

FILED Jan 14, 2014

**KNUCKLES, KOMOSINSKI & ELLIOTT, LLP**  
 565 Taxter Road, Suite 590  
 Elmsford, NY 10523  
 Tel: (914) 345-3020  
 Fax: (914) 345-0080  
 Attorneys for Statebridge Company, LLC

**IN RE APPLICATION BY STATEBRIDGE  
 COMPANY, LLC TO ISSUE CORRECTED  
 NOTICES OF INTENT TO FORECLOSE  
 ON BEHALF OF AN IDENTIFIED  
 FORECLOSURE PLAINTIFF IN CERTAIN  
 UNCONTESTED CASES**

**SUPERIOR COURT OF NEW JERSEY  
 CHANCERY DIVISION  
 PASSAIC COUNTY**

**DOCKET NO.:**

**E-001646-14  
 CIVIL ACTION**

**VERIFIED COMPLAINT**

Statebridge Company, LLC ("Statebridge"), authorized to act on behalf of the Wilmington Savings Fund Society, FSB, Not in its Individual Capacity But Solely as Trustee for the Prime Star H Fund I Trust ("Wilmington") in certain pending, pre-judgment uncontested foreclosure actions, brings 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"). Statebridge respectfully states the following:

1. Statebridge is a foreign limited liability company that services mortgage loans for residential properties in New Jersey for Wilmington, among other owners of mortgage loans.
2. When Statebridge is the servicer of the loan, it undertakes payment collection, loss mitigation (modifications, short sales, deeds in lieu) and collection efforts, including foreclosure, with respect to a mortgage loan. If a loan is owned by another entity, Statebridge undertakes these efforts in accordance with the contracts that govern its relationship with the owner of the loan as well as the loan documents,

rules of Court and any applicable laws. As the entity collecting and processing payments, Statebridge 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 Statebridge's systems of record. In cases in which Statebridge is only the servicer (and not also the lender), the lender is not likely to have possession of the relevant servicing information, as was recognized by the Supreme Court when it revised the Court Rules governing foreclosures at R. 4:64-1 and R. 4:64-2 in June, 2011. Statebridge makes this application to the Court on behalf of and pursuant to the authority granted to Statebridge as the servicing agent of Wilmington in pending foreclosure cases.

3. Wilmington is the foreclosing plaintiff in the foreclosure cases for which Statebridge is seeking to issue corrected Notices of Intent to Foreclose. Attached hereto as Exhibit A is the current list of 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 of a defaulted mortgage loan in New Jersey is to prepare and serve the Notice of Intent to Foreclose ("NOI"), in accordance with the applicable contracts and as required by N.J.S.A. 2A:50-56 of the Fair Foreclosure Act. The NOI is prepared based on current loan information held by Statebridge 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 Honorable Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage, and the Honorable 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 30 days<sup>1</sup> in which to object or to cure the default.

8. Statebridge has identified a population of foreclosure cases in which the previously served NOIs failed to include the name and/or address of the lender, as required by N.J.S.A. 2A:50-56(c)(11), and will therefore require a corrected NOI.

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<sup>1</sup> Statebridge will provide borrowers 35 days from the date of the corrected NOI, as reflected in the correspondence that will be sent to the borrowers.

Statebridge has also determined that some of the NOIs did not identify: (1) the name, address and/or phone number of a person to whom the payment or tender shall be made or to contact if the mortgagor disagrees with the lender's assertion that a default has occurred or the correctness of the lender's calculation of the amount required to cure the default; and/or (2) the mortgagor's right to cure the default after steps towards the initiation of foreclosure proceedings were taken. The Corrected NOI List was reviewed for accuracy to verify the status of the foreclosures, 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 attached as Exhibit "A" includes the portfolio of loans that are pre-judgment, uncontested foreclosures that Statebridge is servicing and in which deficient NOIs were served. Specifically, as directed by the Court in Guillaume and the April 4, 2012 Order, the Corrected NOI List includes a listing of:

- a. foreclosures that were filed on or before February 27, 2012 and which Statebridge is servicing the loans and acting as agent for Wilmington;
- b. in which final judgment has not been entered; and
- c. in which Statebridge is seeking leave to file a corrected NOI to include the identity of the lender and the lender's address.

10. The Corrected NOI List also identifies: (1) the name of the lender for each loan; (2) the abbreviated caption for each foreclosure action (including the first-named defendant); (3) the foreclosure docket number; (4) whether the foreclosure is contested; and (5) a brief description of the deficiencies of each NOI.<sup>2</sup> Statebridge is the servicer of

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<sup>2</sup> Because considerable time has passed since NOIs were originally sent in the foreclosure actions, the Foreclosure Plaintiff initially identified in the caption will not be the current correct entity that will be

each such loan, maintains the records for each such loan, and is responsible for mailing the corrected NOI pursuant to the relevant contract(s) with Wilmington.

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 Statebridge intends to send to each Foreclosure Defendant. In accordance with 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. explains the procedure to follow in the event a Foreclosure Defendant wishes to object to the NOI;
- c. includes the borrower name, loan number, plaintiff and a docket number for the underlying foreclosure action;
- d. identifies the individual(s) a Foreclosure Defendant should contact with any questions; and
- e. 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.

**COUNT 1 - WILMINGTON SAVINGS FUND SOCIETY, FSB, NOT IN ITS  
INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE FOR THE PRIME STAR H  
FUND I TRUST**

12. Statebridge services residential mortgage loans in New Jersey for Wilmington pursuant to an agreement between the parties.

13. Identified on the attached Exhibit "A" is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by Statebridge for Wilmington and in which a NOI previously served did not strictly comply with N.J.S.A. 2A:50-56.

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listed in the corrected NOI. For sake of clarity, the corrected NOI will list the current lender and lender's address and Statebridge will require that foreclosure counsel take appropriate steps to change the plaintiff in the affected foreclosure actions where required.

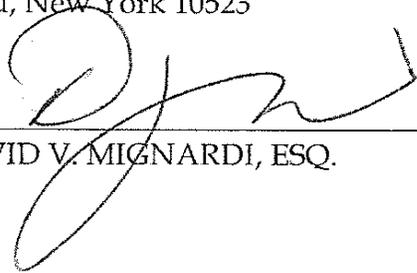
WHEREFORE, Plaintiff respectfully requests that this Court enter an Order permitting Statebridge to issue corrected NOIs in an omnibus manner as permitted in the April 4, 2012 Order to, *inter alia*, include the name and address of the lender in the pending, uncontested foreclosure cases lists on the Corrected NOI List, and for such other and further relief as this Court deems just, proper, and equitable.

Dated: January 14, 2014

**KNUCKLES, KOMOSINSKI & ELLIOTT, LLP.**  
Attorneys for Statebridge Company, LLC  
565 Taxter Road, Suite 590  
Elmsford, New York 10523

By: \_\_\_\_\_

DAVID V. MIGNARDI, ESQ.

A handwritten signature in black ink, appearing to read 'D. Mignardi', is written over a horizontal line. The signature is stylized and cursive.

CERTIFICATION

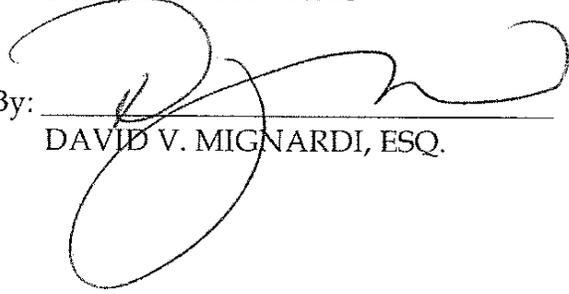
I certify pursuant to Rule 4:5-1 that, to the best of my knowledge, this matter is not the subject of any other action pending in any court or of a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated, other than the pending foreclosure actions on the Corrected NOI List attached hereto and any pleading, separate actions initiated outside of the uncontested foreclosure proceedings in which Foreclosure Defendants may have raised claims concerning, *inter alia*, their NOIs but which are not at issue in this application. 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.

Dated: January 14, 2014

**KNUCKLES, KOMOSINSKI & ELLIOTT, LLP.**  
Attorneys for Statebridge Company, LLC  
565 Taxter Road, Suite 590  
Elmsford, New York 10523

By: \_\_\_\_\_

DAVID V. MIGNARDI, ESQ.

A large, stylized handwritten signature in black ink, written over a horizontal line. The signature is cursive and appears to read 'David V. Mignardi'.

VERIFICATION

STATE OF COLORADO

COUNTY OF ARAPAHOE

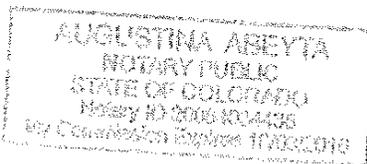
I, DAVID McDONNELL, being duly sworn states:

1. I am managing DIRECTOR of Statebridge Company, LLC, the applicant named in the foregoing Verified Complaint.
2. The allegations in the Verified Complaint are true to the best of my knowledge and belief.
3. The Exhibits attached to the Verified Complaint are true and correct copies.

  
Name: DAVID McDONNELL  
Title: managing DIRECTOR

Sworn to before me this  
14 day of January, 2014

  
NOTARY PUBLIC





**EXHIBIT A**

<u>Lender</u>	<u>Abbreviated Caption</u>	<u>Docket No.</u>	<u>Litigation</u>	<u>NOI Deficiencies</u>
Wilmington Savings Fund Society, FSB*	J.P. Morgan Mortgage Acquisition Corp. v. Steven J. Dustin, et al	F-24909-09	N	NOI did not contain phone number of lender representative to whom payment shall be made. NOI did not identify whether owner and servicer are the same. NOI did not contain a telephone number of lender representative if debtor disagrees there is a default
Wilmington Savings Fund Society, FSB*	J.P. Morgan Mortgage Acquisition Corp v. Anzhelika Morell, et al	F-45038-09	N	NOI did not contain phone number of lender representative to whom payment shall be made. NOI did not identify whether owner and servicer are the same. NOI did not contain a telephone number of lender representative if debtor disagrees there is a default NOI doesn't state that mortgagor has right to cure after commencement of foreclosure
Wilmington Savings Fund Society, FSB*	Bank United v. Cleusa P. Nieves, et al	F-53354-09	N	NOI did not contain phone number of lender representative to whom payment shall be made. NOI did not identify whether owner and servicer are the same. NOI did not contain a telephone number of lender representative if debtor disagrees there is a default NOI doesn't state that mortgagor has right to cure after commencement of foreclosure
Wilmington Savings Fund Society, FSB*	J.P. Morgan Mortgage Acquisition Corp v. Fedric O. Robins, et al	F-52888-09	N	NOI did not contain phone number of lender representative to whom payment shall be made. NOI did not identify whether owner and servicer are the same. NOI did not contain a telephone number of lender representative if debtor disagrees there is a default NOI doesn't state that mortgagor has right to cure after commencement of foreclosure
Wilmington Savings Fund Society, FSB*	Bank United v. Sofia Spangler, et al	F-00773-10	N	NOI did not contain phone number of lender representative to whom payment shall be made. NOI did not identify whether owner and servicer are the same. NOI did not contain a telephone number of lender representative if debtor disagrees there is a default NOI doesn't state that mortgagor has right to cure after commencement of foreclosure

*\*\*The Lender is Wilmington Savings Fund Society, FSB, Not in its Individual Capacity But Solely as Trustee for the Prime Star H Fund I Trust but is abbreviated herein as "Wilmington Savings Fund Society, FSB" for practicality purposes.*

**EXHIBIT B**

Statebridge Company, LLC  
5680 Greenwood Plaza Blvd, Suite 100S  
Greenwood Village, CO 80111



*[Current Date]*

**CERTIFIED MAIL: Return Receipt Requested and First Class Mail**

*[Mortgagor 1]*

*[Mortgagor 2]*

*[Mortgagor 3]*

*[Mailing Address]*

*[Mailing City, State ZIP]*

RE:           *[Loan No.]*  
                  *[Property Address]*  
                  *[If unit, Unit No.]*  
                  *[Property City, State ZIP]*

Dear *[Mortgagor Name(s)]*:

**NOTICE OF INTENTION TO FORECLOSE MORTGAGE**

**YOU SHOULD READ THIS DOCUMENT IMMEDIATELY!**

Notice is hereby given that the mortgage described below made by *[Loan Originator]* and assigned to Wilmington Savings Fund Society, FSB, Not in its Individual Capacity But Solely as Trustee for the Prime Star H Fund I Trust, the current owner of such mortgage loan, as identified below in Paragraph 1 is in default. Notice is being sent to you because the records of Statebridge Company, LLC, the current holder and servicer of this loan, show that you are a person obligated to pay the obligation secured by the mortgage.

Statebridge Company, LLC intends to accelerate the maturity (due date) of the mortgage obligation and commence legal action, including foreclosure to take possession of the property and obtain a deficiency judgment against you, if allowed by applicable law and the facts of this matter.

This notice is being sent to you pursuant to Section 4 of the Fair Foreclosure Act. The information you are hereby put on notice of is as follows:

1(a). **The Obligation.** The particular obligation is a certain *[Adjustable Rate]* Note dated *[Loan Date]* given by *[Mortgagor(s)]* to *[Loan Originator]* and assigned to Wilmington Savings Fund Society, FSB, Not in its Individual Capacity But Solely as Trustee for the Prime Star H Fund I Trust in the principal sum of *[Loan Amount]* plus interest.

1(b). **Property to be Foreclosed.** The real estate given as security for the *[Adjustable Rate]* Note identified in Paragraph 1(a), above is:

Street Address: *[Address]*

City: *[City]*

State: New Jersey

Tax: Block: *[Block]* Lot: *[Lot]*

2. **Nature of Default.** The failure to make monthly payments of interest, principal, escrow payments, handling charges and late charges beginning *[Default Date]*.

3. **Your Right to Cure the Default.** You have the right to cure the default as provided in Section 5 of the *Fair Foreclosure Act*. A copy of Section 5 of the *Fair Foreclosure Act* is attached to this letter.

4. **The Amount You Must Pay to Cure the Default.** In order to cure the default, you must pay to Statebridge Company, LLC, on or before the date set forth in Paragraph 5, below the following sums of money:

Principal	\$[	]
Interest	\$[	]
Late Charges	\$[	]
NG Charges	\$[	]
Escrow	\$[	]
Life Insurance	\$[	]
Acc/Health Ins.	\$[	]
Total	\$[	]

This figure is the amount you must pay on *[Cure Date - 35 Days from Date of Letter]* to reinstate your mortgage loan. If you make the payment earlier than *[Cure Date - 35 Days from Date of Letter]*, call *[Contact Name]* at *[Contact Number]* to find out the amount which must be paid on such earlier date.

By reason of your default and pursuant to the Default Interest Rate Rider to your loan documents, your loan has been accruing interest at the rate of *[Current Interest Rate]* per year and this default interest rate shall continue until you cure the default.

5. **Timing of the Payment to Cure the Default.** In order to avoid the institution of foreclosure proceedings, you must pay the full amount set forth at Paragraph 4, above, no later than *[Cure Date - 35 Days from Date of Letter]*, and the person to whom the payment shall be made is:

*[Contact Name]*

Statebridge Company, LLC

5680 Greenwood Plaza Blvd, Suite 100S

Greenwood Village, CO 80111

6. **Your Failure to Cure the Default.** If you do not cure the default by the date specified in Paragraph 5, above, Statebridge Company, LLC may take steps to terminate your ownership in the property by commencing a foreclosure suit in a court of competent jurisdiction. Should a foreclosure suit be commenced, you will have the right to assert in the foreclosure proceedings the non-existence of a default or any other defense you may have to the acceleration or foreclosure.

7. **Additional Costs and Expenses You May Have to Pay.** If Statebridge Company, LLC takes steps as described in Paragraph 6, above, you shall have the right to cure the default pursuant to Section 5 of the *Fair Foreclosure Act*, but you shall be responsible for Statebridge Company, LLC's court costs and attorneys' fees in an amount not to exceed that amount permitted pursuant to the rules governing the courts of the State of New Jersey.

8. **Transferring the Property.**

If this box is checked, you do NOT have the right to transfer the property described in Paragraph 1 to another person subject to the lender's mortgage.

If this box is checked, you DO have the right to transfer the property described in Paragraph 1 to another person subject to the lender's mortgage.

9. **You Should Confer With a Lawyer.** You are advised to seek counsel from an attorney of your own choosing concerning your residential mortgage default situation. If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association or Lawyer Referral Service in the County in which the property securing the mortgage loan is located. If you are unable to afford an attorney, you may communicate with the Legal Services Office in the County in which the property is located. Attached to this letter is a statewide list of the Lawyer Referral Services and Legal Services Offices for each County, and the address and phone number of the New Jersey Bar Association.

10. **Possible Assistance.** You may be eligible for financial assistance for curing a default from programs operated by the State of New Jersey or the Federal Government or non-profit organizations. You may obtain the identity of any such programs or organizations from the State of New Jersey Commissioner of Banking at the following address and phone number:

Steven M. Goldman, Commissioner  
Division of Banking  
P.O. Box 040  
Trenton, New Jersey 08625  
(609) 292-7272

11. **Person You Should Contact At Statebridge Company, LLC.** If you disagree with Statebridge Company, LLC's assertion that a default has occurred or the correctness of Statebridge Company, LLC's calculation of the amount required to cure the default, you may contact the following authorized representative of the lender:

*[Contact Name]*  
Statebridge Company, LLC  
5680 Greenwood Plaza Blvd, Suite 100S  
Greenwood Village, CO 80111  
*[Contact Number]*

Who is the representative of Wilmington Savings Fund Society, FSB, Not in its Individual Capacity But Solely as Trustee for the Prime Star H Fund I Trust  
16242 N Florida Avenue  
Lutz, FL 33549

*Partial payments may be credited to your account but will not cure outstanding defaults or affect the right of Wilmington Savings Fund Society, FSB, Not in its Individual Capacity But Solely as Trustee for the Prime Star H Fund I Trust to pursue the remedies referenced above. This letter is written without waiver of, or prejudice to, any of the rights or remedies of Wilmington Savings Fund Society, FSB, Not in its Individual Capacity But Solely as Trustee for the Prime Star H Fund I Trust.*

**Payment must be made in the form of a money order, personal check, or bank check. Business checks will not be accepted.**

Very truly yours,

**EXHIBIT C**

Statebridge Company, LLC  
5680 Greenwood Plaza Blvd, Suite 100S  
Greenwood Village, CO 80111



[Current Date]

**CERTIFIED MAIL: Return Receipt Requested and First Class Mail**

[Mortgagor 1]  
[Mortgagor 2]  
[Mortgagor 3]  
[Mailing Address]  
[Mailing City, State ZIP]

Re: Order to Show Cause [Order to Show Cause]

Borrower Name: [Mortgagor 1]  
[Mortgagor 2]  
[Mortgagor 3]  
Loan Number: [Loan Number]  
Plaintiff Name in Foreclosure Action: [Plaintiff Name]  
Docket Number in Foreclosure Action: [Docket No.]

Dear [Mortgagor Name(s)]:

Please be advised that the New Jersey Supreme Court recently held in *U.S. Bank N.A. v. Guillaume*, 209 N.J. 449 (2012), that mortgage lenders seeking to foreclose must comply with the New Jersey Fair Foreclosure Act's requirement that a Notice of Intention to Foreclose set forth the name and address of the lender.

### **Why You Are Receiving This Letter**

You are receiving this letter because you are the defendant in a pending foreclosure action, and it is believed that the Notice of Intention to Foreclose served upon you prior to the commencement of the foreclosure action did not comply with the requirements of the Fair Foreclosure Act.

By the court's Order to Show Cause dated [month] [day], 2014, and in compliance with the Supreme Court's opinion in *U.S. Bank N.A. v. Guillaume*, the Honorable Margaret Mary McVeigh, P.J. Ch., Passaic Vicinage, gave permission to Statebridge Company, LLC to serve, along with the Order to Show Cause and Verified Complaint, corrected Notices of Intention to Foreclose on all defendant mortgagors/parties obligated on the debt in pending foreclosure actions filed before February 28, 2012 in which Statebridge Company, LLC is servicing the subject loan on behalf of Wilmington Savings Fund Society, FSB, Not in its Individual Capacity

But Solely as Trustee for the Prime Star H Fund I Trust.

The docket number for your foreclosure action may be found in the subject line of this letter.

**Information About the Order to Show Cause and Verified Complaint**

Enclosed with this letter is a copy of the Order to Show Cause and a copy of the Verified Complaint filed with the Order to Show Cause. Wilmington Savings Fund Society, FSB, Not in its Individual Capacity But Solely as Trustee for the Prime Star H Fund I Trust is the lender of the loans identified in the Verified Complaint.

The Verified Complaint sent to you does not include the attachments. The Verified Complaint with attachments, which list the foreclosure actions in which Wilmington Savings Fund Society, FSB, Not in its Individual Capacity But Solely as Trustee for the Prime Star H Fund I Trust is the lender and in which Statebridge Company, LLC is the servicer, will be made available on the New Jersey Courts web site at <http://www.judiciary.state.nj.us/>.

**Information About the Corrected Notice of Intention to Foreclose**

Also enclosed with this letter is the corrected Notice of Intention to Foreclose. It allows you an additional 35 days in which to cure the default without having to pay the plaintiff's court costs and attorneys' fees. It also sets forth important information about your loan, including information on how you can cure the default; the consequences of failing to cure the default; contact information for the plaintiff, and information about retaining counsel and borrower assistance. If you fail to cure the default by the date set forth in the corrected Notice of Intention to Foreclose, the foreclosure action against you will proceed.

With the passage of time since the foreclosure action was filed against you, the lender on your loan may have changed from the named plaintiff in the foreclosure action. The corrected Notice of Intention to Foreclose lists the name and address of Wilmington Savings Fund Society, FSB, Not in its Individual Capacity But Solely as Trustee for the Prime Star H Fund I Trust, the current lender on your loan.

**Questions about the Notice of Intention to Foreclose**

Should you have questions with regard to your loan or the corrected Notice of Intention to Foreclose, please contact:

Overnight/Regular Mail:     *[Contact Name]*  
Statebridge Company, LLC\  
5680 Greenwood Plaza Blvd, Suite 100S  
Greenwood Village, CO 80111  
Phone:                             *[Contact Number]*

Additional contact information is provided in the corrected Notice of Intention to Foreclose.

### **How to File an Objection**

You have the right to object to the enclosed Order to Show Cause (the process by which the court gave the plaintiff permission to serve the corrected Notice of Intention to Foreclose). To do so, you must file a written objection under the docket number for the Order to Show Cause.

You also have the right to object to the enclosed corrected Notice of Intention to Foreclose. To do so, you must file a written objection under the docket number for the foreclosure action in your individual case. The docket number for your foreclosure action may be found in the subject line of this letter.

For either type of objection, you must set forth with specificity the basis of the objection, and file the objection with the Superior Court Clerk's Office on or before *[Objection file date]* at the following address:

Supreme 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 the plaintiff's attorneys, Knuckles, Komosinski & Elliott, LLP, at 565 Taxter Road, Suite 590, Elmsford, NY 10523, and mail a copy of the objection to Judge McVeigh at:

Superior Court of New Jersey  
Passaic County Courthouse, Chambers 100  
71 Hamilton Street  
Paterson, New Jersey 07505

Your personal appearance at the Superior Court Clerk's Office or your local courthouse will not qualify as an objection. A telephone call will not protect your rights; you must file your objection and serve it on the plaintiff's attorney if you want the court to hear your objection to the relief the plaintiff is seeking. If you file a specific written objection, the case will be sent to a Judge for resolution. You will be informed by the Judge of the time and place of the hearing on your objection.

### **Questions about Filing an Objection**

Should you have questions related to the procedures for filing an objection, please visit the New Jersey Courts On-Line Self-Help Center at <http://www.judiciary.state.nj.us/prose/index.htm>. You may also contact the Superior Court Clerk's Office at (609) 421-6100, or at [SCCOForeclosure.Mailbox@judiciary.state.nj.us](mailto:SCCOForeclosure.Mailbox@judiciary.state.nj.us).

If you are represented by an attorney in your foreclosure case, you should notify him or her that you received these papers. These papers are not being sent directly to your attorney if

you have one.

If you cannot afford an attorney, you may apply for free legal assistance online at [www.lsnjlaw.org](http://www.lsnjlaw.org) or call the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529) or call the Legal Services office in the county where you live. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is enclosed.

#### Enclosures

- Copy of the Order to Show Cause;
- Copy of the Verified Complaint;
- Corrected Notice of Intention to Foreclose; and
- List of New Jersey State Bar Association Lawyer Referral Services or Legal Services Offices.

**We are attempting to collect a debt, and any information obtained will be used for that purpose.**

**If you are represented by an attorney, please refer this letter to your attorney and provide us with the attorney's name, address, and telephone number.**

**To the extent your original obligation was discharged, or is subject to an automatic stay of bankruptcy under Title 11 of the United States Code, this notice is for compliance and/or informational purposes only and does not constitute an attempt to collect a debt or to impose personal liability for such obligation. However, a secured party retains rights under its Security Instrument, including the right to foreclose its lien.**





