**SPECK LAW OFFICES, LLC**
MICHAEL R. SPECK, ESQ.
80 E. MAIN ST.
SOMERVILLE, NJ 08876
(908) 428-4190 / Fax (908) 300-8219
Attorney for Defendant, Holly Morgan

| | | |
|---|---|---|
| GMAC MORTGAGE, LLC<br><br>Plaintiff<br><br>vs.<br><br>HOLLY MORGAN, ET AL.<br><br>Defendants | : | SUPERIOR COURT OF NEW JERSEY<br>CHANCERY DIVISION<br>MERCER COUNTY<br>Docket No.: F-025354-12<br><br>**Civil Action**<br><br>**OBJECTION TO ORDER TO SHOW CAUSE** |

Michael R. Speck, Esq., attorney for Defendant, Holly Morgan hereby objects to the Plaintiff's filing of the Order to Show Cause in its entirety. Defendant, Holly Morgan has engaged HUD Modifications in Morganville, New Jersey to negotiate a loan modification. They are in contact with GMAC Mortgage and have requested that they not pursue any further action to date. Attached at Exhibit A please find a copy of a January 5, 2013 letter from the Account Administrator at HUD Modifications.

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

**Speck Law Offices, LLC**
Attorneys for Defendant,
Holly Morgan

Michael R. Speck, Esq.

Dated: March 1, 2013

# Exhibit A

HUD MODIFICATIONS

4 NOLAN ROAD

MORGANVILLE, NJ 07751

732-242-9873

January 5, 2013

Re: Holly Morgan-Roth

12 Chestnut Drive

Colts Neck, NJ 07722

To Whom It Concerns:

Ms Roth has engaged our firm to negotiate a loan modification for her lien(s) on the referenced property. Due to the tragic loss of her husband, we feel confident that GMAC will cooperate with a successful modification; however GMAC's response has been delayed many times due to the lender's own pending bankruptcy filing.

We are in constant contact with GMAC's attorneys and have kept them from pursuing further action to date. When GMAC complies with our request, Ms. Roth will enter into a temporary modification plan, and then if successful a more permanent plan will be offered. Due to the circumstances surrounding this action, Hud Homes is confident that the foreclosure will not be acted upon.

Sincerely,

*Clarence Clemons III*

Clarence Clemons III

Account Administrator

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| | | |
|---|---|---|
| GMAC MORTGAGE, LLC<br><br>Plaintiff<br><br>vs.<br><br>HOLLY MORGAN, ET AL.<br><br>Defendants | :<br>:<br>:<br>:<br>:<br>:<br>:<br>:<br>: | SUPERIOR COURT OF NEW JERSEY<br>CHANCERY DIVISION<br>MERCER COUNTY<br>Docket No.: F-025354-12<br><br>**Civil Action**<br><br>**CERTIFICATION OF SERVICES** |

Theresa E. Kelly does hereby certify that:

1. On March 1, 2013 I sent an original and two copies of the within Objection to Notice of Intention to Foreclose via Lawyer's Service to Superior Court Clerk's Office, Foreclosure Processing Services, Attention: Objection to Notice of Intention to Foreclosure, 25 Market St., Trenton, NJ 08625-0971.

2. On March 1, 2013, I sent a copy of the within Objection to Notice of Intention to Foreclose via regular mail to The Honorable Paul Innes, J.S.C., Mercer County Civil Courthouse, 175 South Broad St., PO Box 8068, Trenton, NJ 08650-0068.

3. On March 1, 2013 I sent a copy of the within Objection to Notice of Intention to Foreclose to D. Brian O'Dell, Esq. at Bradley Arant Boult Cummings LLP via fax to 205-521-8800 and regular mail to One Federal Place, 1819 Fifth Avenue North, Birmingham, AL 35203.

4. On March 1, 2013 I sent a copy of the within Objection to Notice of Intention to Foreclose to Ian S. Marx, Esq. at Greenberg Traurig LLP via fax to 973-301-8410 and

regular mail to 200 Park Ave., P.O. Box 677, Florham Park, NJ 07932.

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

Theresa E. Kelly

Theresa E. Kelly

Dated: March 1, 2013

# SPECK LAW OFFICES, LLC

E-Mail: MSpeck@SpeckLawOffice.com



RECEIVED

MAR 0 4 2013

SUPERIOR COURT
CLERK'S OFFICE


March 1, 2013

***Via Lawyer's Service***
Superior Court Clerk's Office
Foreclosure Processing Services
Attn: Objection to Notice of Intention to Foreclosure
25 Market St.
Trenton, NJ 08625-0971.

**RE: GMAC Mortgage, LLC v. Holly Morgan, et al.**
**Docket No.: MER-F-025354-12**

Dear Sir/Madam

Enclosed please find an original and two copies of an Objection to Order to Show Cause and supporting papers with respect to the above mentioned matter. Kindly file and return a filed copy to the undersigned in the enclosed self-addressed stamped envelope.

I thank you in advance for your anticipated courtesies and cooperation.

Very truly yours,
SPECK LAW OFFICES

By: *Michael R. Speck*
Michael R. Speck

MRS/tk
cc: The Honorable Paul Innes, J.S.C. *(via regular mail)*
D. Brian O'Dell, Esq. *(via fax to 205-521-8800 and regular mail)*
Ian S. Marx, Esq. *(via fax to 973-301-8410 and regular mail)*
Client


✦ 80 E. Main St. ✦ Somerville ✦ NJ ✦ 08876 ✦ 908.428.4190 ✦ 908.300.8219 (fax) ✦
✦ 34 East Main St ✦ Suite 3 ✦ Freehold ✦ NJ ✦ 07728 ✦
REPLY TO SOMERVILLE OFFICE