

The Honorable Paul Innes, P.J Ch
Superior Court of New Jersey
Mercer County Courthouse
175 South Broad Street
Trenton
New Jersey
NJ 08650-0068

RECEIVED
FEB 22 2013
SUPERIOR COURT
CLERK'S OFFICE

RE: PLAINTIFF: **Docket No:F-025354-12**
Order to Show Cause – In re Application by GMAC Mortgage, LLC,
Superior Court of New Jersey,
Chancery Division,
Mercer County.

DEFENDANT: **Docket No:F-020205-08**
Devakanand Singh
89 S Harrison Ave
Iselin, New Jersey
NJ 08830
917-285-7344
Middlesex County Superior Court

Dear Honorable Judge,
I am writing to you regarding the Order to Show Cause and Notice of Intent of Foreclosure filed in your court on 2/15/13.

Please accept this letter as my objection to **Order to show cause and Notice of Intent of Foreclosure** :

I object on **ORDER TO SHOW CAUSE** as two or more conditions were violated as stated in Exhibit "A" Below

"in the pending, pre-judgement, uncontested foreclosure cases"

1. A Foreclosure Judgment was granted at Middlesex Superior Court by the Honourable Judge Berman Larson on approximately October 7,2009 .
2. This was a contested foreclosure. The contest was made in 2009 as allowable by the laws and statutes.

I also object on **NOTICE OF INTENT TO FORECLOSE** as two or more conditions were violated, including two violations as stated in Exhibit "A" Below

"in the pending, pre-judgement, uncontested foreclosure cases"

1. . A Foreclosure Judgment was granted at Middlesex Superior Court by the Honourable Judge Bergman Larson on approximately October 7,2009 .

Shortly thereafter, **Emergent Amendments to Rules 1:5-6, 4:64-1 and 4:64-2 went into effect and Plaintiff was ordered to perform. This was effective on Dec20,2010.**December 20, 2010 - Notice and Order - Emergent Amendments to Rules 1:5-6, 4:64-1, and 4:64-2 - Residential Mortgage Foreclosure

Thereafter, **RESIDENTIAL MORTGAGE FORECLOSURES -- CERTIFICATIONS OF DILIGENT INQUIRY RESIDENTIAL MORTGAGE FORECLOSURES -- CERTIFICATIONS OF DILIGENT INQUIRY** went into effect on Jan 7, 2011. January 7, 2011 - Notice - Residential Mortgage Foreclosures - Certifications of Diligent Inquiry

Thereafter, on Jan 18, 2011,January 18, 2011 - Notice - In the Matter of Residential Mortgage Foreclosure Pleading and Document Irregularities (Administrative Order 01-2010) - Submissions to Special Master [Barisonek]

“ Plaintiff’s counsel shall file such documents (1) immediately upon the commencement of any new residential foreclosure action filed after the effective date of the new rule and amendments, as to the accuracy of the information contained in the complaint, as set forth in *Rule 4:64-1(b)(1)* through (13); (2) within 60 days in any residential foreclosure action today pending and awaiting judgment, as to the accuracy of the complaint and of any proofs submitted; (3) within 45 days in any residential foreclosure action in which judgment was entered but no sale of the property has yet occurred; and (4) with the motion to enter judgment in all future foreclosure actions in which judgment is sought, as to the accuracy of any proofs submitted pursuant to *Rule 4:64-2*. “

2. This was a contested foreclosure. The contest was made in 2009 as allowable by the laws and statutes .

3. To the best I can tell, Plaintiff,s Lawyers have not complied with the below requirements for Bar members to address and report misconduct of the Plaintiff..

**Emergent Amendments to Rules 1:5-6, 4:64-1 and 4:64-2 , AND
RESIDENTIAL MORTGAGE FORECLOSURES -- CERTIFICATIONS OF DILIGENT INQUIRY**

**IN THE MATTER OF RESIDENTIAL MORTGAGE FORECLOSURE PLEADING AND
DOCUMENT IRREGULARITIES (ADMINISTRATIVE ORDER 01-2010)
– SUBMISSIONS TO THE SPECIAL MASTER**

I suspect once again that Plaintiff is using this court to egregiously restart the foreclosure process once again thereby bypassing the steps to be reported to the of the Special Master, The Honorable Judge Walter Barisonek The full details of misconduct of the Plaintiff can be found in my Middlesex County file, Docket F-020205 08

RECEIVED

FEB 22 2013

SUPERIOR COURT
CLERK'S OFFICE

I hereby make a motion that the Honourable Judge Paul Innes in each and every Docket, except of course of any glaring and warrantied exception, order that these proceedings do not in any way limit, undermine, take precedence, or in any way reduce the function or authority of the Special Master appointed on March 1, 2011 - Order - Judge Walter Barisonek Assigned as Superior Court Judge to Serve As Special Master Pursuant to Administrative Order 01-2010

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

Yours truly,

M. Levakand Syl Date 2/19/13

BY CERTIFIED MAIL TO:

The Honorable Paul Innes

D Brian O'Dell-Plaintiff's Attorney

Superior Court Clerk's Office, Foreclosure Processing Center

on 2/19/13

on 2/19/13

on 2/19/13

EXHIBIT: A

IN RE APPLICATION BY GMAC
MORTGAGE, LLC TO ISSUE
CORRECTED NOTICE OF INTENT
TO FORECLOSE ON BEHALF OF
IDENTIFIED FORECLOSURE
PLAINTIFFS IN UNCONTESTED
CASES

CHANCERY DIVISION
MERCER COUNTY

DOCKET NO.: F-025354-12

CIVIL ACTION

ORDER TO SHOW CAUSE

THIS MATTER being brought before the Court by Greenberg Traurig, LLP, attorneys for GMAC Mortgage, LLC ("GMACM"), authorized to act on behalf of Foreclosure Plaintiffs in pending foreclosure cases in New Jersey, seeking relief by way of summary action for an Order permitting GMACM to issue corrected Notices of Intention to Foreclose ("NOI") to the defendant mortgagor and/or parties obligated on the debt ("Foreclosure Defendants") in the pending, pre-judgment, uncontested foreclosure cases listed on Exhibits A-1 through A-20 to the Verified Complaint ("Corrected NOI List"), and based upon the New Jersey Supreme Court's decision in US Bank, N.A. v. Guillaume, 209 N.J. 449 (2012), the implementing Order of the New Jersey Supreme Court dated April 4, 2012, and for good