

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

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IN RE APPLICATION OF STURDY  
SAVINGS 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 -010262-13**

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

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Plaintiff Sturdy Savings Bank, through their attorneys, Stern, Lavinthall  
& Frankenberg, LLC, by way of Verified Complaint, hereby says as follows:

**FACTS:**

1. Sturdy Savings Bank is a state chartered savings bank with an office at 506 South Main Street, PO Box 900 Cape May Courthouse, NJ.
2. Sturdy Savings Bank services residential and commercial mortgage loans primarily New Jersey, primarily in Cape May and Atlantic Counties. Sturdy Savings Bank services loans it originates. Sturdy Savings Bank also services some loans held by Federal National Mortgage Association. None of Sturdy Saving's Bank's loans are serviced by other

entities. Sturdy Savings Bank currently has 1105 residential mortgage loans in its portfolio. Of those, 12 loans are in default and 11 loans are in foreclosure.

3. Among the duties performed by Sturdy Savings Bank in the servicing of a loan is the collection and application of monthly mortgage payments from borrowers, the payment of escrows, if any, the negotiation of loss mitigation resolutions and default servicing. In order to meet its obligations in servicing loans, Sturdy Savings Bank maintains business records which reflect the status and activity of each loan.

4. For all of the loans serviced and held by Sturdy Savings Bank it is its policy to actively engage the obligor defendants in a dialogue in an effort to resolve the default. Prior to the referral of an action to foreclosure counsel, contact is attempted with the borrower. Should that contact not result in a resolution of the default, Sturdy Savings Bank reviews its business records and based upon that review, prepares and forwards a Notice of Intention to Foreclose to all obligors in accordance with the Fair Foreclosure Act.

5. 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. Taken in tandem with the amendments to the Court Rules which require the execution of a Certification of Diligent Inquiry, any deficiencies in a Notice of Intention to Foreclose would render a case impossible to move forward.

6. 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. That procedure requires the filing of an Order to Show Cause and Verified Complaint. This action is being filed in accordance with the procedure set forth by the Court in that Order.

7. Sturdy Savings Bank currently services 5 pre final Judgment matters in which the NOIs may not have been compliant with the Fair Foreclosure Act for some of the following reasons: failure to send the NOI via regular and certified mail to each obligor individually, and deficiencies in the language required by 2A:50-56 © (3) (5) – (11). The list of files for which Plaintiff is seeking to re breach is attached hereto as Exhibit A.

9. Sturdy Savings Bank has revised its NOI in accordance with recent rulings of the Court. Attached as Exhibit B is a true and accurate copy of the Notice of Intention to Foreclose that Sturdy Savings Bank currently utilizes, and for which it is seeking authorization to serve upon the borrowers noted in Exhibit A. Sturdy Savings Bank will not include attorney fees or costs for the currently pending foreclosure action in the newly issued Notice of Intention to Foreclose.

10. Sturdy Savings Bank seeks the Court's permission to provide an explanatory letter to each obligor, along with the Notice of Intention to Foreclose. Attached as Exhibit C is a true and accurate copy of the form of Explanatory letter which Sturdy Savings Bank will cause to be sent to each of the obligor borrowers on the files listed in Exhibit A.

WHEREFORE, Sturdy Savings Bank respectfully requests judgment:

- (a) Deeming the form Notice of Intention to Foreclose attached as Exhibit B compliant with the requirements of the Fair Foreclosure Act;
- (b) Permitting Sturdy Savings Bank to serve new Notices of Intention to Foreclose, in the form attached as Exhibit B to defendant obligors and/or parties obligated on the underlying debt, for pre-judgment foreclosure actions listed on Exhibit A to this pleading.
- (c) Authorizing Plaintiff to serve the Explanatory Letter as in the form as proposed in Exhibit C, along the with NOI;
- (d) Any further relief the Court deems equitable and just.

Stern, Lavinthal & Frankenberg, LLC  
Attorneys for STURDY SAVINGS  
BANK

DATED: 3/24/13

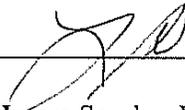
  
\_\_\_\_\_  
By: Laura Scurko, Esq.

#### 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 proceeded contemplated, other than the pending foreclosure actions as to each of the matters listed on Exhibit A 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, Lavinthal & Frankenberg, LLC  
Attorneys for Plaintiff STURDY  
SAVINGS BANK



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By: Laura Scurko, Esq

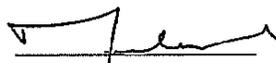
DATED: 3/20/13

## VERIFICATION

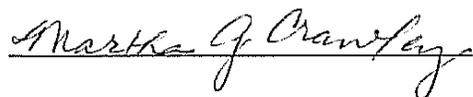
I, Michael Woods, of full age certify as follows:

1. I am the Senior Vice President, Director of Lending for Sturdy Savings 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: 3/25/2013

  
Michael Woods

Sworn to before me  
This 25<sup>th</sup> day of March, 2013



**MARTHA G. CRAWLEY**  
NOTARY PUBLIC OF NEW JERSEY  
MY COMMISSION EXPIRES 4-27-2017

EXHIBIT A

The following is a list of files in which Plaintiff is seeking to issue corrective Notices of Intent to foreclose

VICINAGE	DOCKET NUMBER	DEFENDANT NAME	DEFICIENCY IN NOI
CAPE MAY	F-14737-10	MOORE, JOSEPH SR. and MOORE, IVELISSE	Identification of Debt; insufficient time to reinstate;
CAPE MAY	F-14734-10	LEWIS, WILLIS and LEWIS, JACQUELINE	Identification of debt; insufficient time to reinstate;
CAPE MAY	F-31841-10	CAMPBELL, BRIAN B. and CAMPBELL, JANE L.	No backup for providing the NOI in separate envelopes to each obligor; language in NJSA 2A:50-56 (7) and (8)
CAPE MAY	F-010259-12	ZEIGLER AND RANALLI, LLC; ZEIGLER, JR. FRANK; ZEIGLER, DANEEN; RANALLI, RICHARD F. RANALLI, EILEEN (FOR THE ELLERY ROAD, VILLAS PROPERTY, ONLY)	NOI sent to corporate entity, no documentation proving that it was sent to individual obligors; insufficient time to reinstate; missing legal services and financial information;
CAPE MAY	F-14730-10	GLAZIER, JOSEPH R.*	

\* This matter is currently in Bankruptcy, and Sturdy Savings Bank does not wish to have the pleadings served on the mortgagor at this time.

EXHIBIT B

PROPOSED COPY OF NOTICE OF INTENT TO FORECLOSE



MORTGAGE DEPARTMENT
609-463-5210
1-888-368-8217
FAX 609-463-5211

DATE

«Borrower»
«CoBorrower»
«Mail\_Street»
«City\_State\_Zip»

and

«Prop\_Street»
«Prop\_City\_State\_Zip»

Re: Loan # «Loan\_Num»
«Prop\_Street», «Prop\_Municipality»
Block «Block\_Num» Lot «Lot\_Num»

Dear «Salutation»:

As you are aware, Sturdy Savings Bank holds a first mortgage on «Prop\_Street»,
«Prop\_Municipality», Block «Block\_Num» Lot «Lot\_Num», County of Cape May, State of New
Jersey, in the original amount of \$«Original\_Loan\_Amt».

Your mortgage payments are past due, which puts you in default of your loan agreement. As of
DATE, you owe the following:

Installments due «Install\_From» to and
Including «Install\_To» @ \$«Pmt\_Amt» \$«Total\_Pmts»
Installments due «Sec\_Install\_From» to and
Including «Sec\_Install\_To»«Install\_To» @ \$«Sec\_Pmt\_Amt» \$«Sec\_Pmt\_Total»
Outstanding Late Charges \$«Late\_Charges»
Real Estate taxes advanced for «Tax\_Yr» \$«RE\_Taxes»
Insurance Premiums advanced \$«Insurance\_Prem»

Total Due \$«Grand\_Total»

You may cure your default by paying the aforesaid amount plus any installments and/or late
charges that come due, by bank check, money order or certified funds so that it is received at
the following address on or before «Deadline»:

**STURDY SAVINGS BANK**  
**506 South Main Street**  
**PO Box 900**  
**Attention: Kevin T Deely, Vice President**  
**1-609-463-5210 or**  
**1-888-368-8217**

If your account is not brought current by «Deadline», then we may start mortgage foreclosure proceedings, which will cause you to lose your property.

Even if a foreclosure is started you may reinstate your account until a judgment in foreclosure is entered. However, if a foreclosure is started, in addition to curing all missed payments, late charges and other necessary items, you will be required to pay for attorney's fees and costs in an amount not to exceed the amount permitted pursuant to the Rules Governing the Courts of the State of New Jersey. .

At any time after default you may transfer your property to another person subject to the security interest and that person may have the right to cure the default, if you mortgage documents allow.

You should immediately seek the advice of an attorney of your own choosing. 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 property is located. If you are unable to afford an attorney, you may communicate with the Legal Services Office in the county in which the property is located. These telephone numbers can be found in your local telephone directory.

There may be possible availability of financial assistance for curing a default from programs operated by the State or Federal Government or non-profit organizations. Enclosed is a listing of Governmental and Non-Profit Entities which may provide financial assistance or counseling to borrowers in foreclosure. You may wish to call any of the enclosed numbers to ascertain whether you qualify for assistance. It is recommended that you consult with your attorney. We are also enclosing an information booklet entitled "How to Avoid Foreclosure."

If you disagree with the assertion that a default has occurred or the correctness of the calculation of the amount required to cure the default you may contact:

Kevin T Deely, Vice President 1-609-463-5210

Sincerely,

Nina Martinez  
Loan Servicing/Collector  
STURDY SAVINGS BANK

Certified mail # «Cert\_Mail\_Num\_one»/Return Receipt;  
and Regular mail.  
Enclosure (2)

**Equity Skimming.** In this type of scam, a "buyer" approaches you, offering to get you out of financial trouble by promising to pay off your mortgage or give you a sum of money when the property is sold. The "buyer" may suggest that you move out quickly and deed the property to him or her. The "buyer" then collects rent for a time, does not make any mortgage payments, and allows the lender to foreclose. Remember, signing over your deed to someone else does not necessarily relieve you of your obligation on your loan.

**Phony counseling agencies.** Some groups calling themselves "counseling agencies" may approach you and offer to perform certain services for a fee. These could well be services you could do for yourself for free, such as negotiating a new payment plan with your lender or pushing a foreclosure sale. If you have any doubt about paying for such services, call a HUD-approved housing counseling agency at 1-800-569-4287 or TDD 1-800-877-8339. Do this before you pay anyone or sign anything.

**Q: ARE THERE ANY PRECAUTIONS I CAN TAKE?**

Here are several precautions that should help you avoid being "taken" by a scam artist:

1. Don't sign any papers you don't fully understand.
2. Make sure you get all "promises" in writing.
3. Beware of any contract of sale or loan assumption when you are not formally released from liability for your mortgage debt.
4. Check with a lawyer or your mortgage company before entering into any deal involving your home.

5. If you're selling the house yourself to avoid foreclosure, check to see if there are any complaints against the prospective buyer. You can contact your state's Attorney

General, the State Real Estate Commission, or the local District Attorney's Consumer Fraud Unit for this type of information.

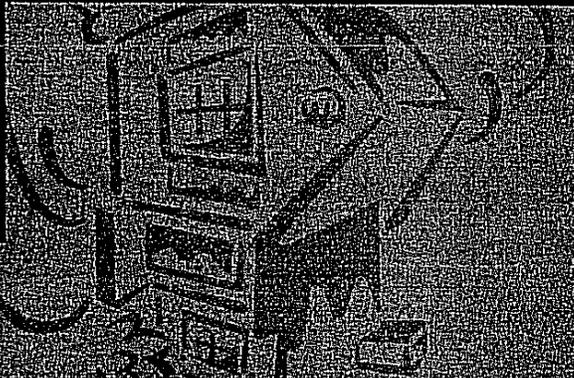
**Q: WHAT ARE THE MAIN POINTS I SHOULD REMEMBER?**

1. Don't lose your home and damage your credit history.
  2. Call or write your mortgage lender immediately and be honest about your financial situation.
  3. Stay in your home to make sure you qualify for assistance.
  4. Arrange an appointment with a HUD-approved housing counselor to explore your options at 1-800-569-4287 or TDD 1-800-877-8339.
  5. Cooperate with the lender or lender trying to help you.
  6. Explore every alternative to keep your home.
  7. Beware of scams.
  8. Do not sign anything you don't understand. And remember that signing over the deed to someone else does not necessarily relieve you of your loan obligation.
- Act now. Delaying can't help. If you do nothing, YOU WILL LOSE YOUR HOME! Get your good credit rating. Visit our web site at [www.hud.gov](http://www.hud.gov).

HUD  
May 2011  
HUD-11-129-11

U.S. Department of Housing and Urban Development  
491 Brown Street, SW  
Office of Single Family Housing  
Washington, D.C. 20410-2000

**HOW TO AVOID FORECLOSURE**



This booklet explains how property owners can avoid losing their homes. Available in English and Spanish.

Este folleto explica los procedimientos de cómo evitar la pérdida de su hogar. Para información en español llame a la línea gratuita de problemas.

[www.hud.gov](http://www.hud.gov)



### Q: WHAT HAPPENS WHEN I MISS FORECLOSURE PAYMENTS?

This is the last means that your lender can use to possess (take over) your home. When this happens, you must move out of your house. If your property is worth less than the total amount you owe on your mortgage loan, a deficiency judgment could be pursued. If that happens, you not only lose your home, you also would owe HUD an additional amount.

Both foreclosures and deficiency judgments could seriously affect your ability to qualify for credit in the future. So you should avoid foreclosure if possible.

### Q: WHAT SHOULD I DO?

**1. DO NOT IGNORE THE LETTERS FROM YOUR LENDER.** If you are having problems making your payments, call or write to your lender's Loss Mitigation Department without delay. Explain your situation. Be

prepared to provide them with financial information, such as your monthly income and expenses. Without this information, they may not be able to help.

**2. Stay in your home for now.** You may not qualify for assistance if you abandon your property.

**3. Contact a HUD-approved housing counseling agency.** Call 1-800-569-4287 or TDD 1-800-877-8339 for the housing counseling agency nearest you. These agencies are valuable resources. They frequently have information on services and programs offered by Government agencies as well as private and community organizations that could help you. The housing counseling agency may also offer credit counseling. These services are usually free of charge.

### Q: WHAT ARE MY ALTERNATIVES?

You may be considered for the following special Foreclosure Assistance. Your lender may be able to arrange a

payment plan based on your financial situation and may even provide for a temporary reduction or suspension of your payments. You may qualify for this if you have recently experienced a reduction in income or an increase in living expenses. You must furnish information to your lender to show that you would be able to meet the requirements of the new payment plan.

**Mortgage Modification.** You may be able to refinance the debt and/or extend the term of your mortgage loan. This may help you catch up by reducing the monthly payments to a more affordable level. You may qualify if you have recovered from a financial problem and can afford the new payment amount.

**Partial Claims.** Your lender may be able to work with you to obtain a one-time payment from the FHA-insurance fund to bring your mortgage current.

You may qualify if:

1. your loan is at least 1 month delinquent but no more than 12 months delinquent;
2. you are able to begin making full mortgage payments.

When your lender files a Partial Claim, the U.S. Department of Housing and Urban Development will pay your lender the amount necessary to bring your mortgage current. You must execute a Promissory Note, and a Lien will be placed on your property until the Promissory Note is paid in full.

The Promissory Note is interest-free and is due when you pay off the first mortgage or when you sell the property.

**Pre-foreclosure sale.** This will allow you to avoid foreclosure by selling your property for an amount less than the amount necessary to pay off your mortgage loan.

You may qualify if:

1. the loan is at least 1 month delinquent;
2. you are able to sell your house within 3 to 5 months; and
3. a new appraisal (that your lender will obtain) shows that the value of your home meets HUD program guidelines.

**Direct Sale of Foreclosure.** As a last resort, you may be able to voluntarily "give back" your property to the lender. This won't save your house, but it is not as damaging to your credit rating as a foreclosure.

You can qualify if:

1. you are in default and don't qualify for any of the other options;
2. your attempts at selling the house before foreclosure were unsuccessful; and
3. you don't have another FHA mortgage in default.

### Q: HOW DO I KNOW IF I QUALIFY FOR ANY OF THESE ALTERNATIVES?

Your lender will determine if you qualify for any of the alternatives. A housing counseling agency can also help you determine which, if any, of these options may meet your needs and also assist you in interacting with your lender. Call 1-800-569-4287 or TDD 1-800-877-8339.

### Q: SHOULD I BE AWARE OF ANYTHING ELSE?

Yes. Be aware of certain solutions that sound too simple or too good to be true usually are. If you're selling your home without professional guidance, beware of buyers who try to rush you through the process. Unfortunately, there are people who may try to take advantage of your financial difficulty. Be especially alert to the following:

### 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. It is recommended that you consult with your attorney.

<b>American Credit Alliance, Inc.</b> 26 S. Warren St. Trenton, NJ 08608 609-393-5400	<b>Atlantic Human Resources, Inc.</b> 1 S. New York Ave. Atlantic City, NJ 08401 609-348-4131	<b>Consumer Credit Counseling Service of Central New Jersey</b> 1931 Nottingham Way Hamilton, NJ 08619 609-586-2574
<b>Consumer Credit Counseling Service of New Jersey</b> 185 Ridgedale Ave. Cedar Knolls, NJ 07927-1812 973-267-4324	<b>Fair Housing Council of Northern New Jersey</b> 131 Main St. Hackensack, NJ 07601 201-489-3552	<b>Garden State Consumer Credit Counseling, Inc.</b> 225 Willowbrook Road Freehold, NJ 07728 1-800-992-4557
<b>Jersey Counseling &amp; Housing Development, Inc.</b> 29 S. Blackhorse Pike Blackwood, NJ 08012 856-227-3683	<b>Jersey Counseling &amp; Housing Development, Inc.</b> 1840 S. Broadway Camden, NJ 08104 856-541-1000	<b>Mercer County Hispanic Association</b> 200 E. State St., 2nd Floor Trenton, NJ 08607 609-392-2446
<b>Middlesex County Economic Opportunities Corporation</b> 1215 Livingston Ave. North Brunswick, NJ 08902 732-790-3344	<b>Monmouth County Human Services Housing Services Unit</b> P.O. Box 3889 Freehold, NJ 07728 732-431-7998	<b>NJ Citizen Action (main office/financial education center)</b> 744 Bread St., Suite 2080 Newark, NJ 07102 973-643-8800 1-800-NJ-OWNER (loan counseling) 1-888-TAXES-11 (free tax preparation assistance)
<b>NJ Citizen Action (Central Jersey)</b> 85 Raritan Ave., Suite 100 Highland Park, NJ 08904 732-246-4772	<b>NJ Citizen Action (South Jersey)</b> 2 Riverside Drive, Suite 362 Camden, NJ 08103 856-966-3091	<b>Ocean Community Economic Action Now, Inc.</b> 22 Hyers St. Toms River, NJ 08753-0773 732-244-2351, ext. 2
<b>Paterson Coalition for Housing, Inc.</b> 262 Main St., 5th Floor Paterson, NJ 07505 973-684-5998	<b>Paterson Task Force for Community Action, Inc.</b> 155 Ellison St. Paterson, NJ 07505 973-279-2333	<b>Puerto Rican Action Board Housing Coalition Unit</b> 90 Jersey Ave. New Brunswick, NJ 08903 732-249-9700
<b>Tri-County Community Action Agency, Inc.</b> 110 Cohansey St. Bridgeton, NJ 08302 856-451-6330	<b>Urban League for Bergen County</b> 106 W. Palisade Ave. Englewood, NJ 07631 201-568-4988	<b>Urban League for Essex County</b> 508 Central Ave. Newark, NJ 07101 973-624-9535
<b>Urban League of Union County</b> 288 N. Broad St. Elizabeth, NJ 07208 908-351-7200	<b>Homelessness Prevention Program</b> 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><b>American Credit Alliance, Inc.</b> Reference # 9201158 25 S. Warren St. Trenton, NJ 08608 <b>609-393-5400</b></p> <p><a href="http://www.americancreditalliance.com">www.americancreditalliance.com</a></p>	<p><b>Clearpoint Financial Solutions Inc/Credit Counselors</b> Reference # 9947115 8000 Franklin Farm Drive Richmond, VA 23229 <b>1-877-422-9040 or 804-222-4660</b></p> <p><a href="http://www.clearpointfs.org">www.clearpointfs.org</a></p>	<p><b>Community Credit Counseling Corp</b> Reference # 9923779 5 Professional CIR Route 34 Colts Neck, NJ 07722 <b>1-800-220-9654 or 1-800-663-4416</b></p> <p><a href="http://www.commcrc.org">www.commcrc.org</a></p>
<p><b>Consolidated Credit Counseling Services Inc</b> Reference # 9826107 5701 W. Sunrise Blvd., Suite 200 Fort Lauderdale, FL 33313 <b>1-800-728-3632 or 954-377-9102</b></p> <p><a href="http://www.debtfree.org">www.debtfree.org</a></p>	<p><b>Consumer Credit and Budget Counseling Inc</b> Reference # 9823498 299 South Shore Road US Route 9 PO Box 866 Marmora, NJ 08223 <b>609-390-9652 or 1-888-738-8233</b> Se Habla Espanol 1-888-5 DUDAS</p> <p><a href="http://www.cc-bc.com">www.cc-bc.com</a></p>	<p><b>Consumer Credit and Debt Counseling Inc</b> Reference # 9600120 95 North Lakeview Drive, PO Box 38 Gibbsboro, NJ 08026 <b>856-566-1666 or 1-800-720-2232</b></p>
<p><b>Consumer Credit Counseling Service of Delaware Valley Inc</b> Reference # 9100890 One Cherry Hill Suite 215 Cherry Hill, NJ 08002 <b>1-800-989-CCCS (2227) or 215-563-5665</b></p> <p><a href="http://www.cccsdv.org">www.cccsdv.org</a></p>	<p><b>Consumer Credit Counseling Service of Greater Atlanta Inc</b> Reference # 9945985 991 US Hwy 22, Suite 200 Bridgewater, NJ 08807 <b>1-800-251-CCCS (2227)</b></p> <p><a href="http://www.cccsatl.org">www.cccsatl.org</a></p>	<p><b>Consumer Credit Counseling Service of Maryland and Delaware Inc.</b> Reference # 0753927 203 East Broadway Salem, NJ 08079 <b>410-747-2050</b></p> <p><a href="http://www.cccsnj.org">www.cccsnj.org</a></p>
<p><b>Consumer Credit Counseling Service of New Jersey Inc</b> Reference # 8303159 185 Ridgedale Ave Cedar Knolls, NJ 07927 <b>1-888-726-3260 or 973-267-4324</b></p> <p><a href="http://www.cccsnj.org">www.cccsnj.org</a></p>	<p><b>Consumer Credit Counseling Service of San Francisco</b> Reference # 0402042 811 Church Road, Suite 105 Cherry Hill, NJ 08002 <b>1-800-777-7526</b></p> <p><a href="http://www.cccssf.org">www.cccssf.org</a></p>	<p><b>Consumer Education Services Inc</b> Reference # 9922598 3801 Lake Boone Trail, Suite 400 Raleigh, NC 27607 <b>1-888-590-2374 or 919-838-8211</b></p> <p><a href="http://www.mvcesi.org">www.mvcesi.org</a></p>
<p><b>Credit Guard of America Inc</b> Reference # 9906663 111 Cornelia St. Boonton, NJ 07005 <b>1-800-500-6489 or 561-241-5828</b></p> <p><a href="http://www.creditguard.org">www.creditguard.org</a></p>	<p><b>Credit Management and Counseling Services Inc</b> Reference # 9915899 46 Fawn Hollow Lane Mullica Hill, NJ 08062 <b>856-262-0645</b></p>	<p><b>Debt Counseling Corp</b> Reference # 0512435 One Gateway Center, Suite 2600 Newark, NJ 07102 <b>1-888-354-6332 or 973-622-8212</b></p> <p><a href="http://www.debtcounselingcorp.org">www.debtcounselingcorp.org</a></p>
<p><b>Family Financial Education Foundation Inc</b> Reference # 9930037 724 Front St., Suite 340, PO Box 2125 Evanston, WY 82931 <b>1-877-292-8444 or 307-789-2010</b></p> <p><a href="http://www.ffef.org">www.ffef.org</a></p>	<p><b>Family Guidance Center Corporation</b> Reference # 9500845 1931 Nottingham Way Hamilton, NJ 08619 <b>609-586-8574</b></p> <p><a href="http://abstraining.net/fgccorp/">http://abstraining.net/fgccorp/</a></p>	<p><b>Garden State Consumer Credit Counseling Inc (Novadebt )</b> Reference # 9101211 225 Willowbrook Road, PO Box 5012 Freehold, NJ 07728 <b>1-800-99-BILLS or 732-409-6281</b></p> <p><a href="http://www.novadebt.org">www.novadebt.org</a></p>
<p><b>Greenpath Inc (Greenpath Debt Solutions)</b> Reference # 9915964 847 Meadows Office Complex, 301 Route 17 North Rutherford, NJ 07070 <b>1-800-550-1961 or 248-553-5400</b></p>	<p><b>Incharge Debt Solutions</b> Reference # 9914761 3000 Atrium Way, Suite 235 Mount Laurel, NJ 08054 <b>1-800-565-8953 or 407-532-5553</b></p> <p><a href="http://www.incharge.org">www.incharge.org</a></p>	<p><b>Lighthouse Credit Foundation Inc</b> Reference # 0504452 151 W Passaic Street Rochelle Park, NJ 07662 <b>1-800-339-2361 or 727-450-1082</b></p> <p><a href="http://www.lighthousecredit.org">www.lighthousecredit.org</a></p>

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

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**EXHIBIT C**

**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**

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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 strictly comply with the New Jersey Fair Foreclosure Act's requirement that a Notice of Intention to foreclose set forth the information set forth in the Act.

**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 may not have strictly complied 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, The Honorable Paul Innes gave permission to Sturdy Savings 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 Sturdy Savings 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 Sturdy Savings Bank is seeking to issue new Notices of Intention to Foreclose.

The attachments to the Verified Complaint which lists the foreclosure actions 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 Sturdy Savings Bank at 1-609-463-5210 or 888-368-8217, attention: Kevin Deely, 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 questions with regard to your loan or the corrected Notice of Intention to foreclose, please contact Sturdy Savings Bank at 1-609-463-5210 or 888-368-8217, attention: Kevin Deely . 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 do so, 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,  
Stern, Lavinthal & Frankenberg, LLC,  
105 Eisenhower Parkway, Suite 302,  
Roseland, NJ 07068,

and mail a copy of the objection to Judge Innes at the following address:

Hon. Paul Innes,  
Chancery Division, General Equity Part  
Mercer County Superior Court,  
Civil Courthouse, P.O. Box 8068  
175 S. Broad Street  
Trenton, NJ 08650-0068

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](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](mailto:SCCOForeclosure.Mailbox@judiciary.state.nj.us).

Very truly yours,

Stern, Lavinthal & Frankenberg, LLC

Enclosures:    Verified complaint  
                  Corrected Notice of Intent to Foreclose  
                  Order of the Superior Court  
                  Letter Brief, and supporting certification







