

FORM A

CHRISTINE A. KUHNS
 (Your Name(s))
40 Stanton Ave
 (Your Mailing Address)
72-330-0425
 (Your Daytime Telephone Number)
 Defendant(s) *Pro Se*

RECEIVED

AUG 01 2013

SUPERIOR COURT
CLERK'S OFFICE

SUPERIOR COURT OF NEW JERSEY
 CHANCERY DIVISION - GENERAL EQUITY
Ocean COUNTY
 (County where the property is located)

HFC Beneficial
 (Name of company or bank that filed the foreclosure complaint)

Docket No F- ~~17634-07~~
01539013

Plaintiff(s),

vs.

CHRISTINE KUHNS
 (Name of first defendant listed on the complaint)

Defendant(s),

CIVIL ACTION
ANSWER

CHRISTINE KUHNS residing at
 (Insert your name(s))
40 Stanton Ave Pine Beach NJ 08741
 (Insert your street address)

in the City of Pine Beach, County of Ocean and State of New Jersey,
 by way of Answer to the plaintiff's complaint herein, says:

AS TO THE FIRST COUNT:

Defendant admits or is without knowledge or information sufficient to form a belief as to the truth of the allegation of each of the following paragraphs of the first count of the complaint as follows:

I WAS NOT AWARE OF THE INSTITUTE OR ADDRESS WHO WAS HELPING ME WITH MY LOAN MODIFICATION "US HOMEOWNERS RELIEF" AS OF LAST DOCKET # F-176-34-07 I HAD BELIEVED THIS COMPANY WAS A LEGIT COMPANY AS I ALSO PAID THEM 3000 IN E-CHECK - WHICH I ENCLOSED AS PROOF THAT I HAD DONE SO & ON I SAY HERE IS CORRECT TRUTH.

My intention is to request
 However the name & address on this "US Homeowners Relief" modification Institute was clearly stated on prior work order documents I've included my intention to refer to Stanton Ave

AND High listed

1. 10/12/20

10/12/20

10/12/20

FORM A

AS TO THE SECOND COUNT:

Defendant ~~admits/denies~~ or is without knowledge or information sufficient to form a belief as to the truth of the allegation of each of the paragraphs of the second count of the complaint as follows:

I Repeat MY ANSWER the same as in First Count on page one to this. As well as I did try to get Legal assistance from Ocean County Legal services. Ocean county New Jersey. I'm also Disabled now by the state of New Jersey and was awaiting Disability before I can move forward with action to help the situation of foreclosure. My intention is to Refinance this Home

[Note: Defendants must include all separate (see R. 4:5-3) and affirmative defenses (see R. 4:5-4), raise them by motion as permitted in R. 4:6-2, or otherwise raise the defense in a timely manner or those separate defenses and affirmative defenses are waived.]

FIRST SEPARATE DEFENSE

IS that I did go to US Homeowners Relief to modify my loan with HSBC Beneficial. My mortgage company. as well as give copies of my loan modification in process with proper address I've given here documented in original paper work - address & name of Institute

SECOND SEPARATE DEFENSE

States I didn't give my Legal advisors information however Ocean county Legal assistance is a free assistance program lawyers who help. Their address is 303 Main Street Freehold Township. NJ

my intention is to
Please Allow more time so this matter can be looked into as OCT 2013 is nearing & more needs to be looked into.

FORM A

THIRD SEPARATE DEFENSE

occur monmouth legal services, does not comply with foreclosure matters as there is a waiting list also because of sandy for any type of help

OL assistance, more time is needed because

FIRST AFFIRMATIVE DEFENSE

the state is still recovering I have nowhere to go

I did seek assistance on a loan modification threw a faulty company called "US Homeowners Relief" dated 3000 (which I included as proof of paper work enclosed show bank that I've paid so) "US Homeowners Relief" address is stated clearly at this time & date on included documents. Highlighted

SECOND AFFIRMATIVE DEFENSE

My intention is to refinance the home

I did call occur monmouth legal services & was placed on a waiting list & live where the disaster of sandy took place. There is a waiting list for any type of help foreclosure matters in all legal

matters. To be reached back from. I have no where to go and need a good amount of time to figure out what to do next.

Wherefore, Defendant demands judgment:

- A. Dismissing the plaintiff's complaint;
- B. Awarding defendant costs incurred in defending against this action; and
- C. For such other relief as the court deems just and equitable.

My intention is to refinance the home

Dated: _____

Signature

Print or Type Name

Dated: _____

Signature

Print or Type Name

FORM A

CERTIFICATION PURSUANT TO RULE 4:5-1

The matter in controversy is not the subject of any other action pending in any other New Jersey court. There are no pending arbitration proceedings. No other action or arbitration proceedings are contemplated. No non-party is known who would be subject to inclusion or joinder in this case because of potential liability.

Dated: 7-12-13
Signature: [Handwritten Signature]
Print or Type Name: Christine Kehol

Dated: 7-12-13
Signature: [Handwritten Signature]
Print or Type Name: Christine Kehol

CERTIFICATION OF MAILING ANSWER TO COURT AND TO THE ATTORNEY FOR THE PLAINTIFF

I hereby certify that:

- 1. A copy of the within Answer was filed within the time prescribed by the Rules of Court.
2. On 7-12-13 I, the undersigned, mailed to Ocean-Monmouth Legal Services
Attorneys for Plaintiff, at 303 W Main Street

by regular mail, a true copy of the within Answer.

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

Dated: 7-12-13
Signature: [Handwritten Signature]
Print or Type Name: Christine Kehol

Dated: 7-12-13
Signature: [Handwritten Signature]
Print or Type Name: Christine Kehol

I am a Disabled Person by the State
of New Jersey. I increased my disabled
I.D CARD. Please allow time as far
as attorney. I am homeless no family. No
husband. All I get is Disability checks
and child support. IS how I am currently
Surviving. All of my state help is for
as housing has a waiting list due to
Hurricane Sandy.

Appendix XII-B2

<p>FORECLOSURE CASE INFORMATION STATEMENT (FCIS)</p> <p>Use for initial Chancery Division — General Equity foreclosure pleadings (not motions) under Rule 4:5-1. Pleading will be rejected for filing, under Rule 1:5-6(c), if information is not furnished or if attorney's signature is not affixed.</p>	<p>FOR USE BY CLERK'S OFFICE ONLY</p> <p>PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA <input type="checkbox"/> MO</p> <p>RECEIPT NO. _____</p> <p>AMOUNT: _____</p> <p>OVERPAYMENT: _____</p> <p>BATCH NUMBER: _____</p> <p>BATCH DATE: _____</p>
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SECTION A: TO BE COMPLETED BY ALL PARTIES

<p>CAPTION</p> <p align="center"><i>for closure</i></p>	<p>COUNTY OF VENUE</p> <p align="center"><i>oc</i></p>
<p>DOCKET NUMBER (when available)</p>	
<p>NAME(S) OF FILING PARTY(IES) (e.g. John Doe, Plaintiff)</p> <p align="center"><i>Beneficial New Jersey / Mortgage Company</i></p>	<p>DOCUMENT TYPE</p> <p><input type="checkbox"/> COMPLAINT <input checked="" type="checkbox"/> ANSWER <input type="checkbox"/> OTHER</p>
<p>ATTORNEY NAME (IF APPLICABLE)</p> <p align="center"><i>Christiane & Kevin Kohn</i></p>	<p>FIRM NAME (IF APPLICABLE)</p> <p align="center"><i>CHRISTIANE</i></p>
<p>MAILING ADDRESS</p> <p align="center"><i>40 Stanton Ave</i></p>	<p>DAYTIME TELEPHONE NUMBER</p> <p align="center"><i>732-330-0418</i></p>

SECTION B: TO BE COMPLETED BY PLAINTIFF TO INITIAL COMPLAINT

<p>FORECLOSURE CASE TYPE NUMBER</p> <p><input type="checkbox"/> 088 IN PERSONAM TAX FORECLOSURE</p> <p><input type="checkbox"/> 089 IN REM TAX FORECLOSURE</p> <p><input checked="" type="checkbox"/> 0RF RESIDENTIAL MORTGAGE FORECLOSURE</p> <p><input type="checkbox"/> 0CF COMMERCIAL MORTGAGE FORECLOSURE</p> <p><input type="checkbox"/> 0CD CONDOMINIUM OR HOMEOWNER'S ASSOCIATION LIEN FORECLOSURE</p> <p><input type="checkbox"/> 091 STRICT FORECLOSURE</p> <p><input type="checkbox"/> 0FP OPTIONAL FORECLOSURE PROCEDURE (NO SALE)</p> <p><input type="checkbox"/> 0TS TIME SHARE FORECLOSURE</p>	<p>IS THIS A HIGH RISK MORTGAGE PURSUANT TO P.L. 2009, C. 84 AND P.L. 2008, C. 127 <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>PURCHASE MONEY MORTGAGE <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>RELATED PENDING CASE <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>IF YES, LIST DOCKET NUMBERS:</p> <p align="center"><i>F--18634-09</i></p>
<p>FULL PHYSICAL STREET ADDRESS OF PROPERTY:</p> <p align="center"><i>40 Stanton Ave</i></p>	<p>MUNICIPALITY CODE (*)</p>
<p>ZIP CODE: <i>08741</i> COUNTY: <i>Ocean</i></p>	<p>MUNICIPAL BLOCK: <i>271 874</i></p> <p>(LOTS) <i>7</i></p>

ALL FILING PARTIES MUST SIGN AND PRINT NAMES(S) AND DATE THE FORM BELOW

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

<p>ATTORNEY / SELF REPRESENTED SIGNATURE</p> <p align="center"><i>[Signature]</i></p>	<p>PRINT ATTORNEY / SELF REPRESENTED NAME</p> <p align="center"><i>Christiane R. Kohn</i></p>	<p>DATE</p> <p align="center"><i>7-12-13</i></p>
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*The Municipality Codes can be found at http://www.judiciary.state.nj.us/forms/11343_municodes.pdf

To whom it may concern,

I am answering my foreclosure process. I plan to work with the Courts here in Ocean County N.J. with Peggy to mediate with Beneficial of New Jersey, my mortgage company.

I am disabled as my disability as my Supplementary income as I am NOW on "permenent"

disability. After a severe car accident I was involved in on September 28, 2007.

Disability Lawyer Name is Greg Hobbie. telephone number 732-544-1100.

I plan to make an appointment with Peggy for mediation of my home, here in Ocean County N.J. Court house.

Peggy's telephone number is 732-244-2351 Hyatt street.

7/12/13 7/12/13 Oliver / h
7/12/13 7/12/13 Thank

ENCLOSED EV ENCLOSED, LAWYERS

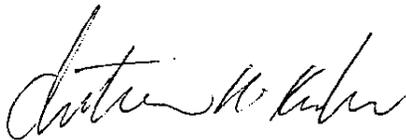
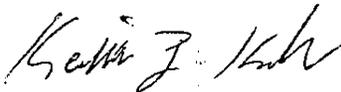
NAME & ADDRESS - Address to, Modification Institute
Payment to Institute E-CHOD 2,900.

To whom it may concern,

We are writing this letter to explain an unfortunate set of circumstances that have caused us to become delinquent on our mortgage. We have done everything in our power to make ends meet. Unfortunately we have fallen short and would like you to consider working with us to modify our loan. Our number one goal is to keep our home and we would really appreciate an opportunity to do that. The main reason that caused us to be late is because I was struck by a drunk driver in September 2007, leaving me with multiple injuries permanently disabling me. Then, in the summer of 2008, my husband, Kevin lost his job of 9 years due to being laid-off because of the economy. Soon after being late, and our income not being nearly enough, we had fallen further and further behind. Now, it's to the point where we cannot afford to pay what is owed to Beneficial. It is our full intention to pay what we owe. But at this time we have exhausted all of our income and resources so we are turning to you for help.

Our situation has gotten better because Kevin found another job as an Engineer and we feel that a loan modification would benefit us both. We would appreciate if you can work with us to lower our delinquent amount and/or payment so we can keep our home and also afford to make amends with your firm. We truly hope that you will consider working with us and we are anxious to get this settled so we all can move on.

Respectfully,

  7/12/13

Christine and Kevin Kuhn
40 Stanton Ave.
Pine Beach, NJ 08741
732-557-9535

Motor Vehicle
Commission

NEW JERSEY

DISABLED PERSON ID



PLACARD#: P850858

GOOD THRU: 05/2014

CHRISTINE R KUHN
40 STANTON AVE
PINE BEACH

NJ 08741
FEE: 0.00

HANDICAPPED 50
DL:K91521247952762
RENEWAL PT:PH
RP201112439792501

KEVIN J KUHN
 136 LIBERTA DR
 TOMS RIVER NJ 08757

07/22/09

7865064468

CYCLE-022

*** CHECKING ACCOUNT TRANSACTIONS ***

DATE	DESCRIPTION	DEBITS	CREDITS
07/14	WTHDRL DDA 8859 07/14 13:14650 CIT DR LIVINGSTON NJ	20.00	
07/14	AC-PayPal Plus CC -PPal EPAY	25.34	
07/14	AC-BANKNORTH NA -LOAN PYMT	329.16	
07/14	AC-US Homeowners Re-FIRST ACH	2,950.00	
07/14	POS DEBIT 07/14 WAWA 321 TOMS RIVER NJ	11.61	
07/14	CKCD DEBIT 07/13 MCDONALD'S F11841 FLORHAM PARK NJ	7.91	
07/14	CKCD DEBIT 07/12 EXXONMOBIL 4727LIVINGSTON NJ	40.01	
07/16	AC-AMERICAN BUILDIN-HOURLY		901.63
07/16	WTHDRL DDA 9360 07/16 18:08 47 EISENHOWER PARKWAY ROSEL NJ	100.00	
07/17	AC-DELL FINANCIAL -ONLINE PMT	25.00	
07/20	WTHDRL DDA 7048 07/18 19:13 10382 OCEAN ROAD PT. PLEASA NJ	43.99	
07/20	AC-CAPITAL ONE -ONLINE PMT	85.00	
07/20	POS DEBIT 07/17 WAWA 321 TOMS RIVER NJ	23.24	
07/20	POS DEBIT 07/19 PATHMARK #582 TOMS RIVER NJ	44.65	
07/20	POS DEBIT 07/18 Marshalls MARSHALLS TOMS RIVER NJ	59.97	
07/20	POS DEBIT 07/18 CNS TOYS R US 4305 TOMS RIVER NJ	71.98	
07/20	CKCD DEBIT 07/16 CLUB PENGUIN ENT. KELOWNA BC	5.95	
07/20	CKCD DEBIT 07/18 THE DISNEY STORE #TOMS RIVER NJ	20.87	
07/20	CKCD DEBIT 07/19 PERKINS 1132TOMS RIVER NJ	27.91	
07/20	CKCD DEBIT 07/18 J & R GASLAND, INCTOMS RIVER NJ	35.40	
07/21	WTHDRL DDA 3836 07/21 17:50 RT 70 & MA AVE TOMS RIVER NJ	100.00	
07/21	CKCD DEBIT 07/19 HESS 30304 TOMS RIVER NJ	7.24	
07/22	CYCLE SERVICE CHARGE	15.00	
07/22	CKCD DEBIT 07/18 CLUB PENGUIN ENT. KELOWNA BC	5.95	
07/22	CKCD DEBIT 07/21 WMV* MATCH.COM 800-326-5161 TX	39.99	

*** BALANCE BY DATE ***

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
06/22	255.86	06/23	96.92	06/24	92.11
06/26	677.82	06/29	419.56	06/30	296.82
07/02	194.28	07/03	79.89	07/06	31.16
07/09	1,016.26	07/10	3,822.07	07/13	3,387.89
07/16	805.49	07/17	780.49	07/20	361.53
07/22	193.35			07/25	778.95
				07/01	200.37
				07/08	8.84
				07/14	3.86
				07/21	254.29

KEVIN J KUHN
136 LIBERTA DR
TOMS RIVER NJ 08757

07/22/09

7865064468

*** CHECKING *** YES CHECKING
ACCOUNT NUMBER 7865064468
PREVIOUS STATEMENT BALANCE AS OF 06/22/09 255.86
PLUS 7 DEPOSITS AND OTHER CREDITS 6,288.22
LESS 76 CHECKS AND OTHER DEBITS 6,335.73
LESS CYCLE SERVICE CHARGE 15.00
CURRENT STATEMENT BALANCE AS OF 07/22/09 193.35
NUMBER OF DAYS IN THIS STATEMENT PERIOD 30

CYCLE-022

*** CHECKING ACCOUNT TRANSACTIONS ***

DATE	DESCRIPTION	DEBITS	CREDITS
06/23	POS DEBIT 06/23 WAWA 321 TOMS RIVER NJ	7.08	
06/23	CKCD DEBIT 06/22 CRYSTAL DINER, THETOMS RIVER NJ	13.00	
06/23	CKCD DEBIT 06/20 CHUCK E CHEESE0000BRICK NJ	20.00	
06/23	CKCD DEBIT 06/21 PIZZA HUT #7318050TOMS RIVER NJ	23.84	
06/23	CKCD DEBIT 06/21 HESS 30304 TOMS RIVER NJ	37.00	
06/23	CKCD DEBIT 06/21 CARRABBA'S #3103 BRICK NJ	58.02	
06/24	POS DEBIT 06/24 SOU THE HOME DEPOT 6627 TOMS RIVER NJ	4.81	
06/25	AC-AMERICAN BUILDIN-HOURLY		749.98
06/25	CKCD DEBIT 06/24 KATIE'S HALLMARK TOMS RIVER NJ	3.95	
06/25	CKCD DEBIT 06/23 THE DISNEY STORE #TOMS RIVER NJ	18.19	
06/25	CKCD DEBIT 06/24 WAWA 927 0000TOMS RIVER NJ	41.00	
06/26	AC-DELL FINANCIAL -ONLINE PMT	25.00	
06/26	POS DEBIT 06/26 NNT WINE & SPIRITS 4628 TENNERSVILLE NY	38.13	
06/26	CKCD DEBIT 06/24 APFLEBEES 76392350MANCHESTER NJ	38.00	
06/29	WTHDRL DDA 4545 06/27 21:4510 MULE RD TOMS RIVER NJ	40.00	
06/29	POS DEBIT 06/27 TURKEY HIL L MINI R.R.#1 TANNERSVILLE PA	35.85	
06/29	POS DEBIT 06/28 PATHMARK #582 TOMS RIVER NJ	49.29	
06/29	CKCD DEBIT 06/27 MCDONALD'S F11840 LAKEWOOD NJ	7.06	
06/29	CKCD DEBIT 06/27 BLOCKBUSTER VIDEO TOMS RIVER NJ	10.69	
06/29	CKCD DEBIT 06/26 AMICI PIZZA AND PATANNERSVILLE PA	15.37	
06/29	CKCD DEBIT 06/26 GULF OIL 9142STROUDSBURG PA	40.00	
06/29	CKCD DEBIT 06/26 NEW JERSEY E -ZPASS888-288-6865 NJ	60.00	
06/30	AC-PayPal Plus CC -PPal EPAY	40.00	
06/30	CKCD DEBIT 06/29 WWW.NEWEGG.COM 800-390-1119 CA	26.74	
06/30	CKCD DEBIT 06/29 WALL TOWNSHIP MUNI732-4494666 NJ	56.00	



US HOMEOWNERS RELIEF

The real property that is the subject of this Agreement (the "Subject Property") is located at: 40 Stanton Ave., Pine Beach, NJ 08741

1st Lien Lender Name: Beneficial Member HSBC Group

Loan Number: 15910136

Lender Address: PO Box 3425, Buffalo, NY 14240

2nd Lien Lender Name: n/a

Loan Number: n/a

Lender Address: n/a

2. Fees for Services. For and in consideration of the Services described in paragraph 4, upon execution of this Agreement, Client shall deposit with US HOMEOWNERS RELIEF, INC the sum of \$2,950.00 (the "Fee").

3. Additional Loan If more than one loan is secured by the Subject Property and Client has requested Services for each additional loan held by a lender or loan servicer (whether plural or singular, collectively "Lender"), the Fees for Services will be increased by \$1,300.00 for each additional loan. Thus, when Services have been requested for two loans held by different Lenders or the same Lender on the Subject property, Client shall deposit with US HOMEOWNERS RELIEF, INC the sum of \$4,250.00 upon the execution of this Agreement.

a. **Trust Account.** All Fees shall be deposited in the following trust account ("Trust Account") and managed as described in paragraphs 3 and 5 of this Agreement:

Depository: Wells Fargo
13410 Yale Ave Irvine, CA 92620
Trust Account Number: 6684077347

Upon receipt of the Fee, US HOMEOWNERS RELIEF, INC shall begin to perform the Services as described in paragraph 4 of this Agreement.

4. Management of Trust Account. US HOMEOWNERS RELIEF, INC shall manage the Trust Account pursuant to *California Business and Professions Code* §10146 (the "Code") which provides that Fees paid by Client (Client is referred to in the Code as the "principal"), be managed as follows:

"Any real estate broker who contracts for or collects an advance fee from any other person, hereinafter referred to as the "principal," is hereby obligated to deposit any such amount or amounts, when collected in a trust account with a bank or other recognized depository. Such funds are trust funds and not the funds of the agent. Amounts may be withdrawn therefore for the benefit of the agent only when actually expended for the benefit of the principal or five days after the verified accounts mentioned hereinafter have been mailed to the principal."



US HOMEOWNERS RELIEF

"Client"

Client Signature: *[Signature]* Date: 7/8/09

Address: 40 Stanton Ave., Pine Beach, NJ 08741

Phone Numbers: Home 732-557-9535 Cell: 732-330-0425

SSN: 091-58-6432

Co-Borrower

Client Signature: *[Signature]* Date: 7/10/09

Address: 40 Stanton Ave., Pine Beach, NJ 08741

Phone Numbers: Home 732-557-9535 Cell: 732-330-0425 -

SSN: 067-70-3142

"Company"

By: _____ Date: _____

US Homeowners Relief, Inc