

Lionel McLeod  
(Your Name(s))

425 Winchester Place  
(Your Mailing Address)

Hackensack, NJ 07601  
(Your Daytime Telephone Number)

Tel.: 201-343-4659

Superior Court of New Jersey  
Chancery Division  
General Equity

Beneficial Financial I, Inc. et al  
(Name of company or bank that filed the foreclosure complaint)

Plaintiff(s),

Mercer County

County where the property is located or "Mercer" for an objection to the Order to Show Cause

Docket No F- 015390-13

Vs.

No defendant identified  
(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 Lionel McLeod  
(filing party or parties)

, the defendant(s) in the foreclosure matter

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 exhibit A attached herein.

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.

Aug 8, 2013  
Date

[Signature]  
Signature

Lionel McLeod  
Print or Type Name

**EXHIBIT**

**A**

**OBJECTION TO ORDER  
TO SHOW CAUSE by Beneficial Financial I, Inc., et al.  
Docket No.: F-015390-13**

WHEREAS: Lionel Mcleod objects to the applicant's Order to Show Cause, **Docket No. F-015390-13** for the following reasons:

**Objection #1**

1. Plaintiff admits that they are the servicer and they do not own the note. Plaintiff is no longer a party interest under Rule 4:26-i Rule 4:26-l which provides in pertinent part that "[e]very action must be prosecuted in the name of the real party in interest[.]" This rule is "ordinarily determinative of standing to prosecute an action." *Fressler, Current NJ Court Rules, comment 2.1 on R. 4:26-1 (2008)*. "To have standing, a party must have 'a sufficient stake and real adverseness with respect to the subject matter of the litigation[.]'" *Town of Secaucus v. Hudson County Bd. of Taxation*, 133 N.J. 482, 49 1-92, 628 A.2d 288 (1993) (quoting *N.J. Chamber of Commerce v. N.J. Election Law Enforcement Comm'n*, 82 N.J. 57, 67, 411 A.2d 168 (1980)). "A financial interest in the outcome of litigation is ordinarily sufficient to confer standing." *Assocs. Commercial Corp. v. Langston*, 236 N.J. Super. 236, 242, 565 A.2d 702 (App.Div.), *certif denied*, 118 N.J. 225, 570 A.2d 979 (1989). Beneficial Financial does not possess such standing and therefore the complaint should be dismissed. **(See exhibit B)**.

**Objection #2**

2. The corrected Notice of Intent to Foreclose is still defective. The fair Foreclosure Act requires that the Notice of Intent to Foreclose specifically list the name of the lender. A "holder" of the note is a Uniform Commercial Code term. It is not the equivalent of the name of the lender. Therefore, Plaintiff's corrective Notice of Intent to Foreclose is defective and fails to

fulfill the requirements of the Fair Foreclosure Act and the Guillaume case.

### **Objection #3**

3. Beneficial Financial is not the holder of the loan and, for all intents and purposes, may not be the rightful servicer of the loan as no service agreement is provided. Ignoring momentarily the blatant standing issue, it is clear that the alleged corrective NOI filed by Beneficial Financial is still completely deficient and noncompliant with the Fair Foreclosure Act and the court's ruling in Guillaume. Guillaume states that strict compliance with the requirements of the Fair Foreclosure Act is necessary and that substantial compliance is insufficient. Plaintiff's "corrected NOT" still fails to provide defendant with the name of the actual owner of the loan.

"N.A.v. Guillaume, 209 N.J. 449 (2012) agreed with the decision in Laks that the FFA requires the NOI to list the name and address of the Lender (defined to mean the original mortgagee or its assigns) in addition to providing contact information for the loan servicer. Plaintiff corrective NOI fails to comply with this requirement."

"Plaintiff's OTSC and corrective Notices of Intent to Foreclose continue to be defective by naming the improper party as Plaintiff Beneficial Financial, Inc. has never had standing to include Defendant in this massive and sweeping OTSC to serve corrected NOI's. *(See exhibit B)*."

#### **Objection #4**

4. The language of the proposed Notice of Intent to Foreclose is misleading. These notices are not tailored to the situation at hand and are written in a manner that is confusing to the mortgagor. The majority of the persons affected by the Order to Show Cause has not retained counsel and will be misled and seriously prejudiced by the language in the corrected NOI's. It appears that the moving party is merely attempting to use judicial resources to approve a proposed form for future notices without regard for the deficiencies they are currently encountering. As the Court is aware the foreclosure process has been full of improperly process foreclosures including improper service of process and the fact that Plaintiff does not even own the loan. To allow a broad and sweeping corrected NOI without regarding to standing and service issues would unduly prejudice homeowners.

#### **Objection #5**

5. To allow a sweeping corrected NOI filed by parties who have failed to prove any legal right to the mortgage or note by its very act violates the Fair Foreclosure Act. The Fair Foreclosure Act contains specific language indicating that the Notice of Intent must be mailed to defaulting homeowners prior to the filing of the foreclosure complaint.

The Act uses the word "shall ". It does not provide for exceptions or alternative options. As the court is aware, he who seeks equity must do equity. However, Beneficial seeks to file a massive sweeping corrected NOI. This proves it violated the Fair Foreclosure Act. To allow such an act to occur completely defeats the purpose, intent and protections provided to homeowners through the Fair Foreclosure Act.

For the reasons stated above and for those reasons that may be raised in any additional objections, it is respectfully requested that Beneficial Financial, Inc's Order to Show Cause be denied in its entirety and/or denied as to the specifically identified homeowner, Lionel Mcleod. for bringing this action against parties during a time when OMAC admits it is not the holder

#### **Objection #6**

6. The law firm of Greenberg Traurig is committing fraud in calling this civil suit as a "Verified Complaint in Support of Order to Show Cause". It is absolutely impossible for Greenberg Traurig to say that they verified this complaint for Beneficial Financial, Inc. did not commence the first action that they claim is being amended.

#### **Objection #7**

7. The first civil suit was commenced by Beneficial New Jersey, Inc. dba Beneficial Mortgage Co. Both companies are out of business as of November 2009. (*See exhibit C*) Yet, Fein, Such, Kahn & Shepard, P.C. , a foreclosure mill being investigated by the Attorney General Office for racketeering fraudulently commenced a foreclosure action on November 4, 2010 after the mortgage company had closed. (*See exhibit D*). Thus, the first case was illegal and had no standing. It put "a cloud" on the property, as to refinancing, because other lenders said that the bank was out of business.

#### **Objection #8**

8. There was never any notification of any assignments of the first mortgage. Thus, Lionel Mcleod's constitutional rights to due process were violated.

**Objection #9**

9. The OTSC is incomplete, for it mentions a list of foreclosure defendants that are supposedly enumerated in "Exhibits A1 through A5. These exhibits are not part of the attached documents and have been excluded. Legally ,the defendant is supposed to be served whatever has been filed.

**Objection #10**

10. Lionel McLeod's name and property address is not mentioned at all in the OTSC. It appears that this is a "mass sweep" in general, for the law firm to do less work and spend less money by not sending to each party a proper OTSC. The following companies have been "grouped together" :

Count One: Beneficial Financial I, Inc.,

Count Two: Beneficial Mortgage Company

Count Three: Household Finance Corporation III

Count Four: HSBC Mortgage Services, Inc.

Respectively,

Lionel McLeod

Dated: August 8, 2013

**EXHIBIT**

**B**

**GREENBERG TRAURIG LLP**

Ian S. Marx, Esq.  
200 Park Avenue  
P.O. Box 677  
Florham Park, NJ 07932  
973-360-7900 (telephone)  
973-301-8410 (facsimile)

Attorneys for Beneficial Financial I, Inc., *et al.*

<p><b>IN RE APPLICATION BY BENEFICIAL FINANCIAL I, INC., ET AL., TO ISSUE CORRECTED NOTICES OF INTENT TO FORECLOSE ON BEHALF OF IDENTIFIED FORECLOSURE PLAINTIFFS</b></p>	<p>) SUPERIOR COURT OF NEW JERSEY ) CHANCERY DIVISION ) MERCER COUNTY ) ) DOCKET NO.: F-015390-13 ) ) <u>CIVIL ACTION</u> ) ) ) VERIFIED AMENDED COMPLAINT ) IN SUPPORT OF ORDER TO SHOW ) CAUSE</p>
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Beneficial Financial I, Inc. ("Beneficial Financial"), Beneficial Mortgage Corporation ("Beneficial Mortgage"), Household Finance Corporation III ("Household"), and HSBC Mortgage Services, Inc. ("HMSI") (collectively, "HSBC") bring this action pursuant to the April 4, 2012 Order of the New Jersey Supreme Court (the "April 4<sup>th</sup> Order") that was entered following the Court's decision in U.S. Bank, N.A. v. Guillaume, 209 N.J. 449 (2012), ("Guillaume"). HSBC respectfully states as follows:

1. HSBC services mortgage loans for residential properties in New Jersey.<sup>1</sup>
2. When HSBC is the servicer of a loan, it undertakes payment collection, loss mitigation (modifications, short sales, deeds in lieu, etc.) and collection efforts, including foreclosure, with respect to a mortgage loan. As the entity collecting and processing payments,

<sup>1</sup> HSBC also appears as a plaintiff in foreclosure proceedings where it may not be the servicer of the loan. This current application to the Court does not include those cases in which the loan is serviced by an entity other than HSBC.

HSBC has the information relevant to the payments, escrows paid, amounts due, and whether a loan is in default and by how much. This information is maintained on HSBC's system of record. HSBC makes this application to the Court in its own capacity.

3. Each of the entities for which HSBC is seeking to issue corrected Notices of Intention to Foreclose ("NOI") are identified in Counts One through Five. Attached as Exhibits A-1 through A-5 to each of those Counts are the current lists of the pending, uncontested foreclosure cases that require corrected NOIs (collectively referred to hereafter as the "Corrected NOI List").

4. One of the duties of a servicer on a defaulted mortgage loan in New Jersey is to prepare and serve the NOI in accordance with N.J.S.A. 2A:50-56 of the Fair Foreclosure Act. The NOI is prepared based on current loan information held by HSBC and includes, among other data elements, information about the amount that is required to reinstate the loan and the date by which reinstatement must occur.

5. On February 27, 2012, the Supreme Court decided Guillaume and held that the Fair Foreclosure Act requires strict adherence to the notice requirements set forth in N.J.S.A. 2A:50-56(c) for all NOIs. The Court further held that a court adjudicating a foreclosure action in which the strict requirements of N.J.S.A. 2A:50-56 were not followed has the discretion to choose the appropriate remedy, permitting a cure of the deficient NOI, or imposing such other remedy as may be appropriate to the specific case.

6. Following its decision in Guillaume, the Court entered the April 4<sup>th</sup> Order which authorizes the Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage, and the Hon. Paul Innes, P.J.Ch., Mercer Vicinage, to entertain summary actions by Orders to Show Cause as to why plaintiffs in any uncontested residential mortgage foreclosure actions filed on or before

February 27, 2012, in which final judgment has not been entered, who caused NOIs to be served that are deficient under the Fair Foreclosure Act, N.J.S.A. 2A:50-56, should not be allowed to serve corrected NOIs on defendant/mortgagors and/or parties obligated on the debt (the "Foreclosure Defendants").

7. The April 4<sup>th</sup> Order further states that any corrected NOI must be accompanied by a letter to the Foreclosure Defendants setting forth the reasons why the corrected NOI is being served, the procedure to follow in the event a Foreclosure Defendant wishes to object to the NOI, the name of a person to contact with any questions, and that the receipt of the corrected NOI allows Foreclosure Defendants thirty (30) days in which to object or to cure the default.

8. HSBC reviewed its pending foreclosure cases to identify those foreclosure cases which will require a corrected NOI. The Corrected NOI List was reviewed for accuracy to verify the status of the foreclosure, the effect of loss mitigation on pending foreclosures, whether there are relevant bankruptcy proceedings and whether, since the original NOIs were sent, there were intervening deaths of Foreclosure Defendants.

9. The Corrected NOI List includes the portfolio of loans that are pre-judgment, uncontested foreclosures that HSBC is servicing and in which deficient NOIs were served by HSBC. Specifically, as directed by the Supreme Court in Guillaume and the April 4<sup>th</sup> Order, the Corrected NOI List will include a listing of:

- a. foreclosures that were filed on or before February 27, 2012 and which HSBC is servicing the loans in its own capacity;
- b. in which final judgment has not been entered; and,
- c. in which HSBC is seeking leave to file a corrected NOI to include the identity of the lender, the lender's address, and any other requirements of N.J.S.A. 2A:50-56(c)(1)-(11).

10. The Corrected NOI List also identifies (1) the name of the lender on each loan which is listed as the plaintiff in the foreclosure action, (2) the last name of the first named Foreclosure Defendant, (3) the foreclosure docket number, and (4) the vicinage.<sup>2</sup> The various HSBC Plaintiffs in these foreclosure actions are both lenders and servicers and maintain the records for each such loan, and are responsible for mailing corrected NOIs.

11. To comply with the April 4<sup>th</sup> Order, attached as Exhibit B to the Verified Complaint is the proposed form of letter ("Explanatory Letter") that HSBC intends to send to each Foreclosure Defendant. As instructed by the Supreme Court in the April 4<sup>th</sup> Order, the proposed form of Explanatory Letter:

- a. explains the reason why the corrected NOI is being served;
- b. the procedure to follow in the event a Foreclosure Defendant wishes to object to the NOI;
- c. identifies the individual(s) a Foreclosure Defendant should contact with any questions; and
- d. advises the Foreclosure Defendant of the right to object to the corrected NOI as well as the right to cure the default within 35 days of the date of the corrected NOI.

The corrected NOIs will exclude attorneys' fees and costs incurred in the pending foreclosure cases.

12. Attached as Exhibit C to the Verified Complaint is the proposed form of corrected NOI which HSBC will send to each of the Foreclosure Defendants identified on the Corrected NOI List. Each Foreclosure Defendant will be served with a corrected NOI that includes, *inter alia*, the information specific to their mortgage loan, their default, the lender's name and address

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<sup>2</sup> Because considerable time has passed since NOIs were originally sent in the foreclosure actions, the lender initially identified in the foreclosure action as plaintiff may not be the current lender listed in the corrected NOI. For sake of clarity, the corrected NOI will list the current lender and lender's address and HSBC will require that foreclosure counsel take appropriate steps to change the plaintiff in affected foreclosure actions where required.

and the amount to reinstate, as provided for in the Order to Show Cause.

**COUNT ONE — BENEFICIAL FINANCIAL I, INC.**

13. Beneficial Financial acts as servicer and is the mortgagee of record for certain residential mortgage loans in New Jersey.

14. Attached as Exhibit A-1 is a list of the pending, uncontested foreclosures in New Jersey where HSBC previously sent an NOI that did not include the name and address of the lender, as well as omitted information about seeking legal assistance.

**COUNT TWO — BENEFICIAL MORTGAGE CORPORATION**

15. Beneficial Mortgage acts as servicer and is the mortgagee of record for certain residential mortgage loans in New Jersey.

16. Attached as Exhibit A-2 is a list of the pending, uncontested foreclosures in New Jersey where HSBC previously sent an NOI that did not include the name and address of the lender, as well as omitted information about seeking legal assistance.

**COUNT THREE — HOUSEHOLD FINANCE CORPORATION III**

17. Household acts as servicer and is the mortgagee of record for certain residential mortgage loans in New Jersey.

18. Attached as Exhibit A-3 is a list of the pending, uncontested foreclosures in New Jersey where HSBC previously sent an NOI that did not include the name and address of the lender, as well as omitted information about seeking legal assistance.

**COUNT FOUR — HSBC MORTGAGE SERVICES, INC.**

19. HMSI acts as servicer and is the mortgagee of record for certain residential mortgage loans in New Jersey.

20. Attached as Exhibit A-4 is a list of the pending, uncontested foreclosures in New

Jersey where HSBC previously sent an NOI that did not include the name and address of the lender.

**COUNT FIVE — PENDING BANKRUPTCY MATTERS**

21. Attached as Exhibit A-5 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by HSBC entities listed in Counts One through Four that are currently subject to the automatic bankruptcy stay. HSBC intends to send corrected NOIs in these matters when permitted by the Bankruptcy Court and in accordance with the instructions of this Court.

**WHEREFORE**, Plaintiff respectfully requests that this Court enter an Order permitting HSBC to issue corrected NOIs in an omnibus manner as permitted in the April 4<sup>th</sup> Order in the pending, uncontested foreclosure cases listed on the Corrected NOI List and for such other and further relief as this Court deems just and equitable.

**GREENBERG TRAURIG LLP**

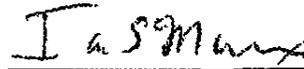


\_\_\_\_\_  
Ian S. Marx, Esq.

Dated: *June* 3, 2013

**CERTIFICATION**

I certify pursuant to Rule 4:5-1 that, to the best of my knowledge, this matter is not the subject of any other action pending in any court or of a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated, other than the pending foreclosure actions on the Corrected NOI List to be submitted to the Court. I further certify that I am unaware of any non-party who should be joined in this action pursuant to Rule 4:28 or who is subject to joinder pursuant to Rule 4:29-1(b) because of potential liability to any party based on the same transactional facts.



\_\_\_\_\_  
Ian S. Marx, Esq.

Dated: *June 3, 2013*



It is on this 11th day of June, 2013, **ORDERED** that the Foreclosure Defendants whose names appear on the Corrected NOI List may appear before the Superior Court at the Mercer County Courthouse, 175 South Broad Street, Trenton, New Jersey at 10:00 o'clock in the forenoon or as soon thereafter as counsel can be heard, on the 3rd day of October, 2013, to object to this Court's Order allowing HSBC to issue corrected NOIs pursuant to this Order to Show Cause.

**AND IT IS FURTHER ORDERED THAT FOR EACH FORELCOSURE ACTION  
IN WHICH HSBC ISSUES A CORRECTED NOI TO A FORECLOSURE DEFENDANT:**

1. HSBC will issue a letter ("Explanatory Letter") to each Foreclosure Defendant in the form attached as Exhibit B to the Verified Amended Complaint. The Explanatory Letter will explain:

- the reasons why the corrected NOI is being served;
- the procedure to follow in the event a Foreclosure Defendant wishes to object to the NOI;
- the individuals to contact with any questions; and
- the right to object to the corrected NOI or the right to cure the default within 35 days of the date of the corrected NOI.

2. HSBC will issue a corrected NOI in the form attached as Exhibit C to the Verified Amended Complaint and shall attach such NOI to the Explanatory Letter referenced in paragraph 1 above. The corrected NOI will exclude attorneys' fees and foreclosure costs that have been incurred in the pending foreclosure cases. In accordance with the servicing guidelines and as required by N.J.S.A. 2A:50-56(e), the Explanatory Letter and corrected NOI will be sent by HSBC, the servicing agent.

3. HSBC will serve the corrected NOI, the Explanatory Letter, and a copy of this Order to Show Cause (collectively, the "OSC Package"), via certified mail, return receipt requested and regular mail at the last known address of the Foreclosure Defendant. For purposes of this Order to Show Cause, HSBC may serve each marital couple residing at the same address with one OSC Package via certified mail and regular mail.<sup>1</sup>

4. A copy of HSBC's complete application to this Court shall be loaded onto the New Jersey Courts website within 20 days of the date of this Order where it will be available for review by the general public at the website link -- <http://www.judiciary.state.nj.us/>.

5. In addition to providing service of the OSC Package by certified and regular mail, HSBC will, within 30 days of the date of this Order, provide publication notice two (2) times in each of the following four (4) daily newspapers in a manner consistent with similar legal notices: The Star-Ledger, The (Bergen) Record, The Press of Atlantic City, and Gloucester County Times. Attached hereto as Exhibit A is a sample publication notice.

6. HSBC shall file with the Court its proof of service of the OSC Package on Foreclosure Defendants on the Corrected NOI List in the manner consistent with this Order no later than nine (9) days before the return date.

7. You [Foreclosure Defendants] have the right to object in this proceeding to this Order to Show Cause (the process by which this Court gave HSBC permission to serve the corrected NOI). To do so, you must file a written objection under the docket number listed on the first page of this Order for this case. You must set forth with specificity the basis for your objection and file your objection with the Superior Court Clerk's Office at the following address by August 9, 2013.

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<sup>1</sup> In the event HSBC has been provided an address for the estate of a deceased Foreclosure Defendant, the OSC Package shall be mailed to the address of the estate and/or the executor or administrator, if known and available.

Superior Court Clerk's Office, Foreclosure Processing Services  
Attention: Objection to Notice of Intention to Foreclose  
P.O. Box 971  
Trenton, New Jersey 08625

You must also serve a copy of the objection on HSBC's attorney, D. Brian O'Dell of Bradley Arant Boult Cummings LLP at One Federal Place, 1819 Fifth Avenue North, Birmingham, AL 35203-2119, and mail a copy of your objection to Judge Innes at the Superior Court of New Jersey, Mercer County Courthouse, First Floor, 175 South Broad Street, Trenton, New Jersey 08650-0068.

8. You [Foreclosure Defendants] also have the right to object to the corrected NOI that you will receive. You will also have 35 days from service of the OSC Package to cure your default. If you object to any of the contents of your corrected NOI, you must file written objection under the docket number for your foreclosure action. If you are unsure of the docket number for your foreclosure action, you can access that information on the Court's website or the attached exhibits to the Verified Amended Complaint or by calling the HSBC representative listed on the Explanatory Letter that will be sent with the corrected NOI. You must set forth with specificity the basis for your objection and file your objection with the Superior Court Clerk's Office at the following address by August 9, 2013.

①

Superior Court Clerk's Office, Foreclosure Processing Services  
P.O. Box 971  
Trenton, New Jersey 08625

You must also serve a copy of the objection on HSBC's attorney, D. Brian O'Dell of Bradley Arant Boult Cummings LLP at One Federal Place, 1819 Fifth Avenue North, Birmingham, AL 35203-2119, and mail a copy of your objection to Judge Innes at the Superior Court of New

③

Jersey, Mercer County Courthouse, First Floor, 175 South Broad Street, P.O. Box 8068 , Trenton, NJ 08650-0068.

9. HSBC may file and serve any written reply to any opposition papers received by August 30, 2013. The reply papers must be filed with the Clerk of the Superior Court in Mercer County, with a copy to Judge Innes and to each Foreclosure Defendant who filed an opposition.

10. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is provided with the corrected NOI.

11. A proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the Court by HSBC no later than nine (9) days before the return date.

12. The Court will entertain argument, but not testimony, on the return date of the Order to Show Cause.

13. In the event a foreclosure action has been suspended or stayed as a result of a bankruptcy filing or loss mitigation activity, the OSC Package shall not be sent unless and until the suspension or stay is lifted. In such circumstances, the following procedure shall be used: HSBC shall mail the OSC Package within 45 days of the lifting of the stay or suspension of the foreclosure action. You [Foreclosure Defendants] will have 30 days in which to object to the corrected NOI or 35 days from service of the OSC Package to cure your default. Any objections to the relief set forth in this Order to Show Cause shall be made in writing to the Court in the County in which your foreclosure action is pending. You must also send a copy of your written papers to HSBC's attorneys, D. Brian O'Dell of Bradley Arant Boult Cummings LLP at One

Federal Place, 1819 Fifth Avenue North, Birmingham, AL 35203-2119, or the Court handling your foreclosure action will not be able to consider your objection.



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PAUL INNES, P.J. Ch.

NJ 227797542

**EXHIBIT**

**D**

Report: #466302

# Complaint Review: Fein Such Kahn Shepard P.C.

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money and then  
walked away  
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\$2,650. Total sum  
after 1 hour  
returned my calls  
since Oct. 06. West  
Seneca, New York



Marceline D  
Dubois, Young  
Mauds Learning  
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Rush, Massachusetts  
stander, water



Nick Macgregor Sell  
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Political Page of  
Garage, Reno

Submitted: Tuesday, June 30, 2009 Last Posting: Monday, November 09, 2009  
Reported By: — Upper Montclair New Jersey

Fein Such Kahn Shepard P.C.  
7 Century Drive #201  
Parsippany, New Jersey Nationwide 07054  
U.S.A.  
Phone: 973-538 4700  
Web:  
Category: Criminal Justice System

## Fein Such Kahn Shepard P.C. Fein Such Kahn Shepard P.C. were sued class action for racketeering, conspiracy, fraud Parsippany, new jersey

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Surprise not only was Fein Such Kahn Shepard PC Lardian consulting sued in class action in Illinois for deceptive practices there were also sued in class action in U.S. District Court in Connecticut in 2002 Docket number 3:02CV960(CFD) for running the same scam on homeowner they now run on credit card fraud scheme.

In that spacious lawsuit there were charged with RACKETEERING, CIVIL CONSPIRACY, MAIL AND WIRE FRAUD, RESPA VIOLATIONS, FAIR DEBIT COLLECTION NEGLIGENCE CLAIMS.

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**FedEx** NEW Package  
Express US Airbill  
FedEx Tracking Number 8034 6579 6704

1 From Please print and press hard.

Date 8/8/13

Sender's FedEx Account Number

Sender's Name Lionel McLeod Phone 201 343-4659

Company

Address 435 Winchester Pl

Office/Room/Suite/Room

City Hackensack State NJ ZIP 07601

2 Your Internal Billing Reference

Sender's FedEx Account Number

3 To Recipient Superior Court Clerk's Office Phone

Name Foreclosure Processing Service CMT  
Company

Address 25 Market St

Office/Room/Suite/Room

Address P.O. Box 971

City Trenton State NJ ZIP 08625

Use this line for the HOLD location address or for completion of your shipping address.

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FedEx Standard Overnight  
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FedEx International Economy  
FedEx International Express  
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Easy new Peel-and-Stick airbill. No pouch needed.  
Apply airbill directly to your package. See directions on back.



Sender's Copy

4 Express Package Service \* To meet business requirements, please select carefully.

Next Business Day

FedEx First Overnight  
Earliest next business morning delivery to other business destinations. Monday-Friday delivery is guaranteed. Saturday delivery is not available.  
 FedEx Priority Overnight  
Next business morning delivery to other business destinations. Monday-Friday delivery is guaranteed. Saturday delivery is not available.  
 FedEx Standard Overnight  
Monday-Friday delivery. Saturday delivery is not available.

2 or 3 Business Days

FedEx 2Day A.M.  
Second business day delivery. Monday-Friday delivery is guaranteed. Saturday delivery is not available.  
 FedEx 2Day  
Second business day delivery. Monday-Friday delivery is guaranteed. Saturday delivery is not available.  
 FedEx Express Saver  
Third business day delivery. Monday-Friday delivery is guaranteed. Saturday delivery is not available.

5 Packaging \* Declared value limit \$500.

FedEx Envelope\*  FedEx Pak\*  FedEx Box  FedEx Tube  Other

6 Special Handling and Delivery Signature Options

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FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.  
 No Signature Required  
Packaging may be left without obtaining a signature for delivery.  
 Direct Signature  
Someone at recipient's address may sign for delivery. Fee applies.  
 Indirect Signature  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. Fee applies.  
Does this shipment contain dangerous goods?  
Use box must be checked.  
 No  Yes per recipient  Shipper's Declaration  Dry Ice  Cargo Aircraft Only  
If preparing goods for shipping, they should be shipped in FedEx packaging or placed in a FedEx-approved shipping box.

7 Payment Bill for

Enter FedEx Acct. No. or Credit Card No. below:  
 Sender's Account  Recipient  Third Party  Credit Card  Cash/Check  
FedEx Acct. No. \_\_\_\_\_  
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Total Packages \_\_\_\_\_ Total Weight \_\_\_\_\_ Total Declared Value\* \$ \_\_\_\_\_

\*Our liability is limited to \$1000 unless you declare a higher value. See back for details. By using the Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms and fees on file.

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PULL AND RETAIN THIS COPY BEFORE AFFIXING TO THE PACKAGE. NO POUCH NEEDED.

**Certification of Service**

I hereby certify that on \_\_\_\_\_ 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

Fed Ex

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 \_\_\_\_\_

Name \_\_\_\_\_

Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Attorney for \_\_\_\_\_

Attorney for \_\_\_\_\_

Date

8/8/13

Signature

Lionel McLeod

Print or Type Name

Lionel McLeod