

RECEIVED

FEB 07 2013

Robin Garip (O'Neill)
(Your Name(s))
3 Wedgewood Court, Berlin, NJ 08009
(Your Mailing Address)
(856) 520-2184
(Your Daytime Telephone Number)

SUPERIOR COURT
CLERK'S OFFICE
Superior Court of New Jersey
Chancery Division
General Equity

GMAC Mortgage, LLC
(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- 025354-12

Vs.

Robin O'Neill
(Name of first defendant listed on the complaint)
Defendant(s),

CIVIL ACTION
OBJECTION TO: (select one)
[X] Order to Show Cause
[] Corrected Notice of Intention to Foreclose

I/We Robin Garip (O'Neill), the defendant(s) in the foreclosure matter
(filing party or parties) hereby object

(caption and docket number if different from above)

to the Plaintiff's filing of the (select one).

[X] 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.)

- 1. The property involved in the Order to Show Cause, 316 Shady Lane, Marlton, NJ 08053, is actively being negotiated by a GMAC Mortgage specialist to date by the real estate agent listing the property. The listing agent is Ines De La Cruz from Remax at 1000 Lincoln Drive East, Marlton, NJ 08043, (856) 988-1800.
2. The property is under contract and awaiting the approval of sale of the property. Documents can be provided.
3. The property has been actively on the market for one year and due to the long list of repairs needed for the home and with the comparable homes for sale in the area, the property has had only very low offers and they were all rejected immediately. The current offer is much higher and is still being reviewed for approval and the buyer is very interested in purchasing the home and doing renovations so the family can move in right away.
4. The defendant wishes to have time to ensure the sale of the property with the current offer, and if not approved, then granted additional time to sell the home and salvage her credit to work regain financial stability and be able to own a home again in the future.
5. Due to an unforeseen and ongoing financial situation and loss since 2009/10, the defendant has been unable to commit to keeping the property, although it is her every wish to be able to stay and resolve the balance owed.
6. The defendant has been communicating with GMAC on the status of the property during its time listed with the real estate agent.

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.

01/31/2013
Date

Robin Garip
Signature
Robin Garip
Print or Type Name

Certification of Service

I hereby certify that on 02/01/2013 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 fax _____

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 D. Brian O'Dell

Name Ian S. Marx, Esq

Address Bradley Arant Boult Cummings LLP

Address 200 Park Avenue

1819 Fifth Avenue North

P.O. Box 677

Birmingham, AL 35203

Florham Park, NJ 07932

Attorney for GMAC

Attorney for GMAC

01/31/2013

Date

Robin Garip (O'Neill)
Signature

Robin Garip (O'Neill)

Print or Type Name

NEW JERSEY JUDICIARY

RECEIVED

FEB 07 2013

SUPERIOR COURT

CLERK'S OFFICE

FILING FEE WAIVER REQUEST

Based on Inability to Pay

GMAC Mortgage, LLC
Plaintiff

VS.

Robin J. Garip (O'Neill)
Defendant

Applicant's Name:		Docket Number:	
Last Garip	First Robin	MI J	
Home Address:		Home Phone #	
Street 3 Wedgewood Court		Apt No	
		(856) 5202184	
City Berlin	State NJ	Zip 08009	Number of Dependents 2

I, Robin Garip, am over the age of 18 and request no court fee be charged as I am without funds to pay the fee. I am a (check one) Plaintiff Defendant in the following court:

Civil Special Civil Part General Equity Probate Family

The following are facts about my financial condition. My income before taxes is:

Salary (per month): \$	Other Income (per month): \$ 1070 maternity pay
Specify source of other income, including six months of prisoners' account statements in accordance with N.J.S.A. 30:4-16.3 (per month):	

The following is a complete list of everything I own and owe, as far as I know:

Own	Amount \$	Owe (per month)	Amount \$
Money in any bank accounts	120.00	Rent/mortgage	
Automobiles		Food	200.00
Real estate		Utilities	
Insurance with cash value		Alimony/child support	
Money owed to me		Auto payment	347.00
Other (specify)		Other (specify)	330.00
		auto insurance, phones, gas, student loan	
TOTALS	120.00	TOTALS	877.00

Please attach documents as to income (pay stubs, welfare documents, unemployment documents, last bank statement, etc.)

I certify the statements made by me in this document are true and that my proposed pleading is attached. I understand that if I give any false information, I may be punished by the court.

I am signing this statement to explain to the court why I am unable to pay any court fees in this lawsuit.

(Rule 1:13-2(a))

Fee Waived: Yes No

Robin Garip
Signature (Applicant) 01/31/2013
Date
Robin Garip
(Print Name)

Signature (Judge) _____
Date
(Print Name)

NOTICE OF ELIGIBLE DETERMINATIONS STATE PLAN (D10)

1. Issued By: New Jersey Department of Labor and Workforce Development Division of Temporary Disability Insurance PO Box 387 Trenton, New Jersey 08625-0387	6. Claimant's S.S. No. XXX-XX-2737	7. Seq. No. 005	8. Date of Claim 10/09/12	9. Claim Rec'd 10/19/12
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2. CLAIMANT'S NAME AND ADDRESS: ROBIN J GARIP 2135 TREMONT AVE ATG0 NJ 08004-1441	10. Mailing Date 10/29/12	11. Det. No. 001	12. Exam No. 315
	13. Claimant's Base Year From: 10/09/11 To: 10/06/12		
	14. Minimum Requirements For Valid Claim Wages = \$ 7300.00 or 20 Base Weeks Base Week Amount = \$ 145.00		

3. EIN 05221849150000000000000000000000	4. CHG% 100.00	15. Claimant's Covered NJ Earnings in Base Year A. Wages = \$ 22225.84 B. Base Weeks = 51
5. EMPLOYER'S NAME AND ADDRESS: CEDAR CREST VILLAGE INC		16. Claimant Entitlement: (Payable as eligible periods are established) A. Weekly Benefit Rate: \$ 284.00 B. Max. Benefit Amt \$ 7384.00
		17.

WE HAVE REVIEWED YOUR CLAIM AND DETERMINED THAT YOU ARE ELIGIBLE FOR BENEFITS.

YOUR MOST RECENT EMPLOYER WILL RECEIVE A COPY OF THIS DETERMINATION. YOU AND YOUR EMPLOYER HAVE THE RIGHT TO APPEAL OR DISAGREE WITH ANY DETERMINATION ISSUED ON YOUR CLAIM

IF YOU ARE INELIGIBLE FOR ANY PERIOD OR YOUR BENEFITS ARE REDUCED, YOU WILL RECEIVE A SEPARATE NOTICE EXPLAINING WHY.

GENERAL INFORMATION

PRGENANCY RELATED CLAIMS: For information pertaining to bonding with your newborn child, visit our web site at www.state.nj.gov/labor. If you are covered under the State Plan for Family Leave Insurance you will receive instructions for filing a claim after we receive your child's date of birth.

DISABILITY BENEFITS WILL NOT BE PAID FOR ANY PERIOD:
 You worked.
 You were not under medical care of a licensed doctor.
 You received:
 Unemployment Compensation.

(CONTINUED ON REVERSE -->)

Christine Madrid
Christine Madrid
Director

RIGHT OF APPEAL

IF YOU DISAGREE WITH ANY PART OF THIS DETERMINATION, YOU MAY FILE AN APPEAL BY WRITING TO THE ADDRESS GIVEN ABOVE IN ITEM 1. THIS DETERMINATION WILL BECOME FINAL UNLESS AN APPEAL IS RECEIVED OR POSTMARKED WITHIN SEVEN DAYS AFTER DELIVERY OR TEN DAYS AFTER THE DATE OF MAILING OF THIS NOTICE GIVEN ABOVE IN ITEM 10.

ESTA DETERMINACION AFECTA SU ELIGIBILIDAD PARA BENEFICIOS Y DESCRIBE SU DERECHO DE APELACION. SI USTED NO HABLA INGLES, BUSQUE, DE INMEDIATO, A UNA PERSONA QUE PUEDA INTERPRETAR ESTA DETERMINACION...



Statement for 01/10/2013



BANK OF AMERICA, N. A.
101 SOUTH TRYON STREET
CHARLOTTE, NC 28255
UNITED STATES

Forward Service Requested

ROBIN J. ONEILL
 316 SHADY LANE
 MARLTON, NJ 08053-0000
 UNITED STATES

Customer Service: 866-213-4074
 Card Number: XXXX XXXX XXXX 0147
 Period Start Date: 12/11/2012
 Period End Date: 01/10/2013

Summary Of Transactions

Previous Balance	(+) Credits and Adjustments	(-) Purchases and Adjustments	New Balance
\$895.17			\$537.17

Account Transaction Activity

Merchant Name	Posted Date(M/D/Y)	Reference Number	Transaction Details	Credit	Debit
HIGHLAND CROSSI 609 BERLI HIGHLAND CROSSI 609 BERLI SICKLERVILLE, New Jersey United States	01/05/2013	300517625676	Purchase of Goods or Services		-\$12.99
WALGREENS 1601 KEARSLEY RD SICKLERVILLE, New Jersey United States	01/02/2013	000000499782	Purchase of Goods or Services		-\$27.99
STATE OF NJ TEMP	12/26/2012	251314705795	ACH Load Credit	\$77.39	
TARGET T2181 TARGET T2181 GLOUCESTE SICKLERVILLE, New Jersey United States	12/24/2012	000000370296	Purchase of Goods or Services		-\$41.91
STATE OF NJ TEMP	12/24/2012	078077059262	ACH Load Credit	\$542.67	
BURGER KING #6026 WEST BERLIN, New Jersey 08091 United States	12/18/2012	235327200399	Purchase of Goods or Services		-\$11.35
KMART 3244 KMART 3244 BERLIN, New Jersey 080091962 United States	12/16/2012	235122735617	Purchase of Goods or Services		-\$61.61
GEICO 800-841-3000, District of Columbia 22412 United States	12/16/2012	235020052000	Purchase of Goods or Services		-\$157.67
MARLTON DINER MARLTON, New Jersey 08053 United States	12/14/2012	234923000895	Purchase of Goods or Services		-\$23.00
TARGET T2181 TARGET T2181 GLOUCESTE SICKLERVILLE, New Jersey United States	12/13/2012	000000931629	Purchase of Goods or Services		-\$26.74
SQ *PINE HILL FIRE DEPART Lindenwold, New Jersey 08021 United States	12/12/2012	234728000776	Purchase of Goods or Services		-\$10.00
TARGET T2181 TARGET T2181 GLOUCESTE SICKLERVILLE, New Jersey United States	12/12/2012	000000144671	Purchase of Goods or Services		-\$31.07
TARGET T2181 TARGET T2181 GLOUCESTE SICKLERVILLE, New Jersey United States	12/12/2012	000000622679	Purchase of Goods or Services		-\$25.63
SIMPLEMOBILE-VR30 949-7486464, California 92818 United States	12/12/2012	234724055275	Purchase of Goods or Services		-\$40.00
SIMPLEMOBILE-VR30 949-7486464, California 92818 United States	12/12/2012	234725055275	Purchase of Goods or Services		-\$40.00
SANTANDERCONSUMERUSA 888-222-4227, Texas 75247 United States	12/12/2012	234726000489	Purchase of Goods or Services		-\$357.89
LAJOBI INC 609-4092495, New Jersey 08512 United States	12/11/2012	234621900010	Purchase of Goods or Services		-\$35.00
ROUTE 130 DINER DELRAN, New Jersey 08075 United States	12/11/2012	234627400004	Purchase of Goods or Services		-\$19.00



Wells Fargo Online®

Account Activity

CHECKING XXXXXXXXX8715

Activity Summary

Current Posted Balance	\$77.13
Pending Withdrawals/ Debits	\$0.00
Pending Deposits/ Credits	\$0.00
Available Balance	\$77.13

Transactions

Show: for Date Range 01/04/13 to 02/01/13

Date ↓	Description	Deposits
Pending Transactions Note: Amounts may change		
No pending transactions meet your criteria above.		
Posted Transactions		
01/31/13	CHECK CRD PUR RTRN 01/29 CVS PHARMACY #2683 BERLIN NJ 473702XXXXXX8222 613031763553771 ?MCC=5912	
01/29/13	CHECK #7 <i>student loan 50-</i>	
01/29/13	ONLINE TRANSFER REF #IBE2HBRN8S FROM WAY2SAVE SAVINGS XXXXXXXXX3813 ON 01/29/13	
01/24/13	MONTHLY SERVICE FEE	
01/24/13	SAVE AS YOU GO TRANSFER DEBIT TO XXXXXXXXXX3813	
01/24/13	CHECK CRD PURCHASE 01/23 MARIA PIZZA PINE HILL NJ 473702XXXXXX8352 163023638512350 ?MCC=5812	
01/24/13	CHECK CRD PURCHASE 01/22 CVS PHARMACY #2683 BERLIN NJ 473702XXXXXX8222 083022775563161 ?MCC=5912	
01/24/13	CHECK CRD PURCHASE 01/22 CVS PHARMACY #2683 BERLIN NJ 473702XXXXXX8222 083022773303200 ?MCC=5912	
01/24/13	CHECK CRD PURCHASE 01/22 CVS PHARMACY #2264 SICKLERVILLE NJ 473702XXXXXX8222 283022517768853 ?MCC=5912	
01/22/13	SAVE AS YOU GO TRANSFER DEBIT TO XXXXXXXXXX3813	
01/22/13	CHECK CRD PURCHASE 01/18 99 CHINESE EXPRESS BERLIN NJ 473702XXXXXX8352 163018829739219 ?MCC=5814	
01/16/13	SAVE AS YOU GO TRANSFER DEBIT TO XXXXXXXXXX3813	
01/16/13	GEICO' PREM COLL 130115 8AS794TUM4ROE E ROBIN J GARIP	
01/16/13	CHECK CRD PURCHASE 01/15 WAWA 377 0000 SICKLERVILLE NJ 473702XXXXXX8222 163015595906793 ?MCC=5499	
01/15/13	SAVE AS YOU GO TRANSFER DEBIT TO XXXXXXXXXX3813	
01/15/13	CHECK CRD PURCHASE 01/14 TARGET 0002 SICKLERVILLE NJ 473702XXXXXX8222 303014590696242 ?MCC=5411	

Date ↓	Description	Deposits
01/14/13	SAVE AS YOU GO TRANSFER DEBIT TO XXXXXXXXXXXX3813	
01/14/13	CHECK CRD PURCHASE 01/13 SIMPEMOBILE-DGTLC 949-7486464 CA 473702XXXXXX8222 463013699989924 ?MCC=5968	
01/14/13	CHECK CRD PURCHASE 01/11 DUNKIN #348945 ATCO NJ 473702XXXXXX8222 283011766209523 ?MCC=5814	
01/14/13	ONLINE TRANSFER REF #IBEG3F4B73 FROM WAY2SAVE SAVINGS XXXXXXXXXXXX3813 ON 01/13/13	
01/14/13	CHECK CRD PUR RTRN 01/11 JCPENNEY 0241 856-488-0330 NJ 473702XXXXXX8352 613012699367527 ?MCC=5311	
01/11/13	SAVE AS YOU GO TRANSFER DEBIT TO XXXXXXXXXXXX3813	
01/11/13	CHECK CRD PURCHASE 01/10 AMAZON MKTPLACE PM AMZN.COM/BILL WA 473702XXXXXX8222 283005109915378 ?MCC=5942	
01/11/13	CHECK CRD PURCHASE 01/10 SHOPRITE SCKLRVILL SICKLERVILLE NJ 473702XXXXXX8222 003010709483815 ?MCC=5411	
01/10/13	SAVE AS YOU GO TRANSFER DEBIT TO XXXXXXXXXXXX3813	
01/10/13	CHECK CRD PURCHASE 01/09 US.DEPT OF EDU 800-872-5327 DC 473702XXXXXX8222 283009696007167 ?MCC=9399	30
01/09/13	SAVE AS YOU GO TRANSFER DEBIT TO XXXXXXXXXXXX3813	
01/09/13	CHECK CRD PURCHASE 01/08 AMAZON MKTPLACE PM AMZN.COM/BILL WA 473702XXXXXX8222 003005109916117 ?MCC=5942	
01/09/13	CHECK CRD PURCHASE 01/08 WAWA 775 0000 WILLIAMSTOWN NJ 473702XXXXXX8222 003008774829410 ?MCC=5542	
01/09/13	CHECK CRD PURCHASE 01/08 WAWA 395 0000 BERLIN NJ 473702XXXXXX8222 283008571141224 ?MCC=5499	
01/07/13	SAVE AS YOU GO TRANSFER DEBIT TO XXXXXXXXXXXX3813	
01/07/13	CHECK CRD PURCHASE 01/06 MUSIC PLAYER NETWO 212-378-0400 NY 473702XXXXXX8222 163005525272564 ?MCC=2741	
01/07/13	CHECK CRD PURCHASE 01/03 DUNKIN #342319 BERLIN NJ 473702XXXXXX8222 083003795187855 ?MCC=5814	
01/04/13	SAVE AS YOU GO TRANSFER DEBIT TO XXXXXXXXXXXX3813	
01/04/13	CHECK CRD PURCHASE 01/03 BURGER KING #6041 CHERRY HILL NJ 473702XXXXXX8222 163003774346833 ?MCC=5814	
01/04/13	CHECK CRD PURCHASE 01/03 WAWA 374 0000 CHERRY HILL NJ 473702XXXXXX8222 003003522478318 ?MCC=5499	
Totals		

 Equal Housing Lender

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