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SUPERIOR COURT OF NEW JERSEY

APR 22 2013

Superior Court of New Jersey
Chancery Division
General Equity
MORRIS COUNTY

Estate of Maxine Leacock M.Oldham/R.Campbell
(Your Name(s))

40 Marion Rd 66-D Lumberton, NC 28358
(Your Mailing Address)

(910) 674-4422
(Your Daytime Telephone Number)

JP Morgan Chase Bank N.A
(Name of company or bank that filed the foreclosure
complaint)

Plaintiff(s),

Bergen County
County where the property is located or
"Mercer" for an objection to the Order to Show Cause
Docket No F- 10884-09

Vs.

CIVIL ACTION

OBJECTION TO: (select one)

- Order to Show Cause
- Corrected Notice of Intention to Foreclose

Estate of M.Leacock M.Oldham/R.Campbell
(Name of first defendant listed on the complaint)
Defendant(s),

I/We Mary Oldham & Reginald Campbell, the defendant(s) in the foreclosure matter
(filing party or parties)

Docket # F-10884-09 hereby object
(caption and docket number if different from above)

to the Plaintiff's filing of the (select one)

- Order to Show Cause
 - Corrected Notice of Intention to Foreclose
- for the following specific reasons:
(Describe specific objections in numbered paragraphs. Please attach additional pages if necessary.)

1. JPMorgan Chase Bank, after the demise of Maxine Leacock, would not recognize M. Oldham/R.Campbell (defendants) as agents on behalf of the Estate of Maxine Leacock. We presented to the plaintiff a Deed to the property with the defendants listed as Joint Tenants with the Right of Survivorship. The plaintiffs declined to acknowledge the Deed or the authority given to the defendants therein. Refusing to dialogue, they proceeded to demand on 10/17/10 \$39,507.59 which we could not negotiate or pay at that time.

2. Phelan Hallinam & Schmieg, P.C. , attorneys for the plaintiff, sent a letter to the Estate of M. Leacock with the following quote therein " the failure to obtain the signatures of M. Oldham & R. Campbell on the mortgage given to JP Morgan Chase Bank N. A. appears to have been a mistake or oversight on the part of parties involved in the closing as it was clearly intended that the interest of M. Oldham & R. Campbell would be subordinate to an subject to the mortgage given by M. Leacock to JPMorgan Chase Bank N.A." . We, the defendants, contend the mistake or oversight to obtain signatures on the mortgage offered by JPMorgan Chase Bank, to be a lack of due diligence on the part of the plaintiff, therefore subject to review.

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

04/18/2013
Date

Reginald L. Campbell
Signature
Reginald L. Campbell
Print or Type Name