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PHELAN HALLINAN & DIAMOND, PC
By: Vladimir Palma, Esquire.
400 Fellowship Road, Suite 100
Mount Laurel, NJ 08054
(856) 813-5500
Attorneys for Plaintiff

IN RE NOTICES OF INTENTION TO FORECLOSE SERVED BY CENTRAL MORTGAGE	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION DOCKET NO: **ATTORNEY CERTIFICATION IN SUPPORT OF ORDER TO SHOW CAUSE**

Vladimir Palma, Esquire, of full age, hereby certifies as follows:

1. I am an attorney licensed to practice in the State of New Jersey and an associate with the law firm of Phelan, Hallinan & Diamond, PC. I am the attorney responsible for this matter and in this capacity I am familiar with the facts of Plaintiff's Order to Show Cause and Verified Complaint. I make this certification in support of Plaintiff's application for an Order to Show Cause.
2. In addition to serving the Order to Show Cause by certified mail to the property address subject to the foreclosure and, if different, the borrower's last known address in Central Mortgage's system of record, Plaintiff proposes providing notice of this action by publication.
3. Attached as **Exhibit C** is a copy of the Cover Letter that we received from the Office of Foreclosure that the Court has required be served with the new NOI.
4. Attached as **Exhibit D** is a copy of the notice plaintiff proposes be utilized for publication in the following newspapers:

a. Star Ledger

b. Bergen Record

c. The Press of Atlantic County

d. The Gloucester County Times

5. 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.

Vladimir Palma, Esquire
Attorney for Plaintiff

Dated: 7/3/13

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Attorneys for Plaintiff

IN RE NOTICES OF INTENTION TO FORECLOSE SERVED BY CENTRAL MORTGAGE	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION DOCKET NO: F- CIVIL ACTION **ORDER TO SHOW CAUSE TO PROCEED SUMMARILY PURSUANT TO R. 4:67-2**

This Matter being brought before the court by the law firm of Phelan, Hallinan & Diamond, P.C., attorneys for plaintiff, Central Mortgage, seeking relief by way of summary action as set forth in Chief Justice Stuart Rabner's April 4, 2012 Order and based upon the facts 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 Exhibit B of the Certification of _____ appear and show cause on the _____ day of _____, 2013 before the Honorable _____, Superior Court, Chancery Division, at the _____ _____ County Courthouse in ___ ___, New Jersey at _____ o'clock, why judgment should not be entered as follows:

A. Declaring Plaintiffs' Form Notice of Intention to Foreclose to be compliant with the requirements of the Fair Foreclosure Act; and

B. Allowing Central Mortgage to send new Notices of Intention to Foreclose in the form attached to the Verified Complaint, giving the borrower(s) at least thirty days from the date the letter is mailed to cure the default on the mortgage without having to pay legal fees or costs; and

C. Granting such other relief as the court deems equitable and just.

IT IS FURTHER ORDERED that;

1. Plaintiff shall serve a copy of this Order to Show Cause and Verified Complaint upon all individuals obligated on the Note secured by a Mortgage on residential property that is the borrower's or their immediate family's, principle residence. Service shall be effectuated by certified mail to the property address and the last known address (if different) in plaintiff's records.
2. A copy of this Order to Show Cause and Verified Complaint shall be posted on the Judiciary Web Page at www.judiciary.state.nj.us..
3. A true copy of this Order to Show Cause, Verified Complaint, and Certification (without exhibits), shall be served upon the parties in interest listed in Exhibit "B" of the Certification of _____ ., by certified mail, return receipt requested (or by registered mail, return receipt requested with respect to any party in interest who resides outside the United States) and by regular mail. All other interested parties shall be served by publication as outlined in this Order.
4. Along with this Order to Show Cause, Plaintiff may serve the corrective Notice of Intention to Foreclose allowing the borrower at least thirty days to cure the default on the

subject mortgage without having to pay attorneys fees or costs, in a form as set forth in Exhibit A of the the Verified Complaint. Plaintiff shall also serve a Cover Letter in the form set forth in Exhibit D of the Certification of Vladimir Palma, Esquire in the Verified Complaint.

a. For any borrower in an active Bankruptcy case where the provisions of the automatic stay are still in place, Plaintiff may serve a copy of this Order to Show Cause and verified Complaint but may choose to delay serving a corrective Notice of Intention to Foreclose until such time that the stay is vacated, if it believes that doing so will violate the automatic stay.

b. If the Court grants final relief on the return date of this Order to Show Cause and plaintiff has not already sent a corrective Notice of Intention to Foreclose, Plaintiff shall serve the corrective Notice of Intention to Foreclose, Plaintiff shall serve the corrective Notice of Intention to Foreclose once the provisions of the automatic stay in the bankruptcy case are no longer in place. In the alternative, Plaintiff may apply to the United States Bankruptcy Court for relief from the provisions of the automatic stay to effectuate service of the corrective notice of Intention to Foreclose pursuant to this Order.

c. In the event that Plaintiff does not serve a corrective Notice of Intention to Foreclose with this Order to Show Cause, Plaintiff may not proceed with a foreclosure action until such Notice of Intention is served as authorized by this Court's Order.

d. If Plaintiff believes that service of this application will be a violation of the provisions of the automatic stay, once the stay is vacated, Plaintiff may file a

motion with the Chancery Judge in the vicinage where their property lies requesting permission to send a new Notice of Intention to Foreclose. Plaintiff shall not be required to file a new Order to Show Cause for cases currently in bankruptcy.

5. Plaintiff shall publish the legal notice of this action as set forth in Exhibit C to the certification of Vladimir Palma, Esq. on at least two days prior to _____ in the following newspapers:

    a. Star Ledger
    b. Bergen Record
    c. The Press of Atlantic City
    d. The Gloucester County Times

6. The Court will only entertain objections to the process outlined in the Supreme Court's April 4, 2012 Order. Any party in interest who wishes to object to the process shall file the objection, **in writing,** with the:

    Clerk of the Superior Court, Foreclosure Processing Services
    Attention: Objection to Notice of Intention to Foreclose
    Hughes Justice Complex
    25 Market Street
    PO Box 971
    Trenton, NJ 08625-0971

A copy of the objection to the Order to Show Cause must also be sent to:

Honorable Margaret Mary McVeigh, P.J.Ch.
Passaic County Courthouse
71 Hamilton Street, Chambers 100
Paterson, NJ 07505

Honorable Paul Innes, P.J.Ch.
Mercer County Civil Courthouse
175 South Broad Street
Trenton, NJ 08650

A copy of the objection to the Order to Show Cause must also be served upon the attorney for the Plaintiff at:

Vladimir Palma, Esq.
Phelan, Hallinan & Diamond, P.C.
400 Fellowship Road
Suite 100
Mount Laurel, NJ 08054

Objections to this order to show cause must state with specificity the basis for the objection and must be filed in writing no later than _____, 2013.

7. If a timely objection is not filed, the matter may proceed to judgment in accordance with the Rules of Court.
8. Any objection in regard to a specific NOI in a specific foreclosure case must be filed in writing **under the docket number of in individual action, NOT under this Order to Show Cause**. Any objection must state the basis for the objection with specificity and be filed and served as set forth in Paragraph 6 above. Objections to a specific NOI will be referred to the Chancery Court in the vicinage in which the property lies for resolution.
9. Parties in interest are hereby advised that a telephone call to the Plaintiff, to the Plaintiff's attorney, to the Office of Foreclosure, or to the Court will not protect your rights; you must file and serve your written objection as outlines in this Order.
10. 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.

11. If no party in interest timely files an serves a response to this Order to Show Cause as provided for above, the application may be decided by the Court on the date this matter is scheduled to be heard, and may be decided on the papers without a hearing, provided that the Plaintiff has filed a proof of service and a proposed form of judgment as required by this Order to Show Cause.

12. 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 the Superior Court, with a courtesy copy directly to the Honorable _____. Plaintiff is only required to serve its response upon any party or parties who have filed written objections to this Order to Show Cause.

13. Plaintiff shall submit to the Court an original and two copies of a proposed form of judgment addressing the relief sought on the date this matter is scheduled to be heard no later than ____ days before the date this matter is scheduled to be heard.

14. The Plaintiff shall file proof of service of the Verified Complaint, this Order to Show Cause, and all supporting documents with the Office of Foreclosure no later than nine (9) days before the return date of this matter.

15. The court will entertain argument, but not testimony, on the return date of the Order to Show Cause, unless the court advised to the contrary no later than _____ days before the return date.

_____

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Exhibit A

Exhibit A

Form Letter to be Attached to Corrected NOIs Pursuant to an Order to Show Cause

[Letterhead of Servicer]

[Date]

[Defendant Name(s)]
[Defendant Address]
[Defendant City, State ZIP]

Re: Order to Show Cause- *[Caption and Docket Number of Order to Show Cause]*

Dear [Defendant Name(s)]:

Please be advised that the New Jersey Supreme Court recently held in *U.S. Bank NA. 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 Foreclosure Act.

By the court's Order to Show Cause dated *[month]* [d~], 2012, and in compliance with the Supreme Court's opinion in *U.S. Bank NA. v. Guillaume,* [Hon. Paul Innes, P.J.Ch., Mercer Vicinage or Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage], gave permission to *[plaintiff or servicer name]* to serve, along with the Order to Show Cause and verified complaint, corrected Notices of Intention to Foreclose on all defendant mortgagors/parties obligated on the debt in pending foreclosure actions filed before February 28, 2012.

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 the following lenders in the following counts of the verified complaint:

Count 1-

The attachments to the verified complaint, which list the foreclosure actions in which the above-named lenders are the plaintiffs, will be made available on the New Jersey Courts web site 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 into the automatic search field on the 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 from Wells Fargo at [number] who can assist you with locating the information about your foreclosure action.

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 plaintiffs court costs and attorneys' 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 *[plaintiff or servicer name]* at *[telephone number]*. 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 within 30 days:

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 the plaintiffs attorney, *[attorney name]*, at *[attorney address]*, and mail a copy of the objection to Judge Innes or Judge McVeigh] at [address].

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 plaintiffs 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 on your objection.

Questions about Filing an Objection

Should you have questions related to the procedure for filing an objection, 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.

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Exhibit B

Exhibit B

Vicinage	Docket No.	Plaintiff	Defendant
Essex	F-056860-10	Central Mortgage Company	Willie B. Whitehurst, et. al.
Hudson	F-006809-11	Central Mortgage Company	Jose Urgiles, et. al.
Ocean	F-006614-11	Central Mortgage Company	Binyomin Herzl, et. al.
Monmouth	F-006607-11	Central Mortgage Company	Binyomin Herzl, et. al.
Ocean	F-006609-11	Central Mortgage Company	Shimon Freilich, et. al.
Camden	F-57105-09	Central Mortgage Company	Rudy N. Villeda, et. al.
Passaic	F-57071-09	Central Mortgage Company	Sergio DeJesus Vasquez, et. al.
Ocean	F-59581-09	Central Mortgage Company	Jechiel Weinfeld, et. al.
Bergen	F-03707-10	Central Mortgage Company	Antonio Garcia, et. al.
Essex	F-30682-10	Central Mortgage Company	Andrixson Suero, et. al.
Hudson	F-034968-10	Central Mortgage Company	Ernest Kotei Kotey, et. al.
Morris	F-044111-10	Central Mortgage Company	Theodore A. Charles, et. al.
Bergen	F-051659-10	Central Mortgage Company	Judine Henry, et. al.
Burlington	F-053259-10	Central Mortgage Company	Rita Hall, et. al.
Passaic	F-24051-10	Central Mortgage Company	Vivian German, et. al.
Burlington	F-26984-10	Central Mortgage Company	Nurcan Ceylan, et. al.
Morris	F-049086-10	Central Mortgage Company	Sean Hale, et. al.
Camden	F-006644-11	Central Mortgage Company	Vicent Du C Ngo, et. al.
Morris	F-007336-11	Central Mortgage Company	Sarah Sayles, et. al.
Monmouth	F-055454-10	Central Mortgage Company	William T. Detweiler, et. al.
Union	F-010315-13	Central Mortgage Company	Michael Montgomery, et. al.
Morris	F-019880-12	Central Mortgage Company	Craig Schwemmer, et. al.
Essex	F-026732-12	Central Mortgage Company	Dona M. Harris, et. al.
Somerset	F-024045-12	Central Mortgage Company	Peter V. Santos, et. al.
Morris	F-023881-12	Central Mortgage Company	Joseph E. Lewis, et. al.
Gloucester	F-019708-12	Central Mortgage Company	Christine Holmes, et. al.
Cumberland	F-026721-12	Central Mortgage Company	Mari-Anne Segich, et. al.
Camden	F-025581-12	Central Mortgage Company	Scott B. Wilston, et. al.
Monmouth	F-027176-12	Central Mortgage Company	Richard Powers, et. al.
Ocean	F-009489-11	Central Mortgage Company	Brian W. Calmon, et. al.
Salem	F-005155-12	Central Mortgage Company	Michael F. Sullivan, et. al.
Atlantic	F-005271-12	Central Mortgage Company	Jeffrey W. Phelps, et. al.
Camden	F-004990-12	Central Mortgage Company	Carol P. Froba, et. al.
Ocean	F-000085-12	Central Mortgage Company	Cecilia Pedroza, et. al.
Gloucester	F-005149-12	Central Mortgage Company	Deborah Klimek, et. al.
Union	F-030513-12	Central Mortgage Company	Kimberly A. Thompson, et. al.
Camden	F-009488-11	Central Mortgage Company	Cheryl Richards, et. al.
Ocean	F-007582-12	Central Mortgage Company	Robert Knapp, et. al.
Passaic	F-015134-12	Central Mortgage Company	Anita Rust, et. al.
Morris	F-019298-12	Central Mortgage Company	Christa M. Granese, et. al.
Cape May	F-005154-12	Central Mortgage Company	Jeffrey S. Thompson, et. al.
Essex	F-36281-07	Central Mortgage Company	William Anderson, et. al.
Somerset	F-4728-08	Central Mortgage Company	Clarice O. Bailey, et. al.
Monmouth	F-47141-08	Mortgage Electronic Registration Systems, Inc., as a nominee for Central Mortgage Company	James J. Lortz, Jr., et. al.

Monmouth	F-28260-08	Central Mortgage Company	William Coffey, et. al.
Essex	F-34795-08	Central Mortgage Company	Miriam Gabriel, et. al.
Ocean	F-39732-08	Central Mortgage Company	Gregory L. Brown, et. al.
Monmouth	F-39486-08	Central Mortgage Company	Kerri A. Ecksel, et. al.
Essex	F-44883-08	Central Mortgage Company	John H. Clomax, et. al
Mercer	F-44906-08	Mortgage Electronic Registration Systems, Inc., as a nominee for Central Mortgage Company	Elisheva Safrati, et. al.
Bergen	F-44885-08	Central Mortgage Company	Barbara R. Spector, et. al.
Ocean	F-045008-08	Central Mortgage Company	Miriam Mendez, et. al.
Bergen	F-47597-08	Central Mortgage Company	Dong Sun Lee, et. al.
Essex	F-000055-09	Central Mortgage Company	Daniel Barli, et. al.
Morris	F-1738-09	Central Mortgage Company	Jose Luis Algarra, et. al.
Burlington	F-03333-10	Central Mortgage Company	Nicole Severino, et. al.
Hudson	F-03325-10	Central Mortgage Company	Stanislaw Marciszewski, et. al.
Hunterdon	F-03334-10	Central Mortgage Company	Guillermo R. Sempertegui, et. al.
Gloucester	F-03285-10	Central Mortgage Company	Lydia Karanja, et. al.
Hudson	F-08534-10	Central Mortgage Company	Ramon Morel, et. al.
Essex	F-14752-10	Central Mortgage Company	Keith Stull, et. al.
Burlington	F-14203-10	Central Mortgage Company	Gene E. Rivera, et. al.
Essex	F-19850-10	Central Mortgage Company	Bernarda Rodriguez, et. al.
Essex	F-20569-10	Central Mortgage Company	Cesar Popkowski, et. al.
Union	F-21825-10	Central Mortgage Company	Sutina Gochuico, et. al.
Union	F-23069-10	Central Mortgage Company	Jose A. Uribe, et. al.
Ocean	F-28253-10	Central Mortgage Company	Gregory T. Genovese, et. al.
Bergen	F-046687-10	Central Mortgage Company	Heriberto D. Calles, et. al.
Union	F-052970-10	Central Mortgage Company	Dontri Welsh, et. al.
Bergen	F-31095-10	Central Mortgage Company	Jose Teixeira, et. al.
Cape May	F-051215-10	Central Mortgage Company	Lisa A. Hinds, et. al.
Morris	F-20243-09	Central Mortgage Company	Anthony A. Polo, Jr., et. al.
Middlesex	F-20491-09	Central Mortgage Company	Nagehan Uzun, et. al.
Hudson	F-13632-09	Central Mortgage Company	Alvaro Pachon, et. al.
Union	F-24020-09	Central Mortgage Company	Theresa Ann Sassone, et. al.
Hudson	F-24029-09	Central Mortgage Company	Martin Pacheco, et. al.
Passaic	F-26739-09	Central Mortgage Company	Eunice Rodriguez, et. al.
Essex	F-28947-09	Central Mortgage Company	Michael McGrath, et. al.
Monmouth	F-40598-09	Central Mortgage Company	Howard C. McLaughlin, et. al.
Essex	F-33316-09	Central Mortgage Company	Samuel Borowski, et. al.
Sussex	F-60680-09	Central Mortgage Company	Michelle White, et. al.
Ocean	F-40226-09	Central Mortgage Company	Michael A. Oldham, et. al.
Warren	F-62511-09	Central Mortgage Company	Lisa S. Turner, et. al.
Essex	F-47376-09	Central Mortgage Company	Viviana Zapata, et. al.
Bergen	F-48155-09	Central Mortgage Company	Jean Marie O'Neill, et. al.
Ocean	F-49399-09	Central Mortgage Company	Henry Van Ginneken, et. al.
Camden	F-48315-09	Central Mortgage Company	Jennifer Russo, et. al.
Middlesex	F-47850-09	Central Mortgage Company	Olegario Perez, et. al.
Essex	F-53812-09	Central Mortgage Company	Toni Ann Branca, et. al.

Hudson	F-58510-09	Central Mortgage Company	James Wooding, et. al.
Hunterdon	F-57469-09	Central Mortgage Company	Lisa Kim, et. al.
Gloucester	F-14543-10	Central Mortgage Company	Angela C. Pasquarella, et. al.
Morris	F-28606-10	Central Mortgage Company	Paul Bartolotta, et. al.
Atlantic	F-63048-09	Central Mortgage Company	Wanda Walker, et. al.
Mercer	F-62886-09	Central Mortgage Company	Stacey L. Keeler, et. al.
Passaic	F-63091-09	Central Mortgage Company	Joanny Hernandez, et. al.
Camden	F-02257-10	Central Mortgage Company	Boanerge Antunez, et. al.
Cape May	F-051224-10	Central Mortgage Company	Joseph Mahoney, et. al.
Burlington	F-049485-10	Central Mortgage Company	Denis A. Zhukov, et. al.
Sussex	F-051199-10	Central Mortgage Company	Thomas A. Jenkins, et. al.
Passaic	F-044839-10	Central Mortgage Company	Reynaldo Zoleta, et. al.
Camden	F-051915-10	Central Mortgage Company	Michael Yussuff, et. al.
Hudson	F-055198-10	Central Mortgage Company	Jose M. Rodriguez, et. al.
Middlesex	F-054233-10	Central Mortgage Company	Vijay Singh, et. al.
Ocean	F-054192-10	Central Mortgage Company	William R. Snover, et. al.
Middlesex	F-055286-10	Central Mortgage Company	Anne Marie Konko, et. al.
Hunterdon	F-057139-10	Central Mortgage Company	Richard F. Burek, et. al.
Middlesex	F-055286-10	Central Mortgage Company	Ann Marie Kondo, et. al.

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Exhibit C

Exhibit C

PHELAN HALLINAN & DIAMOND, PC
400 Fellowship Road
Suite 100
Mt. Laurel, NJ 08054
856-813-5500
Fax: 856-813-5501

Representing Lenders in
Pennsylvania and New Jersey

/attorneyName

February 5, 2013

Mortgagors Name
Mortgagors Address
Via certified mail, return receipt requested and regular mail
Tracking Number:

(NOI – Loan #)

RE: Our File No.: NJID #
Property Address:

NOTICE OF INTENTION TO FORECLOSE

Your lender, (Primary Servicer) located at (Servicers Address) holds the Mortgage, dated March 6, 2006, for $0.00, on your property located at (Property Address). The present principal balance of the mortgage is $0.00.

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.

If this is the first notice that you have received from this office be advised that: You may dispute the validity of the debt or any portion thereof. If you do so in writing within thirty (30) days from receipt of this letter, this firm will obtain and provide you with written verification thereof; otherwise, the debt will be assumed to be valid. Likewise, if requested within thirty (30) days from receipt of this letter, the firm will send you the name and address of the original creditor if different from above.

Please be advised of the following:

1. This letter concerns the mortgage described above.

2. Your mortgage is in serious default because you have not made the required payments. The total amount now required to cure this default, in other words, the amount required to bring your mortgage current to March 1, 2013 is as follows:

Monthly Payments:	
	$0.00
	$0.00
Late Charges:	
Accrued Late Charges	$0.00
Other Charges:	
	$0.00
TOTAL:	$0.00

3. You have the right to cure the default within THIRTY-FIVE (35) days of the date of this letter.

4. To cure this default, you must pay the amount of $0.00 plus any additional monthly payment and late charge which may fall due during the thirty-five (35) day period after the date of this letter.

   The payment must be mailed within thirty-five (35) days of the date of this letter to:

   Phelan Hallinan & Diamond, PC
   Attn: Edie Nash
   400 Fellowship Road, Suite 100
   Mt. Laurel, NJ 08054
   856-813-5500

   The funds submitted for reinstatement must be in the form of certified check or money order only, and must be made payable to:

   ****SERVICERS NAME****

5. If you do not cure the default within thirty-five (35) days of the date of this letter, (SERVICERS NAME) intends to exercise its right to accelerate the mortgage payments, consider the mortgage in default and initiate foreclosure proceedings on your property.

6. You have the right to cure your default, and bring you mortgage payments current, after the date of expiration of this letter, until the entry of the foreclosure judgment; however, you will be responsible for the court costs and attorney fees, calculated consistent with the rules governing the courts of the State of New Jersey, incurred in the foreclosure proceeding.

7. You have the right to transfer your interest in the mortgaged property to a third party, and the third party may cure the default as provided in this letter, if provided for in the mortgage documents.

8. You have the right to an attorney. If you are unable to obtain an attorney or otherwise afford an attorney, you may contact the New Jersey Bar Association or Lawyer Referral Service in the county in which the property is located. Attached to this correspondence is a list of the Legal Services and Legal Aid Offices by county in the State of New Jersey, and a list of the Lawyer Referral Services available in New Jersey.

9. There may also be financial assistance for curing your default available from organizations operated by the state or federal government, or non-profit organizations. The New Jersey State Commissioner of Banking promulgates a list of such organizations and a copy of that list is attached hereto.

10. If you have received a discharge of debt as part of a bankruptcy court proceeding, then the within notice does not constitute, nor is intended to be, a demand for payment, but rather, is offered for informational purposes only.

11. If you do not agree that a default of your mortgage has occurred or you dispute the amount provided for in curing that default, please contact:

Contact Name
Servicers Name
Servicers Address
Servicers Phone #

Very Truly Yours,
Phelan Hallinan & Diamond, PC

_____
/attorneyName/

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.

American Credit Alliance, Inc.
26 South Warren Street
Trenton, NJ 08608
(609) 393-5400

Atlantic Human Resources, Inc.
1 South New York Avenue
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 Avenue
Cedar Knolls, NJ 07927-1812
(973) 267-4324

Fair Housing Council of Northern New Jersey
131 Main Street
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 South Blackhorse Pike
Blackwood, NJ 08012
(856) 227-3683

Jersey Counseling & Housing Development, Inc.
1840 South Broadway
Camden, NJ 08104
(856) 541-1000

Mercer County Hispanic Association
200 E. State Street – 2 nd Floor
Trenton, NJ 08607
(609) 392-2446

Middlesex County Economic Opportunities Corporation
1215 Livingston Avenue
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., Ste. 2080
Newark, NJ 07102
(973) 643-8800

Loan Counseling
(800) NJ-OWNER

Free Tax Preparation Assistance
(888) TAXES-11

NJ Citizen Action
Central Jersey
85 Raritan Ave., Ste. 100
Highland, NJ 08904
(732) 246-4772

NJ Citizen Action
South Jersey
2 Riverside Drive, Ste. 362
Camden, NJ 08103
(856) 966-3091

Ocean Community Economic Action Now, Inc.
22 Hyers Street
Toms River, NJ 08753-0773
(732) 244-2351, ext. 2

Paterson Coalition for Housing, Inc.
262 Main Street, 5th Floor
Paterson, NJ 07505
(973) 684-5998

Paterson Task Force for Community Action, Inc.
155 Ellison Street
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 Street
Bridgeton, NJ 08302
(856) 451-6330

Urban League for Bergen County
106 West Palisade Avenue
Englewood, NJ 07631
(201) 568-4988

Urban League for Essex County
508 Central Avenue
Newark, NJ 07101
(973) 624-9535

Urban League of Union County
288 North Broad Street
Elizabeth, NJ 07208
(908) 351-7200

Homelessness Prevention Program
New Jersey Department of Community Affairs
(866) 889-6270*

Loan Counseling
(800) NJ-OWNER

Free Tax Preparation Assistance
(888) TAXES-11

*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.

ATLANTIC COUNTY LEGAL SERVICES
26 S. PENNSYLVANIA AVE.
SUITE 100, 1ST FLOOR
ATLANTIC CITY, NJ 08401
(609)348-4200

BERGEN COUNTY LEGAL SERVICES
190 MOORE ST. 1ST FL.
HACKENSACK, NJ 07601
(201)487-2166

BURLINGTON COUNTY LEGAL SERVICES
107 HIGH STREET
MOUNT HOLLY, NJ 08060
(609)261-1088

CAMDEN COUNTY LEGAL SERVICES
745 MARKET STREET
CAMDEN, NJ 08102
(856)964-2010
OR 1-800-496-4570

CAPE MAY COUNTY LEGAL SERVICES
1261 ROUTE 9 SOUTH
CAPE MAY COURT HOUSE, NJ 08210
(609)465-3001

CUMBERLAND COUNTY LEGAL SERVICES
CUMBERLAND/SALEM
415 LANDIS AVE. 2ND FL.
VINELAND, NJ 08360
(856) 691-0494
AND
FARMWORKER PROJECT
71 EAST COMMERCE STREET
BRIDGETON, NJ 08302
(856) 455-0017

ESSEX- NEWARK COUNTY LEGAL SERVICES
5 COMMERCE ST., 2ND FLOOR
NEWARK, NJ 07102
(973) 824-3000 OR
(973 624-4500

GLOUCESTER COUNTY LEGAL SERVICES
47 NEWTON AVENUE
WOODBURY, NJ 08096
(856)848-5360

HUDSON COUNTY LEGAL SERVICES
574 SUMMIT AVENUE
JERSEY CITY, NJ 07306
(201)792-6363

HUNTERDON COUNTY LEGAL SERVICES
82 PARK AVENUE
FLEMINGTON, NJ 08822
(908)782-7979

MERCER COUNTY LEGAL SERVICES
198 WEST STATE STREET
TRENTON, NJ 08608
(609) 695-6249

MIDDLESEX COUNTY LEGAL SERVICES
NEW BRUNSWICK OFFICE
317 GEORGE ST, SUITE 201
NEW BRUNSWICK, NJ 08901
(732)249-7600 OR

PERTH AMBOY OFFICE
313 STATE STREET, SUITE 308
PERTH AMBOY, NJ 08861
(732) 324-1613

MONMOUTH COUNTY LEGAL SERVICES
FREEHOLD OFFICE
303 WEST MAIN ST., 3RD FLOOR
FREEHOLD, NJ 07728
(732)866-0020 OR

LONG BRANCH OFFICE
279 BROADWAY, SUITE 300
LONG BRANCH, NJ 07740
(732) 222-3338

MORRIS COUNTY LEGAL SERVICES
30 SCHUYLER PLACE
CN-900
MORRISTOWN, NJ 07963
(973)285-6911

OCEAN COUNTY LEGAL SERVICES
TOMS RIVER OFFICE
599 ROUTE 37 WEST
TOMS RIVER, NJ 08753
(732)341-2727 OR

LAKEWOOD OFFICE
LAKEWOOD MEDICAL PLAZA
681 RIVER AVENUE, UNIT 2C
LAKEWOOD, NJ 08701
(732) 730-3054

PASSAIC COUNTY LEGAL SERVICES
152 MARKET STREET
PATERSON, NJ 07505
(973) 523-2900

SALEM COUNTY LEGAL SERVICES
SEE CUMBERLAND COUNTY L

SOMERSET COUNTY LEGAL SERVICES
34 W MAIN ST., STE 301
SOMERVILLE, NJ 08876
(908)231-0840

SUSSEX COUNTY LEGAL SERVICES
18 CHURCH ST., SUITE 120
NEWTON, NJ 07860
(973)383-7400

UNION COUNTY LEGAL SERVICES
60 PRINCE STREET
ELIZABETH, NJ 07208
(908)354-4340

WARREN COUNTY LEGAL SERVICES
91 FRONT STREET
P.O. BOX 65
BELVIDERE, NJ 07823
(908)475-2010

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ATLANTIC COUNTY LAWYER REFERRAL
ATLANTIC COUNTY
COURT HOUSE
1201 BACHARACH BLVD.
ATLANTIC CITY, NJ 08401
(609)345-3444

BERGEN COUNTY LAWYER REFERRAL
15 BERGEN STREET
HACKENSACK, NJ 07601
(201)488-0044

BURLINGTON COUNTY LAWYER REFERRAL
45 GRANT STREET
MOUNT HOLLY, NJ 08060
(609)261-4862

CAMDEN COUNTY LAWYER REFERRAL
1040 N. KINGS HWY., SUITE 201
CHERRY HILL, NJ 08034
(856) 482-0618

CAPE MAY COUNTY LAWYER REFERRAL
RT. 9, MAIN STREET
P.O. BOX 425
CAPE MAY COURTHOUSE, NJ 08210
(609) 961-0172

CUMBERLAND COUNTY LAWYER REFERRAL
P.O. BOX 2374
VINELAND,NJ 08362
(856) 696-5550

ESSEX COUNTY LAWYER REFERRAL
470 DR. MARTIN LUTHER KING JR. BLVD.
RM B01
NEWARK, NJ 07102
(973) 622-6204

GLOUCESTER COUNTY LAWYER REFERRAL
JUSTICE COMPLEX
P.O. BOX 338
WOODBURY, NJ 08096
(856)848-4589

HUDSON COUNTY LAWYER REFERRAL
583 NEWARK AVENUE
JERSEY CITY, NJ 07306
(201)798-2727

HUNTERDON COUNTY LAWYER REFERRAL
P.O. BOX 573
ANNANDALE, NJ 08801
(908)735-2611

MERCER COUNTY LAWYER REFERRAL
1245 WHITEHORSE-MERCERVILLE ROAD
SUITE 420
MERCERVILLE, NJ 08619
(609)585-6200

MIDDLESEX COUNTY LAWYER REFERRAL
87 BAYARD STREET
NEW BRUNSWICK, NJ 08901
(732)828-0053

MONMOUTH COUNTY LAWYER REFERRAL
COURTHOUSE
FREEHOLD, NJ 07728
(732)431-5544

MORRIS/SUSSEX/ COUNTIES LAWYER REFERRAL
28 SCHUYLER PLACE
MORRISTOWN, NJ 07960
(973)267-5882

OCEAN COUNTY LAWYER REFERRAL
COURTHOUSE, P.O. BOX 381
TOMS RIVER, NJ 08753
(732)240-3666

PASSAIC COUNTY LAWYER REFERRAL
COURTHOUSE
401 GRAND ST., 3RD FL
PATERSON, NJ 07505
(973)278-9223

SALEM COUNTY LAWYER REFERRAL
(856)935-5629

SOMERSET COUNTY LAWYER REFERRAL
20 NORTH BRIDGE ST.
PO BOX 1095
SOMERVILLE, NJ 08876
(908)685-2323

UNION COUNTY LAWYER REFERRAL
COURTHOUSE, 1ST FLOOR
ELIZABETH, NJ 07207
(908)353-4715
MON - THURS 10A.M.-1P.M.

WARREN COUNTY LAWYER REFERRAL
413 SECOND STREET
BELVIDERE, NJ 07823
(908) 387-1835

03/2011

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Exhibit D

Exhibit D

LEGAL NOTICE

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

Why Central Mortgage Company 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: Central Mortgage Company has filed a lawsuit with the Court and has requested permission to issue corrected Notices of Intent in certain foreclosure actions. The New Jersey court has given Central Mortgage Company 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 Central Mortgage Company 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 Central Mortgage Company 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 plaintiffs 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 on or before [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 Central Mortgage Company, Vladimir Palma, Esq. at Phelan Hallinan & Diamond, 400 Fellowship Road, Suite 100, Mount Laurel, NJ 08054.

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 Plaintiffs 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.

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PHELAN HALLINAN & DIAMOND, PC
By: Vladimir Palma, Esquire.
400 Fellowship Road, Suite 100
Mount Laurel, NJ 08054
(856) 813-5500
Attorneys for Plaintiff

IN RE NOTICES OF INTENTION TO FORECLOSE SERVED BY CENTRAL MORTGAGE	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION DOCKET NO: **VERIFICATION IN SUPPORT OF ORDER TO SHOW CAUSE BY BEN A. COLEMAN**

I, Ben A. Coleman, of full age, hereby certifies as follows:

1. I am Vice President of Central Mortgage Company, hereinafter referred to as "Central Mortgage." In this capacity, I am the person who assist with the servicing of delinquent mortgage accounts. As such, I have the authority to make this verification on behalf of Central Mortgage. I am the officer in the best position to provide this verification and explain Central Mortgage's policies and procedures as they relate to foreclosures and Notices of Intention to Foreclose. I am fully familiar with the facts set forth in this Certification and make this Certification in support of Central Mortgage's Verified Complaint and Order to Show Cause pursuant to the Supreme Court's April 4, 2012 Order in furtherance of the Guillaume decision.

2. I have extensive knowledge of the policies, procedures and processes that Central Mortgage follows as a loan becomes delinquent, referred to foreclosure, and ultimately liquidated. As such, I submit this verification based upon personal knowledge as well as knowledge gained through a personal review of the business records where necessary.

3. Central Mortgage services residential mortgage loans throughout the county, including in the State of New Jersey.

4. Once a loan goes into default, multiple attempts are made to contact the borrower to see if any arrangement short of foreclosure can be reached, including a repayment plan, loan modification, forbearance agreement, deed in lieu of foreclosure or short sale. If the borrower opts not to communicate with us or does not otherwise resolve the default through reinstatement of one of the aforementioned plans, Central Mortgage sends out a Notice of Intention to Foreclose (hereinafter "NOI") as required by the Fair Foreclosure Act, giving the borrower at least thirty days to cure the default. If the default is not cured, or other arrangements made to resolve the delinquency, the loan is referred to local foreclosure counsel to initiate the foreclosure after the NOI expires.

5. In light of the New Jersey Supreme Court's opinion in U.S. Bank National Association v. Guillaume, 209 N.J. 449 (2012), Central Mortgage revised its form NOI to insure it strictly complies with the Fair Foreclosure Act.

6. Attached as Exhibit A to the verified complaint is a true and accurate copy of the form Notice of Intention to Foreclose that Central Mortgage currently utilizes.

7. Attached as Exhibit B to the verified complaint is a spreadsheet of the pending uncontested pre-judgment residential mortgage foreclosure pending in the State of New Jersey that Central Mortgage requests permission to send new NOIs.

8. I have read the contents of the Verified Complaint and verify the statements contained therein are true to the best of my knowledge and personal information.

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.

Ben A. Coleman, Vice President

Dated: March 25, 2013

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PHELAN HALLINAN & DIAMOND, PC
By: Vladimir Palma, Esquire.
400 Fellowship Road, Suite 100
Mount Laurel, NJ 08054
(856) 813-5500
Attorneys for Plaintiff

IN RE NOTICES OF INTENTION TO FORECLOSE SERVED BY CENTRAL MORTGAGE	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION DOCKET NO: **CERTIFICATION OF SERVICE**

I, Vladimir Palma, Esquire, do hereby certify as follows:

1. I am an attorney with the law firm of Phelan, Hallinan & Diamond, P.C. I am the attorney responsible for the above captioned matter.
2. On, July 3, 2013, our firm caused to be served the within Order to Show Cause, Verified Complaint, Certification of Ben A. Coleman, Vice President of Central Mortgage Company, Certification of Vladimir Palma, Esquire, and Letter Brief to the following persons:

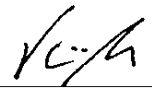
   Clerk of the Superior Court, Foreclosure Processing Services
   Attention: Objection to Notice of Intention to Foreclose
   Hughes Justice Complex
   25 Market Street
   PO Box 971
   Trenton, NJ 08625-0971

   Honorable Margaret Mary McVeigh, P.J.Ch.
   Passaic County Courthouse
   71 Hamilton Street, Chambers 100
   Paterson, NJ 07505

Honorable Paul Innes, P.J.Ch.
Mercer County Civil Courthouse
175 South Broad Street
Trenton, NJ 08650

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.

Phelan Hallinan & Diamond, P.C.



Vladimir Palma, Esquire