: CAPTION AND DOCKET NUMBER
Your foreclosure Action: CAPTION AND DOCKET NUMBER

Dear Borrower:

Please be advised that the New Jersey Supreme Court recently held in U.S. Bank, N.A. v Guillaume, 209 N.J. 449 (2012) that mortgage lenders seeking to foreclose must comply with the New Jersey Fair Foreclosure Act's requirement that a Notice of Intention to foreclose set forth the name and address of the lender.

Why You Are Receiving this Letter

You are receiving this letter because you are the defendant in a pending foreclosure action, and it is believed that the Notice of Intention to Foreclose served upon you prior to the commencement of the foreclosure action did not comply with the requirements of the Fair Foreclose Act.

By the Court's Order to Show Cause dated _____, 2013 and in compliance with the Supreme Court's opinion in U.S. Bank N.A. V Guillaume, Hon. Margaret Mary McVeigh, P.J.Ch. gave permission to Investors Bank to serve, along with the Order to Show Cause and Verified Complaint, corrected Notices of Intention to foreclose on all defendant mortgagors or parties obligated on the debt

in pending foreclosure actions filed before February 28, 2012 in which Investors Bank is the plaintiff and/or servicer.

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 all of the matters for which Investors Bank is seeking to issue new Notices of Intention to Foreclose.

The attachments to the Verified Complaint which lists the foreclosure actions, in which lenders are Plaintiffs, 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 action, you can access that information on the court's website on the attached exhibits to the verified complaint by entering your name on the automatic search field on the Court's 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 of Investors at _____ who can assist you in locating the information about your foreclosure.

Information About the Corrected Notice of Intention to Foreclose

Also enclosed with this letter is the corrected Notice of Intention to Foreclose. It allows you an additional 30 days in which to cure the default without having to pay the plaintiff's court costs and attorney's 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 Notice of Intention to Foreclose, the foreclosure action against you will proceed.

With the passage of time since the foreclosure action was filed against you, the lender on your loan may have changed from the named plaintiff in the foreclosure action. The corrected Notice of Intention to Foreclose lists the name and address of the current lender on your loan.

Questions about the Notice of Intention to Foreclose

Should you have question with regard to your loan or the corrected Notice of Intention to foreclose, please contact Investors Bank at _____. Additional contact information is provided in the corrected Notice of Intention to foreclose.

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 Notice of Intention to Foreclose). 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 Notice of Intention to Foreclose. To so do, 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 by _____.

Superior Court Clerk's Office, Foreclosure Processing services
Attention: Objection to NOI
PO Box 971
Trenton, NJ 08625

You must also serve a copy of the objection on the plaintiff's attorney,

Laura Scurko, Esq, at Stern, Lavinthal & Frankenberg, LLC,
105 Eisenhower Parkway, Suite 302,
Roseland, NJ 07068,

and mail a copy of the objection to the following Judge :

Hon. Margaret Mary McVeigh, P.J.Ch.
Passaic County Courthouse
77 Hamilton Street
Room 621
Paterson, NJ 07505

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 your objection.

Questions about filing an Objection:

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

Very truly yours,

Stern, Lavinthal & Frankenberg, LLC

Enclosures: Corrected Notice of Intent to Foreclose
Order of the Superior Court
Verified complaint
Certification in support of Order to Show Cause

STERN LAVINTHAL & FRANKENBERG LLC
105 Eisenhower Parkway - Suite 302
Roseland, NJ 07068
(973) 797-1100
Attorneys for Plaintiff

IN RE APPLICATION OF INVESTORS
BANK TO ISSUE CORRECTIVE NOTICES
OF INTENTION TO FORECLOSE IN
PENDING UNCONTESTED
FORECLOSURE ACTIONS

SUPERIOR COURT OF NEW JERSEY

CHANCERY DIVISION

CIVIL ACTION

Docket No: F-16805-13

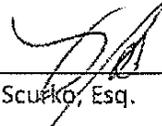
CERTIFICATION OF COUNSEL

I, Laura Scurko, Esq. of full age, hereby certify as follows:

1. I am an attorney of the State of New Jersey, and an associate in the firm of Stern, Lavinthal & Frankenberg, LLC. I am the attorney with the primary responsibility for the filing of the Verified Complaint and Order to Show Cause in this matter. I make the statements herein based upon personal knowledge. I am authorized to make these statements in support of Plaintiff's Verified Complaint and Order to Show Cause.

2. Should the Court execute the Order to Show Cause in this matter, our office will undertake the publication of a legal notice as required by the Order to Show Cause. A true copy of the proposed form of that Notice is attached hereto as Exhibit A.

3. I hereby 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.



Laura Scufko, Esq.

Dated: 7-19-13

LEGAL NOTICE

Docket No.: F-16805-13
Superior Court of New Jersey
Chancery Division

STATE OF NEW JERSEY TO:

Any defendant in an uncontested residential mortgage foreclosure action in which Investors Bank is both the Plaintiff and servicer or in matters where Investors Bank services the loan for the Federal National Mortgage Association

YOU ARE HEREBY ORDERED TO SHOW CAUSE why the relief requested by Investors Bank in the Verified Complaint and Order to Show Cause in a civil action pending in the Superior Court of New Jersey, Chancery Division, bearing Docket F-16805-13 should not be granted by the Court. Copies of all pleadings in regard to this matter may be obtained from the Court's web page at <http://www.judiciary.state.nj.us>.

This action has been instituted for the purpose of whether or not the Court should allow Investors Bank to re-send Notices of Intention to Foreclose pursuant to the process established by the Supreme Court of New Jersey on April 4 2012. Any objection to this action must be **in writing** and filed with the Clerk of the Superior Court, Hughes Justice Complex – CN 971, Trenton, New Jersey 08625. A copy of any objection must also be sent to Hon. Margaret Mary McVeigh, P.J.Ch. Passaic County Courthouse 77 Hamilton Street, Room 621 Paterson, NJ 07505 and to Laura Scurko, Esq, Stern, Lavinthal and Frankenberg, LLC, 105 Eisenhower Parkway, Suite 302, Roseland, NJ 07068. Any objection must be filed no later than _____ . If timely objection is filed, the Court may conduct oral argument on _____ . If no timely objection is filed, the Court may rule on the application on the papers on the return date.

If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association by calling **732-249-5000**. You may also contact the Lawyer Referral Service of the county of venue by calling **973-267-5882**. If you cannot afford an attorney, you may communicate with the Legal Services office of the county of venue by calling **973-383-7400**.

ELISABETH ANN STROM
ACTING CLERK
SUPERIOR COURT OF NEW JERSEY

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

"The Fair Housing Act prohibits "any preference, limitation or discrimination because of race, color, religion, sex, handicap, familial status or national origin, or intention to make such preference, limitation or discrimination" in connection with any aspect of a residential real estate transaction. Stern, Lavinthal & Frankenberg, LLC encourages and supports the equal housing practices of the Fair Housing Act in the conduct of business."

STERN LAVINTHAL & FRANKENBERG LLC
105 Eisenhower Parkway - Suite 302
Roseland, NJ 07068
(973) 797-1100
Attorneys for Plaintiff

**IN RE APPLICATION OF INVESTORS
BANK TO ISSUE CORRECTIVE NOTICES
OF INTENTION TO FORECLOSE IN
PENDING UNCONTESTED
FORECLOSURE ACTIONS**

SUPERIOR COURT OF
NEW JERSEY
CHANCERY DIVISION
CIVIL ACTION
Docket No: F-16805-13

**ORDER TO SHOW CAUSE
TO PROCEED
SUMMARILY PURSUANT
TO RULE 4:67-2**

THIS MATTER being brought before the Court by the law firm Stern, Lavinthal & Frankenberg, LLC, attorneys for plaintiff, Investors Bank (hereinafter "Investors ") seeking relief by way of summary action to permit the service of corrective Notices of Intention to Foreclose (hereinafter "NOI"), based upon the New Jersey Supreme Court decision in U.S. Bank v. Guillaume, 209 N.J. 449 (2012), and as implemented in Chief Justice Stuart Rabner's April 4, 2012 Order, and based upon the facts as set forth in the Verified Complaint filed herewith; and the Court having determined that this matter may be 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 the parties in interest listed in Exhibits A, B and C to the Amended Verified Complaint appear and show Cause on the _____ day of _____, 2013, before the Hon. Margaret Mary McVeigh, P.J.Ch.

Passaic County Courthouse 77 Hamilton Street Paterson, NJ 07505 at _____ o'clock or as soon thereafter as counsel can be heard, to object to this Court's allowing Investors to issue corrective Notices of Intention to Foreclose pursuant to this Order to Show Cause.

AND IT IS FURTHER ORDERED THAT FOR EACH FORECLOSURE ACTION IN WHICH INVESTORS ISSUES A CORRECTED NOTICE OF INTENT TO FORECLOSE IN ACCORDANCE WITH THIS ORDER, AS FOLLOWS:

1. Investors shall issue a letter ("Explanatory Letter") to each such Defendant in the form attached as Exhibit E to the Amended Verified Complaint. The Explanatory Letter will set forth the following:
 - a. explain the reason why the corrected Notice of Intention is being served;
 - b. explain the procedure to follow in the event a Defendant wishes to object to the NOI;
 - c. set forth the borrower name, loan number, plaintiff and docket number for the underlying foreclosure action;
 - d. identify a contact for questions in the event that the defendant has any questions;
 - e. advise the Defendant of the right to object to the corrected Notice of Intent as well as the right to cure the default within a certain time, which is more than 30 days from the date of the corrected Notice of Intention.
2. Plaintiff shall serve a copy of this Order to Show Cause and Verified Complaint upon all individuals obligated on the loans listed in Exhibits A, B and C to the Amended Verified Complaint, for loans which have a Note secured by a Mortgage on residential

property that is the borrower's, or their immediate family's principal residence. Service shall be effectuated by certified mail return receipt requested and regular mail to the property address and the last known address (if different) as indicated in Plaintiff's records, within _____ days of the date of this Order.

3. Investors will issue the corrective Notice of Intention to Foreclose in the form attached as Exhibit D as applicable, and shall attach such Notice of Intention to the Explanatory Letter as referenced in paragraph 1 above. The corrected Notice of Intention will exclude attorneys' fees and foreclosure costs that have been incurred in the pending foreclosure cases. In accordance with the servicing guidelines and as required by N.J.S.A 2A:50-56©, the Explanatory letter and the corrected Notice of Intent will be sent by or on behalf of Investors, the servicer.
4. Investors will serve the corrected Notice of Intention, the Explanatory Letter, the Verified Complaint and a copy of this Order to Show Cause (collectively the OTSC Package") via certified mail, return receipt requested and via regular mail at the last known address of the Defendant. The OTSC Package shall be mailed within _____ days from the date of this Order. For purposes of the Order to Show Cause Investors may serve each married couple residing at the same address with one OTSC Package via Certified and Regular Mail. In the event

that Investors has been provided an address for the estate of a deceased Defendant, the OTSC Package shall be mailed to the address of the estate and or the executor/or administrator if known and available.

5. A copy of this Order to Show Cause and Verified Complaint shall be posted on the Judiciary web Page at <http://www.judiciary.state.nj.us> within _____ days of the date herein.
6. In addition to the service of the OTSC package by certified and regular mail, Investors will within _____ days prior to _____, 2013 provide publication notice two (2) times in each of the following four (4) daily newspapers substantially in the form as Set forth in Exhibit A to the Certification of Laura Scurko, Esq.: a. Star Ledger b. Bergen Record; c. The Press of Atlantic City; d. The Gloucester County Times.
7. The Plaintiff shall file proof of service of the Verified Complaint, this Order to Show Cause and all supporting documents with the Clerk of Superior Court no later than nine (9) days before the return date of this Order.
8. You, the Defendant, have the right to object in this proceeding to this Order to Show Cause (the process by which this Court gave Investors permission to serve the corrected Notice of Intention.) You must file an original copy of the written objection under the docket number listed on the first page of

this Order for this case with the Superior Court Clerk's office, Foreclosure Processing Services in Trenton New Jersey and you must serve copies of the objection to both the Honorable Margaret Mary McVeigh and counsel for Investors. To do so, you must set forth with specificity the basis of your objection and file your objection with the Superior Court Clerk's office at the following address on or before _____, 2013:

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.

You must also serve a copy of the objection on Investors attorney at the following address:

Laura Scurko, Esq.
STERN, LAVINTHAL & FRANKENBERG, LLC
105 Eisenhower Parkway - Suite 302
Roseland, NJ 07068

And mail a copy of your objection to the Honorable Margaret Mary McVeigh at the following address:

Hon. Margaret Mary McVeigh, P.J.Ch.
Passaic County Courthouse
77 Hamilton Street
Paterson, NJ 07505

9. You, the Defendant also have the right to object to the corrected Notice of Intent to foreclose that you will receive. You will also have at least 30 days from the date of the

corrected Notice of Intent to cure your default. If you object to any of the contents of your corrected Notice of Intent, you must file written objection under the docket number for your foreclosure action. You must set forth with specificity the basis of your objection and file your objection with the Superior Court Clerk's office on or before _____, 2013 at the following address:

Clerk of the Superior Court
Foreclosure Processing Services
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625-0971.

You must also serve a copy of the objection on Investors attorney at the following address:

Laura Scurko, Esq.
STERN, LAVINTHAL & FRANKENBERG, LLC
105 Eisenhower Parkway - Suite 302
Roseland, NJ 07068

And mail a copy of your objection to the Honorable Margaret Mary McVeigh at the following address:

Hon. Margaret Mary McVeigh, P.J.Ch.
Passaic County Courthouse
77 Hamilton Street
Paterson, NJ 07505

10. If written objection to this Order to Show Cause is filed, the Plaintiff's written 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 sent directly to the Honorable Hon. Margaret Mary McVeigh, Plaintiff is only required to serve its response upon any party or parties who have filed written objections to this Order to Show Cause.

11. 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.
12. Plaintiff shall submit to the Court a proposed form of judgment addressing the relief sought on the return date no later than nine (9) days before the return date.
13. The Court will entertain argument but not testimony, on the return date of the Order to Show Cause.
14. In the event a foreclosure action has been suspended or stayed as a result of a bankruptcy filing or loss mitigation activity, the OTSC Package shall not be sent unless and until the suspension or stay is lifted. In such circumstances, the following procedure shall be used. Investors shall mail the OTSC Package within 45 days of the lifting of the stay of suspension of the foreclosure action. You the Defendant will

have at least 30 days from the date of the corrected Notice of Intention in which to object to the corrected Notice of Intention or cure the default. Any objections to the relief set forth in the Order to Show Cause shall be made in writing to the Court in the County in which your foreclosure action is pending. You must also send a copy of your written papers to Investors' attorney at the following address:

Laura Scurko, Esq.
STERN, LAVINTHAL & FRANKENBERG, LLC
105 Eisenhower Parkway - Suite 302
Roseland, NJ 07068

Or the Court handling your foreclosure action will not be able to consider your objection.

Hon Margaret Mary McVeigh, P.J.Ch.



STERN, LAVINTHAL & FRANKENBERG, LLC

COUNSELLORS AT LAW

105 EISENHOWER PARKWAY, ROSELAND, NEW JERSEY 07068

973-797-1100 – FAX 973-228-2679

July 19, 2013

Via Jefis

Hon. Margaret Mary McVeigh, P.J.Ch. Phone: (973) 247-8168
Passaic County Courthouse Fax: (973) 523-4284
77 Hamilton Street
Room 621
Paterson, NJ 07505

**RE: IN RE APPLICATION OF INVESTORS BANK TO ISSUE CORRECTIVE NOTICES OF
INTENTION TO FORECLOSE IN PENDING UNCONTESTED FORECLOSURE ACTIONS**

Docket No: F-16805-13

Dear Judge McVeigh:

Stern, Laventhal & Frankenberg, LLC represents Investors Bank (hereinafter “Investors”) in the filing of a Verified Complaint and Order to Show Cause which seeks an Order of the Court permitting Investors to serve corrected Notices of Intent to Foreclose (hereinafter “NOI”) on some of its pending uncontested pre final judgment actions. The pleadings filed herein, are filed pursuant to the decision of the Court in U.S. Bank v. Guillaume, 209 N.J. 449 (2012) and the procedure established by the April 4, 2012 Order of Justice Stuart Rabner.

That procedure authorizes the Court to entertain summary actions by Order to Show Cause as to why lenders or servicers who have served deficient NOI’s should not be allowed to issue

corrected NOI's to the obligor defendants in pre final judgment actions. The Order of April 4, 2012 also requires that a corrected NOI be accompanied by correspondence advising the obligor defendant of the following information: the reasons why the corrected NOI is necessary; the procedure in place for the filing of an objection to the corrected NOI by the defendant/obligor; the name of a contact who can respond to questions of the Defendant/obligor; a statement that the receipt of the corrected NOI permits the obligor 30 days in which he/she may either cure the default or object to the issuance of the corrected NOI. A form of letter which will explain the procedure in accordance with the April 4, 2012 notice of the Court is attached as Exhibit E to the Amended Verified Complaint.

The Guillaume Court established that dismissal was not the sole remedy for the service of an NOI which was not strictly compliant with the Fair Foreclosure Act. While the deficiencies in some of the NOI's for which Investors is seeking permission to re breach do not involve the naming of the lender and/or servicer as in Guillaume, the deficiencies could be interpreted as preventing the execution of a Certification of Diligent Inquiry. Therefore, Investors is seeking an Order of the Court allowing for the re breaching of these files as well.

Investors is a state chartered bank which services residential mortgages in the Northeast States of Delaware, Pennsylvania, Connecticut, New York and New Jersey. There are three categories of loans involving Investors:

- i) Loans held by other entities but serviced by Investors;
- ii) Loans held by Investors and serviced by Investors;
- iii) Loans held by Investors, but serviced by others.

(See Amended Verified Complaint, paragraphs 2 and 3). Some loans acquired by Investors are serviced by entities other than Investors. The relief sought herein, pertains only to the loans

serviced by Investors. (See paragraph 3 of the Amended Verified Complaint). It is the policy of Investors to diligently work with the borrowers in an effort to resolve the default. Investors utilizes foreclosure only as a last resort. Once efforts to address the default have proven less than fruitful, an NOI is sent to the obligors in accordance with the Fair Foreclosure Act, N.J.S.A. 2A:50-56. (See the Amended Verified Complaint, paragraph 5).

The NOI in use by Investors has been revised to comply with the Court's ruling in the case of U.S. Bank v. Guillaume, 209 N.J. 449 (2012), and to enable counsel to sign a Certification of Diligent Inquiry in accordance with recent revisions to the Rules of Court. (See the Amended Verified Complaint, paragraph 12). The cases listed on Exhibit A to the Amended Verified Complaint are those which fall into category i) above: Loans held by other entities but serviced by Investors. Among the entities for which Investors services loans is Federal National Mortgage Association. For these files, Investors is seeking to send out new, compliant NOIs which identify the lender. In each of these cases, an NOI was sent to the obligor defendant at the property address as well as to the last known address of the defendant obligor via certified and regular mail. (See the Amended Verified Complaint, paragraph 9.) To date, none of these loans has been reinstated.

The cases listed on Exhibit B to the Amended Verified Complaint fall into the second category of cases: Loans held by Investors and serviced by Investors. On these files, the NOI was sent to the borrower/obligor by Certified and Regular Mail to the property address and to the last known address of the obligor defendant, however possible deficiencies in the calculation of the date render counsel unable to execute a Certification of Diligent Inquiry. In none of these cases was the complaint filed prior to the expiration of 30 days from the date of the mailing of the NOI. (See the Amended Verified Complaint, paragraph 10).

The cases listed on Exhibit C to the Amended Verified Complaint also fall into the second category of loans as they are held by Investors and serviced by Investors. The loans included on this listing, are pre final Judgment matters in which the loans may not have been clearly described on the Notice of Intention to Foreclose, and/or in which Investors may lack sufficient information to verify fees which may have been included on the Notice of Intention to Foreclose and/or in which it may lack sufficient proofs that the list of current programs promulgated by the Department of Banking and Insurance was attached to the Notice of Intention to Foreclose. As in all of the other types of cases, the original NOI was sent to the property address as well as to the last known address of the defendant obligors, by certified and regular mail. (See the Amended Verified Complaint, paragraph 11.)

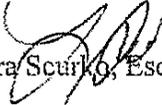
It is respectfully submitted that in each of the cases on Exhibits A, B and C to the Amended Verified Complaint, the NOI was sufficient to accomplish the purpose of the notice under the Fair Foreclosure Act, mainly, the notice was sufficient to “make the debtors “aware of the situation”. See Guillaume, at 479. In each instance, the mortgagor received an NOI more than 30 days in advance of the filing of the complaint in foreclosure. In each instance, the NOI was sent to the property address as well as to the last known address of the mortgagor, by both certified and regular mail. In each instance, the NOI included contact information for Investors Bank.

Exhibit D to the Amended Verified Complaint is a copy of the NOI proposed to be utilized by Investors, should the Court permit the rebreaching of these accounts. There are two versions of the NOI. Version One is the form which will be utilized for the cases in which the loans are held by others, but serviced by Investors – the first category of loans. The second version of the NOI will be utilized by the second category of cases: those held by and serviced by Investors.

Plaintiff proposes to send the corrective NOI accompanied by an Explanatory Letter, which is attached as Exhibit E to the Amended Verified Complaint. It is respectfully submitted that the proposed NOI complies with the Fair Foreclosure Act, and that the Explanatory Letter is in compliance with the tenets expressed in the April 4, 2012 Order of the Court. It is further respectfully urged that the corrective NOI is not prejudicial to the obligor defendants in that the reinstatement figure incorporated in the NOI will not include any attorney fees and costs which have been incurred in the pending foreclosure action.

It is respectfully urged that this Court grant the relief sought and that it order that if the Defendant Obligor fails to cure the default or object in a timely manner to the service of the NOI, that the case should proceed to Final Judgment as an uncontested matter.

Respectfully submitted,
STERN, LAVINTHAL, & FRANKENBERG, LLC


Laura Scurko, Esq.

LS/tar