



Theodore McEvoy
Tel 973.360.7900
Fax 973.301.8410
mcevoyt@gtlaw.com

January 13, 2011

VIA Federal Express

RECEIVED

JAN 14 2011

**SUPERIOR COURT OF NJ
MERCER COUNTY
CIVIL DIVISION**

Clerk of the Court
Chancery Division
Mercer County
Civil Case Management Office
175 South Broad Street - 1st floor
Trenton, New Jersey 08650-0068

**Re: In the Matter Of Residential Mortgage Foreclosure
Pleading and Document Irregularities
Docket No. F-059553-10**

Dear Sir or Madam:

This firm represents GMAC Mortgage, LLC, in the above-captioned matter. Please find enclosed for filing with your office an original and two (2) copies of the following documents:

1. Notice of Motion for Admission Pro Hac Vice of Robert R. Maddox, Marc James Ayers and F. Wendell Allen;
2. Certification of Ian S. Marx in Support of Admission of Robert R. Maddox;
3. Certification of Ian S. Marx in Support of Admission of Marc James Ayers,
4. Certification of Ian S. Marx in Support of Admission of F. Wendell Allen;
5. Certification of Robert R. Maddox in Support;
6. Certification of Marc James Ayers in Support;
7. Certification of F. Wendell Allen in Support;
8. Proposed Orders, and
9. Certificate of Service.

Kindly file the originals and return a filed-stamped copy in the enclosed self addressed stamped envelope. Please charge our firm's account number 141185 for any filing fees.

Clerk of the Court
January 13, 2011
Page 2

Thank you for your attention and please do not hesitate to contact me with any questions.

Respectfully submitted,



Theodore J. McEvoy

Enclosures

cc: All Counsel of Record (w/encl.)

GREENBERG TRAUIG, LLP
200 Park Avenue
P.O. Box 677
Florham Park, NJ 07932-0677
(973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN THE MATTER OF
RESIDENTIAL
MORTGAGE
FORECLOSURE
PLEADING AND
DOCUMENT
IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY

DOCKET NO. F-059553-10

Civil Action

**NOTICE OF MOTION FOR PRO HAC
VICE ADMISSION**

**TO: Edward J. Dauber, Esq.
Greenberg, Dauber, Epstein & Tucker
One Gateway Center, Suite 600
Newark, NJ 07102**

PLEASE TAKE NOTICE that, on Friday, February 4, 2011, at 9:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned, counsel for GMAC Mortgage, LLC ("GMACM"), shall move before the Honorable Mary C. Jacobson, Presiding Judge, Chancery Division, Mercer County, 210 South Broad Street, Trenton, New Jersey for an Order allowing the *pro hac vice* appearance of Robert R. Maddox, F. Wendell Allen and Marc James Ayers in the within matter, pursuant to R. 1:21-2.

PLEASE TAKE FURTHER NOTICE that GMACM will rely upon the accompanying Certifications of Ian S. Marx, Esq., Robert R. Maddox, F. Wendell Allen and Marc James Ayers in support of the motion.

PLEASE TAKE FURTHER NOTICE that the moving party requests oral argument only if opposition to this motion is timely filed and served.

By: Ian Marx
Ian S. Marx, Esq.

Dated: January 13, 2011

GREENBERG TRAUIG, LLP
200 Park Avenue
P.O. Box 677
Florham Park, NJ 07932-0677
(973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN THE MATTER OF
RESIDENTIAL
MORTGAGE
FORECLOSURE
PLEADING AND
DOCUMENT
IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY

DOCKET NO. F-059553-10

Civil Action

**CERTIFICATION OF IAN S. MARX IN SUPPORT OF APPLICATION FOR
ADMISSION OF ROBERT R. MADDOX PRO HAC VICE**

IAN S. MARX, of full age, hereby certifies as follows:

1. I am a shareholder of the law firm of Greenberg Traurig, LLP, counsel for GMAC Mortgage, LLC ("GMACM"), and an attorney-at-law duly licensed to practice in the State of New Jersey pursuant to R. 1:21-1. I am fully familiar with the facts and circumstances of this case. I submit this certification in support of GMACM's motion for *pro hac vice* admission of Robert R. Maddox in this matter.

2. Mr. Maddox is a partner of the law firm of Bradley Arant Boult Cummings, LLP, and he has submitted his Certification in support of this motion, in accordance with the New Jersey Court Rules.

3. I have read the Certification of Mr. Maddox in support of this application and, to the best of my knowledge, information and belief, his Certification is accurate.

4. I am counsel of record in this matter and Mr. Maddox will be associated with me in representing GMACM, in accordance with R. 1:21-2(b)(1)(B). I will be responsible for filing and accepting service of papers, entering appearances for parties, signing stipulations, and signing and receiving payments on judgments, decrees or orders, the conduct of this case and the conduct of Mr. Maddox. All notices, orders and pleadings may be served upon me.

5. Mr. Maddox is experienced in the subject matter of this litigation and will be responsible for those aspects of this matter that require his expertise, knowledge and experience. As such, his participation will serve to expedite this matter. Additionally, he has been requested by GMACM to actively participate in this matter.

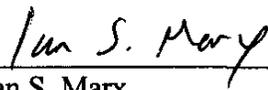
6. Mr. Maddox is familiar with the facts of this case and has had an attorney/client relationship with the client for an extended period of time. Accordingly, GMACM respectfully requests that Mr. Maddox be permitted to appear on its behalf in this current matter.

7. I and others from my firm appearing in this matter on behalf of GMACM shall comply with New Jersey Rule 1:21.

8. I and others *from my firm* will ensure that Mr. Maddox will comply with New Jersey Rule 1:21.

9. I have read, and am familiar with, the Local Rules of this Court.

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.



Ian S. Marx

Dated: January 13, 2011

GREENBERG TRAUIG, LLP
200 Park Avenue
P.O. Box 677
Florham Park, NJ 07932-0677
(973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN THE MATTER OF
RESIDENTIAL
MORTGAGE
FORECLOSURE
PLEADING AND
DOCUMENT
IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY

DOCKET NO. F-059553-10

Civil Action

**CERTIFICATION OF IAN S. MARX IN SUPPORT OF APPLICATION FOR
ADMISSION OF F. WENDELL ALLEN PRO HAC VICE**

IAN S. MARX, of full age, hereby certifies as follows:

1. I am a shareholder of the law firm of Greenberg Traurig, LLP, counsel for GMAC Mortgage, LLC ("GMACM"), and an attorney-at-law duly licensed to practice in the State of New Jersey pursuant to R. 1:21-1. I am fully familiar with the facts and circumstances of this case. I submit this certification in support of GMACM's motion for *pro hac vice* admission of F. Wendell Allen in this matter.

2. Mr. Allen is a partner of the law firm of Bradley Arant Boult Cummings, LLP, and he has submitted his Certification in support of this motion, in accordance with the New Jersey Court Rules.

3. I have read the Certification of Mr. Allen in support of this application and, to the best of my knowledge, information and belief, his Certification is accurate.

4. I am counsel of record in this matter and Mr. Allen will be associated with me in representing GMACM, in accordance with R. 1:21-2(b)(1)(B). I will be responsible for filing and

accepting service of papers, entering appearances for parties, signing stipulations, and signing and receiving payments on judgments, decrees or orders, the conduct of this case and the conduct of Mr. Allen. All notices, orders and pleadings may be served upon me.

5. Mr. Allen is experienced in the subject matter of this litigation and will be responsible for those aspects of this matter that require his expertise, knowledge and experience. As such, his participation will serve to expedite this matter. Additionally, he has been requested by GMACM to actively participate in this matter.

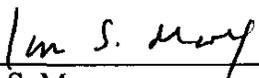
6. Mr. Allen is familiar with the facts of this case and has had an attorney/client relationship with the client for an extended period of time. Accordingly, GMACM respectfully requests that Mr. Allen be permitted to appear on its behalf in this current matter.

7. I and others from my firm appearing in this matter on behalf of GMACM shall comply with New Jersey Rule 1:21.

8. I and others from my firm will ensure that Mr. Allen will comply with New Jersey Rule 1:21.

9. I have read, and am familiar with, the Local Rules of this Court.

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.



Ian S. Marx

Dated: January 13, 2011

GREENBERG TRAURIG, LLP
200 Park Avenue
P.O. Box 677
Florham Park, NJ 07932-0677
(973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN THE MATTER OF
RESIDENTIAL
MORTGAGE
FORECLOSURE
PLEADING AND
DOCUMENT
IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY

DOCKET NO. F-059553-10

Civil Action

**CERTIFICATION OF IAN S. MARX IN SUPPORT OF APPLICATION FOR
ADMISSION OF MARC JAMES AYERS PRO HAC VICE**

IAN S. MARX, of full age, hereby certifies as follows:

1. I am a shareholder of the law firm of Greenberg Traurig, LLP, counsel for GMAC Mortgage, LLC ("GMACM"), and an attorney-at-law duly licensed to practice in the State of New Jersey pursuant to R. 1:21-1. I am fully familiar with the facts and circumstances of this case. I submit this certification in support of GMACM's motion for *pro hac vice* admission of Marc James Ayers in this matter.

2. Mr. Ayers is a partner of the law firm of Bradley Arant Boult Cummings, LLP, and he has submitted his Certification in support of this motion, in accordance with the New Jersey Court Rules.

3. I have read the Certification of Mr. Ayers in support of this application and, to the best of my knowledge, information and belief, his Certification is accurate.

4. I am counsel of record in this matter and Mr. Ayers will be associated with me in representing GMACM, in accordance with R. 1:21-2(b)(1)(B). I will be responsible for filing and

accepting service of papers, entering appearances for parties, signing stipulations, and signing and receiving payments on judgments, decrees or orders, the conduct of this case and the conduct of Mr. Ayers. All notices, orders and pleadings may be served upon me.

5. Mr. Ayers is experienced in the subject matter of this litigation and will be responsible for those aspects of this matter that require his expertise, knowledge and experience. As such, his participation will serve to expedite this matter. Additionally, he has been requested by GMACM to actively participate in this matter.

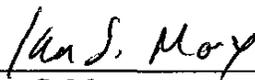
6. Mr. Ayers is familiar with the facts of this case and has had an attorney/client relationship with the client for an extended period of time. Accordingly, GMACM respectfully requests that Mr. Ayers be permitted to appear on its behalf in this current matter.

7. I and others from my firm appearing in this matter on behalf of GMACM shall comply with New Jersey Rule 1:21.

8. I and others from my firm will ensure that Mr. Ayers will comply with New Jersey Rule 1:21.

9. I have read, and am familiar with, the Local Rules of this Court.

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.



Ian S. Marx

Dated: January 13, 2011

GREENBERG TRAUIG, LLP
200 Park Avenue
P.O. Box 677
Florham Park, NJ 07932-0677
(973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN THE MATTER OF
RESIDENTIAL
MORTGAGE
FORECLOSURE
PLEADING AND
DOCUMENT
IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY

DOCKET NO. F-059553-10

Civil Action

**CERTIFICATION OF ROBERT R. MADDOX IN SUPPORT OF
MOTION FOR ADMISSION PRO HAC VICE**

ROBERT R. MADDOX, of full age, hereby certifies as follows:

1. I am an attorney-at-law duly admitted to practice law in all courts in the State of Alabama, the State of Georgia, the State of New York, the State of Oklahoma, the State of Tennessee, the State of Texas and the District of Columbia.

2. I am a partner in the law firm of Bradley Arant Boult Cummings, LLP. My principal place of business is One Federal Place, 1819 Fifth Avenue North, Birmingham, Alabama 35203-2119. I submit this Certification in support of the motion of GMAC Mortgage, LLC ("GMACM") for my *pro hac vice* admission in this matter.

3. I am a member in good standing in each court in which I am admitted to practice.

4. There are no disciplinary proceedings pending against me in any jurisdiction and no discipline has previously been imposed upon me in any jurisdiction. During the pendency of this action, I will notify the Court of any change in standing with the bar of any other court, and notify the Court immediately if any actions are instituted against me affecting my standing with the bar of any

state.

5. I am familiar with the subject matter of this proceeding, and will be responsible for those aspects of this matter that require my expertise, knowledge and experience. As such, my participation will serve to expedite this matter. Additionally, I have been requested by GMACM to actively participate in this matter.

6. I am familiar with the facts of this case and have had an attorney/client relationship with the client for an extended period of time.

7. As a condition of my admission, I agree to have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey.

8. As a condition of my admission, I agree to pay all fees required by Rule 1:20-1(b), the Lawyers Fund for Client Protection pursuant to Rule 1:28-2, and the Lawyers Assistance Program pursuant to Rule 1:28B-1(e).

9. As a condition of my admission, I agree that automatic termination of pro hac vice admission will occur for failure to make the required annual payment to the New Jersey Lawyers' Fund for Client Protection.

10. Under Rule 1:21-2(b)(3) and for the above-stated reasons, there is good cause to admit me pro hac vice herein.

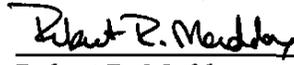
11. I am associated in this matter with Ian S. Marx, Esq. of Greenberg Traurig's Florham Park, New Jersey office, who is a member of the bar of the State of New Jersey and New Jersey counsel of record qualified to practice pursuant to R. 1:21-1, and who will continue as counsel of record, upon whom all notices, orders and pleadings may be served in this action and who will remain active in this case.

12. I consent to the appointment of the Clerk of the Supreme Court as an agent upon

whom service of process may be made for all actions against me or my firm that may arise out of my participation in this matter.

10. I have contacted counsel for all parties to this action, and all parties have consented to my admission in this matter *pro hac vice*.

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.



Robert R. Maddox

Dated: January 7, 2011

GREENBERG TRAURIG, LLP
200 Park Avenue
P.O. Box 677
Florham Park, NJ 07932-0677
(973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN THE MATTER OF
RESIDENTIAL
MORTGAGE
FORECLOSURE
PLEADING AND
DOCUMENT
IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY

DOCKET NO. F-059553-10

Civil Action

**CERTIFICATION OF MARC JAMES AYERS IN SUPPORT OF
MOTION FOR ADMISSION PRO HAC VICE**

MARC JAMES AYERS, of full age, hereby certifies as follows:

1. I am an attorney-at-law duly admitted to practice law in all courts in the State of Alabama and the State of Florida.

2. I am a partner in the law firm of Bradley Arant Boult Cummings, LLP. My principal place of business is One Federal Place, 1819 Fifth Avenue North, Birmingham, Alabama 35203-2119. I submit this Certification in support of the motion of GMAC Mortgage, LLC ("GMACM") for my *pro hac vice* admission in this matter.

3. I am a member in good standing in each court in which I am admitted to practice.

4. There are no disciplinary proceedings pending against me in any jurisdiction and no discipline has previously been imposed upon me in any jurisdiction. During the pendency of this action, I will notify the Court of any change in standing with the bar of any other court, and notify the Court immediately if any actions are instituted against me affecting my standing with the bar of any state.

5. I am familiar with the subject matter of this proceeding, and will be responsible for those aspects of this matter that require my expertise, knowledge and experience. As such, my participation will serve to expedite this matter. Additionally, I have been requested by GMACM to actively participate in this matter.

6. I am familiar with the facts of this case and have had an attorney/client relationship with the client for an extended period of time.

7. As a condition of my admission, I agree to have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey.

8. As a condition of my admission, I agree to pay all fees required by Rule 1:20-1(b), the Lawyers Fund for Client Protection pursuant to Rule 1:28-2, and the Lawyers Assistance Program pursuant to Rule 1:28B-1(e).

9. As a condition of my admission, I agree that automatic termination of pro hac vice admission will occur for failure to make the required annual payment to the New Jersey Lawyers' Fund for Client Protection.

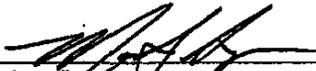
10. Under Rule 1:21-2(b)(3) and for the above-stated reasons, there is good cause to admit me pro hac vice herein.

11. I am associated in this matter with Ian S. Marx, Esq. of Greenberg Traurig's Florham Park, New Jersey office, who is a member of the bar of the State of New Jersey and New Jersey counsel of record qualified to practice pursuant to R. 1:21-1, and who will continue as counsel of record, upon whom all notices, orders and pleadings may be served in this action and who will remain active in this case.

12. I consent to the appointment of the Clerk of the Supreme Court as an agent upon whom service of process may be made for all actions against me or my firm that may arise out of my participation in this matter.

10. I have contacted counsel for all parties to this action, and all parties have consented to my admission in this matter *pro hac vice*.

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.



Marc James Ayers

Dated: January 10, 2011

GREENBERG TRAUIG, LLP
200 Park Avenue
P.O. Box 677
Florham Park, NJ 07932-0677
(973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN THE MATTER OF
RESIDENTIAL
MORTGAGE
FORECLOSURE
PLEADING AND
DOCUMENT
IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY

DOCKET NO. F-059553-10

Civil Action

**CERTIFICATION OF F. WENDELL ALLEN IN SUPPORT OF
MOTION FOR ADMISSION PRO HAC VICE**

F. WENDELL ALLEN, of full age, hereby certifies as follows:

1. I am an attorney-at-law duly admitted to practice law in all courts in the State of Alabama.
2. I am a partner in the law firm of Bradley Arant Boult Cummings, LLP. My principal place of business is One Federal Place, 1819 Fifth Avenue North, Birmingham, Alabama 35203-2119. I submit this Certification in support of the motion of GMAC Mortgage, LLC ("GMACM") for my *pro hac vice* admission in this matter.
3. I am a member in good standing in each court in which I am admitted to practice.
4. There are no disciplinary proceedings pending against me in any jurisdiction and no discipline has previously been imposed upon me in any jurisdiction. During the pendency of this action, I will notify the Court of any change in standing with the bar of any other court, and notify the Court immediately if any actions are instituted against me affecting my standing with the bar of any state.

5. I am familiar with the subject matter of this proceeding, and will be responsible for those aspects of this matter that require my expertise, knowledge and experience. As such, my participation will serve to expedite this matter. Additionally, I have been requested by GMACM to actively participate in this matter.

6. I am familiar with the facts of this case and have had an attorney/client relationship with the client for an extended period of time.

7. As a condition of my admission, I agree to have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey.

8. As a condition of my admission, I agree to pay all fees required by Rule 1:20-1(b), the Lawyers Fund for Client Protection pursuant to Rule 1:28-2, and the Lawyers Assistance Program pursuant to Rule 1:28B-1(e).

9. As a condition of my admission, I agree that automatic termination of pro hac vice admission will occur for failure to make the required annual payment to the New Jersey Lawyers' Fund for Client Protection.

10. Under Rule 1:21-2(b)(3) and for the above-stated reasons, there is good cause to admit me pro hac vice herein.

11. I am associated in this matter with Ian S. Marx, Esq. of Greenberg Traurig's Florham Park, New Jersey office, who is a member of the bar of the State of New Jersey and New Jersey counsel of record qualified to practice pursuant to R. 1:21-1, and who will continue as counsel of record, upon whom all notices, orders and pleadings may be served in this action and who will remain active in this case.

12. I consent to the appointment of the Clerk of the Supreme Court as an agent upon whom service of process may be made for all actions against me or my firm that may arise out of my participation in this matter.

10. I have contacted counsel for all parties to this action, and all parties have consented to my admission in this matter *pro hac vice*.

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.



F. Wendell Allen

Dated: January 12, 2011.



GREENBERG TRAUIG, LLP
 200 Park Avenue
 P.O. Box 677
 Florham Park, NJ 07932-0677
 (973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN THE MATTER OF
 RESIDENTIAL
 MORTGAGE
 FORECLOSURE
 PLEADING AND
 DOCUMENT
 IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
 CHANCERY DIVISION
 MERCER COUNTY

DOCKET NO. F-059553-10

Civil Action

**ORDER GRANTING ADMISSION OF F.
 WENDELL ALLEN PRO HAC VICE**

THIS MATTER having been opened to the Court upon the motion of GMAC Mortgage, LLC (“GMACM”), by and through its attorneys, Greenberg Traurig, LLP, seeking entry of an Order granting the *pro hac vice* appearance of F. Wendell Allen, an attorney admitted to the practice of law in the State of Alabama, to participate with other counsel for GMACM in all phases of the trial, and it appearing that Mr. Allen is a licensed attorney in good standing in the State of Alabama, and it appearing that he is familiar with the facts of this case and has had an attorney/client relationship with the client for an extended period of time, and the Court having considered the moving papers, as well as any papers in opposition or in reply, and having heard any arguments offered by counsel for the parties; and for good cause shown;

IT IS on this ____ day of January, 2011;

ORDERED that F. Wendell Allen be and hereby is admitted *pro hac vice* and is authorized to appear and participate with other counsel for GMAC in all phases of the trial, subject to the following conditions:

1. Mr. Allen shall abide by the New Jersey Court Rules, including all disciplinary

rules, R. 1:20-1 and R. 1:28:2.

2. Mr. Allen shall, and hereby does, consent to the appointment of the Clerk of the Supreme Court as his agent upon whom service of process may be made for all actions against him or his firm that may arise out of his participation in this matter.

3. Mr. Allen shall notify the Court immediately of any matter affecting his standing at the bar of any other jurisdiction.

4. Mr. Allen shall have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey, who shall be held responsible for him, the conduct of the litigation and the attorney admitted herein.

5. Mr. Allen cannot be designated as trial counsel.

6. No discovery, motion, trial or any other proceeding delay shall occur or be requested by reason of the inability of Mr. Allen to be in attendance.

7. Mr. Allen must, within ten (10) days, pay the fees required by R. 1:20-1 and R. 1:28:2 and submit an affidavit of compliance.

8. *Pro hac vice* admissions will automatically terminate for failure to make the initial and any annual payment required by R. 1:20-1 and R. 1:28:2.

9. Non-compliance with any of the terms of this order shall constitute grounds for removal.

10. A copy of this Order shall be served upon all counsel of record within seven (7) days of third-party defendant's counsel's receipt of an executed copy of same.

Hon. Mary C. Jacobson, P.J. Ch.

OPPOSED

UNOPPOSED

GREENBERG TRAURIG, LLP
200 Park Avenue
P.O. Box 677
Florham Park, NJ 07932-0677
(973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN THE MATTER OF
RESIDENTIAL
MORTGAGE
FORECLOSURE
PLEADING AND
DOCUMENT
IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY

DOCKET NO. F-059553-10

Civil Action

**ORDER GRANTING ADMISSION OF
ROBERT R. MADDOX PRO HAC VICE**

THIS MATTER having been opened to the Court upon the motion of GMAC Mortgage, LLC (“GMACM”), by and through its attorneys, Greenberg Traurig, LLP, seeking entry of an Order granting the *pro hac vice* appearance of Robert R. Maddox, an attorney admitted to the practice of law in the State of Alabama, the State of Georgia, the State of New York, the State of Oklahoma, the State of Tennessee, the State of Texas and the District of Columbia, to participate with other counsel for GMACM in all phases of the trial, and it appearing that Mr. Maddox is a licensed attorney in good standing in the States of Alabama, Georgia, New York, Oklahoma, Tennessee, Texas and the District of Columbia, and it appearing that he is familiar with the facts of this case and has had an attorney/client relationship with the client for an extended period of time, and the Court having considered the moving papers, as well as any papers in opposition or in reply, and having heard any arguments offered by counsel for the parties; and for good cause shown;

IT IS on this ____ day of January, 2011;

ORDERED that Robert R. Maddox be and hereby is admitted *pro hac vice* and is

4
authorized to appear and participate with other counsel for GMAC in all phases of the trial, subject to the following conditions:

1. Mr. Maddox shall abide by the New Jersey Court Rules, including all disciplinary rules, *R. 1:20-1* and *R. 1:28:2*.

2. Mr. Maddox shall, and hereby does, consent to the appointment of the Clerk of the Supreme Court as his agent upon whom service of process may be made for all actions against him or his firm that may arise out of his participation in this matter.

3. Mr. Maddox shall notify the Court immediately of any matter affecting his standing at the bar of any other jurisdiction.

4. Mr. Maddox shall have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey, who shall be held responsible for him, the conduct of the litigation and the attorney admitted herein.

5. Mr. Maddox cannot be designated as trial counsel.

6. No discovery, motion, trial or any other proceeding delay shall occur or be requested by reason of the inability of Mr. Maddox to be in attendance.

7. Mr. Maddox must, within ten (10) days, pay the fees required by *R. 1:20-1* and *R. 1:28:2* and submit an affidavit of compliance.

8. *Pro hac vice* admissions will automatically terminate for failure to make the initial and any annual payment required by *R. 1:20-1* and *R. 1:28:2*.

9. Non-compliance with any of the terms of this order shall constitute grounds for removal.

10. A copy of this Order shall be served upon all counsel of record within seven (7) days of third-party defendant's counsel's receipt of an executed copy of same.

Hon. Mary C. Jacobson, P.J. Ch.

OPPOSED

UNOPPOSED

GREENBERG TRAURIG, LLP
200 Park Avenue
P.O. Box 677
Florham Park, NJ 07932-0677
(973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN THE MATTER OF
RESIDENTIAL
MORTGAGE
FORECLOSURE
PLEADING AND
DOCUMENT
IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY

DOCKET NO. F-059553-10

Civil Action

**ORDER GRANTING ADMISSION OF
MARC JAMES AYERS PRO HAC VICE**

THIS MATTER having been opened to the Court upon the motion of GMAC Mortgage, LLC (“GMACM”), by and through its attorneys, Greenberg Traurig, LLP, seeking entry of an Order granting the *pro hac vice* appearance of Marc James Ayers, an attorney admitted to the practice of law in the State of Alabama and the State of Florida, to participate with other counsel for GMACM in all phases of the trial, and it appearing that Mr. Ayers is a licensed attorney in good standing in the State of Alabama and the State of Florida, and it appearing that he is familiar with the facts of this case and has had an attorney/client relationship with the client for an extended period of time, and the Court having considered the moving papers, as well as any papers in opposition or in reply, and having heard any arguments offered by counsel for the parties; and for good cause shown;

IT IS on this ____ day of January, 2011;

ORDERED that Marc James Ayers be and hereby is admitted *pro hac vice* and is authorized to appear and participate with other counsel for GMAC in all phases of the trial, subject to the following conditions:

1. Mr. Ayers shall abide by the New Jersey Court Rules, including all disciplinary rules, *R. 1:20-1* and *R. 1:28:2*.
2. Mr. Ayers shall, and hereby does, consent to the appointment of the Clerk of the Supreme Court as his agent upon whom service of process may be made for all actions against him or his firm that may arise out of his participation in this matter.
3. Mr. Ayers shall notify the Court immediately of any matter affecting his standing at the bar of any other jurisdiction.
4. Mr. Ayers shall have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey, who shall be held responsible for him, the conduct of the litigation and the attorney admitted herein.
5. Mr. Ayers cannot be designated as trial counsel.
6. No discovery, motion, trial or any other proceeding delay shall occur or be requested by reason of the inability of Mr. Ayers to be in attendance.
7. Mr. Ayers must, within ten (10) days, pay the fees required by *R. 1:20-1* and *R. 1:28:2* and submit an affidavit of compliance.
8. *Pro hac vice* admissions will automatically terminate for failure to make the initial and any annual payment required by *R. 1:20-1* and *R. 1:28:2*.
9. Non-compliance with any of the terms of this order shall constitute grounds for removal.
10. A copy of this Order shall be served upon all counsel of record within seven (7) days of third-party defendant's counsel's receipt of an executed copy of same.

Hon. Mary C. Jacobson, P.J. Ch.

() OPPOSED

() UNOPPOSED

GREENBERG TRAURIG, LLP
200 Park Avenue
P.O. Box 677
Florham Park, NJ 07932-0677
(973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN THE MATTER OF
RESIDENTIAL
MORTGAGE
FORECLOSURE
PLEADING AND
DOCUMENT
IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY

DOCKET NO. F-059553-10

Civil Action

CERTIFICATE OF SERVICE

I, Theodore J. McEvoy being of full age, hereby certifies as follows:

1. I am associated with the law firm of Greenberg Traurig, LLP, 200 Park Avenue, Florham Park, New Jersey 07932.

2. On January 13, 2011, I caused the enclosed Notice of Motion for Admission Pro Hac Vice, Proposed Order and Certifications of Ian S. Marx, Esq., Robert R. Maddox, Esq., Marc James Ayers, Esq., and F. Wendell Allen, Esq., to be served via Federal Express upon all counsel on the attached service list.

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: January 13, 2011



THEODORE J. MCEVOY

SERVICE LIST

***IN THE MATTER OF RESIDENTIAL MORTGAGE FORECLOSURE
PLEADINGS AND DOCUMENT IRREGULARITIES***
**Superior Court of New Jersey, Chancery Division-General Equity Part,
Mercer County Docket No. F-59553-10**

Judge (retired) Walter Barisonek
Porzio, Bromberg & Newman, P.C.
100 Southgate Parkway
P.O. Box 1997
Morristown, NJ 07962-1007
(973) 538-4006 (phone)
(973) 538-5146 (fax)

Edward J. Dauber, Esq.
Greenberg, Dauber, Epstein & Tucker
One Gateway Center, Suite 600
Newark, NJ 07102
(973) 643-3700 (phone)
(973) 643-1219 (fax)
edauber@greenbergdauber.com

Counsel for Bank of America/BAC Home Loans Servicing LP

Graham Curtin, PA
4 Headquarters Plaza
PO Box 1991
Morristown, NJ 07962-1991
Thomas R. Curtin
(973) 292-1700 (phone)
tcurtin@grahamcurtin.com

Counsel for Wells Fargo Bank NA

Reed Smith LLP
Princeton Forrestal Village
136 Main Street, Suite 250
Princeton, NJ 08540
Mark S. Melodia
mmelodia@reedsmith.com
Diane A. Bettino
dbettino@reedsmith.com
(609) 987-0050 (phone)

K & L Gates
One Newark Center, 10th Floor
Newark, New Jersey 07102
Rosemary Alito
rosemary.alito@klgates.com

Joy Lindo
joy.lindo@klgates.com
(973) 848-4047

Counsel for Citibank/Citi Residential Lending Inc

Krovatin Klingeman LLC
744 Broad Street, Suite 1903
Newark, NJ 07102
Gerald Krovatin
(973) 424-9777 (phone)
GKrovatin@Krovatin.com

Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas
New York, NY 10019-6064
Theodore V. Wells Jr.
(212) 373-3000
twells@paulweiss.com

Counsel for JPMorgan Chase Bank NA/Chase Home Finance LLC

McElroy Deutsch Mulvaney & Carpenter LLP
1300 Mount Kemble Avenue
PO Box 2075
Morristown, NJ 07962
Richard P. Haber
(973) 993-8100 (phone)
(973) 425-0161 (fax)
rhaber@mdmc-law.com

Counsel for OneWest Bank FSB

O'Melveny & Myers LLP
Times Square Tower
7 Times Square
New York, NY 10036
Andrew Frackman
afrackman@omm.com
Anthony DiLello
adilello@omm.com
(212) 326-2000 (phone)
(212) 326-2061 (fax)