FILED Jan 19, 2011

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SUPERIOR COURT OF NJ
MERCER COUNTY
CIVIL DIVISION

KROVATIN KLINGEMAN LLC
744 Broad Street, Suite 1903
Newark, New Jersey 07102
(973) 424-9777

PAUL, WEISS, RIFKIND, WHARTON & GARRISON, LLP
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Attorneys for Citibank, N.A. and Citi Residential Lending, Inc.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
GENERAL EQUITY PART
MERCER COUNTY

IN THE MATTER OF RESIDENTIAL MORTGAGE FORECLOSURE PLEADING AND DOCUMENT IRREGULARITIES

DOCKET NO. F-059553-10

Civil Action

NOTICE OF MOTION
FOR ADMISSION *PRO HAC VICE*

TO: Edward J. Dauber, Esq.
Greenberg, Dauber, Epstein & Tucker, PC
One Gateway Center, Suite 600
Newark, New Jersey 07102

DEAR SIR:

PLEASE TAKE NOTICE that on February 4, 2010, Krovatin Klingeman LLC, attorneys for Citibank, N.A. and Citi Residential Lending, Inc. will move before the Superior Court of New Jersey, Chancery Division, General Equity Part, Mercer County, at the Mercer County Courthouse, Trenton, New Jersey, pursuant to R.1:21-2(b), for an Order admitting Liza M. Velazquez, Esq. as counsel *pro hac vice* in the above-captioned matter.

PLEASE TAKE FURTHER NOTICE that Citibank, N.A. and Citi Residential Lending, Inc will rely upon the enclosed Certification of Liza M. Velazquez, Esq. in support of this motion.

PLEASE TAKE FURTHER NOTICE that Defendant waives oral argument if no objection is posed; however, if any objection is posed, oral argument is requested.

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Attorneys for Citibank, N.A.
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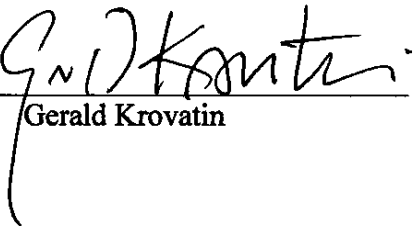
By: 
Gerald Krovatin

Dated: January 18 2011

CERTIFICATION OF SERVICE

I hereby certify that I caused the original and two copies of the within Notice of Motion and supporting papers to be sent by United Parcel Service to the Clerk of the Court, Chancery Division, Mercer County, Civil Case Management Office, 175 South Broad Street, Trenton, New Jersey 08650-0068.

I further certify that I caused a copy of the within documents to be sent by United Parcel Service to the following:

Edward J. Dauber, Esq.
Greenbaum, Dauber, Epstein & Tucker, PC
One Gateway Center, Suite 600
Newark, New Jersey 071012

Gerald Krovatin

Dated: January 18, 2011

KROVATIN KLINGEMAN LLC
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Newark, New Jersey 07102
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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
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IN THE MATTER OF RESIDENTIAL MORTGAGE FORECLOSURE PLEADING AND DOCUMENT IRREGULARITIES	:	DOCKET NO. F-059553-10 Civil Action
	:	**CERTIFICATION OF LIZA M. VELAZQUEZ FOR ADMISSION *PRO HAC VICE***

LIZA M. VELAZQUEZ, of full age, hereby certifies as follows:

1. I am an attorney at law of the State of New York and a member of the firm of Paul, Weiss, Rifkind, Wharton & Garrison, LLP.

2. I submit this certification in support of my application for admission *pro hac vice* for purpose of serving as counsel to Citibank, N.A. and Citi Residential Lending, Inc. in the above-captioned action.

3. I graduated from Harvard Law School and am a member of good standing of the Bar of New York, which is the state where I principally practice law. I was admitted to the State Bar in New York in 1997.

4. I am associated in this matter with Gerald Krovatin, Esq. of the law firm of Krovatin Klingeman LLC, counsel of record qualified to practice pursuant to R.1:21.

5. I am an attorney specializing in litigation.

6. Citibank, N.A. and Citi Residential Lending, Inc. have been clients of my law firm for an extended period of time and they have requested that my firm and I act as counsel for them in this matter.

7. There are no disciplinary proceedings pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

8. I agree to observe the dates fixed for scheduling conferences, motions, briefs, pretrial conferences, trials, or other proceedings and submit to the jurisdiction of this Court for the purpose of sanctions, discipline, or such other actions as the Court may deem proper. I further consent to the appointment of the clerk of the Supreme Court as my agent for service of process.

9. I agree upon admission *pro hac vice* to comply with R.1:21(b) and R.1:28-2 pertaining to payment of the annual fee payable to the New Jersey Lawyer's Fund for Client Protection.

10. I agree to notify the Court immediately of any matter affecting my standing at any other Court.

11. For the foregoing reasons, I respectfully request that this Court admit me *pro hac vice* in the within matter.

I hereby certify that the foregoing statements made by me are true. I am aware if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Liza M. Velazquez

Dated: January 11, 2011

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744 Broad Street, Suite 1903
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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
GENERAL EQUITY PART
MERCER COUNTY

IN THE MATTER OF RESIDENTIAL MORTGAGE FORECLOSURE PLEADING AND DOCUMENT IRREGULARITIES

DOCKET NO. F-059553-10

Civil Action

ORDER ADMITTING LIZA M. VELAZQUEZ *PRO HAC VICE*

THIS MATTER being opened to the Court upon application of Krovatin Klingeman LLC, attorneys for Citibank, N.A. and Citi Residential Lending, Inc., to permit Liza M. Velazquez, Esq., an attorney admitted to the practice of law in the State of New York, to participate with other counsel for Citibank, N.A. and Citi Residential Lending, Inc. in all phases of the litigation, and it appearing that Liza M. Velazquez, Esq. is a licensed attorney in good standing in the State of New York, and it appearing that Paul, Weiss, Rifkind, Wharton & Garrison, LLP, regular outside counsel for Citibank, N.A. and Citi Residential Lending, Inc. has developed a familiarity with the client and the client has requested that Paul, Weiss, Rifkind, Wharton & Garrison, LLP and its attorneys serve as counsel in this matter,

IT IS on this ____ day of February 2011,

ORDERED that Liza M. Velazquez be and she hereby is admitted *pro hac vice* and is authorized to appear and participate with other counsel for Citibank, N.A. and Citi Residential Lending, Inc. in all phases of the litigation, subject to the following conditions:

1. Liza M. Velazquez, Esq. shall abide by the New Jersey Court Rules including all disciplinary rules, R.1:20-1 and R.1:28-2;

2. Liza M. Velazquez, Esq. shall, and hereby does, consent to the appointment of the Clerk of the Supreme Court as her agent upon whom service of process may be made for all actions against her firm that may arise out of her participation in this matter;

3. Liza M. Velazquez, Esq. shall notify the Court immediately of any matter affecting her standing at the bar of any other court;

4. Liza M. Velazquez, Esq. shall have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice in this State, who shall be held responsible for them, the conduct of the litigation, and the admitted attorney herein;

5. Liza M. Velazquez, Esq. must, within 10 days, pay the fees required by R. 1:20-1(b) and R.1:28-2 and submit affidavits of compliance;

6. Liza M. Velazquez, Esq., having paid the fees required by R. 1:20-1(b) and R. 1:28-2 for the year 2011, shall pay those fees for such subsequent years as her admission *pro hac vice* may remain effective and submit affidavits of compliance.

7. Liza M. Velazquez, Esq. acknowledges that automatic termination of *pro hac vice* admission will occur for failure to make the required annual payment to the New Jersey Lawyer's Fund for Client Protection. Proof of such payment, after filing proof of the initial payment, shall be made no later than February 15 of each year;

8. Liza M. Velazquez, Esq. acknowledges that noncompliance with any of these requirements shall constitute grounds for revocation of permission to appear; and,

9. A copy of this Order shall be served upon all counsel appearing in this matter within seven (7) days of its entry.

_____

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