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August 25, 2011

By Overnight Delivery and Electronic Filing via JEFIS

Hon. Walter R. Barisonek, J.S.C.
Union County Courthouse
2 Broad Street, Courtroom 101
Elizabeth, New Jersey 07207

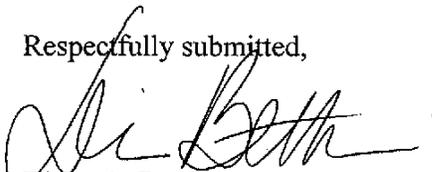
**Re: *In the Matter of Residential Mortgage Foreclosure Pleading
Docket No. F-238-11: Administrative Order No. 01-2010***

Dear Judge Barisonek:

On behalf of Sovereign Bank, I enclose the Supplemental Certification of Simone A. Marino (the "Certification").

We look forward to continuing to work with you regarding Sovereign Bank's submissions. Please contact me if you have any questions or concerns regarding the enclosed materials.

Respectfully submitted,



Diane A. Bettino

Enclosure

cc: Acting Superior Court Clerk
Travis Nelson, Esquire (via inter-office pouch)

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Formed in the State of Delaware
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**IN THE MATTER OF RESIDENTIAL
MORTGAGE FORECLOSURE PLEADING
AND DOCUMENT IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY

ADMINISTRATIVE ORDER: 01-2010

DOCKET NO.: F-00238-11

**CERTIFICATION OF SIMONE A. MARINO IN SUPPORT OF SOVEREIGN BANK'S
RESPONSE TO THE ADMINISTRATIVE ORDER DATED APRIL 25, 2011**

1. I am currently the Senior Vice President in charge of Sovereign Bank's Consumer Loan Default Department. I submit this Certification in response to supplemental questions posed by the Court to Sovereign Bank's counsel, Diane Bettino, Esq., and Travis Nelson, Esq., of Reed Smith LLP, in a conference with the Court on July 13, 2011. This Certification is in supplement to and does not supersede the prior certifications submitted by Sovereign Bank (also referred to herein as the "Bank").
2. The Consumer Loan Default Department is responsible for the processing of late stage residential Real Estate Secured accounts and late stage default processing of Consumer unsecured accounts.

The current structure of the Consumer Loan Default Department includes:

- Single Point of Contact Team: 25 Staff members assigned to accounts in Loss Mitigation and/or foreclosure;

- Foreclosure / Bankruptcy: 27 Staff members assigned duties relative to the maintenance and processing of accounts in Bankruptcy or in the process of foreclosure;
- Operations and Control: 17 Staff members assigned duties in support of the various default functions; and
- Consumer Loan Recovery: 11 Staff members assigned late stage default duties in support of the Consumer secured and unsecured loan portfolio

1.a. STATE WHAT PROCESSES AND PROCEDURES YOU HAVE TO ENSURE THAT THE CERTIFICATIONS/AFFIDAVITS SUBMITTED ARE BASED UPON THAT PERSON'S PERSONAL KNOWLEDGE OR THAT PERSON'S REVIEW OF BUSINESS RECORDS WHICH RECORDS WOULD BE ADMISSIBLE IN EVIDENCE IN A NEW JERSEY COURT. DESCRIBE THE PROCESSES AND PROCEDURES IN DETAIL AND ATTACH A COPY OF ANY DOCUMENTS THAT ESTABLISH THE PROCESSES AND PROCEDURES.

3. Sovereign's Foreclosure Quality Control ("FQC") Team reports independently to the Quality Assurance Team which is part of the Mortgage Operations Control Group and not part of the Consumer Default Department. The unit reviews original legal documents, such as certifications and affidavits, for accuracy based on a detailed checklist. The FQC Team is comprised of staff members with knowledge of the foreclosure processes and other banking professionals from within Sovereign Bank. FQC is responsible for the quality control of all original documents that are prepared for execution by Bank personnel. The FQC Team, as part of the overall QC function, reviews the submitted Bank employee signature to ensure that the proper level of management and/or personal knowledge of the account is in support of the requirements of the document. Original, signed legal documents are imaged to the Bank's document imaging system and sent directly to foreclosure counsel by the FQC team. The Foreclosure Representative remains the point of contact for the foreclosure counsel.

4. Prior to filing the complaint with the court, Sovereign Bank has adjusted its procedures for New Jersey to include the verification of the accuracy of the following information in the complaint by reviewing business records maintained in the regular course of the Bank's business: (a) the name of the obligor, mortgagor, obligee and mortgagee; (b) the amount of the debt secured by the mortgage; (c)

the dates of execution of the debt instrument and the mortgage; (d) the recording date, county recording office, and book and page recording reference of the mortgage securing the debt; (e) whether the mortgage is a purchase money mortgage; (f) a description of the pertinent terms or conditions of the debt instrument or mortgage and the facts establishing the default; (g) the default date; (h) if applicable, the acceleration of the debt's maturity date; (i) if applicable, any prepayment penalty; (j) if the plaintiff is not the original mortgagee or original nominee mortgagee, the names of the original mortgagee and a recital of all assignments in the chain of title; (k) the names of all parties in interest whose interest is subordinate or affected by the mortgage foreclosure action and, for each party, a description of the nature of the interest, with sufficient particularity to give the court and parties notice of the transaction or occurrence on which the interest is based including recording date of the lien, encumbrance, or instrument creating the interest; (l) a description of the subject property by street address, block and lot as shown on the municipal tax map and a metes and bounds description stating whether the recorded mortgage instrument includes that description; and (m) if applicable, whether the plaintiff has complied with the pre-filing notice requirements of the Fair Foreclosure Act or other notices required by law. Once all of the foregoing information has been confirmed, the Foreclosure Representative confirms to the foreclosure attorney that the information has been so verified. The Bank is in the process of amending its Policies and Procedures to reflect this practice under the revised Rules in New Jersey.

5. The Foreclosure Representative will be responsible for signing the Affidavit of Amount Due, based on personal review of the Bank's business records.

6. The Foreclosure Representative will be responsible for personally reviewing the following documents: (a) the Affidavit of Amount Due; (b) the original or true copy of the note; (c) the mortgage; and (d) recorded assignments, if any. After the Foreclosure Representative has reviewed these documents, if an error is found, the Foreclosure Representative must communicate the results of this review to the foreclosure counsel and request corrected documents.

7. This Foreclosure Representative will continue to serve as the point of contact for the foreclosure counsel, should such foreclosure counsel have any questions during the foreclosure process.

8. All affidavits signed and notarized by Bank personnel are signed and notarized in Reading, Pennsylvania in accordance with the laws of the Commonwealth of Pennsylvania concerning notarization of documents, 57 PA. STAT. ANN. § 158.1 (West 2011), and in accordance with Sovereign Bank's policies and procedures on affidavits.

1.e. STATE IN DETAIL ANY TRAINING PROGRAMS YOU HAVE IN PLACE FOR INDIVIDUALS COMPLETING CERTIFICATIONS/AFFIDAVITS TO ENSURE THAT THEIR KNOWLEDGE OF THE CONTENTS OF THE AFFIDAVITS IS BASED UPON PERSONAL KNOWLEDGE OR BUSINESS RECORDS WHICH WOULD BE ADMISSIBLE IN A NEW JERSEY COURT.

9. In November 2010, Sovereign Bank conducted a training program with employees that reviewed the procedure for the proper execution of legal documents, the importance of the contents of the legal documents, and the need for accuracy of the information contained in the legal documents. At the end of the review, each employee signed an acknowledgement that they have read and understand the legal document signing procedures. This review was conducted to cover proper signing policy and procedures.

10. In February 2011, a one week training program was held for one hour each day to focus on the content of the legal documents, including but not limited to, Affidavits. During that training, each participant was tested by completing a blank affidavit based on actual account data. All test affidavits were retained by the foreclosure supervisor. Going forward, all new hires will be tested in the same manner. A supervisor in the foreclosure area must review and approve the new hire's test results prior to allowing them to perform any functions independently.

1.f. DESCRIBE IN DETAIL THE PROCESS YOU HAVE IN PLACE TO ENSURE THAT FORECLOSURE COUNSEL IS PROVIDED WITH CURRENT ACCURATE INFORMATION TO SUPPORT THE PREPARATION OF ANY DOCUMENTATION COUNSEL WILL BE SUBMITTING TO THE COURT PURSUANT TO COURT RULE

11. Sovereign Bank maintains an extensive process for ensuring that timely and accurate information is furnished to its New Jersey foreclosure counsel. Sovereign Bank is currently in the process of analyzing and potentially implementing additional automated systems that will enhance overall communication with foreclosure attorneys. Among these additional automated systems that the Bank is

in process of implementing is Core Logic's Vendor Scape Case Management System, which interacts directly with foreclosure attorneys. The target for completion of the implementation is by the 3rd quarter of 2011.

12. All original mortgage-related documents for loans serviced by Sovereign Bank are stored according to the requirements of the specific investor. All custodial documents for Sovereign portfolio loans are stored in the Bank's document vault in Tuckerton, Pennsylvania. The original notes for FNMA and FHLMC are delivered as per their instruction while the remaining custodial documents are stored in the Tuckerton facility.

1.h. STATE WHETHER YOU UTILIZED OR INTEND ON UTILIZING ANY INDEPENDENT AUDITOR TO REVIEW THE PROCESS AND PROCEDURES MENTIONED IN THE ABOVE ANSWERS TO ENSURE THAT YOU ARE IN COMPLIANCE WITH THE MANDATES OF COURT RULE 4:64-1 ET. SEQ.

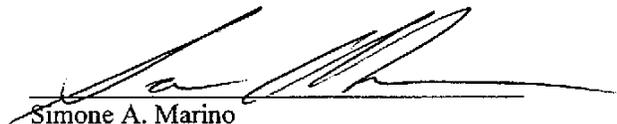
13. Sovereign Bank has engaged an independent consultant to conduct a review of its foreclosure processes in accordance with the Consent Order issued by Sovereign Bank's primary federal regulator, the Office of Thrift Supervision ("OTS"). The independent consultant's assignment is scheduled to conclude prior to end of the 3rd quarter, 2011. For a copy of the Consent Order, see http://www.ots.treas.gov/_files/enforcement/97662.pdf (last visited July 28, 2011). The results of the independent review conducted pursuant to the Consent Order will be provided to the appropriate federal bank regulator as part of the agency's confidential supervisory record. The appropriate federal bank regulatory agency, pursuant to its comprehensive visitorial powers, will also exercise ongoing examination authority in order to ensure compliance with the Consent Order. The appropriate federal bank regulatory agency has expansive authority to order legal and equitable relief against Sovereign Bank for failure to comply with the provisions of the Consent Order.

ADDITIONAL ISSUES NOT INCLUDED IN THE APRIL 25 ORDER.

14. Sovereign Bank does not accept partial payments on mortgage loans that it services unless a workout agreement is in place.

15. Sovereign Bank considers the availability of loan modifications throughout the default process. The Bank strictly follows the guidelines of the investors relative to loss mitigation requirements. Upon receipt of requests from borrowers for loan modifications, the Bank implements loss mitigation procedures in an attempt to cure the current loan default or to achieve a modification. The Bank is in contact with the foreclosure counsel concerning the status of the loss mitigation process for those loans that are in foreclosure status. If a modification is achieved, foreclosure counsel is notified. In addition, foreclosure counsel are often involved in the loss mitigation process as part of the foreclosure process and therefore, are aware of the status of the loss mitigation efforts.

Dated: August 24, 2011



Simone A. Marino
Senior Vice President
Mortgage Default Department