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**MAR 04 2013**

**SUPERIOR COURT  
CLERK'S OFFICE**

**PERRY H. HARROLD  
ATTORNEY AT LAW**



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February 25, 2013

**UPS NEXT DAY AIR**

Office of the Clerk  
Superior Court of  
New Jersey  
Mercer County  
Mercer County Courthouse  
175 South Broad Street  
Trenton, New Jersey 08625

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

Dear Clerk:

I have enclosed a copy of a Written Objection to Order to Show Cause, in the above referenced cause of action. Please file the same there in your office.

Please feel free to direct any further questions and/or comments here to my office, care of my attention.

Sincerely,  
Perry H. Harrold

A handwritten signature in black ink, appearing to read "Perry H. Harrold", written over a printed name.

PHH/tjh  
Enclosures a/s  
Cc: To File  
TRACKING NUMBER · J187 523 172 1

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

**SUPERIOR COURT OF  
NEW JERSEY  
CHANCERY DIVISION  
MERCER COUNTY  
DOCKET NO.:F-025354-12  
CIVIL ACTION**

**WRITTEN OBJECTION TO ORDER TO SHOW CAUSE**

**COMES NOW** a defendant, **PATRICIA WALTON**, by counsel, in the above entitled cause of action and for her Written Objection to Order to Show Cause the aforesaid defendant would respectfully say unto the Court herein as follows, to-wit:

1.) That the aforesaid Patricia Walton is a defendant in the above entitled foreclosure action and said defendant was heretofore served with a Notice of Intention to Foreclose prior to the said foreclosure action which did not comply with the requirements of the Fair Foreclosure Act; and

2.) That by the court's Order to Show Cause herein dated December 13, 2012, and in compliance with the Supreme Court's opinion in *U.S. Bank N.A. v. Guillaume*, Hon. Paul Innes, P. J. Ch., Mercer Vicinage, gave permission to GMAC Mortgage, LLC ("GMACM") to serve, along with the Order to Show Cause and verified complaint, corrected Notices of Intention to Foreclose on all defendant mortgagors/parties obligated on the debt in pending foreclosure actions filed before February 28, 2012; and

3.) That the pleading herein is filed as a written objection to the Order to Show Cause or the process by which the Honorable Court herein gave GMACM permission to serve the corrected NOI or Notice of Intent to

Foreclose; and

4.) That the defendant Patricia Walton herein has moved and relocated to the Commonwealth of Virginia and she now lives in Martinsville, Virginia, and further, she has been unable to obtain the services of a New Jersey Attorney to file her objection herein, and requests the Court allow the undersigned attorney at law, licensed in the Commonwealth of Virginia, to file the written objection herein, or allow her additional time to file such written objection; and

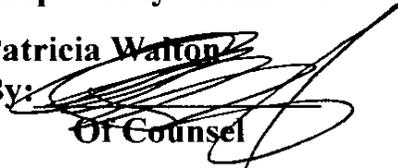
5.) That the defendant herein objects to the corrected NOI as it results in additional time loss in conducting a foreclosure sale, resulting in the real property being foreclosed upon has even less value; possibly resulting in a deficiency judgment or amount due by the defendant herein subsequent to foreclosure; and

**WHEREFORE**, for the above and foregoing reasons defendant objects to the Order to Show Cause, request that such Order be quashed, canceled and/or withdrawn, and for any and all other relief just and proper in the premises.

**Respectfully submitted**

Patricia Walton

By:

  
Of Counsel

**CERTIFICATE OF SERVICE**

I hereby certify that I have mailed a copy of the above and foregoing Written Objection to Order to Show Cause upon the following, to-wit:  
Superior Court Clerk's Office, Foreclosure Processing Services, Attention: Objection to Notice of Intention to Foreclose, P. O. Box 971, Trenton, NJ 08625, D. Brian O'Dell, Bradley Arant Boult Cummings, LLP, 1819 Fifth

Avenue North, Birmingham, AL 350203, and The Hon. Paul Innes, P.J Ch.,  
Superior Court of New Jersey, Mercer County Courthouse, First Floor, 175  
South Broad Street, Trenton, New Jersey 08650-0068 by First Class U. S.  
Mail, on this 25<sup>th</sup> day of February, 2013.



**PERRY H. HARROLD**

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