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Attorneys for Plaintiff

IN RE NOTICES OF INTENTION TO
FORECLOSE SENT BY VALLEY
NATIONAL BANK

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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY

CIVIL ACTION

E-002863-13
VERIFIED COMPLAINT

Plaintiff, Valley National Bank (the "Plaintiff," "Lender" "Servicer" or "VNB" as applicable), by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing, pursuant to the April 4, 2012, Order of the New Jersey Supreme Court (the "April 4th Order"), that was entered following the Court's decision in U.S. Bank, N.A. v. Guillaume, 209 N.J. 449 (2012), ("Guillaume"), respectfully states as follows:

1. VNB services mortgage loans encumbering residential properties (the "Mortgaged Properties") in New Jersey.

2. When VNB is the Servicer of a loan (a "Loan"), it undertakes payment collection/application, loss mitigation (modifications, short sales, deeds in lieu of foreclosure or other consensual resolutions) and collection efforts, including institution and prosecution, via local counsel, of foreclosure actions (the "Foreclosures") pending in the Superior Court of New Jersey. As the entity collecting and processing payments for the Lender, the Servicer has the information regarding to the payments received and applied, escrow deposits/disbursements, amounts due,

whether a loan is in default and, if so, the constituent components of such delinquency. The information (the "Loan Records") is maintained in the Servicer's systems in the regular course of their business. The Lender is not likely to have possession of the relevant servicing information, as was recognized by the Supreme Court in June 2011 revisions to Court Rules 4:64-1 and 4:64-2. The Servicer makes this application to the Court pursuant to their authority as the Servicing Agent of the Lender/Plaintiff in pending Foreclosures.

3. Among the duties of a Servicer, and specifically the Servicer herein, when a residential mortgage encumbering a New Jersey property becomes in default is to prepare and serve the Notice of Intent to Foreclose (the "NOI") as required by the Fair Foreclosure Act of 1995 (the "FFA"), N.J.S.A. 2A:50-56, et seq. The NOI is prepared based on the Servicer's Loan Records and includes, among other information, the amount due or other performance that is required to cure the delinquency/default and reinstate the Loan, and the date by which such cure and reinstatement must occur.

4. The Plaintiff/Lender and their Servicer herein have identified a number of Foreclosures wherein the NOI was substantially, but not strictly, compliant with the Fair Foreclosure Act. Attached hereto is a list (the "Remediated NOI List") of Foreclosures in which the Plaintiff/Lender and their Servicer respectfully request remediation in the form of leave to serve remediated NOIs (the "Remediated NOIs") upon the residential mortgage debtor(s) who are defendants in the Foreclosures. See Exhibit "A," Remediated NOI List.

5. On February 27, 2012, the New Jersey Supreme Court published their Opinion in Guillaume holding that a Court adjudicating a foreclosure action in which the NOI was not strictly compliant with the notice provisions of the Fair Foreclosure Act has the discretion to determine the appropriate remedy, including allowing remediation of a noncompliant NOI by granting leave to serve a Remediated NOI.

6. Following its decision in Guillaume, the New Jersey Supreme Court entered the April 4th Order which authorizes the Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage, and the Hon. Paul Innes, P.J.Ch., Mercer Vicinage, to entertain summary actions by Orders to Show Cause such as this (the "OTSC") as to why Plaintiffs in any uncontested residential mortgage foreclosure actions filed on or before April 27, 2012 and in which Final Judgment has not been entered, who caused NOIs to be served that are not strictly compliant with the NOI provisions of the Fair Foreclosure Act, should not be allowed to serve Remediated NOIs on defendants/mortgagors and/or parties obligated on the debt (the "Foreclosure Defendants") as provided for by the Loan documents and defined by the Fair Foreclosure Act..

7. The April 4th Order further provides that any Remediated NOI must be accompanied by a letter to the Foreclosure Defendants (the "Explanatory Letter") containing the reasons why the Remediated NOI is being served, the procedure to follow in the event a Foreclosure Defendant wishes to object to the relief requested via this OTSC or a particular Remediated NOI, the name of a person to contact with any questions, and that the receipt of the Remediated NOI allows Foreclosure Defendants 30 days in which to object or to cure the default.

8. The Servicer herein reviewed their pending Foreclosures with local counsel to identify those Foreclosures in which a Remediated NOI is appropriate because the Lender and/or the Lender's address were not included in the previously served NOIs, or such NOIs were otherwise not strictly compliant with the Fair Foreclosure Act as recently interpreted. The Remediated NOI List describes the Foreclosures and indicates whether prosecution thereof is enjoined by operation of the Automatic Stay in any bankruptcy proceedings and other available information.

9. Specifically, the Remediated NOI List includes the following:

- a. Foreclosures that were initiated on or before February 27, 2012 and which VNB is servicing the Loans,
- b. in which Final Judgment has not been entered, and
- c. regarding which leave is sought to serve a Remediated NOI.

10. The Remediated NOI List contains information required by the Court, i.e., (1) the abbreviated Caption of the Foreclosure, (2) the Foreclosure Docket Number, (3) the Vicinage, and (4) the nature of deviation from strict compliance, as well as other available and potentially relevant information. Although VNB is not the Plaintiff in all of the Foreclosures, it is the Servicer of each subject Loan, maintains the Loan Records for each such Loan, and is responsible for mailing the Remediated NOI pursuant to the relevant contracts with the Plaintiff/Lender.

11. Pursuant to the April 4th Order, attached as Exhibit "B" to the Verified Complaint is the proposed form the Explanatory Letter (the "Explanatory Letter Template) that VNB intends

to send to each Foreclosure Defendant. As instructed by the Supreme Court in the April 4th Order, the proposed form of Explanatory Letter contains the following explanations:

- a. the reason why the Remediated NOI is being served,
- b. the procedure to follow in the event a Foreclosure Defendant wishes to object to the relief requested via this OTSC and/or a particular Remediated NOI;
- c. the individual(s) a Foreclosure Defendant should contact with any questions;
- d. that the Foreclosure Defendant has the right to object to the Remediated NOI as well as the right to cure the default within 30 days of the date of the Remediated NOI;
- e. that the Remediated NOIs will exclude attorneys' fees and costs incurred in the pending Foreclosures from the calculation of the amount due to cure the default.

12. Attached as Exhibit "C" to the Verified Complaint is the proposed form of Remediated NOI (the "Remediated NOI Template") that VNB will send to each of the Foreclosure Defendants identified on the Remediated NOI List. Each Foreclosure Defendant will be served with a Remediated NOI in the form of the Remediated NOI Template that includes, *inter alia*, the information specific to their mortgage Loan derived from the Loan Records, their default, the Lender/Holder's name and address and the amount due or other performance required to reinstate, as provided for in the Order To Show Cause, without attorneys' fees or costs incurred in the pending foreclosures.

13. To promote economy, avoid waste, and to afford Foreclosure Defendants the earliest opportunity to cure their defaults by providing the amount due before more monthly payments and other charges accrue, VNB will send to each of the Foreclosure Defendants identified on the Remediated NOI List a complete package (the "OTSC Package") consisting of this Verified Complaint, a conformed copy of this OTSC if/when entered, supporting Certification and Letter Memorandum, Explanatory Letter in the form of the Explanatory Letter Template and Remediated NOI in the form of the Remediated NOI Template and containing substantive information pertaining to the subject Loan in each Foreclosure. See Exhibit "D," sample OTSC Package.

14. Service of the Verified Complaint, OTSC, Explanatory Letter and Remediated NOI as a complete OTSC Package may be inconsistent with certain provisions contained in the Explanatory Letter, created by the Court before conception of the "single mailing" procedure (the "Single Mailing Procedure") authorized by the Court in In re Notices of Intention to Foreclose Served by MidFirst Bank, Docket No. F-12399-12. To the extent that such an inconsistency exists in this regard only, VNB requests that the provisions of the pleadings herein shall be deemed to amend and supersede the Explanatory Letter.

15. VNB respectfully submits that the foregoing procedure accomplishes the salutary purposes of applicable authorities while avoiding the expense and delay of a duplicate mailing to all Foreclosure Defendants if/when a Final Order is entered herein. In the alternative, if the Court is not inclined to the foregoing, then VNB requests leave to send the OTSC Package and/or Remediated NOI as otherwise directed by the Court.

16. As described more fully in the Order To Show Cause herein, VNB respectfully requests the following relief in all Counts:

a. That this Court schedule a Hearing (the "Hearing") in 60-90 days to consider the relief requested hereby and any Objections tendered in compliance with the terms of the Order To Show Cause; and

b. That this Court determine and find that NOIs in the form of the Remediated NOI Template that contain accurate substantive information regarding the subject Loan from the subject Loan Records are fully compliant with the Fair Foreclosure Act: and

c. That VNB may send to each Foreclosure Defendant an OTSC Package consisting of this Verified Complaint, supporting Certification and Letter Memorandum, conformed copy of the Order To Show Cause, Explanatory Letter (as amended/superseded by the Pleadings herein) and Remediated NOI without attorneys' fees or costs incurred in the Foreclosure; and

d. That Foreclosures may proceed where the OTSC Package was sent to a Foreclosure Defendant/Obligor at the Mortgaged Property or his/her/their last known address if different, and that more than 35 days passed after the OTSC Package was sent without the default having been cured; and

e. That the Final Order/Judgment entered herein need be served only upon any Parties who appeared and any Foreclosure Defendant to whom was not previously sent a Remediated NOI by the Hearing date: and

f. Requiring that VNB mail an OTSC Package or Remediated NOI only to those Foreclosure Defendants to whom an OTSC Package was not mailed by the date of entry of

the Final Order/Judgment herein; and

g. Allowing VNB to refrain from sending an OTSC Package to Foreclosure Defendants in Foreclosures subject to the Automatic Stay in any bankruptcy proceedings and authorizing VNB to remediate NOIs in such Foreclosures by sending an OTSC Package at such time when the Automatic Stay no longer enjoins such action; and

h. Such other or further relief the Courts deems equitable and just.

COUNT I: VNB

17. Plaintiff hereby incorporates by reference paragraphs 1 through 16 as if set forth herein.

18. VNB is servicing twenty eight (28) Loans that are the subject of Foreclosures predicated upon NOIs that were not strictly statutorily compliant for the reason(s) described in the Remediated NOI List.

19. Attached as Exhibit "A" is the Remediated NOI List of uncontested residential foreclosure actions including the twenty eight (28) wherein VNB is the Plaintiff.

20. VNB requests relief from this Court to issue an Order To Show Cause consistent with the Supreme Court's April 4, 2012 Order.

WHEREFORE, VNB respectfully requests Judgment:

~~(a) Deeming the NOIs in the form of the Remediated NOI Template that contain accurate~~
information derived from the Loan Records compliant with the requirements of the
Fair Foreclosure Act;

- (b) Approving the Servicer's having sent an OTSC Package to the Foreclosure Defendants at the Mortgaged Property or last known address, if different, consisting of the OTSC herein, supporting Certification and Letter Memorandum, Explanatory Letter and Remediated Notice of Intention to Foreclose, in the form of the Remediated NOI Template and containing accurate information regarding the Loan derived from the Loan Records including the amount presently required to reinstate the Mortgage without attorneys' fees or costs incurred in the pending Foreclosure, in the Foreclosures identified in the Remediated NOI List wherein VNB is the Plaintiff;
- (c) Deeming the Explanatory Letter amended and superseded by the Pleadings herein to the extent of any inconsistency between the Explanatory Letter and the Single Mailing Procedure described herein;
- (d) Allowing Foreclosures to proceed upon where more than 35 days passed after the Remediated NOI was sent to the Foreclosure Defendant without the default having been cured;
- (e) Requiring that VNB mail the Final Order/Judgment herein only to those Parties who appeared in these proceedings pursuant to the procedure specified by the Court in the OTSC;
- (f) Requiring that VNB mail an OTSC Package after entry of the Final Order/ Judgment only to those Foreclosure Defendants to whom an OTSC Package was not mailed by the date of entry of the Final Order/Judgment herein;
- (g) Allowing VNB to refrain from sending an OTSC Package to Foreclosure Defendants in Foreclosures subject to the Automatic Stay in any bankruptcy proceedings and authorizing VNB to remediate NOIs in such Foreclosures by sending an OTSC

Package at such time when the Automatic Stay no longer enjoins such action; and
(h) Such other or further relief the Courts deems equitable and just.

COUNT II: Federal National Mortgage Association

21. Plaintiff hereby incorporates by reference paragraphs 1 through 20 as if set forth herein.

22. VNB is servicing one (1) Loan that are the subject of Foreclosures predicated upon NOIs that were not strictly statutorily compliant for the reason(s) described in the Remediated NOI List.

23. Attached as Exhibit "A" is the Remediated NOI List including uncontested residential foreclosure actions including the one (1) foreclosure in which Federal Nation Mortgage Association is the Plaintiff.

24. VNB respectfully requests this Court to issue an Order to Show Cause consistent with the Supreme Court's April 4, 2012 Order.

WHEREFORE, VNB respectfully requests Judgment:

(a) Deeming the NOIs in the form of the Remediate NOI Template that contain accurate information derived from the Loan Records complaint with the requirements of the Fair Foreclosure Act;

(b) Approving the Servicer's having sent an OTSC Package to the Foreclosure Defendants at the Mortgaged Property or last known address, if different, consisting of the OTSC herein, supporting Certification and Letter Memorandum, Explanatory Letter and Remediated Notice of Intention to Foreclose, in the form of the Remediated NOI Template and containing accurate information regarding the Loan derived from the

Loan Records including the amount presently required to reinstate the Mortgage without attorneys' fees or costs incurred in the pending Foreclosure, in the Foreclosures identified in the Remediated NOI List wherein Federal National Mortgage Association is the Plaintiff;

- (c) Deeming the Explanatory Letter amended and superseded by the Pleadings herein to the extent of any inconsistency between the Explanatory Letter and the Single Mailing Procedure described herein;
- (d) Allowing Foreclosures to proceed upon where more than 35 days passed after the Remediated NOI was sent to the Foreclosure Defendant without the default having been cured;
- (e) Requiring that VNB mail the Final Order/Judgment herein only to those Parties who appeared in these proceedings pursuant to the procedure specified by the Court in the OTSC;
- (f) Requiring that VNB mail an OTSC Package after entry of the Final Order/ Judgment only to those Foreclosure Defendants to whom an OTSC Package was not mailed by the date of entry of the Final Order/Judgment herein;
- (g) Allowing VNB to refrain from sending an OTSC Package to Foreclosure Defendants in Foreclosures subject to the Automatic Stay in any bankruptcy proceedings and authorizing VNB to remediate NOIs in such Foreclosures by sending an OTSC Package at such time when the Automatic Stay no longer enjoins such action; and
- (h) Such other or further relief the Courts deems equitable and just.

COUNT III: New Jersey Housing and Mortgage Finance Agency

25. Plaintiff hereby incorporates by reference paragraphs 1 through 24 as if set forth herein.

26. VNB is servicing three (3) Loans that are the subject of Foreclosures predicated upon NOIs that were not strictly statutorily compliant for the reason(s) described in the Remediated NOI List.

27. Attached as Exhibit "A" is the Remediated NOI List including uncontested residential foreclosure actions including the three (3) foreclosures in which New Jersey Housing and Mortgage Finance Agency is the Plaintiff.

28. VNB respectfully requests this Court to issue an Order to Show Cause consistent with the Supreme Court's April 4, 2012 Order.

WHEREFORE, VNB respectfully requests Judgment:

- (a) Deeming the NOIs in the form of the Remediate NOI Template that contain accurate information derived from the Loan Records complaint with the requirements of the Fair Foreclosure Act;
- (b) Approving the Servicer's having sent an OTSC Package to the Foreclosure Defendants at the Mortgaged Property or last known address, if different, consisting of the OTSC herein, supporting Certification and Letter Memorandum, Explanatory Letter and Remediated Notice of Intention to Foreclose, in the form of the Remediated NOI Template and containing accurate information regarding the Loan derived from the Loan Records including the amount presently required to reinstate the Mortgage without attorneys' fees or costs incurred in the pending Foreclosure, in the Foreclosures identified in the Remediated NOI List wherein New Jersey Housing and

Mortgage Finance Agency is the Plaintiff;

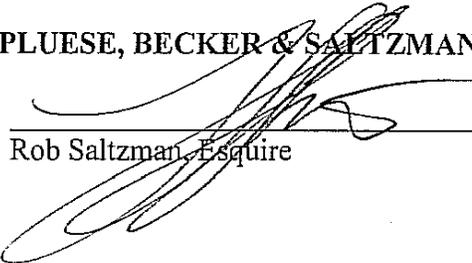
- (c) Deeming the Explanatory Letter amended and superseded by the Pleadings herein to the extent of any inconsistency between the Explanatory Letter and the Single Mailing Procedure provided for herein;
- (d) Allowing Foreclosures to proceed upon where more than 35 days passed after the Remediated NOI was sent to the Foreclosure Defendant without the default having been cured;
- (e) Requiring that VNB mail the Final Order/Judgment herein only to those Parties who appeared in these proceedings pursuant to the procedure specified by the Court in the OTSC;
- (f) Requiring that VNB mail an OTSC Package after entry of the Final Order/ Judgment only to those Foreclosure Defendants to whom an OTSC Package was not mailed by the date of entry of the Final Order/Judgment herein;
- (g) Allowing VNB to refrain from sending an OTSC Package to Foreclosure Defendants in Foreclosures subject to the Automatic Stay in any bankruptcy proceedings and authorizing VNB to remediate NOIs in such Foreclosures via Motion to the Chancery Court of the County in which the Mortgaged Property is located at such time when the Automatic Stay no longer enjoins such action; and
- (h) Such other or further relief the Courts deems equitable and just.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order permitting

VNB to concurrently serve the Verified Complaint, , Order to Show Cause, supporting Certification and Letter Memorandum, Explanatory Letter and Remediated NOI upon all

Foreclosure Defendants indentified in the annexed Remediated NOI List. VNB requests that any Foreclosure may proceed if it is demonstrated that the default was not cured within 35 days from the date of such Remediated NOI, and for such other and further relief as this Court deems just and equitable.

PLUESE, BECKER & SALTZMAN, LLC

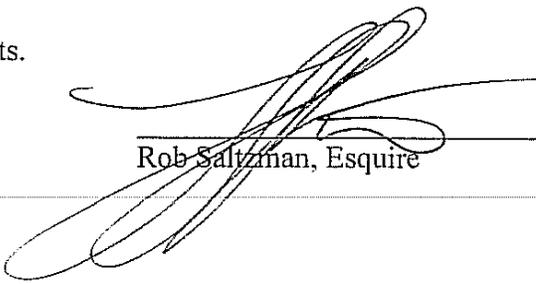


Rob Saltzman, Esquire

Dated: 1/25/13

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 proceeding contemplated, other than the pending foreclosure actions On the Remediated NOI List attached hereto and any pending, separate actions initiated outside of the uncontested foreclosure proceedings in which Foreclosure Defendants may have raised claims concerning, *inter alia*, their NOIs but which are not at issue in this application. 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.



Rob Saltzman, Esquire

Dated: 1/25/13

VERIFICATION

I, Paul Granski, of full age certify as follows:

1. I am a Vice President and Mortgage Collections Manager of VNB Servicing, LLC.
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. 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.



Paul Granski

Dated: 12-28-12

PLUESE, BECKER & SALTZMAN, LLC
Attorneys At Law
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
Attorneys for Plaintiff

**IN RE NOTICES OF INTENTION TO
FORECLOSE SENT BY VALLEY
NATIONAL BANK**

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**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY
DOCKET NO. F-**

CIVIL ACTION

**ORDER TO SHOW CAUSE
SUMMARY PROCEEDING
PURSUANT TO R. 4:67-2**

THIS MATTER being brought before the Court by **VALLEY NATIONAL BANK** (“the Servicer” or “VNB”), in pending foreclosure cases (“the Foreclosures”), by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing, pursuant to the April 4, 2012 Order of the New Jersey Supreme Court (the “April 4th Order”) and based upon the facts and circumstances described in the Verified Complaint filed herewith and incorporated herein by reference, including defined terms; and the Court having determined that this matter is appropriately 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 Foreclosure Defendants identified in Exhibit “A” of the Verified Complaint (the “Remediated NOI List”) appear and show cause on the _____ day of _____, 2013 before the Honorable Margaret Mary McVeigh, P.J.Ch., Superior Court, Passaic County, Chancery Division, at 71 Hamilton Street, Paterson, NJ 07505 at _____ o’clock (the “Hearing”), why a Final Order/Judgment should not be entered as follows:

- A. Declaring the Servicer's Remediated NOIs in the form of the Remediated NOI Template that contain accurate information regarding each subject Loan derived from the Servicer's Loan Records to be compliant with the requirements of the Fair Foreclosure Act; and

- B. Allowing the Servicer to send Remediated Notices of Intention to Foreclose (the "Remediated NOIs"), affording Foreclosure Defendants at least thirty (30) days from the date the Remediated NOI is mailed to cure the default on their Mortgage without attorneys' fees or costs incurred in the pending Foreclosure; and

- C. Allowing Foreclosures to proceed where more than 35 days have passed since a Remediated Notice of Default was sent to a Foreclosure Defendant without the default at issue having been cured; and

- D. Granting such other relief as the Court deems equitable and just.

IT IS FURTHER ORDERED that:

1. Plaintiff shall serve upon each Foreclosure Defendant a complete package (the "OTSC Package") consisting of a conformed copy of this Order To Show Cause, Verified Complaint without Exhibits, Supporting Certification, Letter Memorandum, Explanatory Letter and Remediated NOI.

2. Service of the OTSC Package shall be effectuated by simultaneous certified mail, return receipt requested, and regular mail to the subject Mortgaged Property's address and the

Foreclosure Defendant's last known address if different.

3. A copy of this Order To Show Cause and Verified Complaint shall be posted on the Judiciary's Web Page at <http://www.judiciary.state.nj.us>.
4. Regarding any Foreclosure Defendant involved in a Bankruptcy case wherein the Automatic Stay enjoins prosecution of the Foreclosure,
 - a. The Servicer may serve a copy of this Order to Show Cause and Verified Complaint, but may defer serving a Remediated NOI if it believes that doing so may violate the Automatic Stay.
 - b. If the Court grants final relief on the return date of this Order To Show Cause and the Servicer has not already sent a Remediated NOI, then the Servicer may send the Remediated NOI once the Automatic Stay is vacated, modified or otherwise inapplicable. In the alternative, Plaintiff may apply to the United States Bankruptcy Court for relief from the Automatic Stay to effectuate service of the Remediated NOI pursuant to this Order.
 - c. In the event that the Servicer does not serve a Remediated NOI with this Order To Show Cause, Plaintiff's Foreclosure action may not proceed until such Remediated NOI is served pursuant to this Court's Order and the time provided therein to cure the default has passed without the default having been cured.
 - d. If the Servicer believes that service of this Order To Show Cause may be a violation of the Automatic Stay, then once the Stay is vacated, modified or

otherwise no longer enjoins service of a Remediated NOI, then the Servicer may send an OTSC Package to the Foreclosure Defendant(s) and the Foreclosure(s) may proceed where more than 35 days have passed after such OTSC Package was sent without the default having been cured. Plaintiff shall not be required to file another Order To Show Cause to Remediate NOIs at issue in Foreclosures subject to the Automatic Stay.

5. Plaintiff shall publish legal notices of this OTSC 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 (the "Objections") to the process provided for by the April 4th Order. Any Party who wishes to object to the process shall file the Objection under the Docket Number for this Order to Show Cause, **in writing**, with the:

Clerk of the Superior Court, Foreclosure Processing Services
Attn: Objection to Notice of Intention to Foreclose
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625-0971

A copy of the Objection must also be sent to:

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

A copy of the Objection must also be served upon the attorney for the Plaintiff:

Rob Saltzman, Esquire
Pluese, Becker & Saltzman, LLC
20000 Horizon Way, Suite 900
Mt. Laurel, New Jersey 08054

Objections must state with specificity the basis for the Objection and must be filed no later than _____, 2013.

7. If a timely Objection is not filed, the matter may proceed to Final Order/Judgment in accordance with applicable Rules of Court.
8. Any objection regarding a particular Remediated NOI in a particular Foreclosure case must be filed in writing under the Docket Number of that particular Foreclosure action, NOT this Order To Show Cause. Any such 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 particular Remediated NOI will be referred for resolution to the Chancery Judge in the Vicinage where the Mortgaged Property is located.
9. Foreclosure Defendants are hereby informed that a telephone call to the Plaintiff, to the Plaintiff's attorney, to the Servicer, to the Superior Court Clerk's Office, or to this Court, will not protect your rights nor constitute a valid Objection; you must file and serve your written Objection as provided for by 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 Foreclosure Defendant timely files and serves an Objection as provided for above, this application may be decided by the Court at the Hearing or otherwise upon submission of a Certification of Service and a proposed form of Final Order/Judgment as required by this Order To Show Cause.
 12. If written Objection is properly filed and served, the Plaintiff's written reply (the "Reply") shall be filed and served by _____, 2013. A copy of the Reply, if any, shall be served upon the Clerk of Superior Court, with a courtesy copy to the Honorable Margaret Mary McVeigh, P.J.Ch. The Reply need only be served upon the particular Foreclosure Defendant who properly filed and served his/her/their Objection.
 13. Plaintiff shall submit to the Court an original and two copies of a proposed form of Final Order/Judgment incorporating the relief sought no later than _____ days before the Hearing.
 14. The Plaintiff shall file a Certificate of Service of the Verified Complaint, this Order to Show Cause and all supporting documents with the Clerk of Superior Court no later than nine (9) days before the Hearing.
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15. The Court will entertain argument, but not testimony, at the Hearing, unless the Court otherwise directs.

By The Court,

Hon. Margaret Mary McVeigh, P.J.Ch.

EXHIBIT D

PLUESE, BECKER & SALTZMAN, LLC
Attorneys At Law
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
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Attorneys for Plaintiff

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SUPERIOR COURT OF NEW JERSEY
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2. When VNB is the Servicer of a loan (a “Loan”), it undertakes payment collection/application, loss mitigation (modifications, short sales, deeds in lieu of foreclosure or other consensual resolutions) and collection efforts, including institution and prosecution, via local counsel, of foreclosure actions (the “Foreclosures”) pending in the Superior Court of New Jersey.

As the entity collecting and processing payments for the Lender, the Servicer has the information regarding to the payments received and applied, escrow deposits/disbursements, amounts due,

whether a loan is in default and, if so, the constituent components of such delinquency. The information (the "Loan Records") is maintained in the Servicer's systems in the regular course of their business. The Lender is not likely to have possession of the relevant servicing information, as was recognized by the Supreme Court in June 2011 revisions to Court Rules 4:64-1 and 4:64-2. The Servicer makes this application to the Court pursuant to their authority as the Servicing Agent of the Lender/Plaintiff in pending Foreclosures.

3. Among the duties of a Servicer, and specifically the Servicer herein, when a residential mortgage encumbering a New Jersey property becomes in default is to prepare and serve the Notice of Intent to Foreclose (the "NOI") as required by the Fair Foreclosure Act of 1995 (the "FFA"), N.J.S.A. 2A:50-56, et seq. The NOI is prepared based on the Servicer's Loan Records and includes, among other information, the amount due or other performance that is required to cure the delinquency/default and reinstate the Loan, and the date by which such cure and reinstatement must occur.

4. The Plaintiff/Lender and their Servicer herein have identified a number of Foreclosures wherein the NOI was substantially, but not strictly, compliant with the Fair Foreclosure Act. Attached hereto is a list (the "Remediated NOI List") of Foreclosures in which the Plaintiff/Lender and their Servicer respectfully request remediation in the form of leave to serve remediated NOIs (the "Remediated NOIs") upon the residential mortgage debtor(s) who are defendants in the Foreclosures. See Exhibit "A," Remediated NOI List.

5. On February 27, 2012, the New Jersey Supreme Court published their Opinion in Guillaume holding that a Court adjudicating a foreclosure action in which the NOI was not strictly compliant with the notice provisions of the Fair Foreclosure Act has the discretion to determine the appropriate remedy, including allowing remediation of a noncompliant NOI by granting leave to serve a Remediated NOI.

6. Following its decision in Guillaume, the New Jersey Supreme Court entered the April 4th Order which authorizes the Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage, and the Hon. Paul Innes, P.J.Ch., Mercer Vicinage, to entertain summary actions by Orders to Show Cause such as this (the “OTSC”) as to why Plaintiffs in any uncontested residential mortgage foreclosure actions filed on or before April 27, 2012 and in which Final Judgment has not been entered, who caused NOIs to be served that are not strictly compliant with the NOI provisions of the Fair Foreclosure Act, should not be allowed to serve Remediated NOIs on defendants/mortgagors and/or parties obligated on the debt (the “Foreclosure Defendants”) as provided for by the Loan documents and defined by the Fair Foreclosure Act..

7. The April 4th Order further provides that any Remediated NOI must be accompanied by a letter to the Foreclosure Defendants (the “Explanatory Letter”) containing the reasons why the Remediated NOI is being served, the procedure to follow in the event a Foreclosure Defendant wishes to object to the relief requested via this OTSC or a particular Remediated NOI, the name of a person to contact with any questions, and that the receipt of the Remediated NOI allows Foreclosure Defendants 30 days in which to object or to cure the default.

8. The Servicer herein reviewed their pending Foreclosures with local counsel to identify those Foreclosures in which a Remediated NOI is appropriate because the Lender and/or the Lender's address were not included in the previously served NOIs, or such NOIs were otherwise not strictly compliant with the Fair Foreclosure Act as recently interpreted. The Remediated NOI List describes the Foreclosures and indicates whether prosecution thereof is enjoined by operation of the Automatic Stay in any bankruptcy proceedings and other available information.

9. Specifically, the Remediated NOI List includes the following:

- a. Foreclosures that were initiated on or before February 27, 2012 and which VNB is servicing the Loans,
- b. in which Final Judgment has not been entered, and
- c. regarding which leave is sought to serve a Remediated NOI.

10. The Remediated NOI List contains information required by the Court, i.e., (1) the abbreviated Caption of the Foreclosure, (2) the Foreclosure Docket Number, (3) the Vicinage, and (4) the nature of deviation from strict compliance, as well as other available and potentially relevant information. Although VNB is not the Plaintiff in all of the Foreclosures, it is the Servicer of each subject Loan, maintains the Loan Records for each such Loan, and is responsible for mailing the Remediated NOI pursuant to the relevant contracts with the Plaintiff/Lender.

11. Pursuant to the April 4th Order, attached as Exhibit "B" to the Verified Complaint is the proposed form the Explanatory Letter (the "Explanatory Letter Template) that VNB intends

to send to each Foreclosure Defendant. As instructed by the Supreme Court in the April 4th Order, the proposed form of Explanatory Letter contains the following explanations:

- a. the reason why the Remediated NOI is being served,
- b. the procedure to follow in the event a Foreclosure Defendant wishes to object to the relief requested via this OTSC and/or a particular Remediated NOI;
- c. the individual(s) a Foreclosure Defendant should contact with any questions;
- d. that the Foreclosure Defendant has the right to object to the Remediated NOI as well as the right to cure the default within 30 days of the date of the Remediated NOI;
- e. that the Remediated NOIs will exclude attorneys' fees and costs incurred in the pending Foreclosures from the calculation of the amount due to cure the default.

12. Attached as Exhibit "C" to the Verified Complaint is the proposed form of Remediated NOI (the "Remediated NOI Template") that VNB will send to each of the Foreclosure Defendants identified on the Remediated NOI List. Each Foreclosure Defendant will be served with a Remediated NOI in the form of the Remediated NOI Template that includes, *inter alia*, the information specific to their mortgage Loan derived from the Loan Records, their default, the Lender/Holder's name and address and the amount due or other performance required to reinstate, as provided for in the Order To Show Cause, without attorneys' fees or costs incurred in the pending foreclosures.

13. To promote economy, avoid waste, and to afford Foreclosure Defendants the earliest opportunity to cure their defaults by providing the amount due before more monthly payments and other charges accrue, VNB will send to each of the Foreclosure Defendants identified on the Remediated NOI List a complete package (the "OTSC Package") consisting of this Verified Complaint, a conformed copy of this OTSC if/when entered, supporting Certification and Letter Memorandum, Explanatory Letter in the form of the Explanatory Letter Template and Remediated NOI in the form of the Remediated NOI Template and containing substantive information pertaining to the subject Loan in each Foreclosure. See Exhibit "D," sample OTSC Package.

14. Service of the Verified Complaint, OTSC, Explanatory Letter and Remediated NOI as a complete OTSC Package may be inconsistent with certain provisions contained in the Explanatory Letter, created by the Court before conception of the "single mailing" procedure (the "Single Mailing Procedure") authorized by the Court in In re Notices of Intention to Foreclose Served by MidFirst Bank, Docket No. F-12399-12. To the extent that such an inconsistency exists in this regard only, VNB requests that the provisions of the pleadings herein shall be deemed to amend and supersede the Explanatory Letter.

15. VNB respectfully submits that the foregoing procedure accomplishes the salutary purposes of applicable authorities while avoiding the expense and delay of a duplicate mailing to all Foreclosure Defendants if/when a Final Order is entered herein. In the alternative, if the Court is not inclined to the foregoing, then VNB requests leave to send the OTSC Package and/or Remediated NOI as otherwise directed by the Court.

16. As described more fully in the Order To Show Cause herein, VNB respectfully requests the following relief in all Counts:

a. That this Court schedule a Hearing (the "Hearing") in 60-90 days to consider the relief requested hereby and any Objections tendered in compliance with the terms of the Order To Show Cause; and

b. That this Court determine and find that NOIs in the form of the Remediated NOI Template that contain accurate substantive information regarding the subject Loan from the subject Loan Records are fully compliant with the Fair Foreclosure Act; and

c. That VNB may send to each Foreclosure Defendant an OTSC Package consisting of this Verified Complaint, supporting Certification and Letter Memorandum, conformed copy of the Order To Show Cause, Explanatory Letter (as amended/superseded by the Pleadings herein) and Remediated NOI without attorneys' fees or costs incurred in the Foreclosure; and

d. That Foreclosures may proceed where the OTSC Package was sent to a Foreclosure Defendant/Obligor at the Mortgaged Property or his/her/their last known address if different, and that more than 35 days passed after the OTSC Package was sent without the default having been cured; and

e. That the Final Order/Judgment entered herein need be served only upon any Parties who appeared and any Foreclosure Defendant to whom was not previously sent a Remediated NOI by the Hearing date; and

f. Requiring that VNB mail an OTSC Package or Remediated NOI only to those Foreclosure Defendants to whom an OTSC Package was not mailed by the date of entry of

the Final Order/Judgment herein; and

g. Allowing VNB to refrain from sending an OTSC Package to Foreclosure Defendants in Foreclosures subject to the Automatic Stay in any bankruptcy proceedings and authorizing VNB to remediate NOIs in such Foreclosures by sending an OTSC Package at such time when the Automatic Stay no longer enjoins such action; and

h. Such other or further relief the Courts deems equitable and just.

COUNT I: VNB

17. Plaintiff hereby incorporates by reference paragraphs 1 through 16 as if set forth herein.

18. VNB is servicing twenty eight (28) Loans that are the subject of Foreclosures predicated upon NOIs that were not strictly statutorily compliant for the reason(s) described in the Remediated NOI List.

19. Attached as Exhibit "A" is the Remediated NOI List of uncontested residential foreclosure actions including the twenty eight (28) wherein VNB is the Plaintiff.

20. VNB requests relief from this Court to issue an Order To Show Cause consistent with the Supreme Court's April 4, 2012 Order.

WHEREFORE, VNB respectfully requests Judgment:

(a) Deeming the NOIs in the form of the Remediated NOI Template that contain accurate information derived from the Loan Records compliant with the requirements of the Fair Foreclosure Act;

- (b) Approving the Servicer's having sent an OTSC Package to the Foreclosure Defendants at the Mortgaged Property or last known address, if different, consisting of the OTSC herein, supporting Certification and Letter Memorandum, Explanatory Letter and Remediated Notice of Intention to Foreclose, in the form of the Remediated NOI Template and containing accurate information regarding the Loan derived from the Loan Records including the amount presently required to reinstate the Mortgage without attorneys' fees or costs incurred in the pending Foreclosure, in the Foreclosures identified in the Remediated NOI List wherein VNB is the Plaintiff;
- (c) Deeming the Explanatory Letter amended and superseded by the Pleadings herein to the extent of any inconsistency between the Explanatory Letter and the Single Mailing Procedure described herein;
- (d) Allowing Foreclosures to proceed upon where more than 35 days passed after the Remediated NOI was sent to the Foreclosure Defendant without the default having been cured;
- (e) Requiring that VNB mail the Final Order/Judgment herein only to those Parties who appeared in these proceedings pursuant to the procedure specified by the Court in the OTSC;
- (f) Requiring that VNB mail an OTSC Package after entry of the Final Order/ Judgment only to those Foreclosure Defendants to whom an OTSC Package was not mailed by the date of entry of the Final Order/Judgment herein;
- (g) Allowing VNB to refrain from sending an OTSC Package to Foreclosure Defendants in Foreclosures subject to the Automatic Stay in any bankruptcy proceedings and authorizing VNB to remediate NOIs in such Foreclosures by sending an OTSC

- Package at such time when the Automatic Stay no longer enjoins such action; and
- (h) Such other or further relief the Courts deems equitable and just.

COUNT II: Federal National Mortgage Association

21. Plaintiff hereby incorporates by reference paragraphs 1 through 20 as if set forth herein.

22. VNB is servicing one (1) Loan that are the subject of Foreclosures predicated upon NOIs that were not strictly statutorily compliant for the reason(s) described in the Remediated NOI List.

23. Attached as Exhibit "A" is the Remediated NOI List including uncontested residential foreclosure actions including the one (1) foreclosure in which Federal Nation Mortgage Association is the Plaintiff.

24. VNB respectfully requests this Court to issue an Order to Show Cause consistent with the Supreme Court's April 4, 2012 Order.

WHEREFORE, VNB respectfully requests Judgment:

- (a) Deeming the NOIs in the form of the Remediate NOI Template that contain accurate information derived from the Loan Records complaint with the requirements of the Fair Foreclosure Act;
- (b) Approving the Servicer's having sent an OTSC Package to the Foreclosure Defendants at the Mortgaged Property or last known address, if different, consisting of the OTSC herein, supporting Certification and Letter Memorandum, Explanatory Letter and Remediated Notice of Intention to Foreclose, in the form of the Remediated NOI Template and containing accurate information regarding the Loan derived from the

Loan Records including the amount presently required to reinstate the Mortgage without attorneys' fees or costs incurred in the pending Foreclosure, in the Foreclosures identified in the Remediated NOI List wherein Federal National Mortgage Association is the Plaintiff;

- (c) Deeming the Explanatory Letter amended and superseded by the Pleadings herein to the extent of any inconsistency between the Explanatory Letter and the Single Mailing Procedure described herein;
 - (d) Allowing Foreclosures to proceed upon where more than 35 days passed after the Remediated NOI was sent to the Foreclosure Defendant without the default having been cured;
 - (e) Requiring that VNB mail the Final Order/Judgment herein only to those Parties who appeared in these proceedings pursuant to the procedure specified by the Court in the OTSC;
 - (f) Requiring that VNB mail an OTSC Package after entry of the Final Order/ Judgment only to those Foreclosure Defendants to whom an OTSC Package was not mailed by the date of entry of the Final Order/Judgment herein;
 - (g) Allowing VNB to refrain from sending an OTSC Package to Foreclosure Defendants in Foreclosures subject to the Automatic Stay in any bankruptcy proceedings and authorizing VNB to remediate NOIs in such Foreclosures by sending an OTSC Package at such time when the Automatic Stay no longer enjoins such action; and
 - (h) Such other or further relief the Courts deems equitable and just.
-

COUNT III: New Jersey Housing and Mortgage Finance Agency

25. Plaintiff hereby incorporates by reference paragraphs 1 through 24 as if set forth herein.

26. VNB is servicing three (3) Loans that are the subject of Foreclosures predicated upon NOIs that were not strictly statutorily compliant for the reason(s) described in the Remediated NOI List.

27. Attached as Exhibit "A" is the Remediated NOI List including uncontested residential foreclosure actions including the three (3) foreclosures in which New Jersey Housing and Mortgage Finance Agency is the Plaintiff.

28. VNB respectfully requests this Court to issue an Order to Show Cause consistent with the Supreme Court's April 4, 2012 Order.

WHEREFORE, VNB respectfully requests Judgment:

- (a) Deeming the NOIs in the form of the Remediate NOI Template that contain accurate information derived from the Loan Records compliant with the requirements of the Fair Foreclosure Act;
- (b) Approving the Servicer's having sent an OTSC Package to the Foreclosure Defendants at the Mortgaged Property or last known address, if different, consisting of the OTSC herein, supporting Certification and Letter Memorandum, Explanatory Letter and Remediated Notice of Intention to Foreclose, in the form of the Remediated NOI Template and containing accurate information regarding the Loan derived from the Loan Records including the amount presently required to reinstate the Mortgage without attorneys' fees or costs incurred in the pending Foreclosure, in the Foreclosures identified in the Remediated NOI List wherein New Jersey Housing and

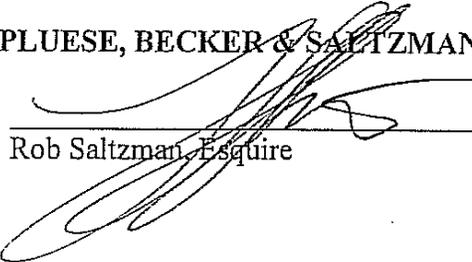
Mortgage Finance Agency is the Plaintiff;

- (c) Deeming the Explanatory Letter amended and superseded by the Pleadings herein to the extent of any inconsistency between the Explanatory Letter and the Single Mailing Procedure provided for herein;
- (d) Allowing Foreclosures to proceed upon where more than 35 days passed after the Remediated NOI was sent to the Foreclosure Defendant without the default having been cured;
- (e) Requiring that VNB mail the Final Order/Judgment herein only to those Parties who appeared in these proceedings pursuant to the procedure specified by the Court in the OTSC;
- (f) Requiring that VNB mail an OTSC Package after entry of the Final Order/ Judgment only to those Foreclosure Defendants to whom an OTSC Package was not mailed by the date of entry of the Final Order/Judgment herein;
- (g) Allowing VNB to refrain from sending an OTSC Package to Foreclosure Defendants in Foreclosures subject to the Automatic Stay in any bankruptcy proceedings and authorizing VNB to remediate NOIs in such Foreclosures via Motion to the Chancery Court of the County in which the Mortgaged Property is located at such time when the Automatic Stay no longer enjoins such action; and
- (h) Such other or further relief the Courts deems equitable and just.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order permitting VNB to concurrently serve the Verified Complaint, , Order to Show Cause, supporting Certification and Letter Memorandum, Explanatory Letter and Remediated NOI upon all

Foreclosure Defendants indentified in the annexed Remediated NOI List. VNB requests that any Foreclosure may proceed if it is demonstrated that the default was not cured within 35 days from the date of such Remediated NOI, and for such other and further relief as this Court deems just and equitable.

PLUESE, BECKER & SALTZMAN, LLC

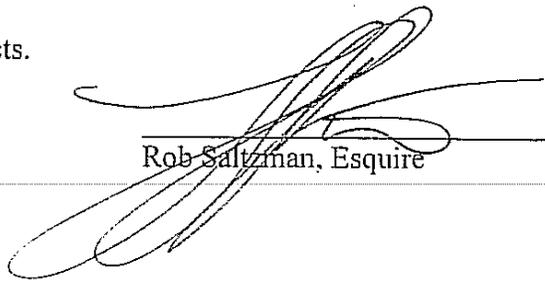


Rob Saltzman, Esquire

Dated: 1/25/13

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 proceeding contemplated, other than the pending foreclosure actions On the Remediated NOI List attached hereto and any pending, separate actions initiated outside of the uncontested foreclosure proceedings in which Foreclosure Defendants may have raised claims concerning, *inter alia*, their NOIs but which are not at issue in this application. 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.



Rob Saltzman, Esquire

Dated: 1/25/13

VERIFICATION

I, Paul Granski, of full age certify as follows:

1. I am a Vice President and Mortgage Collections Manager of VNB Servicing, LLC.
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. 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.



Paul Granski

Dated: 12-28-12

PLUESE, BECKER & SALTZMAN, LLC
Attorneys At Law
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
Attorneys for Plaintiff

**IN RE NOTICES OF INTENTION TO
FORECLOSE SENT BY VALLEY
NATIONAL BANK**

**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY
DOCKET NO. F-**

CIVIL ACTION

**ORDER TO SHOW CAUSE
SUMMARY PROCEEDING
PURSUANT TO R. 4:67-2**

THIS MATTER being brought before the Court by **VALLEY NATIONAL BANK** (“the Servicer” or “VNB”), in pending foreclosure cases (“the Foreclosures”), by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing, pursuant to the April 4, 2012 Order of the New Jersey Supreme Court (the “April 4th Order”) and based upon the facts and circumstances described in the Verified Complaint filed herewith and incorporated herein by reference, including defined terms; and the Court having determined that this matter is appropriately 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 Foreclosure Defendants identified in Exhibit “A” of the Verified Complaint (the “Remediated NOI List”) appear and show cause on the _____ day of _____, 2013 before the Honorable Margaret Mary McVeigh, P.J.Ch., Superior Court, Passaic County, Chancery Division, at 71 Hamilton Street, Paterson, NJ 07505 at _____ o’clock (the “Hearing”), why a Final Order/Judgment should not be entered as follows:

- A. Declaring the Servicer's Remediated NOIs in the form of the Remediated NOI Template that contain accurate information regarding each subject Loan derived from the Servicer's Loan Records to be compliant with the requirements of the Fair Foreclosure Act; and

- B. Allowing the Servicer to send Remediated Notices of Intention to Foreclose (the "Remediated NOIs"), affording Foreclosure Defendants at least thirty (30) days from the date the Remediated NOI is mailed to cure the default on their Mortgage without attorneys' fees or costs incurred in the pending Foreclosure; and

- C. Allowing Foreclosures to proceed where more than 35 days have passed since a Remediated Notice of Default was sent to a Foreclosure Defendant without the default at issue having been cured; and

- D. Granting such other relief as the Court deems equitable and just.

IT IS FURTHER ORDERED that:

1. Plaintiff shall serve upon each Foreclosure Defendant a complete package (the "OTSC Package") consisting of a conformed copy of this Order To Show Cause, Verified Complaint without Exhibits, Supporting Certification, Letter Memorandum, Explanatory Letter and Remediated NOI.

 2. Service of the OTSC Package shall be effectuated by simultaneous certified mail, return receipt requested, and regular mail to the subject Mortgaged Property's address and the
-

Foreclosure Defendant's last known address if different.

3. A copy of this Order To Show Cause and Verified Complaint shall be posted on the Judiciary's Web Page at <http://www.judiciary.state.nj.us>.
4. Regarding any Foreclosure Defendant involved in a Bankruptcy case wherein the Automatic Stay enjoins prosecution of the Foreclosure,
 - a. The Servicer may serve a copy of this Order to Show Cause and Verified Complaint, but may defer serving a Remediated NOI if it believes that doing so may violate the Automatic Stay.
 - b. If the Court grants final relief on the return date of this Order To Show Cause and the Servicer has not already sent a Remediated NOI, then the Servicer may send the Remediated NOI once the Automatic Stay is vacated, modified or otherwise inapplicable. In the alternative, Plaintiff may apply to the United States Bankruptcy Court for relief from the Automatic Stay to effectuate service of the Remediated NOI pursuant to this Order.
 - c. In the event that the Servicer does not serve a Remediated NOI with this Order To Show Cause, Plaintiff's Foreclosure action may not proceed until such Remediated NOI is served pursuant to this Court's Order and the time provided therein to cure the default has passed without the default having been cured.
 - d. If the Servicer believes that service of this Order To Show Cause may be a violation of the Automatic Stay, then once the Stay is vacated, modified or

otherwise no longer enjoins service of a Remediated NOI, then the Servicer may send an OTSC Package to the Foreclosure Defendant(s) and the Foreclosure(s) may proceed where more than 35 days have passed after such OTSC Package was sent without the default having been cured. Plaintiff shall not be required to file another Order To Show Cause to Remediate NOIs at issue in Foreclosures subject to the Automatic Stay.

5. Plaintiff shall publish legal notices of this OTSC 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 (the "Objections") to the process provided for by the April 4th Order. Any Party who wishes to object to the process shall file the Objection under the Docket Number for this Order to Show Cause, **in writing**, with the:

Clerk of the Superior Court, Foreclosure Processing Services
Attn: Objection to Notice of Intention to Foreclose
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625-0971

A copy of the Objection must also be sent to:

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

A copy of the Objection must also be served upon the attorney for the Plaintiff:

Rob Saltzman, Esquire
Pluese, Becker & Saltzman, LLC
20000 Horizon Way, Suite 900
Mt. Laurel, New Jersey 08054

Objections must state with specificity the basis for the Objection and must be filed no later than _____, 2013.

7. If a timely Objection is not filed, the matter may proceed to Final Order/Judgment in accordance with applicable Rules of Court.
8. Any objection regarding a particular Remediated NOI in a particular Foreclosure case must be filed in writing under the Docket Number of that particular Foreclosure action, NOT this Order To Show Cause. Any such 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 particular Remediated NOI will be referred for resolution to the Chancery Judge in the Vicinage where the Mortgaged Property is located.
9. Foreclosure Defendants are hereby informed that a telephone call to the Plaintiff, to the Plaintiff's attorney, to the Servicer, to the Superior Court Clerk's Office, or to this Court, will not protect your rights nor constitute a valid Objection; you must file and serve your written Objection as provided for by 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 Foreclosure Defendant timely files and serves an Objection as provided for above, this application may be decided by the Court at the Hearing or otherwise upon submission of a Certification of Service and a proposed form of Final Order/Judgment as required by this Order To Show Cause.
 12. If written Objection is properly filed and served, the Plaintiff's written reply (the "Reply") shall be filed and served by _____, 2013. A copy of the Reply, if any, shall be served upon the Clerk of Superior Court, with a courtesy copy to the Honorable Margaret Mary McVeigh, P.J.Ch. The Reply need only be served upon the particular Foreclosure Defendant who properly filed and served his/her/their Objection.
 13. Plaintiff shall submit to the Court an original and two copies of a proposed form of Final Order/Judgment incorporating the relief sought no later than _____ days before the Hearing.
 14. The Plaintiff shall file a Certificate of Service of the Verified Complaint, this Order to Show Cause and all supporting documents with the Clerk of Superior Court no later than nine (9) days before the Hearing.
-
-

15. The Court will entertain argument, but not testimony, at the Hearing, unless the Court otherwise directs.

By The Court,

Hon. Margaret Mary McVeigh, P.J.Ch.

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.

PLUESE, BECKER & SALTZMAN, LLC

Attorneys at Law

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(856) 813-1700
FACSIMILE: (856) 813-1720

PENNSYLVANIA OFFICE:
721 Dresher Road, Suite 1050
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(215) 546-3205
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Glen-David Schwarzschild, Esq.♦
Glens@genslaw.com

♦ PA and NJ Bars

Please reply to our MOUNT LAUREL office

The Honorable Margaret Mary McVeigh, P.J. Ch.
Superior Court of New Jersey
Passaic County Courthouse, Chambers 100
71 Hamilton Street
Paterson, New Jersey 07505

Re: *In re Notices of Intention to Foreclose Sent by Valley National Bank*

Dear Judge McVeigh:

Valley National Bank, ("VNB " or "the Servicer"), by and through local counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing, respectfully submits this letter memorandum in lieu of a more formal submission in support of the within Order To Show Cause (the "OTSC") seeking authorization to remediate pre-foreclosure Notice(s) of Intent to Foreclose (the "NOI" or "NOIs") in various residential mortgage foreclosure actions (the "Foreclosure" or "Foreclosures") pending in the Superior Court of New Jersey. The Order of the Supreme Court of New Jersey entered on April 4, 2012 (The "April 4 Order") empowers this Honorable Court to entertain summary actions to consider authorizing remediation of NOIs consistent with the Supreme Court's Opinion in *U.S. Bank, N.A. v. Guillaume*, 209 N.J. 449 (2012) ("Guillaume"), where such NOIs were not strictly compliant with the notice provisions of the Fair Foreclosure Act of 1995 (The "FFA"), N.J.S.A. 2A:50-56 et seq.

Mortgage Servicers like VNB are uniquely situated to seek and effectuate relief of the kind requested by this OTSC. The contents of the within Verified Complaint are respectfully incorporated herein by reference, including defined terms therein. Briefly summarized and as described more specifically in the within Verified Complaint, in their capacity as Servicer, VNB undertakes payment collection/application, loss mitigation and various collection efforts, including referrals to and management of foreclosure actions referred to local counsel for prosecution, pursuant to the contracts that govern its relationship with the owners of the subject mortgage loans (the "Loan" or "Loans"), the Loan documents, Rules of Court and applicable law.

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As the entity collecting and processing payments, Servicers like VNB possess the information regarding payments tendered/applied, escrow subaccount deposits/disbursements, payments that are due, whether a loan is in default and, if so, the extent of any delinquency. The foregoing information is maintained in contemporaneous business records of Servicers like VNB (the "Loan Records") and Plaintiffs rarely maintain such "loan level" data where their loans are being serviced by another.

Among the responsibilities of a Servicer like VNB is to issue the NOI when a mortgage (the "Mortgage" or "Mortgages") encumbering property located in this jurisdiction (the "Mortgaged Property" or "Mortgaged Properties") is in default and foreclosure is contemplated, VNB issued the NOIs that are the subject of this OTSC. Accordingly, if granted, the Servicer is uniquely situated to effectuate the relief sought by this OTSC.

Applicable authority guides the Court in the sound exercise of discretion to grant the relief requested in the within OTSC. On February 27, 2012, the New Jersey Supreme Court released their Opinion in Guillaume, and held that, while strict compliance of the notice provisions of the FFA is generally required, a Court adjudicating a foreclosure action has the discretion to determine the appropriate remedy for an NOI that is not strictly statutorily compliant, including allowing a remediated NOI to be sent to those persons (the "Foreclosure Defendants") to whom the FAA requires that a NOI be sent. The Supreme Court's April 4 Order, in furtherance of Guillaume, provides that any remediated NOI must be accompanied by a letter (the "Explanatory Letter") to each Foreclosure Defendant explaining

- The reasons why the Remediated NOI is being served;
- The procedure if a Foreclosure Defendant wishes to object to the relief requested;
- The name of the person to contact with questions; and
- That the receipt of the Remediated NOI allows the Foreclosure Defendant 30 days in which to object to or cure the default without attorneys' fees or costs incurred in the pending Foreclosure.

Pursuant to the foregoing authorities, VNB has identified a population of Foreclosures in which the previously served NOIs were not strictly statutorily compliant and respectfully requests that an Order be entered allowing VNB to send Remediated NOIs to such Foreclosure Defendants. VNB has communicated with various local counsel prosecuting the Foreclosures to compile the information incorporated into the attached list (the "Remediated NOI List"), including, the abbreviated Caption, Docket Number, County of venue and the nature of the noncompliant aspect of the NOI, as well as other available and relevant information.

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The role of Government Sponsored Entities (the “GSEs”) has also been considered. Regarding Foreclosures involving Mortgages related to the Federal National Mortgage Association (“Fannie Mae”), the GSE at issue in this OTSC, VNB seeks to issue Remediated NOIs in the cases in which Fannie Mae is the Foreclosure Plaintiff. By way of explanation as applicable, if the Servicer of a Fannie Mae loan also holds a subordinate lien encumbering the subject property (e.g. a second mortgage lien), applicable Fannie Mae Servicing Guidelines allow the Servicer to institute foreclosure in the name of the GSE entity. In such cases, identified on the Remediated NOI List if applicable, Fannie Mae's interest should have been identified in the original NOI, because in such cases, Fannie Mae is the Holder of the subject residential Mortgage. The FAA defines a “Lender” as “any person, corporation, or other entity which makes or holds a residential mortgage, and any person corporation or other entity to which such residential mortgage is assigned.” N.J.S.A. 2A:50-55. Therefore, as the “Holder” of the mortgages, the GSE should have been described as the “Lender” in the previously served NOIs. Not included in this OTSC are other uncontested Foreclosure in which Fannie Mae is not the Plaintiff because Fannie Mae does not hold the subject Mortgage. In those actions, a GSE such as Fannie Mae retains a beneficial interest in the Loan but is not the Holder of the subject Mortgage and therefore, not the “Residential Mortgage Lender” as defined by the FAA.

Previously contested matters are also included in the Remediated NOI List if remanded to the Office of Foreclosure after resolution of the contested issue(s), pursuant to N.J.Ct R. 4:64(1)(c)(3). Foreclosures in this posture, if any, are included in this OTSC to afford an additional benefit to these Foreclosure Defendants and because excluding them could result in an unresolved issue that could be detrimental to the Parties, the Court and the communities in which the properties at issue therein are located.

In the exercise of this Honorable Court’s sound discretion to fashion an appropriate equitable remedy for a NOI that does not strictly comply with the FAA as construed by applicable authorities, the Supreme Court provided the following guidance:

In determining an appropriate remedy for a violation of N.J.S.A. 2A:50-56(c) (11), trial courts should consider the express purpose of the provision: to provide notice makes “the debtor aware of the situation”, and to enable the homeowner to attempt to cure the default. N.J.S.A. 2A:50-56(c); Statement to Assembly Bill No. 1064, *supra*, at 8. Accordingly, a trial court fashioning an equitable remedy for a violation of N.J.S.A. 2A:50-56(c) (11) should consider the impact of the defect in the notice of intention upon the homeowner’s information about the status of the loan, and on his or her opportunity to cure the default.

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The original NOIs at issue herein contained incomplete contact information for the Lender, and/or otherwise deviated from strict compliance with the FFA as recently interpreted by our Courts. It is the mortgage loan Servicer to whom the Lender delegated all responsibility regarding “loan-level” matters, including addressing Borrower’s inquiries regarding, *inter alia*, delinquency and foreclosure issues. Notwithstanding any technical noncompliance in the NOI, the Borrower was fully informed of the identity of and the contact information for the entity with whom any inquiries regarding the “status of the loan” and/or “his or her opportunity to cure the default” within the meaning of Guillaume. The original NOIs were consistent with and effectuated the salutary goal of the FFA to provide Borrowers with contact information for the entity with whom they may discuss, dispute, and/or otherwise address their default. Any information absent from the original NOI, e.g., complete contact information for the “Lender” or any counseling agency, etc., was readily obtainable via the simple expedient of contacting the Servicer, whose complete contact information was provided in the NOI.

Further, during the pendency of the subject Foreclosures, each Borrower received various Notices, pleadings, documents and other communications from counsel for the Plaintiff/Mortgagee, all of which contained information regarding the status of the loan, opportunities to cure the default (e.g., the materials regarding the Court sponsored Mediation Program served upon the Borrower with the Summons and Complaint), and contact information for counsel. Each such Pleading, Notice or other document constituted a source of information and invitation to initiate contact with authorized representatives in a position to provide further information or assistance.

If any Borrower had the inclination to contact a responsible representative of the Plaintiff/Lender for the purpose of understanding the “status of the loan” or any available “opportunity to cure the default” then such Borrower was provided ample opportunities and means to initiate such contact. If no such contact was made notwithstanding all the foregoing communications, then VNB respectfully submits that the inference can reasonably be drawn that the deviation from strict statutory compliance at issue herein was immaterial and had no adverse impact upon the Borrower’s ability to understand and/or address the default. In the alternative, if the Borrower contacted the Servicer or foreclosure counsel, or availed him/herself of the benefits of the Court sponsored Mediation Program or other available options for an amicable resolution to the Foreclosure, then the inference may be reasonably drawn that the deviation from strict statutory compliance at issue herein was immaterial because the purpose of the NOI was fulfilled.

Either way, the deviation in the original NOIs at issue herein from strict statutory compliance had no adverse impact upon the Borrowers’ ability to obtain information regarding the status of the loan or any opportunities to cure the default. Accordingly, the criterion for determining whether an equitable alternative to the harsh sanction of dismissal is appropriate is the extent, if any, that the deficiency in the subject NOI adversely impacted the Borrower’s ability to understand and address the mortgage default. VNB respectfully submits that the harsh sanction of dismissal is inappropriate in the context of the subject Foreclosures and that, for the reasons articulated herein, this Honorable Court should exercise its discretion to fashion a more equitable remedy that allows

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the Foreclosure to proceed while preserving the Borrower's statutory rights and opportunity to resolve the default upon which the Foreclosure is predicated.

VNB respectfully submits that the deviation from strict statutory compliance is readily amenable to remediation and that an appropriate equitable remedy would be to authorize the Servicer to send a "remediated" NOI (the "Remediated NOI") to each Foreclosure Defendant, without intervening expenses related to the pending Foreclosure. The foregoing equitable remedy vitiates any adverse impact and restores the Parties to the same positions they would have occupied if the original NOIs were strictly statutorily compliant. If the Foreclosure Defendant is either unwilling or unable to cure the delinquency within the time provided for by the Court, then the Foreclosure should proceed.

Further, VNB respectfully submits that to promote economy, avoid waste, and to afford Foreclosure Defendants the earliest opportunity to cure their defaults by providing the amount due before more monthly payments and other charges accrue, VNB is contemporaneously sending to each of the Foreclosure Defendants identified on the Remediated NOI List a complete package (the "OTSC Package") consisting of the Verified Complaint, OTSC, Supporting Certification and this Letter Memorandum, Explanatory Letter and Remediated NOI in the form of the Remediated NOI Template containing substantive information pertaining to the subject Loan in each Foreclosure derived from the Loan Records. VNB will produce to this Court proof of service of such Remediated NOIs upon the Foreclosure Defendants at the Mortgaged Property or their last known address, if different. It is VNB's request that this Honorable Court find that the foregoing procedure accomplishes the salutary purpose of applicable authorities while avoiding the necessity to send duplicate mailings to all Foreclosure Defendants after a Final Order/Judgment is entered herein. VNB requests authorization to send the Final Order/Judgment herein only to those Foreclosure Defendants who have filed an Objection or otherwise appeared in these proceedings as directed by the Court and also to any Foreclosure Defendant who had not already been sent an OTSC Package.

VNB understands that the "single mailing" procedure described above (the "Single Mailing Procedure") was approved by the Court in In re Notices of Intention to Foreclose Served by MidFirst Bank, Docket No. F-12399-12 (the "MidFirst Matter") and VNB respectfully submits that the Single Mailing Procedure is also appropriate herein because it balances the goals of affording Foreclosure Defendants the earliest possible opportunity to cure their default, reinstate their Mortgage(s) and resolve their Foreclosure(s) while avoiding duplicative effort, waste and delay. In the alternative, if the Court is not inclined to the foregoing, then VNB requests leave to send the OTSC Package again upon entry of a Final Order/Judgment or as otherwise directed by the Court.

VNB is concerned that service of the Verified Complaint, OTSC, Explanatory Letter and Remediated NOI as a complete package upon entry of the OTSC (i.e., the Single Mailing Procedure authorized by the Court in the MidFirst Matter) may be inconsistent with certain

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portions of the Explanatory Letter created by the Court before the Single Mailing Procedure was developed, and to the extent that such an inconsistency exists in this regard only, VNB requests that the provisions of the OTSC and Pleadings herein shall be deemed to amend and supersede the Explanatory Letter.

By reason of the foregoing, VNB respectfully request entry of the within Order To Show Cause permitting remediation of the original NOIs at issue in the Foreclosures by sending a OTSC Package to the Foreclosure Defendants consisting of the OTSC, Supporting Certification and this Letter Memorandum, Explanatory Letter and Remediated NOI (without expenses incurred in the pending Foreclosure) to the Mortgaged Property or last known address of each Foreclosure Defendant, if different. VNB further requests that insofar as service of the Verified Complaint, OTSC, Explanatory Letter and Remediated NOI as a complete package may be inconsistent with certain provisions contained in the Explanatory Letter created by the Court before conception of the Single Mailing Procedure authorized by the Court in the MidFirst matter to the extent that such an inconsistency exists in this regard only, the provisions of the OTSC be deemed to amend and supersede the Explanatory Letter

By reason of the foregoing, VNB respectfully submits that good cause exists and has been demonstrated for the relief requested in this Application.

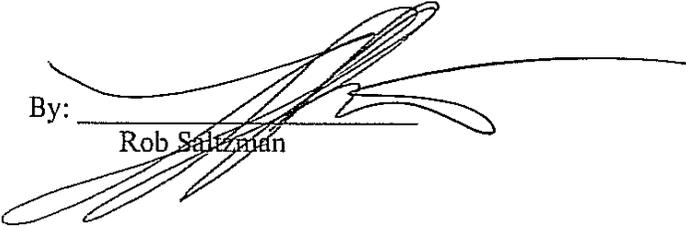
Thank you for your Honor's consideration of this matter.

Respectfully Submitted,

Pluese, Becker & Saltzman, LLC

By: _____

Rob Saltzman



DATE

*****NOTICE OF INTENTION TO FORECLOSE*****

NAME
MAILING ADDRESS
MAILING ADDRESS

Re: Mortgage Loan Number Loan Number

Dear Borrower(s):

As you are aware, Valley National Bank is the lender for this first mortgage. We are located at:

**Valley National Bank
1445 Valley Road
Wayne, NJ 07470
Ph# 1-800-526-9098**

The Mortgage at issue is dated **Origination Date**, was given to secure a loan in the original principal amount of **ORIGINAL PRINCIPAL AMOUNT**, and is a lien on property located at:

Property Address
Property Address

You are in default under your mortgage loan documents because we have not received the following payments:

Payments due since:	Due Date
Total past due payments:	\$
Late charges:	\$
Other charges:	\$
Less Unapplied Balance	\$
<hr/>	
*****TOTAL AMOUNT DUE:	\$

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You may cure your default by paying the TOTAL AMOUNT DUE in cash, cashiers' check, or certified check on or before 33 days from the date of this letter at the following address:

**Valley National Bank
1445 Valley Road
Wayne, NJ 07470
Attention: Collection Dept. 1-800-526-9098, Ext. 5783**

If your account is not brought current within the 33 days specified above, we may commence a foreclosure suit, at the end of which you will lose your property!

You have the right to cure the default, together with any payments or other charges which may subsequently become due, at any time up to the entry of a Final Judgment in Foreclosure or Order of Redemption if you pay or tender all sums which would have been due in the absence of default at the time of such payment; perform any other obligation which you would have been bound to perform in the absence of default or the exercise of an acceleration clause; pay or tender Court costs, if any, and attorneys' fees in amount not to exceed the amount permitted under the Rules Governing the Courts of the State of New Jersey; and, pay all contractual late charges as provided for in the Note or Mortgage.

You have the right to transfer the mortgaged property to another person subject to the Mortgage and any such transferee may have the right to cure the default as provided for by law, subject to the provisions of the Mortgage documents.

You are advised to seek counsel from an attorney of your choice concerning your rights. If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association or the 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.

Financial assistance for curing the default may be available from the attached list of programs operated by the State or Federal Government or non profit organizations. You may wish to contact one of them or contact one of the following to determine whether assistance may be available:

HUD Housing Counseling Service	1-800-569-4287
Veterans Administration	1-800-827-1000
NJ Commissioner of Banking	1-609-292-3240
Military One-Source	1-800-342-9647

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As required under N.J.S.A. 46:10B-51.a.: (i) a copy of this Notice has been served on the Municipal Clerk of City and (ii) the name and address of the individual located within New Jersey who is authorized to accept service on behalf of Valley National Bank is Lucinda P. Long, Esq., General Counsel, Legal Department, Valley National Bank, 1455 Valley Road, Wayne, New Jersey 07470.

If you dispute that a default has occurred or disagree with the correctness of the calculation of the amount required to cure the default, you may contact the undersigned at 1-(800) 526-9098, Ext. 5783.

Very Truly Yours,

Valley National Bank

By: William Michaels
Collection Representative

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION
OBTAINED WILL BE USED FOR THAT PURPOSE.

**NOTICE REQUIRED BY THE
FAIR DEBT COLLECTION
PRACTICES ACT, (the act),
15 U.S.C. SECTION 1692, et seq.**

To the extent the Act may apply, please be advised of the following:

1. The amount of the original debt is stated in the Notice of Intention to Foreclose Mortgage attached hereto.
 2. The Entity who is named in the attached Notice of Intention to Foreclose Mortgage is the Creditor to whom the debt is owed.
 3. The debt described in the Notice attached hereto will be assumed to be valid by the Creditor's law firm, unless the Debtor(s), within thirty days after receipt of this Notice, disputes the validity of the debt or some portion thereof.
 4. If the Debtor notifies the Valley National Bank within thirty days of the receipt of this Notice that the debt or any portion thereof is disputed, Valley National Bank will obtain verification of the debt and a copy of the verification will be mailed to the Debtor by the Creditor's law firm.
 5. If the Creditor is not the original creditor, and if the Debtor makes a request to Valley National Bank within thirty days from the receipt of this notice, the name and address of the original Creditor will be mailed to the Debtor by the Creditor's law firm.
-
6. The request should be addressed to Valley National Bank, 1445 Valley Road, Wayne, NJ 07470. Attention: Collection Manager
-

<p>New Jersey Bar Association Lawyer Referral Service (800)567-0089</p> <p>Legal Services of New Jersey, Inc. (908)572-9100</p>	<p><u>Gloucester County</u> Gloucester County Bar Association Lawyer Referral Service (856)848-4589</p> <p>*Regional Legal Services (856)848-5360</p>	<p><u>Passaic County</u> Passaic County Bar Association Lawyer Referral Service (973)278-9223</p> <p>Passaic County Legal Aid (973)345-7171</p>
<p><u>Atlantic County</u> Atlantic County Bar Association Lawyer Referral Service (609)345-3444</p> <p>Cape-Atlantic Legal Services (609)348-4200</p>	<p><u>Hudson County</u> Hudson County Bar Association Lawyer Referral Service (201)798-2727</p> <p>Hudson County Legal Services (201)792-6363</p>	<p><u>Salem County</u> Salem County Bar Association Lawyer Referral Service (856)678-8363</p> <p>*Regional Legal Services (856)451-0003</p>
<p><u>Bergen County</u> Bergen County Bar Association Lawyer Referral Service (201)488-0044</p> <p>Bergen County Legal Services (201)487-2166</p>	<p><u>Hunterdon County</u> Hunterdon County Bar Association Lawyer Referral Service (908)735-2611</p> <p>Hunterdon County Legal Services (908)782-7979</p>	<p><u>Somerset County</u> Somerset County Bar Association Lawyer Referral Service (908)685-2323</p> <p>Somerset-Sussex Legal Services (908)231-0840</p>
<p><u>Burlington County</u> Burlington County Bar Association Lawyer Referral Service (609)261-4862</p> <p>*Regional Legal Services (609)261-1088</p>	<p><u>Mercer County</u> Mercer County Bar Association Lawyer Referral Service (609)585-6200</p> <p>Legal Aid Society-Mercer County (609)695-6249</p>	<p><u>Sussex County</u> Sussex County Bar Association Lawyer Referral Service (973)267-5882</p> <p>Somerset-Sussex Legal Services (973)383-7400</p>
<p><u>Camden County</u> Camden County Bar Association Lawyer Referral Service (856)964-4520</p> <p>*Regional Legal Services (800)496-3001</p>	<p><u>Middlesex County</u> Middlesex County Bar Association Lawyer Referral Service (732)828-0053</p> <p>Middlesex County Legal Services (732)249-7600</p>	<p><u>Union County</u> Union County Bar Association Lawyer Referral Service (908)353-4715</p> <p>Union County Legal Services (908)354-4340</p>
<p><u>Cape May County</u> Cape May County Bar Association Lawyer Referral Service (609)463-0313</p> <p>Cape-Atlantic Legal Services (609)465-3001</p>	<p><u>Monmouth County</u> Monmouth County Bar Association Lawyer Referral Service (732)431-5544</p> <p>Ocean-Monmouth Legal Services (732)866-0020</p>	<p><u>Warren County</u> Warren County Bar Association Lawyer Referral Service (973)267-5882</p> <p>Warren County Legal Services (908)475-2010</p>
<p><u>Cumberland County</u> Cumberland County Bar Assoc. Lawyer Referral Service (609)692-6207</p> <p>Legal Aid Society (609)451-0083</p>	<p><u>Morris County</u> Morris County Bar Association Lawyer Referral Service (973)267-5882</p> <p>Legal Aid Society of Morris (978)285-6911</p>	
<p><u>Essex County</u> Essex County Bar Association Lawyer Referral Service (973)622-6207</p> <p>Essex County Legal Aid Assoc. (973)622-1513</p>	<p><u>Ocean County</u> Ocean County Bar Association Lawyer Referral Service (732)240-3666</p> <p>Ocean-Monmouth Legal Services (732)341-2727</p>	<p>* Camden Regional Legal Services, Inc. serves Burlington, Cumberland, Gloucester and Salem Counties.</p>

American Credit Alliance, Inc.
26 S. Warren St.
Trenton, NJ 08608
609-393-5400

Atlantic Human Resources, Inc. 1 S
New York Ave.
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 Ave.
Cedar Knolls, NJ 07927-1812
973-267-4324

Fair Housing Council of Northern
New Jersey
131 Main St.
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 S. Blackhorse Pike
Blackwood, NJ 08012
856-227-3683

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

Mercer County Hispanic Association
200 E. State St., 2nd Floor
Trenton, NJ 08607
609-392-2446

Middlesex County Economic
Opportunities Corporation
1215 Livingston Ave.
North Brunswick, NJ 08902
732-790-3344

Morrmouth 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., Suite 2080
Newark, NJ 07102
973-643-8800
1-800-NJ-OWNER (loan counseling)
1-888-TAXES-11 (free tax prep assist)

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

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

Ocean Community Economic Action Now,
Inc.
22 Hye's St.
Toms River, NJ 08753-0773
732-244-2351, ext. 2

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

Paterson Task Force for Community
Action, Inc.
155 Ellison St.
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 Cohansay St.
Bridgeton, NJ 08302
856-451-6330

Urban League for Bergen County
106 W. Palisade Ave.
Englewood, NJ 07631
201-568-4985

Urban League for Essex County
508 Central Ave.
Newark, NJ 07101
973-624-9535

Urban League of Union County
288 N. Broad St.
Elizabeth, NJ 07208
908-351-7200

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

Basic eligibility is limited to (a) single family owner/occupied dwellings with at 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 pending 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.

DATE

*****NOTICE OF INTENTION TO FORECLOSE*****

NAME
MAILING ADDRESS
MAILING ADDRESS

Re: Mortgage Loan Number Loan Number

Dear Borrower(s):

As you are aware, Valley National Bank is the holder for this first mortgage. Also be advised that Investor is the investor for this first mortgage. We are located at:

**Valley National Bank
1445 Valley Road
Wayne, NJ 07470
Ph# 1-800-526-9098**

The Mortgage at issue is dated Origination Date, was given to secure a loan in the original principal amount of ORIGINAL PRINCIPAL AMOUNT, and is a lien on property located at:

Property Address
Property Address

You are in default under your mortgage loan documents because we have not received the following payments:

Payments due since:	Due Date
Total past due payments:	\$
Late charges:	\$
Other charges:	\$
Less Unapplied Balance	\$
<hr/>	
*****TOTAL AMOUNT DUE:	\$

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You may cure your default by paying the TOTAL AMOUNT DUE in cash, cashiers' check, or certified check on or before 33 days from the date of this letter at the following address:

**Valley National Bank
1445 Valley Road
Wayne, NJ 07470
Attention: Collection Dept. 1-800-526-9098, Ext. 5783**

If your account is not brought current within the 33 days specified above, we may commence a foreclosure suit, at the end of which you will lose your property!

You have the right to cure the default, together with any payments or other charges which may subsequently become due, at any time up to the entry of a Final Judgment in Foreclosure or Order of Redemption if you pay or tender all sums which would have been due in the absence of default at the time of such payment; perform any other obligation which you would have been bound to perform in the absence of default or the exercise of an acceleration clause; pay or tender Court costs, if any, and attorneys' fees in amount not to exceed the amount permitted under the Rules Governing the Courts of the State of New Jersey; and, pay all contractual late charges as provided for in the Note or Mortgage.

You have the right to transfer the mortgaged property to another person subject to the Mortgage and any such transferee may have the right to cure the default as provided for by law, subject to the provisions of the Mortgage documents.

You are advised to seek counsel from an attorney of your choice concerning your rights. If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association or the 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.

Financial assistance for curing the default may be available from the attached list of programs operated by the State or Federal Government or non profit organizations. You may wish to contact one of them or contact one of the following to determine whether assistance may be available:

HUD Housing Counseling Service	1-800-569-4287
Veterans Administration	1-800-827-1000
NJ Commissioner of Banking	1-609-292-3240
Military One-Source	1-800-342-9647

PAGE 3

As required under N.J.S.A. 46:10B-51.a.: (i) a copy of this Notice has been served on the Municipal Clerk of City and (ii) the name and address of the individual located within New Jersey who is authorized to accept service on behalf of Valley National Bank is Lucinda P. Long, Esq., General Counsel, Legal Department, Valley National Bank, 1455 Valley Road, Wayne, New Jersey 07470.

If you dispute that a default has occurred or disagree with the correctness of the calculation of the amount required to cure the default, you may contact the undersigned at 1-(800) 526-9098, Ext. 5783.

Very Truly Yours,

Valley National Bank

By: William Michaels
Collection Representative

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION
OBTAINED WILL BE USED FOR THAT PURPOSE.

**NOTICE REQUIRED BY THE
FAIR DEBT COLLECTION
PRACTICES ACT, (the act),
15 U.S.C. SECTION 1692, et seq.**

To the extent the Act may apply, please be advised of the following:

1. The amount of the original debt is stated in the Notice of Intention to Foreclose Mortgage attached hereto.
 2. The Entity who is named in the attached Notice of Intention to Foreclose Mortgage is the Creditor to whom the debt is owed.
 3. The debt described in the Notice attached hereto will be assumed to be valid by the Creditor's law firm, unless the Debtor(s), within thirty days after receipt of this Notice, disputes the validity of the debt or some portion thereof.
 4. If the Debtor notifies the Valley National Bank within thirty days of the receipt of this Notice that the debt or any portion thereof is disputed, Valley National Bank will obtain verification of the debt and a copy of the verification will be mailed to the Debtor by the Creditor's law firm.
 5. If the Creditor is not the original creditor, and if the Debtor makes a request to Valley National Bank within thirty days from the receipt of this notice, the name and address of the original Creditor will be mailed to the Debtor by the Creditor's law firm.
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6. The request should be addressed to Valley National Bank, 1445 Valley Road, Wayne, NJ 07470. Attention: Collection Manager
-

<p>New Jersey Bar Association Lawyer Referral Service (800)367-0089</p> <p>Legal Services of New Jersey, Inc. (908)572-9100</p>	<p><u>Gloucester County</u> Gloucester County Bar Association Lawyer Referral Service (856)848-4589</p> <p>*Regional Legal Services (856)848-5360</p>	<p><u>Passaic County</u> Passaic County Bar Association Lawyer Referral Service (973)278-9223</p> <p>Passaic County Legal Aid (973)345-7171</p>
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<p><u>Essex County</u> Essex County Bar Association Lawyer Referral Service (973)622-5207</p> <p>Essex County Legal Aid Assoc. (973)621-1513</p>	<p><u>Ocean County</u> Ocean County Bar Association Lawyer Referral Service (732)240-3666</p> <p>Ocean-Monmouth Legal Services (732)341-2727</p>	<p>* Camden Regional Legal Services, Inc. serves Burlington, Cumberland, Gloucester and Salem Counties.</p>

<p>American Credit Alliance, Inc. 26 S. Warren St. Trenton, NJ 08608. 609-393-5400</p>	<p>Atlantic Human Resources, Inc. 1 S New York Ave. Atlantic City, NJ 08401 609-348-4131</p>	<p>Consumer Credit Counseling Service of Central New Jersey 1931 Nottingham Way Hamilton, NJ 08619 609-586-2574</p>
<p>Consumer Credit Counseling Service of New Jersey 185 Ridgedale Ave. Cedar Knolls, NJ 07927-1812 973-267-4324</p>	<p>Fair Housing Council of Northern New Jersey 131 Main St. Hackensack, NJ 07601 201-489-3552</p>	<p>Garden State Consumer Credit Counseling, Inc. 225 Willowbrook Road Freehold, NJ 07728 1-800-992-4557</p>
<p>Jersey Counseling & Housing Development, Inc. 29 S. Blackhorse Pike Blackwood, NJ 08012 856-227-3683</p>	<p>Jersey Counseling & Housing Development, Inc. 1840 S. Broadway Camden, NJ 08104 856-541-1000</p>	<p>Mercer County Hispanic Association 200 E. State St., 2nd Floor Trenton, NJ 08607 609-392-2446</p>
<p>Middlesex County Economic Opportunities Corporation 1215 Livingston Ave. North Brunswick, NJ 08902 732-790-3344</p>	<p>Morrmouth County Human Services Housing Services Unit P.O. Box 3000 Freehold, NJ 07728 732-431-7998</p>	<p>NJ Citizen Action (main office/financial education center) 744 Broad St., Suite 2080 Newark, NJ 07102 973-643-8800 1-800-NJ-OWNER (loan counseling) 1-888-TAXES-11 (free tax prep assist)</p>
<p>NJ Citizen Action (Central Jersey) 85 Raritan Ave., Suite 100 Highland Park, NJ 08904 732-246-4772</p>	<p>NJ Citizen Action (South Jersey) 2 Riverside Drive, Suite 362 Camden, NJ 08103 856-966-3091</p>	<p>Ocean Community Economic Action Now, Inc. 22 Hyers St. Toms River, NJ 08753-0773 732-244-2351, ext. 2</p>
<p>Paterson Coalition for Housing Inc 262 Main St., 5th Floor Paterson, NJ 07505 973-684-5998</p>	<p>Paterson Task Force for Community Action, Inc. 155 Ellison St. Paterson, NJ 07505 973-279-2333</p>	<p>Puerto Rican Action Board Housing Coalition Unit 90 Jersey Ave. New Brunswick, NJ 08903 732-249-9700</p>
<p>Tri-County Community Action Agency, Inc. 110 Cohansey St. Bridgeton, NJ 08302 856-451-6330</p>	<p>Urban League for Bergen County 106 W. Palisade Ave. Englewood, NJ 07631 201-568-4988</p>	<p>Urban League for Essex County 508 Central Ave. Newark, NJ 07101 973-624-9535</p>
<p>Urban League of Union County 288 N. Broad St. Elizabeth, NJ 07208 908-351-7200</p>	<p>Homelessness Prevention Program New Jersey Department of Community Affairs (866) 829-6270*</p>	

*Basic eligibility is limited by: (a) single family owner/occupied dwellings with at least one deed and mortgage occupying the house; (b) no more than one mortgage or lien encumbrance on the property; (c) no initiated or pending 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.

DATE

*****NOTICE OF INTENTION TO FORECLOSE*****

NAME
MAILING ADDRESS
MAILING ADDRESS

Re: Mortgage Loan Number Loan Number

Dear Borrower(s):

As you are aware, Valley National Bank services this first mortgage on behalf of your lender:

**New Jersey Housing and Mortgage Finance Agency
637 South Clinton Ave.
Trenton, NJ 08650
Ph# 609-278-7400**

The Mortgage at issue is dated Origination Date, was given to secure a loan in the original principal amount of ORIGINAL PRINCIPAL AMOUNT, and is a lien on property located at:

Property Address
Property Address

You are in default under your mortgage loan documents because we have not received the following payments:

Payments due since:	Due Date
Total past due payments:	\$
Late charges:	\$
Other charges:	\$
Less Unapplied Balance	\$
<hr/>	
*****TOTAL AMOUNT DUE:	\$

PAGE 2

You may cure your default by paying the TOTAL AMOUNT DUE in cash, cashiers' check, or certified check on or before 33 days from the date of this letter at the following address:

**Valley National Bank
1445 Valley Road
Wayne, NJ 07470
Attention: Collection Dept. 1-800-526-9098, Ext. 5783**

If your account is not brought current within the 33 days specified above, we may commence a foreclosure suit, at the end of which you will lose your property!

You have the right to cure the default, together with any payments or other charges which may subsequently become due, at any time up to the entry of a Final Judgment in Foreclosure or Order of Redemption if you pay or tender all sums which would have been due in the absence of default at the time of such payment; perform any other obligation which you would have been bound to perform in the absence of default or the exercise of an acceleration clause; pay or tender Court costs, if any, and attorneys' fees in amount not to exceed the amount permitted under the Rules Governing the Courts of the State of New Jersey; and, pay all contractual late charges as provided for in the Note or Mortgage.

You have the right to transfer the mortgaged property to another person subject to the Mortgage and any such transferee may have the right to cure the default as provided for by law, subject to the provisions of the Mortgage documents.

You are advised to seek counsel from an attorney of your choice concerning your rights. If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association or the 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.

Financial assistance for curing the default may be available from the attached list of programs operated by the State or Federal Government or non profit organizations. You may wish to contact one of them or contact one of the following to determine whether assistance may be available:

HUD Housing Counseling Service	1-800-569-4287
Veterans Administration	1-800-827-1000
NJ Commissioner of Banking	1-609-292-3240
Military One-Source	1-800-342-9647

PAGE 3

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Very Truly Yours,

Valley National Bank

By: William Michaels
Collection Representative

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<p><u>Essex County</u> Essex County Bar Association Lawyer Referral Service (973)621-6307</p> <p>Essex County Legal Aid Assoc. (973)621-1513</p>	<p><u>Ocean County</u> Ocean County Bar Association Lawyer Referral Service (732)240-3666</p> <p>Ocean-Monmouth Legal Services (732)341-2727</p>	<p>* Camden Regional Legal Services, Inc. serves Burlington, Cumberland, Gloucester and Salem Counties.</p>

American Credit Alliance, Inc.
26 S. Warren St.
Trenton, NJ 08608
609-383-5400

Atlantic Human Resources, Inc. 1 S
New York Ave.
Atlantic City, NJ 08401
609-343-4131

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 Ave.
Cedar Knolls, NJ 07927-1812
973-267-4324

Fair Housing Council of Northern
New Jersey
131 Main St.
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 S. Blackhorse Pike
Blackwood, NJ 08012
856-227-3683

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

Mercer County Hispanic Association
200 E. State St., 2nd Floor
Trenton, NJ 08607
609-392-2446

Middlesex County Economic
Opportunities Corporation
1215 Livingston Ave.
North Brunswick, NJ 08902
732-790-3344

Morrmouth 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., Suite 2080
Newark, NJ 07102
973-643-8800
1-800-NJ-OWNER (loan counseling)
1-888-TAXES-11 (free tax prep assist)

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

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

Ocean Community Economic Action Now,
Inc.
22 Myers St.
Toms River, NJ 08753-0773
732-244-2351, ext. 2

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

Paterson Task Force for Community
Action, Inc.
155 Ellison St.
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 Cohamsey St.
Bridgeton, NJ 08302
856-451-6330

Urban League for Bergen County
106 W. Pailsade Ave.
Englewood, NJ 07631
201-568-4988

Urban League for Essex County
508 Central Ave.
Newark, NJ 07101
973-624-9535

Urban League of Union County
288 N. Broad St.
Elizabeth, NJ 07208
908-351-7200

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New Jersey Department of Community
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(866) 829-6270*

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EXHIBIT C

DATE

*****NOTICE OF INTENTION TO FORECLOSE*****

NAME
MAILING ADDRESS
MAILING ADDRESS

Re: Mortgage Loan Number Loan Number

Dear Borrower(s):

As you are aware, Valley National Bank is the lender for this first mortgage. We are located at:

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1445 Valley Road
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Ph# 1-800-526-9098**

The Mortgage at issue is dated Origination Date, was given to secure a loan in the original principal amount of ORIGINAL PRINCIPAL AMOUNT, and is a lien on property located at:

Property Address
Property Address

You are in default under your mortgage loan documents because we have not received the following payments:

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<p><u>Essex County</u> Essex County Bar Association Lawyer Referral Service (973)621-6207</p> <p>Essex County Legal Aid Assoc. (973)622-1513</p>	<p><u>Ocean County</u> Ocean County Bar Association Lawyer Referral Service (732)240-3666</p> <p>Ocean-Monmouth Legal Services (732)341-2727</p>	<p>* Camden Regional Legal Services, Inc. serves Burlington, Cumberland, Gloucester and Salem Counties.</p>

American Credit Alliance, Inc.
26 S. Warren St.
Trouton, NJ 08608
609-393-5400

Atlantic Human Resources, Inc. 1 S
New York Ave.
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 Ave.
Cedar Knolls, NJ 07927-1812
973-267-4324

Fair Housing Council of Northern
New Jersey
131 Main St.
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
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29 S. Blackhorse Pike
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856-227-3683

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856-541-1000

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609-392-2446

Middlesex County Economic
Opportunities Corporation
1215 Livingston Ave.
North Brunswick, NJ 08902
732-790-3344

Morrmouth County Human Services
Housing Services Unit
P.O. Box 3000
Freehold, NJ 07728
732-431-7988

NJ Citizen Action (main office/financial
education center)
744 Broad St., Suite 2080
Newark, NJ 07102
973-643-8800
1-800-NJ-OWNER (loan counseling)
1-888-TAXES-11 (free tax prep assist)

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

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

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

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

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

Urban League for Bergen County
105 W. Palisade Ave.
Englewood, NJ 07631
201-566-0888

Urban League for Essex County
508 Central Ave.
Newark, NJ 07101
973-624-9535

Urban League of Union County
288 N. Broad St.
Elizabeth, NJ 07208
908-351-7200

Homelessness Prevention Program
New Jersey Department of Community
Affairs
(866) 829-6270*

*Basic eligibility is limited to: (a) single family owner/occupied dwellings with at least one 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.

DATE

*****NOTICE OF INTENTION TO FORECLOSE*****

NAME
MAILING ADDRESS
MAILING ADDRESS

Re: Mortgage Loan Number Loan Number

Dear Borrower(s):

As you are aware, Valley National Bank is the holder for this first mortgage. Also be advised that Investor is the investor for this first mortgage. We are located at:

**Valley National Bank
1445 Valley Road
Wayne, NJ 07470
Ph# 1-800-526-9098**

The Mortgage at issue is dated Origination Date, was given to secure a loan in the original principal amount of ORIGINAL PRINCIPAL AMOUNT, and is a lien on property located at:

Property Address
Property Address

You are in default under your mortgage loan documents because we have not received the following payments:

Payments due since:	Due Date
Total past due payments:	\$
Late charges:	\$
Other charges:	\$
Less Unapplied Balance	\$
<hr/>	
*****TOTAL AMOUNT DUE:	\$

PAGE 2

You may cure your default by paying the TOTAL AMOUNT DUE in cash, cashiers' check, or certified check on or before 33 days from the date of this letter at the following address:

**Valley National Bank
1445 Valley Road
Wayne, NJ 07470
Attention: Collection Dept. 1-800-526-9098, Ext. 5783**

If your account is not brought current within the 33 days specified above, we may commence a foreclosure suit, at the end of which you will lose your property!

You have the right to cure the default, together with any payments or other charges which may subsequently become due, at any time up to the entry of a Final Judgment in Foreclosure or Order of Redemption if you pay or tender all sums which would have been due in the absence of default at the time of such payment; perform any other obligation which you would have been bound to perform in the absence of default or the exercise of an acceleration clause; pay or tender Court costs, if any, and attorneys' fees in amount not to exceed the amount permitted under the Rules Governing the Courts of the State of New Jersey; and, pay all contractual late charges as provided for in the Note or Mortgage.

You have the right to transfer the mortgaged property to another person subject to the Mortgage and any such transferee may have the right to cure the default as provided for by law, subject to the provisions of the Mortgage documents.

You are advised to seek counsel from an attorney of your choice concerning your rights. If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association or the 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.

Financial assistance for curing the default may be available from the attached list of programs operated by the State or Federal Government or non profit organizations. You may wish to contact one of them or contact one of the following to determine whether assistance may be available:

HUD Housing Counseling Service	1-800-569-4287
Veterans Administration	1-800-827-1000
NJ Commissioner of Banking	1-609-292-3240
Military One-Source	1-800-342-9647

PAGE 3

As required under N.J.S.A. 46:10B-51.a.: (i) a copy of this Notice has been served on the Municipal Clerk of City and (ii) the name and address of the individual located within New Jersey who is authorized to accept service on behalf of Valley National Bank is Lucinda P. Long, Esq., General Counsel, Legal Department, Valley National Bank, 1455 Valley Road, Wayne, New Jersey 07470.

If you dispute that a default has occurred or disagree with the correctness of the calculation of the amount required to cure the default, you may contact the undersigned at 1-(800) 526-9098, Ext. 5783.

Very Truly Yours,

Valley National Bank

By: William Michaels
Collection Representative

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION
OBTAINED WILL BE USED FOR THAT PURPOSE.

**NOTICE REQUIRED BY THE
FAIR DEBT COLLECTION
PRACTICES ACT, (the act),
15 U.S.C. SECTION 1692, et seq.**

To the extent the Act may apply, please be advised of the following:

1. The amount of the original debt is stated in the Notice of Intention to Foreclose Mortgage attached hereto.

 2. The Entity who is named in the attached Notice of Intention to Foreclose Mortgage is the Creditor to whom the debt is owed.

 3. The debt described in the Notice attached hereto will be assumed to be valid by the Creditor's law firm, unless the Debtor(s), within thirty days after receipt of this Notice, disputes the validity of the debt or some portion thereof.

 4. If the Debtor notifies the Valley National Bank within thirty days of the receipt of this Notice that the debt or any portion thereof is disputed, Valley National Bank will obtain verification of the debt and a copy of the verification will be mailed to the Debtor by the Creditor's law firm.

 5. If the Creditor is not the original creditor, and if the Debtor makes a request to Valley National Bank within thirty days from the receipt of this notice, the name and address of the original Creditor will be mailed to the Debtor by the Creditor's law firm.
-
6. The request should be addressed to Valley National Bank, 1445 Valley Road, Wayne, NJ 07470. Attention: Collection Manager
-

<p>New Jersey Bar Association Lawyer Referral Service (800)367-0089</p> <p>Legal Services of New Jersey, Inc. (908)572-9100</p>	<p><u>Gloucester County</u> Gloucester County Bar Association Lawyer Referral Service (856)848-4589</p> <p>*Regional Legal Services (856)848-5360</p>	<p><u>Passaic County</u> Passaic County Bar Association Lawyer Referral Service (973)278-9223</p> <p>Passaic County Legal Aid (973)345-7171</p>
<p><u>Atlantic County</u> Atlantic County Bar Association Lawyer Referral Service (609)345-3444</p> <p>Cape-Atlantic Legal Services (609)348-4200</p>	<p><u>Hudson County</u> Hudson County Bar Association Lawyer Referral Service (201)798-2727</p> <p>Hudson County Legal Services (201)792-6363</p>	<p><u>Salem County</u> Salem County Bar Association Lawyer Referral Service (856)678-8363</p> <p>*Regional Legal Services (856)451-0003</p>
<p><u>Bergen County</u> Bergen County Bar Association Lawyer Referral Service (201)488-0044</p> <p>Bergen County Legal Services (201)487-2166</p>	<p><u>Hunterdon County</u> Hunterdon County Bar Association Lawyer Referral Service (908)735-2611</p> <p>Hunterdon County Legal Services (908)782-7979</p>	<p><u>Somerset County</u> Somerset County Bar Association Lawyer Referral Service (908)685-2323</p> <p>Somerset-Sussex Legal Services (908)231-0840</p>
<p><u>Burlington County</u> Burlington County Bar Association Lawyer Referral Service (609)261-4862</p> <p>*Regional Legal Services (609)261-1088</p>	<p><u>Mercer County</u> Mercer County Bar Association Lawyer Referral Service (609)585-6200</p> <p>Legal Aid Society-Mercer County (609)695-6249</p>	<p><u>Sussex County</u> Sussex County Bar Association Lawyer Referral Service (973)267-5882</p> <p>Somerset-Sussex Legal Services (973)383-7400</p>
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<p><u>Cumberland County</u> Cumberland County Bar Assoc. Lawyer Referral Service (609)692-6207</p> <p>Legal Aid Society (609)451-0083</p>	<p><u>Morris County</u> Morris County Bar Association Lawyer Referral Service (973)267-5882</p> <p>Legal Aid Society of Morris (978)285-6911</p>	
<p><u>Essex County</u> Essex County Bar Association Lawyer Referral Service (973)621-6207</p> <p>Essex County Legal Aid Assoc. (973)621-1513</p>	<p><u>Ocean County</u> Ocean County Bar Association Lawyer Referral Service (732)240-3666</p> <p>Ocean-Monmouth Legal Services (732)341-2727</p>	<p>* Camden Regional Legal Services, Inc. serves Burlington, Cumberland, Gloucester and Salem Counties.</p>

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609-348-4131

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1931 Nottingham Way
Hamilton, NJ 08619
609-586-2574

Consumer Credit Counseling Service of
New Jersey
185 Ridgedale Ave.
Cedar Knolls, NJ 07927-1812
973-267-4324

Fair Housing Council of Northern
New Jersey
131 Main St.
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
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29 S. Blackhorse Pike
Blackwood, NJ 08012
856-227-3683

Jersey Counseling & Housing
Development, Inc.
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Camden, NJ 08104
856-541-1000

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North Brunswick, NJ 08902
732-790-3344

Morrmouth 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., Suite 2080
Newark, NJ 07102
973-643-8800
1-800-NJ-OWNER (loan counselling)
1-888-TAXES-11 (free tax prep assist)

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

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

Ocean Community Economic Action Now,
Inc.
22 Myers St.
Toms River, NJ 08753-0773
732-244-2351, ext. 2

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

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973-279-2333

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Housing Coalition Unit
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New Brunswick, NJ 08903
732-249-9700

Tri-County Community Action Agency,
Inc.
110 Cohansay St.
Bridgeton, NJ 08302
856-451-6330

Urban League for Bergen County
106 W. Fallside Ave.
Englewood, NJ 07631
201-568-0885

Urban League for Essex County
508 Central Ave.
Newark, NJ 07101
973-624-9535

Urban League of Union County
288 N. Broad St.
Elizabeth, NJ 07208
908-351-7200

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

*Basic eligibility is limited to: (a) single family owner/occupied dwellings with at 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 pending 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.

DATE

*****NOTICE OF INTENTION TO FORECLOSE*****

NAME
MAILING ADDRESS
MAILING ADDRESS

Re: Mortgage Loan Number Loan Number

Dear Borrower(s):

As you are aware, Valley National Bank services this first mortgage on behalf of your lender:

**New Jersey Housing and Mortgage Finance Agency
637 South Clinton Ave.
Trenton, NJ 08650
Ph# 609-278-7400**

The Mortgage at issue is dated Origination Date, was given to secure a loan in the original principal amount of ORIGINAL PRINCIPAL AMOUNT, and is a lien on property located at:

Property Address
Property Address

You are in default under your mortgage loan documents because we have not received the following payments:

Payments due since:	Due Date
Total past due payments:	\$
Late charges:	\$
Other charges:	\$
Less Unapplied Balance	\$
<hr/>	
*****TOTAL AMOUNT DUE:	\$

PAGE 2

You may cure your default by paying the TOTAL AMOUNT DUE in cash, cashiers' check, or certified check on or before 33 days from the date of this letter at the following address:

**Valley National Bank
1445 Valley Road
Wayne, NJ 07470
Attention: Collection Dept. 1-800-526-9098, Ext. 5783**

If your account is not brought current within the 33 days specified above, we may commence a foreclosure suit, at the end of which you will lose your property!

You have the right to cure the default, together with any payments or other charges which may subsequently become due, at any time up to the entry of a Final Judgment in Foreclosure or Order of Redemption if you pay or tender all sums which would have been due in the absence of default at the time of such payment; perform any other obligation which you would have been bound to perform in the absence of default or the exercise of an acceleration clause; pay or tender Court costs, if any, and attorneys' fees in amount not to exceed the amount permitted under the Rules Governing the Courts of the State of New Jersey; and, pay all contractual late charges as provided for in the Note or Mortgage.

You have the right to transfer the mortgaged property to another person subject to the Mortgage and any such transferee may have the right to cure the default as provided for by law, subject to the provisions of the Mortgage documents.

You are advised to seek counsel from an attorney of your choice concerning your rights. If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association or the 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.

Financial assistance for curing the default may be available from the attached list of programs operated by the State or Federal Government or non profit organizations. You may wish to contact one of them or contact one of the following to determine whether assistance may be available:

HUD Housing Counseling Service	1-800-569-4287
Veterans Administration	1-800-827-1000
NJ Commissioner of Banking	1-609-292-3240
Military One-Source	1-800-342-9647

PAGE 3

As required under N.J.S.A. 46:10B-51.a.: (i) a copy of this Notice has been served on the Municipal Clerk of City and (ii) the name and address of the individual located within New Jersey who is authorized to accept service on behalf of Valley National Bank is Lucinda P. Long, Esq., General Counsel, Legal Department, Valley National Bank, 1455 Valley Road, Wayne, New Jersey 07470.

If you dispute that a default has occurred or disagree with the correctness of the calculation of the amount required to cure the default, you may contact the undersigned at 1-(800) 526-9098, Ext. 5783.

Very Truly Yours,

Valley National Bank

By: William Michaels
Collection Representative

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION
OBTAINED WILL BE USED FOR THAT PURPOSE.

**NOTICE REQUIRED BY THE
FAIR DEBT COLLECTION
PRACTICES ACT, (the act),
15 U.S.C. SECTION 1692, et seq.**

To the extent the Act may apply, please be advised of the following:

1. The amount of the original debt is stated in the Notice of Intention to Foreclose Mortgage attached hereto.
 2. The Entity who is named in the attached Notice of Intention to Foreclose Mortgage is the Creditor to whom the debt is owed.
 3. The debt described in the Notice attached hereto will be assumed to be valid by the Creditor's law firm, unless the Debtor(s), within thirty days after receipt of this Notice, disputes the validity of the debt or some portion thereof.
 4. If the Debtor notifies the Valley National Bank within thirty days of the receipt of this Notice that the debt or any portion thereof is disputed, Valley National Bank will obtain verification of the debt and a copy of the verification will be mailed to the Debtor by the Creditor's law firm.
 5. If the Creditor is not the original creditor, and if the Debtor makes a request to Valley National Bank within thirty days from the receipt of this notice, the name and address of the original Creditor will be mailed to the Debtor by the Creditor's law firm.
-
6. The request should be addressed to Valley National Bank, 1445 Valley Road, Wayne, NJ 07470. Attention: Collection Manager
-

<p>New Jersey Bar Association Lawyer Referral Service (800)367-0089</p> <p>Legal Services of New Jersey, Inc. (908)572-9100</p>	<p><u>Gloucester County</u> Gloucester County Bar Association Lawyer Referral Service (856)848-4589</p> <p>*Regional Legal Services (856)848-5360</p>	<p><u>Passaic County</u> Passaic County Bar Association Lawyer Referral Service (973)278-9223</p> <p>Passaic County Legal Aid (973)345-7171</p>
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609-586-2574

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Cedar Knolls, NJ 07927-1812
973-267-4324

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2 Riverside Drive, Suite 362
Camden, NJ 08103
856-966-3091

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

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

Paterson Task Force for Community
Action, Inc.
155 Ellison St.
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 Cohansy St.
Bridgeton, NJ 08302
856-451-6330

Urban League for Bergen County
106 W. Palisade Ave.
Englewood, NJ 07631
201-568-0888

Urban League for Essex County
508 Central Ave.
Newark, NJ 07101
973-624-9535

Urban League of Union County
288 N. Broad St.
Elizabeth, NJ 07208
908-351-7200

Homelessness Prevention Program
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 defaulted or unpaid 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.

EXHIBIT B

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/indx.htm> You may also contact the Superior Court Clerk's Office at (609) 421-6100, or at SCCOForeclosure.Mailbox@judiciary.state.nj.us.

EXHIBIT A

Plaintiff's County	Loan Number	Packet Number	Case Caption	Verdict	Judicial Forum Note: FCJ Compliance	Plaintiff's Last Known Address	Plaintiff's Counsel (If Applicable)	Artic. Bankruptcy Info. (If Applicable)	Special Circumstances
Seneca Landmark & Franchising, LLC	18209622	F-17067-18	VALLEY NATIONAL BANK	Memorandum	NOI IS FROM VALLEY NATIONAL BANK DOES NOT STATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. NOI DOES NOT STATE THE LENDER'S ADDRESS. DOES NOT STATE THE LENDER'S PHONE NUMBER AND DOES NOT STATE THE LENDER'S BUSINESS TYPE. LOAN AGREEMENT PROVIDES ONLY 31 DAYS TO CURE. NO STATE JUDGMENT BUT NOT "TRIAL" - JUDGMENT RE: CURE. NO LIST OF HUD APPROVED COUNSELLORS WAS PROVIDED. NO DEFAULT DATE IS INCORRECT PER STATE. DEPOS NOT MADE PER AGREEMENT IS INCORRECT. LENDER'S SHODDLE INITIAL IS MISSING	1408 N. HICKORY RD., BOX 100, WEST FARGO, ND 58078	VALLEY NATIONAL BANK	NOI IS ON PLAINIFF'S LETTERHEAD BUT DOES NOT INDICATE WHERE THEIR VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. NO STATE JUDGMENT BUT NOT "TRIAL" - JUDGMENT RE: CURE. NO LIST OF HUD APPROVED COUNSELLORS IS PROVIDED.	THE MORTGAGOR'S MOTHER CONTACTED MFR OFFICE AND STATED THAT THE MORTGAGOR HAS BREAST CANCER AND WOULD LIKE A WAIVER OF THE EXTENT LETTER SENT MAIL TO THE EXTENT APPROPRIATE. NO DECCA LANGUAGE ON THE FIRST PAGE OF THE NOI
Seneca Landmark & Franchising, LLC	12311836	F-24667-18	VALLEY NATIONAL BANK	Fact	NOI IS ON PLAINIFF'S LETTERHEAD BUT DOES NOT INDICATE WHERE THEIR VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. NO STATE JUDGMENT BUT NOT "TRIAL" - JUDGMENT RE: CURE. NO LIST OF HUD APPROVED COUNSELLORS IS PROVIDED.	1408 N. HICKORY RD., BOX 100, WEST FARGO, ND 58078	VALLEY NATIONAL BANK	THE MORTGAGOR'S MOTHER CONTACTED MFR OFFICE AND STATED THAT THE MORTGAGOR HAS BREAST CANCER AND WOULD LIKE A WAIVER OF THE EXTENT LETTER SENT MAIL TO THE EXTENT APPROPRIATE. NO DECCA LANGUAGE ON THE FIRST PAGE OF THE NOI	
Seneca Landmark & Franchising, LLC	18209233	F-047906-18	VALLEY NATIONAL BANK	Memorandum	NOI STATES VALLEY NATIONAL BANK ON THE LETTERHEAD WHICH IS PLAINIFF BUT DOES NOT STATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. NO STATE JUDGMENT BUT NOT "TRIAL" - JUDGMENT RE: CURE. NO LIST OF HUD APPROVED COUNSELLORS WAS PROVIDED. NO DEFAULT DATE IS INCORRECT PER STATE. DEPOS NOT MADE PER AGREEMENT IS INCORRECT. LENDER'S SHODDLE INITIAL IS MISSING	1408 N. HICKORY RD., BOX 100, WEST FARGO, ND 58078	VALLEY NATIONAL BANK	NOI STATES VALLEY NATIONAL BANK ON THE LETTERHEAD WHICH IS PLAINIFF BUT DOES NOT STATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. NO STATE JUDGMENT BUT NOT "TRIAL" - JUDGMENT RE: CURE. NO LIST OF HUD APPROVED COUNSELLORS WAS PROVIDED.	
Seneca Landmark & Franchising, LLC	18209230	F-047906-18	VALLEY NATIONAL BANK	Memorandum	NOI STATES VALLEY NATIONAL BANK ON THE LETTERHEAD WHICH IS PLAINIFF BUT DOES NOT STATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. NO STATE JUDGMENT BUT NOT "TRIAL" - JUDGMENT RE: CURE. NO LIST OF HUD APPROVED COUNSELLORS WAS PROVIDED.	1408 N. HICKORY RD., BOX 100, WEST FARGO, ND 58078	VALLEY NATIONAL BANK	NOI STATES VALLEY NATIONAL BANK ON THE LETTERHEAD WHICH IS PLAINIFF BUT DOES NOT STATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. NO STATE JUDGMENT BUT NOT "TRIAL" - JUDGMENT RE: CURE. NO LIST OF HUD APPROVED COUNSELLORS WAS PROVIDED.	
Seneca Landmark & Franchising, LLC	12311487	F-43362-19	FRANCIS MCGEE, MICHAEL MCGEE, INC. BANK, BETHESDA NATIONAL BANK, N.J.; ROBERTA LAMAKONE, STATE OF NEW JERSEY; FIA CARD SERVICES NA, ANZA BANK OF AMERICA, N.A.	Memorandum	NOI STATES VALLEY NATIONAL BANK ON THE LETTERHEAD WHICH IS PLAINIFF BUT DOES NOT STATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. NO STATE JUDGMENT BUT NOT "TRIAL" - JUDGMENT RE: CURE. NO LIST OF HUD APPROVED COUNSELLORS WAS PROVIDED. NO DEFAULT DATE IS INCORRECT PER STATE. DEPOS NOT MADE PER AGREEMENT IS INCORRECT. LENDER'S SHODDLE INITIAL IS MISSING	1408 N. HICKORY RD., BOX 100, WEST FARGO, ND 58078	FRANCIS MCGEE, MICHAEL MCGEE, INC. BANK, BETHESDA NATIONAL BANK, N.J.; ROBERTA LAMAKONE, STATE OF NEW JERSEY; FIA CARD SERVICES NA, ANZA BANK OF AMERICA, N.A.	NOI STATES VALLEY NATIONAL BANK ON THE LETTERHEAD WHICH IS PLAINIFF BUT DOES NOT STATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. NO STATE JUDGMENT BUT NOT "TRIAL" - JUDGMENT RE: CURE. NO LIST OF HUD APPROVED COUNSELLORS WAS PROVIDED.	
Seneca Landmark & Franchising, LLC	18210368	F-1061-19	VALLEY NATIONAL BANK	Memorandum	NOI STATES VALLEY NATIONAL BANK ON THE LETTERHEAD WHICH IS PLAINIFF BUT DOES NOT STATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. NO STATE JUDGMENT BUT NOT "TRIAL" - JUDGMENT RE: CURE. NO LIST OF HUD APPROVED COUNSELLORS WAS PROVIDED.	1408 N. HICKORY RD., BOX 100, WEST FARGO, ND 58078	VALLEY NATIONAL BANK	NOI STATES VALLEY NATIONAL BANK ON THE LETTERHEAD WHICH IS PLAINIFF BUT DOES NOT STATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. NO STATE JUDGMENT BUT NOT "TRIAL" - JUDGMENT RE: CURE. NO LIST OF HUD APPROVED COUNSELLORS WAS PROVIDED.	

VALLEY NATIONAL BANK, INC.

15. MICHAEL SABBARINO, CONCERNED SABBARINO, Wolf Pump Bank, NA Successor by Merger to WolfBank, Inc., WACHOVIA BANK, NATIONAL ASSOCIATION and KISSEBEE BALEY TRUST

Ston. Lavaland & Frankfort, LLC 23011629 F-11956-10

Utah

VALLEY NATIONAL BANK, INC.

MARGERY SCHMIDT

Ston. Lavaland & Frankfort, LLC 14218974 F-09181-10

Ocean

VALLEY NATIONAL BANK

15. GARY SCRO and BETHANY M. SCRO, HIS WIFE

Ston. Lavaland & Frankfort, LLC 12311335 F-06694-11

Utah

VALLEY NATIONAL BANK

15. RECEIVED II. STEEL, ANNE M. STEEL, HIS WIFE, OCEAN TRAVEL AND CONDOMINIUM ASSOCIATION, UNITED STATES OF AMERICA.

Ston. Lavaland & Frankfort, LLC 17100720 F-08394-10

Cape May

VALLEY NATIONAL BANK

15. SEAN C. WORTHER, MARGARET S. WORTHER, HIS WIFE, BANK OF AMERICA, N.A. and AMERICAN EXPRESS TRAVEL RELIANT SERVICES CO INC.

Ston. Lavaland & Frankfort, LLC 18200904 F-07184-09

Massachusetts

VALLEY NATIONAL BANK

15. CRYSTI WOLF, STEVEN WOLF, JIMMIE GAN CREDIT BANK, LOUIS WOLF, STATE OF NEW JERSEY.

Ston. Lavaland & Frankfort, LLC 18160376 F-11006-10

Massachusetts

NOT IS ON PLAINIFF'S LETTERHEAD BUT DOES NOT INDICATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. APPROVED CONSIDERATIONS PROVIDED TO US.

MICHAEL SABBARINO & CONCERNED SABBARINO-211 DELAWARE STREET, 2ND FLOOR, ELIZABETH, NJ 07208

NOT IS ON PLAINIFF'S LETTERHEAD BUT DOES NOT INDICATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. APPROVED CONSIDERATIONS PROVIDED TO US.

MARGERY SCHMIDT 102 DEVON STREET, TORRENS RIVER, NJ 08751

NOT IS ON PLAINIFF'S LETTERHEAD BUT DOES NOT INDICATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. APPROVED CONSIDERATIONS PROVIDED TO US.

GARY SCRO/MILO & MORTIMARY SCRO/IBR ACTION SHOWS SERVICE AT THE PROPERTY ADDRESS

NOT IS ON PLAINIFF'S LETTERHEAD BUT DOES NOT INDICATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. APPROVED CONSIDERATIONS PROVIDED TO US.

RECEIVED II. STEEL & ANNE M. STEEL, 447 W. VILLAGE LANE, CHANDLER, VA 20117 BUT NOT TO THAT ADDRESS. AMOUNT PAID DUES IS \$100.00

NOT IS ON PLAINIFF'S LETTERHEAD BUT DOES NOT INDICATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. APPROVED CONSIDERATIONS PROVIDED TO US.

SEAN C. WORTHER & MARGARET S. WORTHER - 27 WEST LARCHMONT DRIVE, COLTS NECK, NJ 07722

NOT IS ON PLAINIFF'S LETTERHEAD BUT DOES NOT INDICATE WHETHER VALLEY NATIONAL BANK IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 31 DAYS TO CURE. APPROVED CONSIDERATIONS PROVIDED TO US.

CRYSTI WOLF - EMERSON DRIVE, MIDDLETOWN, NJ 07951

ORIGINAL LETTER IS SOVEREIGN BANK. AOM IS RECEIVED FROM STATE OF NEW JERSEY. VALLEY NATIONAL BANK, INC IS BEING DESIGNATED AS THE FIRST PAGE OF APPROPRIATE DOCUMENT LANGUAGE ON THE FIRST PAGE OF THE NO

COURT LETTER SENT 7/21/11 TO THE EXTENT APPROPRIATE, NOT PERMITTED FOR THE FIRST PAGE OF THE NO

DEFEND TYPED ON PAGE 10 TO THE EXTENT APPROPRIATE, NOT PERMITTED FOR THE FIRST PAGE OF THE NO

COURT LETTER SENT 8/11/11 TO THE EXTENT APPROPRIATE, NOT PERMITTED FOR THE FIRST PAGE OF THE NO

FILED APPROX TO STAY CURRENT SALE FROM MEDIATION. COURT LETTER SENT 11/21/11. SURRENDER OF PAYMENT AGREEMENT SIGNED 12/11 TO THE EXTENT APPROPRIATE, NOT PERMITTED FOR THE FIRST PAGE OF THE NO

NATION TO SURRENDER PAYMENT FROM MEDIATION. COURT LETTER SENT 11/21/11. SURRENDER OF PAYMENT AGREEMENT SIGNED 12/11 TO THE EXTENT APPROPRIATE, NOT PERMITTED FOR THE FIRST PAGE OF THE NO

VALLEY NATIONAL BANK

VS.

JACQUELINE BELLA VALLE, VINCENT BELLA VALLE, HER HUSBAND and FINANCIAL CLAUSE BANK, N.A.

Plaintiff

NOT IS ON PLAINIFF'S LETTERHEAD BUT DOES NOT STATE THAT THE LETTERHEAD BANK WAS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT; PROVIDES ONLY A DATES TO CURE. NOT STATES JUDGMENT BUT NOT "TRIAL" JUDGMENT BE CAUSE NO LIST OF HED APPROVED COUNSELLORS PROVIDED TO US. AMOUNT DUE MAY BE TOO HIGH

JACQUELINE BELLA VALLE vs GARNETT COURT WAYNE 1979739

CLAW: 7 FILED ON 6/27/12 CASE NO. 12-2027 RECEIVED GRANTED 8/9/12

SENT CLINE LETTERS ON 7/21/11. TO THE EXTENT APPROPRIATE, NO DEBRA LANGRISH ON THE FIRST PAGE OF THE NOT

VALLEY NATIONAL BANK

VS.

TADRESE DUBER, ZAVIELA JANDURIA, WACHOVIA BANK, NATIONAL ASSOCIATION and NEW CENTURY FINANCIAL SERVICES

Defendant

NOT IS ON PLAINIFF'S LETTERHEAD BUT DOES NOT STATE THAT THE LETTERHEAD BANK WAS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT; PROVIDES ONLY A DATES TO CURE. NOT STATES JUDGMENT BUT NOT "TRIAL" JUDGMENT BE CAUSE NO LIST OF HED APPROVED COUNSELLORS PROVIDED TO US. AMOUNT DUE MAY BE TOO HIGH

TADRESE DUBER & ZAVIELA JANDURIA - 13 WILLARD STREET, GAINFIELD, NJ 07035

ZAVIELA JANDURIA, BRIAN D PRESS, ESQ. 2146 BROADWAY SUITE 3 PAUL LAWYER 1979740

CLAW: 7 FILED ON 1/21/11 CASE NO. 11-1033 DATE OF ABANDONMENT 10/19/11 DISCHARGE DATE 4/15/11

SENT CLINE LETTERS ON 1/21/11. TO THE EXTENT APPROPRIATE, NO DEBRA LANGRISH ON THE FIRST PAGE OF THE NOT

VALLEY NATIONAL BANK

VS.

H. PETER DUBEREL, MRS. H. PETER DUBEREL, HIS WIFE and TERRY DUBERELS, TRAVANT

Plaintiff

LISTS VALLEY NATIONAL BANK BUT DOES NOT STATE IT IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT; PROVIDES ONLY A DATES TO CURE. NOT STATES JUDGMENT BUT NOT "TRIAL" JUDGMENT BE CAUSE NO LIST OF HED APPROVED COUNSELLORS. THE AMOUNT DUE MAY BE TOO HIGH. TWO HIGH SENT ONE SHOULD STATE 24 HANBROOK AVE, ROSELAND, NJ 07068 AND ONE SHOULD STATE 24 HANBROOK AVE, ROSELAND, NJ 07068

H. PETER DUBEREL (PHD)

EMPHATIC DUBEREL ON 4/16/11. PROPERTY DESCRIPTION SHOWS THE MORTGAGE DOES NOT RESIDE THEREIN. CURE LETTERS SENT 4/16/11 TO THE EXTENT APPROPRIATE, NO DEBRA LANGRISH ON THE FIRST PAGE OF THE NOT

FRANK FROBE, PATRICIA R. FROBE, HIS WIFE, WACHOVIA BANK, NATIONAL ASSOCIATION, HOKING SERVICES CORP.

Plaintiff

LISTS VALLEY NATIONAL BANK BUT DOES NOT STATE IT IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT; PROVIDES ONLY A DATES TO CURE. NOT STATES JUDGMENT BUT NOT "TRIAL" JUDGMENT BE CAUSE NO LIST OF HED APPROVED COUNSELLORS. THE AMOUNT DUE MAY BE TOO HIGH

FRANK FROBE & PATRICIA FROBE - 90 ARNOLD ROADWEST CALDWELL, NJ 08066

TO THE EXTENT APPROPRIATE, NO DEBRA LANGRISH ON THE FIRST PAGE OF THE NOT

VALLEY NATIONAL BANK

VS.

HESTER HERBOSCHIAFT, DENISE HERBOSCHIAFT, MODERATE NEWS CORPORATION ASSOCIATION, UNITED STATES OF AMERICA, STATE OF NEW JERSEY.

Plaintiff

LISTS VALLEY NATIONAL BANK BUT DOES NOT STATE IT IS THE LENDER. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT; PROVIDES ONLY A DATES TO CURE. NOT STATES JUDGMENT BUT NOT "TRIAL" JUDGMENT BE CAUSE NO LIST OF HED APPROVED COUNSELLORS IS PROVIDED TO US. THE AMOUNT DUE MAY BE TOO HIGH

HESTER HERBOSCHIAFT & DENISE HERBOSCHIAFT-913 GROVE STREET UNIT 111, CLIFTON, NJ 07013

SENT CLINE LETTERS ON 6/15/11. TO THE EXTENT APPROPRIATE, NO DEBRA LANGRISH ON THE FIRST PAGE OF THE NOT

Sam Lavelle & Frankcorp, LLC 1204173 F-42778-10

Sam Lavelle & Frankcorp, LLC 1208668 F-40786-10

Sam Lavelle & Frankcorp, LLC 1041754 F-40375-10

Sam Lavelle & Frankcorp, LLC 1830118 F-40236-10

Sam Lavelle & Frankcorp, LLC 1830130 F-40793-10

VALLEY NATIONAL BANK

VS
THOMAS JACOBS, LEZLIE JACOBS, HIS WIFE, BANK OF AMERICA, N.A., STATE OF NEW JERSEY,

Ston Lavalid & Frankberg, LLC 3003171 F44832-10

VALLEY NATIONAL BANK

VS
DEBORA KIELY, STEPHEN KELLY, HER HUSBAND, WACHOVIA BANK and SEA BRIGHT CONDOMINIUM ASSOCIATION

Ston Lavalid & Frankberg, LLC 1211892 F-30456-10

VALLEY NATIONAL BANK

VS
ANTHONY MARRIED, JR., TAMARA ANN MARRIED, HIS WIFE and JIMMORAN CLUSE BANK, NATIONAL ASSOCIATION

Ston Lavalid & Frankberg, LLC 1214873 F-50141-10

VALLEY NATIONAL BANK

VS
EDWARD OLIVANO, MICHELLE OLIVANO, TD BANK, N.A and JIMMORAN CLUSE BANK, N.A.

Ston Lavalid & Frankberg, LLC 3004039 F-41084-09

VALLEY NATIONAL BANK

VS
FERNANDO PORTO and CECILIA DE PORTO, HIS WIFE

Ston Lavalid & Frankberg, LLC 2482720 F-80663-14

VALLEY NATIONAL BANK

VS
ROBERT BIRKOLL, KANS ROBERT BIRKOLL HIS WIFE, DENISE SCOTT and MEL SCOTT, HUSBAND OF DENISE SCOTT

Ston Lavalid & Frankberg, LLC 1232908 F-33029-10

VALLEY NATIONAL BANK

VS
VICTORIA M. ROSE and RICHARD S. JAMES, P/A

Ston Lavalid & Frankberg, LLC 3700101 F-35001-09

LISTS VALLEY NATIONAL BANK, IT DOES NOT STATE IT IS THE LENDER. IT DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 33 DAYS TO CURE. NOT STATES ADJUDICATED BUT NOT FINAL. ADJUDICATED THE CURE. NO LIST OF HUD APPROVED CONSERVATORS. THE AMOUNT DUE MAY BE TOO HIGH. AS MANY INCLUDED OTHER CHARGES?

THOMAS JACOBS, IN VIRGINIA COURT, OLD BRIDGE, NJ 08857

LISTS VALLEY NATIONAL BANK, IT DOES NOT STATE IT IS THE LENDER. IT DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 33 DAYS TO CURE. NOT STATES ADJUDICATED BUT NOT FINAL. ADJUDICATED THE CURE. NO LIST OF HUD APPROVED CONSERVATORS. THE AMOUNT DUE MAY BE TOO HIGH

DEBORAH & STEPHEN KELLY, 766 OCEAN AVENUE UNIT 4, SEA BRIGHT, NJ 07761

LISTS VALLEY NATIONAL BANK, IT DOES NOT STATE IT IS THE LENDER. IT DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 33 DAYS TO CURE. NOT STATES ADJUDICATED BUT NOT FINAL. ADJUDICATED THE CURE. NO LIST OF HUD APPROVED CONSERVATORS. THE AMOUNT DUE MAY BE TOO HIGH

TAMARA & ANTHONY MARRIED, JR 410N DRIVE HARRINGTON NJ 08043

LISTS VALLEY NATIONAL BANK, IT DOES NOT STATE IT IS THE LENDER. IT DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 33 DAYS TO CURE. NOT STATES ADJUDICATED BUT NOT FINAL. ADJUDICATED THE CURE. NO LIST OF HUD APPROVED CONSERVATORS. THE AMOUNT DUE MAY BE TOO HIGH

MICHELLE OLIVANO IN WORKING AND CURIE BERKWOOD IN 07346 EDWARD OLIVANO, UNKOWN

LISTS VALLEY NATIONAL BANK, IT DOES NOT STATE IT IS THE LENDER. IT DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 33 DAYS TO CURE. NOT STATES ADJUDICATED BUT NOT FINAL. ADJUDICATED THE CURE. NO LIST OF HUD APPROVED CONSERVATORS. THE AMOUNT DUE MAY BE TOO HIGH

CECILIA DE PORTO 31 LAUREL STREET WASHINGTON NJ 07253 FERNANDO PORTO 263 HARRINGTON AVE APT 3 NJ 07001 HARRINGTON, AVE APT 3 NJ 07001

LISTS VALLEY NATIONAL BANK, IT DOES NOT STATE IT IS THE LENDER. IT DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 33 DAYS TO CURE. NOT STATES ADJUDICATED BUT NOT FINAL. ADJUDICATED THE CURE. NO LIST OF HUD APPROVED CONSERVATORS. THE AMOUNT DUE MAY BE TOO HIGH

ROBERT BIRKOLL & DENISE SCOTT, 114 BRICKROAD DRIVE BELLVILLE NJ 07109

NO REFERENCE MADE TO THE LENDER, NOR PREPARES THE WORK. DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT. PROVIDES ONLY 33 DAYS TO CURE. NOT STATES ADJUDICATED BUT NOT FINAL. ADJUDICATED THE CURE. NO LIST OF HUD APPROVED CONSERVATORS. THE AMOUNT DUE MAY BE TOO HIGH

VICTORIA M. ROSE 36 LAKWOOD DRIVE EASTON NJ 08733

TAMARA & ANTHONY MARRIED, JR PHILLIP M. MILLER, ESQ 369 NORTH MAIN STREET, HARRINGTON NJ 08043

MICHELLE OLIVANO-DORN LACON, IN ESQ MICHA REALETY, 10 WASHINGTON THROUGH WASHINGTON THROUGH 10 BOX 281 WAYNE NJ 07070

CHIEF FILED ON 8/19/16 CASE NO. 16-1300 IN: CHIEF LETTER SENT 12/21/16, ENHANCED TO VACATE DEBALT RECEIVED 7/21/16, AMOUNT TO VACATE DEBALT DENIED 10/6/16 TO THE EXTENT APPROPRIATE. NO FEDERAL LANGUAGE ON THE FIRST PAGE OF THE NOI

CHIEF FILED ON 8/19/16 CASE NO. 16-1300 IN: CHIEF LETTER SENT 12/21/16, ENHANCED TO VACATE DEBALT RECEIVED 7/21/16, AMOUNT TO VACATE DEBALT DENIED 10/6/16 TO THE EXTENT APPROPRIATE. NO FEDERAL LANGUAGE ON THE FIRST PAGE OF THE NOI

CHIEF FILED ON 8/19/16 CASE NO. 16-1300 IN: CHIEF LETTER SENT 12/21/16, ENHANCED TO VACATE DEBALT RECEIVED 7/21/16, AMOUNT TO VACATE DEBALT DENIED 10/6/16 TO THE EXTENT APPROPRIATE. NO FEDERAL LANGUAGE ON THE FIRST PAGE OF THE NOI

SENT CURIE LETTERS ON 10/19/16. TO THE EXTENT APPROPRIATE, NOTICE LANGUAGE ON THE FIRST PAGE OF THE NOI

REPARATION 11/06/16 & 2/15/17. NO NOTICE SENT TO THE EXTENT APPROPRIATE. NO FEDERAL LANGUAGE ON THE FIRST PAGE OF THE NOI

CHIEF LETTER SENT 10/21/16, AMOUNT TO VACATE DEBALT RECEIVED 7/21/16, AMOUNT TO VACATE DEBALT DENIED 10/6/16 TO THE EXTENT APPROPRIATE. NO FEDERAL LANGUAGE ON THE FIRST PAGE OF THE NOI

CHIEF LETTER SENT 12/21/16, ENHANCED TO VACATE DEBALT RECEIVED 7/21/16, AMOUNT TO VACATE DEBALT DENIED 10/6/16 TO THE EXTENT APPROPRIATE. NO FEDERAL LANGUAGE ON THE FIRST PAGE OF THE NOI

CHIEF LETTERS SENT 12/21/16, TO THE EXTENT APPROPRIATE, NO FEDERAL LANGUAGE ON THE FIRST PAGE OF THE NOI

SENT CURIE LETTERS ON 8/11/16, TO THE EXTENT APPROPRIATE, NO FEDERAL LANGUAGE ON THE FIRST PAGE OF THE NOI

SENT CURIE LETTERS ON 8/23/16, TO THE EXTENT APPROPRIATE, NO FEDERAL LANGUAGE ON THE FIRST PAGE OF THE NOI

VALLEY NATIONAL BANK

13

DEBORAH SANDERS, BERNALDO OSORIO FERRIZ, BANK OF AMERICA, N.A., PUBLIC SERVICE ELECTRIC AND GAS COMPANY, ESSICK COUNTY WELFARE, JAMES LOGAN JR. HOMELEY ESTATES TRUST (CONDO, WIL FEDERAL CREDIT UNION, STATE OF NEW YORK, U.S. DISTRICT COURT THOMASIN DEPT, HENDERSON, MISSOURI, HENDERSON FINANCIAL GROUP, A CREDIT OF HENDERSON COUNTY OF CAMBER, CASH OR N LLC,

Item Located & Frankfort, LLC 12313165 F40099311

Memorandum

LISTS VALLEY NATIONAL BANK BUT DOES NOT STATE IT IS THE LENDOR, DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT, PROVIDES ONLY 31 DAYS TO CURE, AND STATES JUDGMENT BUT NOT FINAL, JUDGMENT HAS COME, NO LIST OF HINDERS OR ENCUMBRANCES, THE AMOUNT DUE MAY BE TOO HIGH

BERNALDO OSORIO FERRIZ & DEBORAH SANDERS 1507 NORTH AVENUE CONDO 100003119 07/24/10

HANDWRIT ACCOUNT, CHAPTER 7 FILED 12/16/11 CASE NO. 11-4669 DATE OF DISCHARGE 3/29/2012

DEFAULT ENTERED ON 3/29/12, TO THE EXTENT APPROPRIATE, NO FICMA LANGUAGE ON THE FIRST PAGE OF THE 301

VALLEY NATIONAL BANK

13

THACE SCIMMO, HENRY VAN WETTING, HERB HUBBARD, V.A. SECTION OF STONE HILL OF VERMON CORPORATION ASSOCIATION and STONE HILL PROPERTY

Item Located & Frankfort, LLC 12323506 F40096410

Summary

LISTS VALLEY NATIONAL BANK BUT DOES NOT STATE IT IS THE LENDOR, DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT, PROVIDES ONLY 31 DAYS TO CURE, AND STATES JUDGMENT BUT NOT FINAL, JUDGMENT HAS COME, NO LIST OF HINDERS OR ENCUMBRANCES, THE AMOUNT DUE MAY BE TOO HIGH

THACE SCIMMO 2 WICO COURT UNIT 1 VERMONT 07042

DEFAULT ENTERED 6/1/10, TO THE EXTENT APPROPRIATE, NO FICMA LANGUAGE ON THE FIRST PAGE OF THE 301

VALLEY NATIONAL BANK

13

MICHAEL A. SULLIVAN, TANYA J. SULLIVAN, HIS WIFE, COLLEEN FERRIERE, DR. CHONG, DAVID L. SYRES, D.M.D., THE SICO COMPANY, MORNINGHILL FACULTY PRACTICE PLAN, JOSEPH F. GIOVANNIZZO, ANACAPRI FOODS INC., UNIBOND CREDIT PARTNERS, AMTRIPACTE LEASING CO INC, and ALLEGHENY AA B.M.L.

Item Located & Frankfort, LLC 12304087 F40051410

Summary

LISTS VALLEY NATIONAL BANK BUT DOES NOT STATE IT IS THE LENDOR, DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT, PROVIDES ONLY 31 DAYS TO CURE, AND STATES JUDGMENT BUT NOT FINAL, JUDGMENT HAS COME, NO LIST OF HINDERS OR ENCUMBRANCES, THE AMOUNT DUE MAY BE TOO HIGH

MICHAEL SULLIVAN & TANYA J. SULLIVAN 11 HAWDOCKE ROAD, FRANKLIN, NJ 07040

SENT CURE LETTERS ON 8/31/11, TO THE EXTENT APPROPRIATE, NO FICMA LANGUAGE ON THE FIRST PAGE OF THE 301

VALLEY NATIONAL BANK

13

ANGEL VINTHILLA, MARIA VINTHILLA, IHS WIFE and BANK OF AMERICA, NA

Item Located & Frankfort, LLC 12289175 F23659410

Exec

LISTS VALLEY NATIONAL BANK BUT DOES NOT STATE IT IS THE LENDOR, DOES NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL LOAN AMOUNT, PROVIDES ONLY 31 DAYS TO CURE, AND STATES JUDGMENT BUT NOT FINAL, JUDGMENT HAS COME, NO LIST OF HINDERS OR ENCUMBRANCES, THE AMOUNT DUE MAY BE TOO HIGH

ANGEL VINTHILLA SERVICE VIA HUSB, BERNALDO SANDERS 1507 NORTH AVENUE CONDO 100003119 07/24/10

SENT CURE LETTERS ON 8/31/11, TO THE EXTENT APPROPRIATE, NO FICMA LANGUAGE ON THE FIRST PAGE OF THE 301

FEDERAL NATIONAL MORTGAGE ASSOCIATION

13
 RONALD BARRY WOOD, JR.; MARIA WOOD, HIS WIFE; VALLEY NATIONAL BANK, BANK OF AMERICA, N.A.; HERITI JERSEY FEDERAL CREDIT UNION; STATE OF NEW JERSEY

14
 CHARLES WRIGHT; ANNE CHARLES WRIGHT HIS WIFE; CONNIE MORTLEY WRIGHT; MA WRIGHT; HERI JERSEY FEDERAL CREDIT UNION; STATE OF NEW JERSEY; ESTELLE R WRIGHT; FREDERICK THALER LEASING INC; MORGANTHAU HEMMILLTAYTON; STATE OF NEW JERSEY; MEDICAL HOSPITAL OF NORTLINGTON COUNTY; THE COUNTY AND TOW. MICHAEL C MORRIS ESQ; RICHARD W FEDERAL CREDIT UNION; FIRST STATE BANK OF NEW JERSEY; CALVARY INVESTMENTS LLC; ASSOCIATE OF AMERICACREDIT; NEW CENTURY FINANCIAL SERVICES; MIDLAND EQUITY LLC.

15
 NEW JERSEY HOUSING AND MORTGAGE FINANCE AGENCY

16
 ARNIE D THOMAS AND ANGELA D THOMAS, IRS WIFE; JOHN DOE AND ANNE DOE F-100NAMES; BERNIC PETTINGILL; TENANTS OCCUPANTS; AND REMAINDER; INSURED FINANCIAL ACCELYANCE CORPORATION; BERGEN COUNTY BOARD OF SOCIAL SERVICES

17
 NO REFERENCE MADE TO PLAINTEXT DEEN NOT STATE THE ORIGINAL LOAN DATE AND ORIGINAL CUR ASSORT; PROVIDE ONLY AS NOT "FINAL" JUDGMENT RE CUR; NO LIST OF LID APPROVED COUNSELINGS

18
 RONALD BARRY WOOD & MARIA WOOD, WOODY ABUNDANCE & ASSOCIATES, LLC; FARMINGTON, EQ, DRUM 1356; 10001 2317; 094780; (OR ESQ)

19
 CHARLES WRIGHT & CONNIE MORTLEY WRIGHT 96C HILLYER STREET, ORANGE, NJ 07055

20
 SERT CUR; LETTERS OR (2011); TO THE EXTENT APPROPRIATE, NO CHECK LANGUAGE ON THE FIRST PAGE OF THE PDF

21
 STEW LAYNELL & FRENCH, LLC

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 STEW LAYNELL & FRENCH, LLC

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 STEW LAYNELL & FRENCH, LLC

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 STEW LAYNELL & FRENCH, LLC

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 STEW LAYNELL & FRENCH, LLC

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 STEW LAYNELL & FRENCH, LLC

37
 FAILS TO IDENTIFY THE LENDER, FAILS TO ADVISE OBLIGOR OF THEIR RIGHT TO TRANSFER PROPERTY, FAILS TO INCLUDE LIST OF FINANCIAL ASSISTANCE PROVIDERS, NO PERVA LANGUAGE ON FIRST PAGE OF PDF

38
 SERT CUR; LETTERS OR (2011); TO THE EXTENT APPROPRIATE, NO CHECK LANGUAGE ON THE FIRST PAGE OF THE PDF

PLUESE, BECKER & SALTZMAN, LLC
Attorneys At Law
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
Attorneys for Plaintiff

**IN RE NOTICES OF INTENTION TO
FORECLOSE SENT BY VALLEY
NATIONAL BANK**

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**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY
DOCKET NO. F-**

CIVIL ACTION

**ORDER TO SHOW CAUSE
SUMMARY PROCEEDING
PURSUANT TO R. 4:67-2**

THIS MATTER being brought before the Court by **VALLEY NATIONAL BANK** (“the Servicer” or “VNB”), in pending foreclosure cases (“the Foreclosures”), by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing, pursuant to the April 4, 2012 Order of the New Jersey Supreme Court (the “April 4th Order”) and based upon the facts and circumstances described in the Verified Complaint filed herewith and incorporated herein by reference, including defined terms; and the Court having determined that this matter is appropriately 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 Foreclosure Defendants identified in Exhibit “A” of the Verified Complaint (the “Remediated NOI List”) appear and show cause on the _____ day of _____, 2013 before the Honorable Margaret Mary McVeigh, P.J.Ch., Superior Court, Passaic County, Chancery Division, at 71 Hamilton Street, Paterson, NJ 07505 at _____ o’clock (the “Hearing”), why a Final Order/Judgment should not be entered as follows:

- A. Declaring the Servicer's Remediated NOIs in the form of the Remediated NOI Template that contain accurate information regarding each subject Loan derived from the Servicer's Loan Records to be compliant with the requirements of the Fair Foreclosure Act; and

- B. Allowing the Servicer to send Remediated Notices of Intention to Foreclose (the "Remediated NOIs"), affording Foreclosure Defendants at least thirty (30) days from the date the Remediated NOI is mailed to cure the default on their Mortgage without attorneys' fees or costs incurred in the pending Foreclosure; and

- C. Allowing Foreclosures to proceed where more than 35 days have passed since a Remediated Notice of Default was sent to a Foreclosure Defendant without the default at issue having been cured; and

- D. Granting such other relief as the Court deems equitable and just.

IT IS FURTHER ORDERED that:

1. Plaintiff shall serve upon each Foreclosure Defendant a complete package (the "OTSC Package") consisting of a conformed copy of this Order To Show Cause, Verified Complaint without Exhibits, Supporting Certification, Letter Memorandum, Explanatory Letter and Remediated NOI.

2. Service of the OTSC Package shall be effectuated by simultaneous certified mail, return receipt requested, and regular mail to the subject Mortgaged Property's address and the

Foreclosure Defendant's last known address if different.

3. A copy of this Order To Show Cause and Verified Complaint shall be posted on the Judiciary's Web Page at <http://www.judiciary.state.nj.us>.
4. Regarding any Foreclosure Defendant involved in a Bankruptcy case wherein the Automatic Stay enjoins prosecution of the Foreclosure,
 - a. The Servicer may serve a copy of this Order to Show Cause and Verified Complaint, but may defer serving a Remediated NOI if it believes that doing so may violate the Automatic Stay.
 - b. If the Court grants final relief on the return date of this Order To Show Cause and the Servicer has not already sent a Remediated NOI, then the Servicer may send the Remediated NOI once the Automatic Stay is vacated, modified or otherwise inapplicable. In the alternative, Plaintiff may apply to the United States Bankruptcy Court for relief from the Automatic Stay to effectuate service of the Remediated NOI pursuant to this Order.
 - c. In the event that the Servicer does not serve a Remediated NOI with this Order To Show Cause, Plaintiff's Foreclosure action may not proceed until such Remediated NOI is served pursuant to this Court's Order and the time provided therein to cure the default has passed without the default having been cured.
 - d. If the Servicer believes that service of this Order To Show Cause may be a violation of the Automatic Stay, then once the Stay is vacated, modified or

otherwise no longer enjoins service of a Remediated NOI, then the Servicer may send an OTSC Package to the Foreclosure Defendant(s) and the Foreclosure(s) may proceed where more than 35 days have passed after such OTSC Package was sent without the default having been cured. Plaintiff shall not be required to file another Order To Show Cause to Remediate NOIs at issue in Foreclosures subject to the Automatic Stay.

5. Plaintiff shall publish legal notices of this OTSC 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 (the “Objections”) to the process provided for by the April 4th Order. Any Party who wishes to object to the process shall file the Objection under the Docket Number for this Order to Show Cause, **in writing**, with the:

Clerk of the Superior Court, Foreclosure Processing Services
Attn: Objection to Notice of Intention to Foreclose
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625-0971

A copy of the Objection must also be sent to:

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

A copy of the Objection must also be served upon the attorney for the Plaintiff:

Rob Saltzman, Esquire
Pluese, Becker & Saltzman, LLC
20000 Horizon Way, Suite 900
Mt. Laurel, New Jersey 08054

Objections must state with specificity the basis for the Objection and must be filed no later than _____, 2013.

7. If a timely Objection is not filed, the matter may proceed to Final Order/Judgment in accordance with applicable Rules of Court.
8. Any objection regarding a particular Remediated NOI in a particular Foreclosure case must be filed in writing under the Docket Number of that particular Foreclosure action, NOT this Order To Show Cause. Any such 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 particular Remediated NOI will be referred for resolution to the Chancery Judge in the Vicinage where the Mortgaged Property is located.
9. Foreclosure Defendants are hereby informed that a telephone call to the Plaintiff, to the Plaintiff's attorney, to the Servicer, to the Superior Court Clerk's Office, or to this Court, will not protect your rights nor constitute a valid Objection; you must file and serve your written Objection as provided for by 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 Foreclosure Defendant timely files and serves an Objection as provided for above, this application may be decided by the Court at the Hearing or otherwise upon submission of a Certification of Service and a proposed form of Final Order/Judgment as required by this Order To Show Cause.
 12. If written Objection is properly filed and served, the Plaintiff's written reply (the "Reply") shall be filed and served by _____, 2013. A copy of the Reply, if any, shall be served upon the Clerk of Superior Court, with a courtesy copy to the Honorable Margaret Mary McVeigh, P.J.Ch. The Reply need only be served upon the particular Foreclosure Defendant who properly filed and served his/her/their Objection.
 13. Plaintiff shall submit to the Court an original and two copies of a proposed form of Final Order/Judgment incorporating the relief sought no later than _____ days before the Hearing.
 14. The Plaintiff shall file a Certificate of Service of the Verified Complaint, this Order to Show Cause and all supporting documents with the Clerk of Superior Court no later than nine (9) days before the Hearing.
-

15. The Court will entertain argument, but not testimony, at the Hearing, unless the Court otherwise directs.

By The Court,

Hon. Margaret Mary McVeigh, P.J.Ch.

PLUESE, BECKER & SALTZMAN, LLC
Attorneys At Law
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
Attorneys for Plaintiff

**IN RE NOTICES OF INTENTION TO
FORECLOSE SENT BY VALLEY
NATIONAL BANK**

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**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY
DOCKET NO. F-**

CIVIL ACTION

**ORDER TO SHOW CAUSE
SUMMARY PROCEEDING
PURSUANT TO R. 4:67-2**

THIS MATTER being brought before the Court by **VALLEY NATIONAL BANK** (“the Servicer” or “VNB”), in pending foreclosure cases (“the Foreclosures”), by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing, pursuant to the April 4, 2012 Order of the New Jersey Supreme Court (the “April 4th Order”) and based upon the facts and circumstances described in the Verified Complaint filed herewith and incorporated herein by reference, including defined terms; and the Court having determined that this matter is appropriately 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 Foreclosure Defendants identified in Exhibit “A” of the Verified Complaint (the “Remediated NOI List”) appear and show cause on the _____ day of _____, 2013 before the Honorable Margaret Mary McVeigh, P.J.Ch., Superior Court, Passaic County, Chancery Division, at 71 Hamilton Street, Paterson, NJ 07505 at _____ o’clock (the “Hearing”), why a Final Order/Judgment should not be entered as follows:

- A. Declaring the Servicer's Remediated NOIs in the form of the Remediated NOI Template that contain accurate information regarding each subject Loan derived from the Servicer's Loan Records to be compliant with the requirements of the Fair Foreclosure Act; and

- B. Allowing the Servicer to send Remediated Notices of Intention to Foreclose (the "Remediated NOIs"), affording Foreclosure Defendants at least thirty (30) days from the date the Remediated NOI is mailed to cure the default on their Mortgage without attorneys' fees or costs incurred in the pending Foreclosure; and

- C. Allowing Foreclosures to proceed where more than 35 days have passed since a Remediated Notice of Default was sent to a Foreclosure Defendant without the default at issue having been cured; and

- D. Granting such other relief as the Court deems equitable and just.

IT IS FURTHER ORDERED that:

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2. Service of the OTSC Package shall be effectuated by simultaneous certified mail, return receipt requested, and regular mail to the subject Mortgaged Property's address and the

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3. A copy of this Order To Show Cause and Verified Complaint shall be posted on the Judiciary's Web Page at <http://www.judiciary.state.nj.us>.
4. Regarding any Foreclosure Defendant involved in a Bankruptcy case wherein the Automatic Stay enjoins prosecution of the Foreclosure,
 - a. The Servicer may serve a copy of this Order to Show Cause and Verified Complaint, but may defer serving a Remediated NOI if it believes that doing so may violate the Automatic Stay.
 - b. If the Court grants final relief on the return date of this Order To Show Cause and the Servicer has not already sent a Remediated NOI, then the Servicer may send the Remediated NOI once the Automatic Stay is vacated, modified or otherwise inapplicable. In the alternative, Plaintiff may apply to the United States Bankruptcy Court for relief from the Automatic Stay to effectuate service of the Remediated NOI pursuant to this Order.
 - c. In the event that the Servicer does not serve a Remediated NOI with this Order To Show Cause, Plaintiff's Foreclosure action may not proceed until such Remediated NOI is served pursuant to this Court's Order and the time provided therein to cure the default has passed without the default having been cured.
 - d. If the Servicer believes that service of this Order To Show Cause may be a violation of the Automatic Stay, then once the Stay is vacated, modified or

otherwise no longer enjoins service of a Remediated NOI, then the Servicer may send an OTSC Package to the Foreclosure Defendant(s) and the Foreclosure(s) may proceed where more than 35 days have passed after such OTSC Package was sent without the default having been cured. Plaintiff shall not be required to file another Order To Show Cause to Remediate NOIs at issue in Foreclosures subject to the Automatic Stay.

5. Plaintiff shall publish legal notices of this OTSC on at least two days prior to _____ in the following newspapers:

- a. Star Ledger
- b. Bergen Record
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A copy of the Objection must also be sent to:

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A copy of the Objection must also be served upon the attorney for the Plaintiff:

Rob Saltzman, Esquire
Pluese, Becker & Saltzman, LLC
20000 Horizon Way, Suite 900
Mt. Laurel, New Jersey 08054

Objections must state with specificity the basis for the Objection and must be filed no later than _____, 2013.

7. If a timely Objection is not filed, the matter may proceed to Final Order/Judgment in accordance with applicable Rules of Court.
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9. Foreclosure Defendants are hereby informed that a telephone call to the Plaintiff, to the Plaintiff's attorney, to the Servicer, to the Superior Court Clerk's Office, or to this Court, will not protect your rights nor constitute a valid Objection; you must file and serve your written Objection as provided for by 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 Foreclosure Defendant timely files and serves an Objection as provided for above, this application may be decided by the Court at the Hearing or otherwise upon submission of a Certification of Service and a proposed form of Final Order/Judgment as required by this Order To Show Cause.
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By The Court,

Hon. Margaret Mary McVeigh, P.J.Ch.

PLUESE, BECKER & SALTZMAN, LLC
Attorneys At Law
20000 Horizon Way, Suite 900
Mount Laurel, NJ 08054-4318
(856) 813-1700
Attorneys for Plaintiff

**IN RE NOTICES OF INTENTION TO
FORECLOSE SENT BY VALLEY
NATIONAL BANK**

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**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY
DOCKET NO. F-**

CIVIL ACTION

**ORDER TO SHOW CAUSE
SUMMARY PROCEEDING
PURSUANT TO R. 4:67-2**

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IT IS on this _____ day of _____, 2013,

ORDERED that Foreclosure Defendants identified in Exhibit “A” of the Verified Complaint (the “Remediated NOI List”) appear and show cause on the _____ day of _____, 2013 before the Honorable Margaret Mary McVeigh, P.J.Ch., Superior Court, Passaic County, Chancery Division, at 71 Hamilton Street, Paterson, NJ 07505 at _____ o’clock (the “Hearing”), why a Final Order/Judgment should not be entered as follows:

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- c. The Press of Atlantic City
- d. The Gloucester County Times

6. The Court will only entertain objections (the "Objections") to the process provided for by the April 4th Order. Any Party who wishes to object to the process shall file the Objection under the Docket Number for this Order to Show Cause, **in writing**, with the:

Clerk of the Superior Court, Foreclosure Processing Services
Attn: Objection to Notice of Intention to Foreclose
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625-0971

A copy of the Objection must also be sent to:

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

A copy of the Objection must also be served upon the attorney for the Plaintiff:

Rob Saltzman, Esquire
Pluese, Becker & Saltzman, LLC
20000 Horizon Way, Suite 900
Mt. Laurel, New Jersey 08054

Objections must state with specificity the basis for the Objection and must be filed no later than _____, 2013.

7. If a timely Objection is not filed, the matter may proceed to Final Order/Judgment in accordance with applicable Rules of Court.
8. Any objection regarding a particular Remediated NOI in a particular Foreclosure case must be filed in writing under the Docket Number of that particular Foreclosure action, NOT this Order To Show Cause. Any such 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 particular Remediated NOI will be referred for resolution to the Chancery Judge in the Vicinage where the Mortgaged Property is located.
9. Foreclosure Defendants are hereby informed that a telephone call to the Plaintiff, to the Plaintiff's attorney, to the Servicer, to the Superior Court Clerk's Office, or to this Court, will not protect your rights nor constitute a valid Objection; you must file and serve your written Objection as provided for by 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 Foreclosure Defendant timely files and serves an Objection as provided for above, this application may be decided by the Court at the Hearing or otherwise upon submission of a Certification of Service and a proposed form of Final Order/Judgment as required by this Order To Show Cause.
 12. If written Objection is properly filed and served, the Plaintiff's written reply (the "Reply") shall be filed and served by _____, 2013. A copy of the Reply, if any, shall be served upon the Clerk of Superior Court, with a courtesy copy to the Honorable Margaret Mary McVeigh, P.J.Ch. The Reply need only be served upon the particular Foreclosure Defendant who properly filed and served his/her/their Objection.
 13. Plaintiff shall submit to the Court an original and two copies of a proposed form of Final Order/Judgment incorporating the relief sought no later than _____ days before the Hearing.
 14. The Plaintiff shall file a Certificate of Service of the Verified Complaint, this Order to Show Cause and all supporting documents with the Clerk of Superior Court no later than nine (9) days before the Hearing.
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15. The Court will entertain argument, but not testimony, at the Hearing, unless the Court otherwise directs.

By The Court,

Hon. Margaret Mary McVeigh, P.J.Ch.