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RECEIVED
JAN 3 0 2013
SUPERIOR COURT
CLERK'S OFFICE

January 28, 2013

Superior Court Clerk's Office, Foreclosure Processing Services
Attention: Objection to Notice of Intention to Foreclose
PO Box 917
Trenton, NJ 08625

D. Brian O'Dell (via telecopier and regular mail)
Bradley Arant Boult Cummings, LLP
One Federal Place
1819 Fifth Avenue North
Birmingham, AL 35203-2119

Re: GMAC Mortgage vs. Daniel B. Nicholson and Patricia A. Nicholson
Notice of Intention to Foreclose Dated 4/2/10
Loan Number: 0600977301
Order to Show Cause-Docket No. F-025354-12

Dear Sir or Madam:

Please accept this letter as an Objection to the above Order to Show Cause which was served upon my clients Daniel B. Nicholson and Patricia A. Nicholson. My clients filed a Chapter 13 petition for bankruptcy relief on June 1, 2010 and have at all times since that date been under the protection of the bankruptcy Stay. The case Number is 10-26922-GMB. GMAC Mortgage was duly notified of the bankruptcy filing and, in fact, a Proof of Claim was filed on July 19, 2010 on its behalf by attorney, Joel A. Ackerman, Esq. A copy of the Notice of Chapter 13 Bankruptcy Case is enclosed herewith.

Paragraph 13 of the Order to Show Cause in Docket No. F-02534-12 clearly states that "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". The bankruptcy stay has not been lifted and therefore, my clients have been served this

package in contempt of the Order to Show Cause as well as the Order for Relief in the bankruptcy case. I am currently drafting a Motion for Contempt which I will file within 30 days. I am herewith notifying you that I will seek attorney fees for said Motion. If you wish to discuss settling this matter, please contact me immediately.

Very truly yours,

JILL T BRYAN

Enclosures
cc: Mr. and Mrs. Daniel B. Nicholson
Judge Innes (with enclosures)
Joel A Ackerman, Esq.