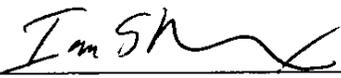


PLEASE TAKE FURTHER NOTICE that pursuant to R. 1:6-2(d), GMACM requests oral argument if this application is contested in a timely manner.

GREENBERG TRAUIG LLP
Attorneys for GMAC Mortgage, LLC

By: 
Ian S. Marx

Date: October 25, 2012

GREENBERG TRAURIG LLP
200 Park Avenue
Florham Park, NJ 07932
(973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN RE APPLICATION BY GMAC
MORTGAGE, LLC TO ISSUE
CORRECTED NOTICES OF INTENT TO
FORECLOSE ON BEHALF OF
IDENTIFIED FORECLOSURE
PLAINTIFFS**

:
: SUPERIOR COURT OF NEW JERSEY
: MERCER COUNTY
: CHANCERY DIVISION
:
: Docket No.
:
: CIVIL ACTION
:
: **CERTIFICATION OF**
: **IAN S. MARX**
:
:
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:
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:

I, IAN S. MARX, of full age, hereby certify as follows:

1. I am an attorney-at-law licensed to practice in the State of New Jersey and a shareholder of the law firm of Greenberg Traurig, LLP, attorneys for GMAC Mortgage, LLC ("GMACM"). I am personally familiar with the facts set forth herein.
2. I am a member in good standing of the Bar of the State of New Jersey.
3. I submit this Certification in Support of GMACM's Motion for *Pro Hac Vice* Admission of D. Brian O'Dell, Esq., of Bradley Arant Boult Cummings LLP, One Federal Place, 1819 Fifth Avenue North, Birmingham, Alabama 35203, (205) 521-8226 (telephone), (205) 488-6086 (facsimile), in this matter, pursuant to R. 1:21-2, on behalf of GMACM.
4. I have read the Certification of D. Brian O'Dell in support of this application and, to the best of my knowledge, information and belief, the Certification is accurate.

5. Bradley Arant Boult Cummings LLP has an ongoing and long-standing client relationship with GMACM, and GMACM has requested that Mr. O'Dell represent its interests in this matter. Accordingly, GMACM respectfully requests that Mr. O'Dell be permitted to appear on their behalf in the current matter.

6. Upon information and belief, Mr. O'Dell is a member in good standing of the Bar of the State of Alabama, and is not now, nor has he ever been, the target of any disciplinary proceedings in that jurisdiction, or any other jurisdiction.

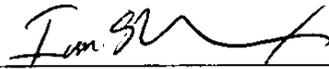
7. If permitted to appear *pro hac vice* on behalf of GMACM in this matter, Mr. O'Dell will abide by the New Jersey Court Rules, including all disciplinary rules, including but not limited to the requirements of Rules 1:20-1(b), 1:28-2, and 1:28B-1(e).

8. Upon the admission *pro hac vice* Mr. O'Dell, I and others from my firm will be responsible for his conduct throughout the course of this matter.

9. Pursuant to the rules of this Court, it is respectfully requested that this Court approve the admission *pro hac vice* of D. Brian O'Dell to serve as additional counsel on behalf of GMACM for the reasons set forth in his Certification.

10. I have read, and am familiar with, the Local Rules of this Court.

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.



IAN S. MARX

Dated: October 25, 2012

GREENBERG TRAURIG LLP
200 Park Avenue
Florham Park, NJ 07932
(973) 360-7900
Attorneys for GMAC Mortgage, LLC

**IN RE APPLICATION BY GMAC
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PLAINTIFFS**

) **SUPERIOR COURT OF NEW JERSEY**
) **CHANCERY DIVISION**
) **MERCER COUNTY**

) **DOCKET NO.:**

) **CIVIL ACTION**

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**CERTIFICATION OF
D. BRIAN O'DELL
FOR ADMISSION PRO HAC VICE**

I, D. Brian O'Dell, being duly sworn, deposes and says:

1. I am attorney at law in the State of Alabama and an attorney at the firm of Bradley Arant Boult Cummings LLP, One Federal Place, 1819 Fifth Avenue North, Birmingham, Alabama 35203, (205) 521-8000 (telephone), (205) 488-6086 (facsimile). I make this Certification in support of application for *pro hac vice* admission in this matter in accordance with Rule 1:21-2.

2. I am a member in good standing of the Bar of the States of Alabama, Florida, Georgia, Mississippi, New York, Tennessee and Texas and the Bar of the District of Columbia. The following are my dates of admission: Alabama 1998, Florida 2003, Georgia 2001, Mississippi 2004, New York 2009, Tennessee 2004, Texas 2004 and the District of Columbia 2004. I have been a member in good standing in each jurisdiction since my admission.

3. I principally practice law in the State of Alabama.

4. There are no disciplinary proceedings pending against me in any jurisdiction, and

there has been no discipline imposed against me by any jurisdiction in the past. During the pendency of this action, I will notify the Court of any change in standing with the bar of any other court, and notify the Court immediately if any actions are instituted against me affecting my standing with the bar of any state.

5. My client, GMAC Mortgage, LLC ("GMACM"), has requested that I represent it in this matter together with Ian Marx of Greenberg Traurig LLP, 200 Park Avenue, Florham Park, NJ 07932, who is qualified to practice in the State of New Jersey in accordance with Rule 1:21-2.

6. My law firm has had an attorney-client relationship with GMACM for the past several years. My work in connection with this representation will assist in the prosecution of this matter.

7. As a condition of my admission, I agree to have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey.

8. As a condition of my admission, I agree to be bound by and comply with the requirements of all applicable rules and to pay all fees required by *Rule* 1:201(b), the Lawyers Fund for Client Protection pursuant to *Rule* 1:28-2, and the Lawyers Assistance Program pursuant to *Rule* 1:28B-1(e).

9. As a condition of my admission, I agree that automatic termination of *pro hac vice* admission will occur for failure to make the required annual payment to the New Jersey Lawyers Fund for Client Protection.

10. Under *Rule* 1:212(b)(3) and for the above stated reasons, there is good cause to admit me *pro hac vice* herein.

11. I respectfully request that I be specially admitted *pro hac vice* to participate in this

matter.

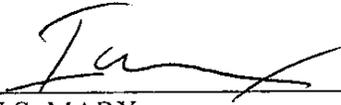
I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated this the 23rd day of October, 2012



D. Brian O'Dell, Esq.

I 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.



IAN S. MARX

Dated: October 25, 2012

GREENBERG TRAUIG 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 GMAC Mortgage, LLC

**IN RE APPLICATION BY GMAC
MORTGAGE, LLC TO ISSUE
CORRECTED NOTICES OF INTENT
TO FORECLOSE ON BEHALF OF
IDENTIFIED FORECLOSURE
PLAINTIFFS**

) **SUPERIOR COURT OF NEW JERSEY**
) **CHANCERY DIVISION**
) **MERCER COUNTY**
) **DOCKET NO.:**
) **CIVIL ACTION**
) **R. 1:4-4(c) CERTIFICATION**

I hereby certify that the facsimile signature of D. Brian O'Dell on the attached Certification of D. Brian O'Dell for Admission *Pro Hac Vice* is genuine. I further certify that a copy of the document with the original signature shall be provided upon request by the Court or a party to this matter.

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.

Greenberg Traurig LLP
Attorneys for GMAC Mortgage, LLC



Ian S. Marx, Esq.

Dated: October 25, 2012

2. D. BRIAN O'DELL shall, and hereby does, consent to the appointment of the Clerk of the Supreme Court as his agent upon whom service of process may be made for all actions against D. BRIAN O'DELL that may arise out of his participation in the matter.

3. D. BRIAN O'DELL shall immediately notify the Court of any matter affecting his standing at the Bar of any other jurisdiction.

4. D. BRIAN O'DELL shall have all pleadings, briefs, and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey, who shall be held responsible for them, the conduct of the litigation and the attorney admitted herein.

5. D. BRIAN O'DELL cannot be designated as trial counsel.

6. No discovery, motion, trial, or any other proceeding delay shall occur or be requested by reason of the inability of D. BRIAN O'DELL to be in attendance.

7. D. BRIAN O'DELL must, within ten (10) days, pay the fees required by R. 1:20-1(b) and R. 1:28-2 and submit an affidavit of compliance.

8. *Pro hac vice* admission will automatically terminate for failure to make the initial and any annual payment required by R. 1:20-1(b) and R. 1:28-2.

9. Non-compliance with any of the terms of this Order shall constitute grounds for removal.

10. A copy of this Order shall be served on all parties within seven (7) days of the date hereof.

J.S.C.

RECEIVED

NOV 01 2012

SUPERIOR COURT
CLERK'S OFFICE

Ian S. Marx
Direct Dial: (973) 360-7951
Direct Fax: (973) 295-1307
Email: marxi@gtlaw.com

October 25, 2012

VIA HAND DELIVERY

Jennifer Perez, Clerk of the Superior Court
Superior Court of New Jersey
Mercer County Courthouse, First Floor
175 South Broad Street
Trenton, New Jersey 08650-0068



Re: **Application by GMAC Mortgage, LLC to Issue Corrected Notices of Intent to Foreclose on Behalf of Identified Foreclosure Plaintiffs in Uncontested Cases**

Dear Ms. Perez:

This firm represents GMAC Mortgage, LLC in the above-referenced matter. Enclosed for filing, please find an original and two copies of the following documents:

1. Notice of Motion for *Pro Hac Vice* Admission of D. Brian O'Dell, Esq.;
2. Certification of Ian S. Marx, Esq.;
3. Certification of D. Brian O'Dell for Admission *Pro Hac Vice*;
4. Order Admitting Attorney *Pro Hac Vice*;
5. Certification of Service; and
6. Certification of Signature.

We would appreciate if a member of the Court's staff would file the original and return an extra copy stamped "filed", in the enclosed return envelope.

Please charge any filing fee to our Superior Court Account No. 141185. Your cooperation and courtesies are, as always, greatly appreciated.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ian S. Marx", with a stylized flourish at the end.

IAN S. MARX

Enclosures

cc: The Hon. Paul Innes, P.J. Ch. (by Hand Delivery w/Encl.)
Margaret Lambe Jurow, Esq. (by Hand Delivery w/Encl.)