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IN RE NOTICES OF INTENTION TO	:	SUPERIOR COURT OF NEW JERSEY
FORECLOSE SENT BY	:	CHANCERY DIVISION
VALLEY NATIONAL BANK,	:	DOCKET NO. F-002863-13
	:	CERTIFICATION
	:	IN SUPPORT OF
	:	ORDER TO SHOW CAUSE

Paul Granski, of full age, hereby certifies as follows:

1. I am the Vice President and Mortgage Collection Manager of Valley National Bank (“VNB”). In this capacity, I have the authority to make this Certification on behalf of VNB and am the person in the best position to provide this Certification and explain VNB’s policies and procedures as they relate to the Foreclosures and Notices of Intention to Foreclose at issue herein. I am fully familiar with the facts set forth in this Certification and make this Certification in support of VNB’s Verified Complaint and Order to Show Cause (the “OTSC”) pursuant to the Supreme Court’s April 4, 2012 Order in furtherance of the Guillaume decision.

2. I have occupied my present position at VNB for over six (6) years. I have a total of six (6) years’ experience with the Company and twenty-five (25) years’ experience in the mortgage lending/servicing industry, sixteen (16) years of which were devoted to First Mortgage Collection and Servicing. As a result of my experience, I have knowledge of the policies, procedures and processes that VNB follows as a loan becomes delinquent, referred to

foreclosure, and ultimately liquidated. As such, I submit this Certification based upon personal knowledge as well as a knowledge gained through a personal review of VNB's business records where necessary.

3. VNB services residential mortgage loans throughout the country including in the state of New Jersey.

4. Once a loan goes into default, multiple attempts are made to contact the Borrower to determine whether any options are available to avoid foreclosure, including repayment plan, loan modification, forbearance agreement, Deed in lieu of foreclosure or "short" sale. If the Borrower does not communicate with us or does not otherwise resolve the default through reinstatement or otherwise, VNB sends out a Notice of Intention to Foreclose (the "NOI") as required by the Fair Foreclosure Act. The NOI gives the Borrower at least thirty (30) days to cure the default. If the default is not cured, or the other arrangements made to resolve the delinquency, the loan is referred to local foreclosure counsel to initiate the foreclosure after the cure period provided for in the NOI expires.

5. In light of the New Jersey Supreme Court's opinion in U.S. Bank National Association v. Guillaume, 209 N.J. 449 (2012), VNB remediated its NOI template (The "Remediated NOI Template") to ensure it strictly complies with the Fair Foreclosure Act.

6. Attached as Exhibit to the Verified Complaint herein is a true and accurate copy of the Remediated NOI Template that VNB currently sends to defaulting Borrowers. VNB has

used best efforts to ensure that, to the extent humanly and technologically possible, all NOIs are sent on the Remediated NOI Template and contain accurate substantive information input into the Remediated NOI Template from VNB's contemporaneous business records (The "Loan Records") for the subject loan (the "Loan") account .

7. VNB respectfully seeks a determination that NOIs sent to defaulting New Jersey Borrowers in the form of the Remediated NOI Template, provided, of course, that such NOIs contain accurate substantive information regarding Borrowers' particular Loans, are fully compliant with the Fair Foreclosure Act.

8. 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 the Verified Complaint, conformed copy of this OTSC, this Certification, Explanatory Letter in the form of the Explanatory Letter Template attached to the Verified Complaint herein, and Remediated NOI in the form of the Remediated NOI Template and containing substantive information pertaining to the subject Loan in each Foreclosure. VNB will produce to this Court proof of service of such Remediated NOIs on the Foreclosure Defendants. 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

Opposition 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 appreciates that a Foreclosure predicated upon an NOI that was not strictly statutorily compliant cannot proceed unless a Remediated NOI is served

9. 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, 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 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 or as otherwise directed by the Court.

10. VNB is concerned that service of the Verified Complaint, OTSC, Explanatory Letter and Remediated NOI as a complete OTSC Package upon entry of the OTSC (i.e., the Single Mailing Procedure authorized in the MidFirst matter) may be inconsistent with certain 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 shall be deemed to amend and supersede the Explanatory Letter.

11. VNB respectfully submits that the relief requested in this application, including the Single Mailing Procedure and other elements of the relief described in the Verified

Complaint, accomplishes the salutary purpose of applicable authorities while avoiding prejudice, waste and delay.

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



Paul Granski
Vice President, Valley National Bank

Dated: 12-29-12