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IN RE APPLICATION BY JPMORGAN CHASE BANK, N.A. TO ISSUE CORRECTED NOTICES OF INTENT TO FORECLOSE ON BEHALF OF IDENTIFIED FORECLOSURE PLAINTIFFS IN UNCONTESTED CASES	**SUPERIOR COURT OF NEW JERSEY** **CHANCERY DIVISION** **PASSAIC COUNTY** **DOCKET NO.: F -021218-12** **CIVIL ACTION** **ORDER TO SHOW CAUSE**

THIS MATTER being brought before the Court by Morgan Lewis & Bockius LLP, attorneys for JPMorgan Chase Bank, N.A. ("JPMC"), authorized to act on behalf of Foreclosure Plaintiffs in pending foreclosure cases in New Jersey, seeking relief by way of summary action for an Order permitting JPMC to issue corrected Notices of Intent to Foreclose ("NOI") to the defendant mortgagor and/or parties obligated on the debt ("Foreclosure Defendants") in the pending, pre-judgment, uncontested foreclosure cases listed on the Exhibits 1 through 45 to the Verified Complaint ("Corrected NOI List"), and based upon the New Jersey Supreme Court's decision in US Bank, N.A. v. Guillaume, 209 N.J. 449 (2012), the implementing Order of the New Jersey Supreme Court dated April 4, 2012, and for good cause shown;

It is on this ____ day of 2012 **ORDERED** that the Foreclosure Defendants whose names appear on the Corrected NOI List may appear before the Superior Court at the Passaic County Courthouse, 71 Hamilton Street, Paterson, New Jersey at _____ o'clock in the _____ noon or as soon thereafter as counsel can be heard, on the _____day of _____, 2012 to object to this Court's Order allowing JPMC to issue corrected NOIs pursuant to this Order to Show Cause.

AND IT IS FURTHER ORDERED THAT FOR EACH FORECLOSURE ACTION IN WHICH JPMC ISSUES A CORRECTED NOI TO A FORECLOSURE DEFENDANT:

1. JPMC will issue a letter ("Explanatory Letter") to each Foreclosure Defendant in the form attached as Exhibit A to the Verified Complaint. The Explanatory Letter will explain:

- the reasons why the corrected NOI is being served;
- the procedure to follow in the event a Foreclosure Defendant wishes to object to the NOI;
- the individuals to contact with any questions; and
- their right to object to the corrected NOI or their right to cure the default within 35 days of the date of the corrected NOI.

2. JPMC will issue a corrected NOI in the form attached as Exhibit B to the Verified Complaint and shall attach such NOI to the Explanatory Letter referenced in paragraph 1 above. The corrected NOI 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(e), the Explanatory Letter and corrected NOI will be sent by JPMC, the servicing agent.

3. JPMC will serve the corrected NOI, the Explanatory Letter, the Verified Complaint without exhibits, and a copy of this Order to Show Cause (collectively, the "OSC

Package"), via certified mail, return receipt requested and regular mail at the last known address of the Foreclosure Defendant. For purposes of this Order to Show Cause, JPMC may serve each marital couple residing at the same address with one OSC Package via certified mail and regular mail.[1]

4. A copy of JPMC's complete application to this Court shall be loaded onto the New Jersey Courts website within ___ days of the date of this Order where it will be available for review by the general public at the website link -- http://www.judiciary.state.nj.us/.

5. In addition to providing service of the OSC Package by certified and regular mail, JPMC will, within ___ days of the date of this Order, provide publication notice two (2) times in each of the following four (4) daily newspapers in a manner consistent with similar legal notices: the Star-Ledger, Bergen County Record, Press of Atlantic City and the Courier Post. Attached hereto as Exhibit A is a sample legal notice.

6. JPMC shall file with the Court its proof of service of the OSC Package on Foreclosure Defendants on the Corrected NOI List in the manner consistent with this Order no later than nine (9) days before the return date.

7. You [Foreclosure Defendants] have the right to object in this proceeding to this Order to Show Cause (the process by which this Court gave JPMC permission to serve the corrected NOI). To do so, you must file a written objection under the docket number listed on the first page of this Order for this case. You must set forth with specificity the basis for your objection and file your objection with the Superior Court Clerk's Office at the following address within ____ days:

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[1] In the event JPMC has been provided an address for the estate of a deceased Foreclosure Defendant, the OSC Package shall be mailed to the address of the estate and/or the executor or administrator, if known and available.

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

You must also serve a copy of the objection on JPMC's attorney, Christopher C. Loeber, Esq. at MORGAN, LEWIS & BOCKIUS LLP, 502 Carnegie Center, Princeton, NJ 08540-6241 and mail a copy of your objection to Judge _____ at the Superior Court of New Jersey, Passaic County Courthouse, Chambers 100, 71 Hamilton Street, Paterson, New Jersey 07505.

8. You [Foreclosure Defendants] also have the right to object to the corrected NOI that you will receive. You will also have 35 days from date of the corrected NOI to cure your default. If you object to any of the contents of your corrected NOI, you must file written objection under the docket number for your foreclosure action. You must set forth with specificity the basis for your objection and file your objection with the Superior Court Clerk's Office at the following address within ____ days of receipt of the corrected NOI:

Superior Court Clerk's Office, Foreclosure Processing Services
P.O. Box 971
Trenton, New Jersey 08625

You must also serve a copy of the objection on JPMC's attorney, Christopher C. Loeber, Esq. at MORGAN, LEWIS & BOCKIUS LLP, 502 Carnegie Center, Princeton, NJ 08540-6241, and mail a copy of your objection to Judge _____ at the Superior Court of New Jersey, Passaic County Courthouse, Chambers 100, 71 Hamilton Street, Paterson, New Jersey 07505.

9. JPMC may file and serve any written reply to any opposition papers received by _____, 2012. The reply papers must be filed with the Clerk of the Superior Court in Mercer County, with a copy to Judge _____ and to each Foreclosure Defendant who filed an opposition.

10. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is provided with the corrected NOI.

11. A proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the Court by JPMC no later than nine (9) days before the return date.

12. The Court will entertain argument, but not testimony, on the return date of the Order to Show Cause.

13. In the event a foreclosure action has been suspended or stayed as a result of a bankruptcy filing or loss mitigation activity, the OSC Package shall not be sent unless and until the suspension or stay is lifted. In such circumstances, the following procedure shall be used. JPMC shall mail the OSC Package within 45 days of the lifting of the stay or suspension of the foreclosure action. You [Foreclosure Defendants] will have 35 days from the date of the corrected NOI in which to object to the corrected NOI or cure your default. Any objections to the relief set forth in this 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 JPMC's attorneys, Christopher C. Loeber, Esq. at MORGAN, LEWIS & BOCKIUS LLP, 502 Carnegie Center, Princeton, NJ 08540-6241 or the Court handling your foreclosure action will not be able to consider your objection.

_____

J.S.C.

EXHIBIT A

LEGAL NOTICE

If you are a defendant in a pending foreclosure action in New Jersey, this notice may concern your case.

Why JPMorgan Chase Bank, N.A. Is Running This Notice: The New Jersey Supreme Court recently held that any Notice of Intent to Foreclose in New Jersey must include the name and address of the lender. Many Notices of Intent issued in the past have only included this information for the servicer of the mortgage loan. Those Notices of Intent did not comply with New Jersey's Fair Foreclosure Act.

What This Means To You: JPMorgan Chase Bank, N.A. has filed a lawsuit with the Court and has requested permission to issue corrected Notices of Intent. The New Jersey court has given JPMorgan Chase Bank, N.A. permission to serve corrected Notices of Intent. These corrected Notices of Intent are being sent to certain defendant mortgagors/parties obligated on the debt in pending foreclosure actions being serviced by JPMorgan Chase Bank, N.A. that were filed before February 28, 2012. You may receive a Notice with copies of the verified complaint and the order of the Court permitting JPMorgan Chase Bank, N.A. to issue the corrected Notices. All of the documents relating to this JPMorgan Chase Bank, N.A. lawsuit will be made available on the New Jersey Courts web site at http://www.judiciary.state.nj.us/.

Your Right To Cure: If you receive a corrected Notice of Intent, you will have an additional 35 days to cure the default on your mortgage that is in foreclosure in New Jersey without being required to pay the plaintiff's court costs and attorneys' fees in your foreclosure case. If you fail to cure the default by the date set forth in the corrected Notice of Intent, the pending foreclosure case against you may proceed ahead.

Your Right To Object To This Process: You also have the right to file an objection to this process of sending corrected Notices of Intent. Your objection must be in writing, and must say specifically what you object to. You must file any such objection by **[date]**. You must file and send any objection to:

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

You must also send copies to Judge Margaret Mary McVeigh, J.S.C. at the Superior Court of New Jersey, Passaic County Courthouse, 71 Hamilton Street, Chambers 100, Paterson, NJ 07505 and to the attorney for JPMorgan Chase Bank, N.A., Christopher C. Loeber, Esq. at MORGAN, LEWIS & BOCKIUS LLP, 502 Carnegie Center, Princeton, NJ 08540-6241.

Your Right To Object To The Corrected Notice of Intent: You also have the right to object to the specific Notice of Intent that is sent to you. To do so, you must file a written objection on

the docket in your individual foreclosure case. You must also serve a copy of that objection on Plaintiff's attorney in the foreclosure case.

If You Have Any Questions: Please visit the New Jersey Courts 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.