

Michael Wyshyvanski
(Your Name(s))
31 Furlong Dr, CMH, NJ
(Your Mailing Address)
609-425-8524
(Your Daytime Telephone Number)

Superior Court of New Jersey
Chancery Division
General Equity

Chase Mortgages
(Name of company or bank that filed the foreclosure complaint)
Plaintiff(s),

Cape May County
County where the property is located or "Mercer" for an objection to the Order to Show Cause
Docket No F- _____

vs.

Michael Wyshyvanski
(Name of first defendant listed on the complaint)
Defendant(s),

CIVIL ACTION
OBJECTION TO: (select one)
 Order to Show Cause
 Corrected Notice of Intention to Foreclose

I/We Michael Wyshyvanski, the defendant(s) in the foreclosure matter
(filing party or parties)
F-002979-13 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.)

see attached -

want to keep car house + work
out a new payment schedule.

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.

4-16-2013
Date

Michael Wyshyvanski
Signature
Michael Wyshyvanski
Print or Type Name

Certification of Service

I hereby certify that on 04/09/2013 I sent my objection to the following parties by. (Select which mailing method you chose. If you sent it by both regular and certified mail, check both.)

regular mail certified mail other OVER- NIGHT

List each party to the lawsuit; send your opposition to the attorney if the party is represented by counsel; if the party is pro se you may send the papers directly to that individual

Name CHASE

Name BRIAN A HERMAN, ESQ - DOUG J GUSH

Address P O BOX 44090

Address 101 PARK AVENUE

JACKSONVILLE, FL 32231-4090

NEW YORK, NY 10178

Attorney for _____

Attorney for _____

04/09/2013
Date

Michael Wyshivanuk 4-16-2013
Signature

MICHAEL WYSHYVANUK/MARY WYSHYVANUK
Print or Type Name

Mary Wyshivanuk

Also to: Superior Court Clerk's Office
Foreclosure Processing Service
P.O. Box 971
Trenton, NJ 08625

RECEIVED

APR 25 2013

SUPERIOR COURT
CLERK'S OFFICE

Morgan, Lewis & Blocklus LLP Loan # - 1942984878
Christopher C. Loeber, Esq.
502 Carnegie Center
Princeton, NJ 08540-6241
609-919-6600

Brian A Herman, Esq
Douglas J Gush, Esq
101 Park Avenue
New York, NY 10178

Superior Court of New Jersey
Chancery Division

Docket No.: F-002979-13

Civil Action

To Whom it may Concern:

We are the owners the property: 31 Furlong Dr, CMCH, NJ 08210

Michael & Mary Wyshyvanuk. We obtained this property from Mr. Alex Wyshyvanuk, Sr. (Michaels dad) back in 1986. We have the deeds for the land and the house sale. This house was in Sea Isle City, NJ, we provided the land and the cost of moving this house. We paid Mr. Wyshyvanuk over time for the house. Back in 2000, Mary broke her neck in a car accident, she broke C-2 to C-4, was out of work for a very long time. We at that time, applied for a home equity loan with Champion Mortgage, we unknowing had a adjustable mortgage. We then re-financed that loan with Ameriquest, and once again, fees and points were put into the loan and the closing cost which was over \$12,000 was not told to us till the title company gentleman was sitting in our house, and we had stopped paying our bills per Karen @ Ameriquest. Then CTX was our last time we had the loan turned, and they in-turn sole it to Chase. With all of this said, we had no idea what was down the line when this was transpiring. So, we hired a financial

advisor, Shane C. Libbey, and instead of him paying the mortgage and our other bills, he was keeping our money & we were not the only victims, he was also making credit cards in our names. He is in prison, from stealing, identify theft and miss representing himself, he was a nother Bernie Madoff.

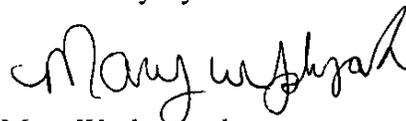
Our older son is in the military and is going on May 2 to Afghanistan. We want to pay our mortgage, but the mortgage company has lost our paperwork atleast three times, they had us fill our a package to modify the loan, somehow, they keep losing it after I received confirmation they received it.

This house is not great, but it is ours and the only house my kids have ever know. We have even went to the PA office to fill out paperwork so they would have it. We are contesting the for-closer, we want to keep the house forever. I hope somehow, God willing this loan will once and for all be straighten out.

THANK YOU IN ADVANCE,



Michael Wyshyvanuk



Mary Wyshyvanuk

cc: Chase Mortgage

Certification of Service

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regular mail certified mail other OVER- NIGHT

List each party to the lawsuit; send your opposition to the attorney if the party is represented by counsel, if the party is pro se you may send the papers directly to that individual

Name CHASE

Name BRIAN A HERMAN, ESQ - DOUG J GUSH

Address P O. BOX 44090

Address 101 PARK AVENUE

JACKSONVILLE, FL 32231-4090

NEW YORK, NY 10178

Attorney for _____

Attorney for _____

04/09/2013
Date

Michael Wyshyvank 4-16-2013
Signature

MICHAEL WYSHYVANUK/MARY WYSHYVANUK
Print or Type Name

Mary Wyshyvank

Also to: Superior Court Clerk's Office
Foreclosure Processing Service
P.O. Box 971
Trenton, NJ 08625

MICHAEL WYSHYVANUK
(Your Name(s))

31 FURLONG DR
(Your Mailing Address)

(609) 425-8524
(Your Daytime Telephone Number)

Superior Court of New Jersey
Chancery Division
General Equity

CHASE MORTGAGE
(Name of company or bank that filed the foreclosure
complaint)

Plaintiff(s),

Vs.

MICHAEL WYSHYVANUK
(Name of first defendant listed on the complaint)

Defendant(s),

Cape May County
County where the property is located or
"Mercer" for an objection to the Order to Show Cause
Docket No **F-** 002979-13

CIVIL ACTION

OBJECTION TO: (select one)

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

I/We MICHAEL & MARY WYSHYVANUK, the defendant(s) in the foreclosure matter
(filing party or parties)

CHASE MORTGAGE 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.)

see attached

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.

04/09/2013
Date

Michael Wyshyvanuk - Mary Wyshyvanuk
Signature

MICHAEL WYSHYVANUK - MARY WYSHYVANUK
Print or Type Name

NEW JERSEY JUDICIARY

JP CHASE MORTGAGE
Plaintiff

FILING FEE WAIVER REQUEST
Based on Inability to Pay

vs. Michael Wyshyvanuk
MARY WYSHYVANUK

Defendant

Applicant's Name: Last WYSHYVANUK		First MARY	MI	Docket Number: FV-002979-13
Home Address: Street 31 FURLONG DR			Apt No	Home Phone # (609) 425-8524
City CMCH	State NJ	Zip 08210	Number of Dependents 3	

I, MARY WYSHYVANUK, am over the age of 18 and request no court fee be charged as I am without funds to pay the fee. I am a (check one) Plaintiff Defendant in the following court:

Civil Special Civil Part General Equity Probate Family

The following are facts about my financial condition. My income before taxes is:

Salary (per month): \$ 1000.	Other Income (per month): \$ 0
Specify source of other income, including six months of prisoners' account statements in accordance with N.J.S.A. 30.4-16.3 (per month):	

The following is a complete list of everything I own and owe, as far as I know:

Own	Amount \$	Owe (per month)	Amount \$
Money in any bank accounts	0.00	Rent/mortgage	1,827.00
Automobiles	0.00	Food	500.00
Real estate	0.00	Utilities	450.00
Insurance with cash value	0.00	Alimony/child support	
Money owed to me		Auto payment	
Other (specify)	0.00	Other (specify)	1,400.00
TOTALS	0.00	TOTALS	4,177.00

Please attach documents as to income (pay stubs, welfare documents, unemployment documents, last bank statement, etc.)

I certify the statements made by me in this document are true and that my proposed pleading is attached. I understand that if I give any false information, I may be punished by the court.

I am signing this statement to explain to the court why I am unable to pay any court fees in this lawsuit.
(Rule 1:13-2(a))

Fee Waived: Yes No

Michael Wyshyvanuk
Signature (Applicant)
Michael Wyshyvanuk
(Print Name)

4-16-2013
Date

Signature (Judge)

(Print Name)

Certification of Service

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regular mail certified mail other OVER- NIGHT

List each party to the lawsuit, send your opposition to the attorney if the party is represented by counsel, if the party is pro se you may send the papers directly to that individual

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Attorney for _____

Attorney for _____

04/09/2013
Date

Michael Wyshyvank 4-16-2013
Signature

MICHAEL WYSHYVANUK/MARY WYSHYVANUK
Print or Type Name

Mary Wyshyvank

Also to: Superior Court Clerk's Office
Foreclosure Processing Service
P.O. Box 971
Trenton, NJ 08625



MEDIATION REQUEST STATEMENT

Homeowner-Borrower(s) Request for Court Sponsored Foreclosure Mediation

DOCKET NO. F 1405027 - 113

Chase Mortgage
Plaintiff's Name

v. Michael Wyshyvank
First Defendant's Name

SECTION A Homeowner-Borrower's Certification

Michael Wyshyvank
[insert your name(s)]

hereby certifies and says

- I/We am/are the owner and mortgagor of the property subject to foreclosure in the above captioned foreclosure action, which property is known as 31 Furlong Dr.
[insert the property address, city, state and zip]
- The complaint is to collect a mortgage debt and I/We am/are the borrowers of the mortgage loan
- I/We live in the above-described property and the property is my/our principal residence.
- I/We have have not filed an answer to the foreclosure complaint filed by my lender
- I/We am am not currently in bankruptcy

I/We certify that the statements made above are true. I/We am/are aware that if any of the statements made by me/us are willfully false, I/we am/are subject to punishment

Michael Wyshyvank
Signature

4-16-13
Date

Mary Wyshyvank
Signature

4-16-13
Date

Michael Wyshyvank
(Type or Print Name)

Mary Wyshyvank
(Type or Print Name)

SECTION B Homeowner's Foreclosure Prevention Proposal/Housing Counselor Proposal

Briefly outline the workout proposal you are seeking, if necessary, attach additional pages

Keep our house + work out a new payment schedule.

SECTION C Housing Agency/Housing Counselor Contact Information

Name _____ Office Phone _____ Cell Phone _____

Address _____ City _____ State _____ Zip _____

Signature _____ Date _____ Print Name _____

SECTION D: Homeowner Contact Information (Please provide the contact information for all parties listed on the mortgage)

Borrowers Name Michael Wyshyvank Home Phone 609-425-8524 Cell Phone _____

Borrowers Name Michael Wyshyvank Home Phone 609-425-8524 Cell Phone _____

31 Furlong Dr Address CMCH City NJ State 08210 Zip