

FEIN, SUCH, KAHN & SHEPARD, P.C.

COUNSELLORS AT LAW

7 CENTURY DRIVE, SUITE 201
PARSIPPANY, NEW JERSEY 07054
(973) 538-9300

FACSIMILE (973) 538-8234

www.feinsuch.com

July 24, 2012

VIA LAWYERS SERVICE

Jennifer Perez, Esq.
Clerk of Superior Court
CN971
Trenton, NJ 08625

Re: ORDER TO SHOW CAUSE PURSUANT TO U.S. BANK-V-GUILLAUME
Docket No. F-37079-09
Our File No. BSI032

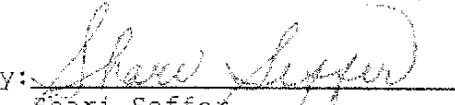
Dear Ms. Perez:

Enclosed herewith please find an original and two (2) copies of my Certification In Support of Order to Show Cause on behalf of BSI Financial as Servicer for RESFUND, LLC.

Kindly assign to the appropriate Judge for review and entry of Order to Show Cause, if acceptable to the Court.

Very truly yours,

FEIN, SUCH, KAHN & SHEPARD, P.C.

By: 
Shari Seffer

SS/sa

Encs.

cc: Kristi Robinson, Esq., Chief Civil Practice Liaison NJ
Administrative Office of the Courts (via lawyers service)

Kevin Wolfe, Esq., Assistant Director Civil Practice Division NJ
Administrative Office of the Courts (via lawyers service)

FEIN, SUCH, KAHN & SHEPARD, PC
7 Century Drive - Suite 201
Parsippany, New Jersey 07054
(973) 538-9300
Attorneys for Movant, BSI Financial
BSI032

IN THE MATTER OF APPLICATION BY
TO ISSUE CORRECTIVE NOTICES OF
INTENT TO FORECLOSE ON BEHALF
OF IDENTIFIED PLAINTIFF(S) IN
UNCONTESTED FORECLOSURE CASES

Defendants.

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION
: PASSAIC COUNTY
: DOCKET NO.: F-013792-12
: Civil Action
: CERTIFICATION OF SHARI SEFFER
: IN SUPPORT OF ORDER TO SHOW
: CAUSE ON BEHALF OF BSI
: FINANCIAL AS SERVICER FOR
: RESFUND, LLC.

SHARI SEFFER, does hereby certify as follows:

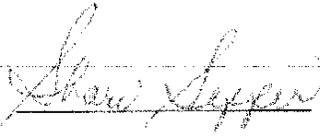
1. I am an attorney at law of the State of New Jersey and of counsel with the firm of Fein Such Kahn and Shepard, PC, attorneys for the applicant in the above entitled action. I am duly authorized to make the instant certification and am fully familiar with the facts and circumstances surrounding the instant application.
2. This application has been made on behalf of the investor Resfund, LLC by BSI Financial Services, INC (hereinafter referred to as "BSI"), for its solitary action pending in a pre-judgment invalid Notice of Intention to Foreclose "NOI". As I was able to ascertain

from BSI, they are not able to include all investors in one application in light of the fact that the investor will be paying the attorney's fees and costs for this application. To require each investor to be included in the same application would result in a co-mingling of funds. It would be impossible to dissect which investor would be responsible for payment of which portion of the fees and costs associated with this application. Thus, as counsel for the applicant herein, the undersigned ascertained that it was vital to separate out the smaller investor portfolios.

3. It is my understanding that there is a strictly, small and limited number of investors which would fall into this category with BSI. As such, the number of similar applications by this investor, upon information and belief, is de minimus.
4. The foregoing is not necessarily the case with the larger servicers. The instant investor is small investor with a very limited portfolio of cases.
5. It is the intent of this office to limit the number of applications to be brought before this court as we recognize the necessity to ensure that judicial economy remain an important concern to all parties involved in the residential mortgage foreclosure process.
6. Furthermore, it was the intent of the undersigned to limit this case as a special circumstance in light of the fact that the borrower does still reside at the property

since a mediation was conducted fairly recently. The instant application is not intended to present a viable format for other matters which should be presented before either of the two (2) judges appointed by the New Jersey Supreme Court to handle the "Guillaume Orders to Show Cause."

7. 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.

A handwritten signature in cursive script, appearing to read "Shari Seffer", is written over a horizontal line.

SHARI SEFFER

Dated; July 24, 2012