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(COUNSEL FOR PLAINTIFF)

IN RE APPLICATION OF

STATEBRIDGE COMPANY, LLC ON BEHALF OF THE
BANK OF NEW YORK MELLON TRUST COMPANY,
NATIONAL ASSOCIATION AS GRANTOR TRUSTEE OF
THE PROTIUM MASTER GRANTOR TRUST
TO ISSUE CORRECTED NOTICES OF INTENT TO
FORECLOSE ON BEHALF OF IDENTIFIED
FORECLOSURE PLAINTIFFS IN UNCONTESTED
CASES

**IN THE SUPERIOR COURT OF
NEW JERSEY F -029140-12
CHANCERY DIVISION
PASSAIC COUNTY**

CIVIL ACTION

Case Number: F-

***VERIFIED COMPLAINT IN
SUPPORT OF ORDER TO SHOW
CAUSE***

Servicer, Statebridge Company, LLC ("Servicer" and/or "Verified Complaint Plaintiff"), authorized to act on behalf of the Foreclosure Plaintiff (specifically The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Protium Master Grantor Trust) in the instant matter, in pending, pre-judgment uncontested foreclosure actions, brings this action pursuant to the April 4, 2012, Order of the New Jersey Supreme Court (the "April 4th Order"), that was entered following the Court's decision in *U.S. Bank, NA v. Guillaume*, 209 N.J. 449 (2012), ("Guillaume"). Servicer respectfully states as follows:

1. Servicer, is a duly organized limited liability company formed under the laws of the State of Colorado.

COMMON FACTS - BACKGROUND

2. Servicer services mortgage loans for residential properties in the State of New Jersey.

3. When Servicer is the servicer of the loan, it undertakes various functions on behalf of the owner of the loan (The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Protium Master Grantor Trust), including, but not limited, payment collection and loan administration, loss mitigation (loan modifications, forbearances, short sales, deeds-in-lieu), collection and loan enforcement efforts, including, but not limited to foreclosure of the mortgage loan. If the loan is owned by an entity other than Servicer, Servicer undertakes these efforts in accordance with contracts that govern the relationship with the owner of the loan, as well as, the loan documents, Rules of Court and any applicable laws. As an entity collecting and processing payments, Verified Complaint Plaintiff has the information relevant to the payments, escrows paid, and other amounts due and whether or not the loan is in default, by how much, and why it is in default. The information is maintained by Verified Complaint Plaintiff's systems records. In cases where Verified Complaint Plaintiff is only the servicer (and not also the lender), the lender is not likely to have possession of the relevant servicing information in the possession of Verified Complaint Plaintiff as recognized by the Supreme Court when it revised the Court Rules governing foreclosures at R. 4:64-1 and R. 4:64-2 in June, 2011. Verified Complaint Plaintiff makes this application on behalf of the lenders identified in this complaint pursuant to its authority as the lenders' servicing agent in the pending foreclosure actions identified herein.
4. A requirement prior to the institution of a foreclosure action in New Jersey is the preparation and service of a Fair Foreclosure Notice of Intent ("NOI") in accordance with the requirements of N.J.S.A. 2A:50-56 of the Fair Foreclosure Act (the "FFA").

The NOI is prepared either by Verified Complaint Plaintiff or its Counsel based on current loan information held by the Verified Complaint Plaintiff. The current loan information includes the amount necessary to reinstate the loan and the date by which the reinstatement must occur.

5. On February 27, 2012, the Supreme Court, in reviewing whether or not a plaintiff complied with the FFA (2A:50-56(c)(11)) decided in Guillaume that the NOI must comply with the requirements of the FFA. The Court determined that the failure to comply was not necessarily fatal to the action, but the Court had discretion to choose the appropriate remedy including permitting a cure of the deficient NOI, or imposing such other remedy as may be appropriate to the specific case.
6. Following the decision and direction of Guillaume, the Court entered an Order dated April 4th, 2012 authorizing the Honorable Margaret Mary McVeigh, PJCh, Passiac Vicinage, and the Honorable Paul Innes PJCh, Mercer Vicinage, to entertain summary actions in the form of verified complaints with orders to show cause as to why Plaintiffs in any uncontested foreclosure actions filed on or before February 27, 2012 in which final judgment has not been entered, who caused NOIs to be served that are deficient under the FFA, should not be allowed to serve corrected NOIs on defendants/mortgagors and/or parties obligated on the debt (the "Foreclosure Defendants").
7. The April 4th Order sets forth direction that any corrected NOI must be accompanied by a letter to the Foreclosure Defendants setting forth the reasons why the corrected NOI is being served, the procedure to follow in the event a Foreclosure Defendant wishes to objection to the corrected NOI, the name of a person to contact with any

- questions, and that the receipt of the corrected NOI allows Foreclosure Defendants 30 days in which to object or cure the default otherwise the foreclosure will proceed.
8. Verified Complaint Plaintiff is in the process of reviewing its pending foreclosure cases to identify those foreclosure cases in which there will be a corrected NOI because it did not comply with a provision of 2a:50-56(b), (c)(1) through (11) as more fully set forth in the specific counts set forth below. The list of foreclosure cases is set forth below and made an exhibit to the relevant count of this Complaint.
 9. The list of foreclosure cases is limited to those matters:
 - a. Foreclosures filed prior to February 27, 2012 in which Verified Complaint Plaintiff is the lender, servicer of the loan and acting as agent/servicer for Foreclosure Plaintiff;
 - b. In which final judgment has not been entered; and,
 - c. In which Verified Complaint Plaintiff seeks leave of this Court to file corrected NOIs for the reasons set forth in each count below, more specifically, to include the identity of the lender and lender's address;
 10. Verified Complaint Plaintiff seeks permission to issue corrected NOIs setting forth the default as of the date of the corrected NOI, setting forth the requirements to cure the default as of the date of the corrected NOI and providing Foreclosure Defendants with thirty (30) days from the date of the corrected NOI to object or cure the default; otherwise, Foreclosure Plaintiff may proceed.¹
 11. To comply with the April 4th Order, attached as Exhibit "A" to this complaint is the proposed form of letter ("Explanatory Letter") that Verified Complaint Plaintiff

¹ In the event the lender (foreclosure plaintiff as identified in the foreclosure caption) has changed since the original NOI was sent, the corrected NOI will identify the current lender and foreclosure counsel will take appropriate steps to amend the foreclosure action to reflect the change in plaintiff.

intends to send to each Foreclosure Defendants together with the corrected NOI. As instructed by the Supreme Court April 4th Order, the Explanatory Letter explains:

- a. The reason why the corrected NOI is being served;
- b. The procedure to follow in the event a Foreclosure Defendant wishes to object to the NOI;
- c. Identifies the individual(s) a Foreclosure Defendant should contact with any questions; and,
- d. Advises Foreclosure Defendants of the right to object to the corrected NOI as well as the right to cure the default within 30 days of the date of the corrected NOI (which will have the default information as of the date of the corrected NOI).

The corrected NOIs will provide the cure information as of the date of the corrected NOI and will exclude attorneys' fees and costs.

12. Attached as Exhibit "B" to the Verified Complaint is the proposed form of corrected NOI pursuant to the FFA which Verified Complaint Plaintiff will send to each of the Foreclosure Defendants identified in each count of the complaint.
13. Plaintiff also seeks confirmation that upon compliance with the procedure approved by the Court that it will be able to proceed with its foreclosure actions and comply with changes made to Rules 4:64-1 and 4:64-2 by the Supreme Court.
14. With regard to each count below, Verified Complaint Plaintiff provides an exhibit for each of the pending uncontested foreclosure cases setting forth; (1) last four digits of servicer account number; (2) docket number; (3) Plaintiff name (current lender); (4)

borrowers; (5) firm file #; (6) county; (7) the attorney firm handling the foreclosure; and, (8) NOI issue under 2A:50-56.

15. In the Counts set forth below, Verified Complaint Plaintiff requests that this Court enter Orders permitting Verified Complaint Plaintiff to issue corrected NOIs for the Foreclosure Plaintiffs identified in the below Counts and allowing Foreclosure Plaintiffs (and Verified Complaint Plaintiff) to proceed with the foreclosure cases set forth in each count below.

COUNT ONE

IN RE FORECLOSURE PLAINTIFF: THE BANK OF NEW YORK MELLON TRUST COMPANY, NATIONAL ASSOCIATION AS GRANTOR TRUSTEE OF THE PROTIUM MASTER GRANTOR TRUST
FFA NOI ISSUE

16. Allegations one through 15 are hereby incorporated by reference as though set forth at length herein.

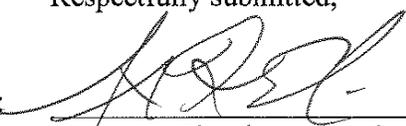
17. The foreclosure cases within the scope of the Guillaume decision regarding the Foreclosure Plaintiff, The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Protium Master Grantor Trust, are attached as Exhibit "1". Exhibit 1 is also being provided in a searchable PDF format to the Court.

18. All foreclosure cases in this Count share a common element in that the NOI needs to be corrected to comply with FFA 2A:50-56(c) as set forth on the list.

WHEREFORE, Verified Complaint Plaintiff respectfully requests that this Court enter an Order permitted Foreclosure Plaintiffs (and Verified Complaint Plaintiff) to issue corrected NOIs in an omnibus manner as permitted in the Supreme Court's April 4th, 2012 Order to the issue identified in paragraph 17 above in the cases identified in this Count together with such other relief as this Court deems reasonable and necessary. Further, Verified Complaint Plaintiff

requests that the Court specify that the corrected NOIs shall provide default information and amounts/actions needed to cure any default as of the date of the corrected NOIs. Counsel has provided a form Order that it seeks to be granted.

Respectfully submitted,

By: 

Steven K. Eisenberg, Esquire
Stern & Eisenberg, PC
Attorneys Verified Complaint Plaintiff &
Foreclosure Plaintiff

DATED: November 27, 2012

CERTIFICATION

Other than the Foreclosure Actions brought by the identified Foreclosure Plaintiffs in the Counts to the Complaint, pursuant to Rule 4:5-1, it is hereby stated that the matter in controversy is not the subject of any other action pending in any other Court or of a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading and the previous pleadings, if any, at the present time we know of no other parties that should be joined under Rule(s) 4:28 or 4:29 in the within action.

Stern & Eisenberg, PC

By: 

Steven K. Eisenberg, Esquire

VERIFICATION OF COMPLAINT

STATE OF Colorado :

COUNTY OF Denver :

I, David McDonnell, being duly sworn states:

1. I am Managing Director (title) for Servicer, the Plaintiff is the foregoing verified complaint.
2. The allegations in the verified complaint are true and correct to the best of my knowledge and belief.
3. The Exhibits attached hereto to the Verified Complaint are true and correct.



Sworn and subscribed before me
this 27 day of November 2012

Sherry Thrash
notary public

Expires: 9/10/2013

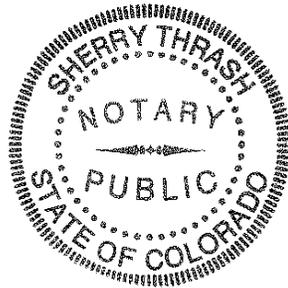


Exhibit B

Proposed Corrected Notice of Intent
To Foreclosure under the Act



4600 S. Syracuse Street
Suite 700
Denver, Colorado 80237

Date

Borrower Name

Borrower Mailing Address

Re: Property: (if different than mailing address also send to property)

Property Address

Mortgagee: *Lender Name*

Lenders Address:

(insert - if different from payment address set forth below)

Loan Number: *Loan Number*

Firm File Number: *Firm File Number*

**IMPORTANT: NOTICE OF INTENTION TO FORECLOSE MORTGAGE
UNDER THE 1995 FAIR FORECLOSURE ACT OF NEW JERSEY (2A:50-56)**

READ THIS NOTICE CAREFULLY

Dear *Borrower*:

The MORTGAGE held by *Lender* on your property situated at *Property Address* IS IN SERIOUS DEFAULT BECAUSE YOU HAVE NOT MADE THE MONTHLY INSTALLMENTS AS NOTED BELOW UNDER (A), AND/OR BECAUSE YOU HAVE FAILED TO COMPLY WITH OR PERFORM THE OTHER PROVISIONS OF THE MORTGAGE OBLIGATIONS, IF ANY, AS NOTED BELOW UNDER (D). PREVIOUS LATE CHARGES UNDER (B) AND OTHER CHARGES, IF ANY, UNDER (C) NOTED BELOW, HAVE ALSO ACCRUED TO THIS DATE. THE TOTAL AMOUNT NOW REQUIRED TO CURE THIS DEFAULT, OR IN OTHER WORDS, TO GET CAUGHT UP IN YOUR PAYMENTS AS OF THE DATE OF THIS LETTER, IS *Total Due to Reinstate* AS NOTED BELOW:

Monthly payments from *Date of Default*
through and including *current date* as follows:

Payments of *Amount* due on *Date of Default* through
and including *end date of payments due at same rate*
as date of default payment,

in the amount of.....*total of monthly payments*

If not one monthly payment amount:

Payments of *Amount* due on *start date of next monthly payment amount* through and including *end date of next monthly payment amount* in the amount of.....*total of monthly payments*
(repeat for each payment change)

Other charges (explain/itemize):

Late charges:.....*Amount*
Fees billed.....*Amount*
Other charges (explain).....*Amount*
Explanation:
Less suspense.....*Amount*

TOTAL AMOUNT PAST DUE:.....*Total Due*

You may cure this default within thirty (30) days from the date of mailing of this letter (*30 Day deadline to pay*) by paying to *Lender Short Name* the above amount, the Total Amount Past Due – *Total Due*. Such payment must be made by cash, cashier’s check, certified check or money order, and such payment must be made payable to *Lender Short Name* and sent to *Payment Address*. You may contact *Lender Short Name* at *Contact/Representative Phone Number*.

If you do not cure the default within thirty (30) days, we intend to exercise *Lender Short Name* right to terminate your ownership in the property and commence a foreclosure suit in a court of competent jurisdiction. If legal proceedings commence, you will be responsible for *Lender Short Name* court costs and reasonable attorney’s fees (as provided for in the mortgage and note) in an amount not to exceed that amount permitted pursuant to the Rules Governing the Courts of the State of New Jersey.

If so provided in your mortgage documents, you may have the right to transfer the subject property to another person subject to *Lender Short Name* security interest and that transferee may have the right to cure the default as provided in the 1995 Fair Foreclosure Act of New Jersey (the “Act”).

If you do not cure the default within thirty (30) days and foreclosure proceedings have begun, you, or anyone authorized to act on your behalf, still have the right to cure the default at any time, up to entry of final judgment, or the entry by the office of the court of an order of redemption pursuant to subsection g of section 11 of this Act.

To cure a default, subsequent to legal proceedings having begun, you must pay to *Lender Short Name* and send to *Payment Address*.

- (1) all sums which would have been due in the absence of default at the time you make said payment;
- (2) perform any other obligation which you would have been bound to perform in the absence of default or the exercise of an acceleration clause, if any;

- (3) pay or tender court costs, if any, and attorney's fees in an amount which shall not exceed the amount permitted under the Rules Governing the Courts of the State of New Jersey; and
- (4) pay all contractual late charges as provided for in the note or mortgage.

A cure of the default may be exercised only once every 18 months, provided, however; that this limitation shall not apply if you cure the default within thirty (30) days after the date of mailing of this notice. The 18 month period shall run from the date of the cure and reinstatement.

If you cure the default, the mortgage will be restored to the same position as if no default had occurred. It nullifies, as of the date of the cure, any acceleration of any obligation under the mortgage, note or bond arising from the default.

You are advised to seek counsel from an attorney of your choice concerning your mortgage default situation. If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association or Lawyer Referral Service at **County Lawyer Referral Number**. If you are unable to afford an attorney, you may communicate with the Legal Services Office at **County Legal Services Number**. There may be financial assistance available for curing the default from a program operated by the State or Federal Government or non-profit organization. You may contact the Commissioner of Banking at 20 W. State Street, CN 040, Trenton, New Jersey 08625, phone number (609) 292-7272 to obtain a list of such programs, including:

New Jersey Home Ownership Preservation Foundation:	1-888-995-HOPE (www.995hope.org)
New Jersey Housing and Mortgage Finance Agency:	1-800-NJ-HOUSE
New Jersey Housing Resource Center (NJHRC)	1-877-428-8844

A list of programs is also attached.

If you disagree with the assertion that a default has occurred or if you disagree with the calculations above required to cure the default, you may contact **Lender Short Name** at **Contact/Representative Phone Number**.

Sincerely,

On Behalf of Lender

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Address correction requested

Also sent first class mail, postage pre-paid

Address correction requested

**THIS IS AN ACTION TO ATTEMPT
TO COLLECT A DEBT. ANY INFORMATION
PROVIDED BY YOU MAY BE USED FOR THAT PURPOSE.**

NOTICE PURSUANT TO THE
FAIR DEBT COLLECTION PRACTICES ACT

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE.

Pursuant to the Fair Debt Collections Practices Act, you may dispute the validity of the debt or any portion thereof. If you do so in writing within thirty (30) days of receipt of this letter, this firm will obtain and provide you with written verification thereof; otherwise, the debt will be assumed to be valid. Likewise, if requested within thirty (30) days of receipt of this letter, this firm will send you the name and address of the original creditor if different from above. Notwithstanding the above, we reserve the right to continue to pursue our clients rights as may be allowed under applicable law.

IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE ENCLOSED LETTER/NOTICE IS FOR INFORMATION PURPOSES ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT A DEBT. IF YOU HAVE RECEIVED A DISCHARGE IN BANKRUPTCY (AFTER ENTERING INTO THE RELEVANT MORTGAGE NOTE AND MORTGAGE AND HAVE NOT REAFFIRMED THE DEBT) THEN THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED AS AN ATTEMPT TO COLLECT A DEBT, BUT SOLELY AS PART OF THE ENFORCEMENT OF THE MORTGAGE/LIEN AGAINST REAL PROPERTY.

NEW JERSEY AGENCY LISTING Fair Foreclosure Act Notice of Intention to Foreclose - List of Entities Providing Assistance The following is a list of governmental and non-profit entities that may provide financial assistance or counseling to borrowers in foreclosure.

American Credit Alliance, Inc. 26 S. Warren St. Trenton, NJ 08608 609-393-5400	Atlantic Human Resources, Inc. 1 S. New York Ave. Atlantic City, NJ 08401 609-348-4131	Consumer Credit Counseling Service of Central New Jersey 1931 Nottingham Way Hamilton, NJ 08619 609-586-2574
Consumer Credit Counseling Service of New Jersey 185 Ridgedale Ave. Cedar Knolls, NJ 07927-1812 973-267-4324	Fair Housing Council of Northern New Jersey 131 Main St. Hackensack, NJ 07601 201-489-3552	Garden State Consumer Credit Counseling, Inc. 225 Willowbrook Road Freehold, NJ 07728 1-800-992-4557
Jersey Counseling & Housing Development, Inc. 29 S. Blackhorse Pike Blackwood, NJ 08012 856-227-3683	Jersey Counseling & Housing Development, Inc. 1840 S. Broadway Camden, NJ 08104 856-541-1000	Mercer County Hispanic Association 200 E. State St., 2nd Floor Trenton, NJ 08607 609-392-2446
Middlesex County Economic Opportunities Corporation 1215 Livingston Ave. North Brunswick, NJ 08902 732-790-3344	Monmouth County Human Services Housing Services Unit P.O. Box 3000 Freehold, NJ 07728 732-431-7998	NJ Citizen Action (main office/financial education center) 744 Broad St., Suite 2080 Newark, NJ 07102 973-643-8800 1-800-NJ-OWNER (loan counseling) 1-888-TAXES-11 (free tax preparation assistance)
NJ Citizen Action (Central Jersey) 85 Raritan Ave., Suite 100 Highland Park, NJ 08904 732-246-4772	NJ Citizen Action (South Jersey) 2 Riverside Drive, Suite 362 Camden, NJ 08103 856-966-3091	Ocean Community Economic Action Now, Inc. 22 Hyers St. Toms River, NJ 08753-0773 732-244-2351, ext. 2
Paterson Coalition for Housing, Inc. 262 Main St., 5th Floor Paterson, NJ 07505 973-684-5998	Paterson Task Force for Community Action, Inc. 155 Ellison St. Paterson, NJ 07505 973-279-2333	Puerto Rican Action Board Housing Coalition Unit 90 Jersey Ave. New Brunswick, NJ 08903 732-249-9700
Tri-County Community Action Agency, Inc. 110 Cohansy St. Bridgeton, NJ 08302 856-451-6330	Urban League for Bergen County 106 W. Palisade Ave. Englewood, NJ 07631 201-568-4988	Urban League for Essex County 508 Central Ave. Newark, NJ 07101 973-624-9535
Urban League of Union County 288 N. Broad St. Elizabeth, NJ 07208 908-351-7200	Homelessness Prevention Program New Jersey Department of Community Affairs (866) 889-6270*	



*Basic eligibility is limited to: (a) single family owner/occupied dwellings with all those on the deed and mortgage occupying the house; (b) no more than one mortgage or lien encumbrance on the property; (c) no initiated or ongoing bankruptcy. Assistance will be in the form of a loan, and a lien will be placed on the property. The family must document the financial reason for nonpayment. At the time of the eligibility decision, the household must have and document income sufficient to support the household and repay the loan. There is a fee for the credit check and property search.

Exhibit A

Proposed Form of Explanatory Letter



4600 S. Syracuse Street
Suite 700
Denver, Colorado 80237

**Please read this letter and the enclosed documents carefully,
as they contain important information concerning your rights**

Statebridge Company, LLC is the servicer (“Plaintiff”) of your mortgage loan. Our records show that your mortgage is in default and you have breached the terms of the note, mortgage, deed of trust or other security agreement securing your loan more fully described in the enclosed Corrected Notice of Intent to Foreclose.

You were previously sent a Notice of Intent to Foreclose pursuant to the New Jersey Fair Foreclosure Act (the “Act”) and a judicial proceeding (a pending foreclosure lawsuit) is pending against you.

Why You Are Receiving This Letter

On February 27, 2012, the Supreme Court of New Jersey issued an opinion in the matter of *US Bank N.A. v. Guillaume*, 209 NJ 449 (2012), interpreting the requirements of the Notice of Intent to Foreclose under the Act. On April 4, 2012, the Supreme Court issued a supplemental Order explaining a procedure for the Plaintiff in certain pending foreclosure lawsuits to correct the Notice of Intent. For you, this means that the Notice of Intent to Foreclose previously sent to you may not have complied with all applicable provisions of the Act. Specifically, the Notice of Intent to Foreclose may not have included:

The name and address of the lender (required pursuant to 2A:50-56(c)(11) of the Act)

Plaintiff has obtained an Order to Show Cause dated _____ from a Judge of the Superior Court (“the “Order”) authorizing Plaintiff to send you a *corrected Notice of Intent to Foreclose* (“*Corrected NOI*”). A copy of the Order and the corrected Notice of Intent to Foreclose are enclosed with this letter. Please read these documents carefully.

Information About the Corrected Notice of Intent (NOI)

The corrected Notice of Intent to Foreclose sets forth important information about your loan, including information on how you can cure the default, the consequences of failing to cure the default, contact information for the servicer and lender, information about retaining counsel, and borrower assistance. With the passage of time since the foreclosure lawsuit was filed against you, the lender on your loan may have changed from the named Plaintiff in the foreclosure lawsuit. The Corrected NOI lists the name and address of the current lender of your loan. As set forth in the Corrected NOI, the default may be cured on or before the date indicated therein. If you fail to cure the default by the date set forth in the Corrected NOI, the foreclosure lawsuit against you will proceed.

Information About the Order to Show Cause and Verified Complaint

Enclosed with this letter are copies of the Order to Show Cause and verified complaint (without exhibits) and Corrected NOI. The verified complaint lists the following lenders in the following counts of the verified complaint.

Count 1 – The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Protium Master Grantor Trust

The attachments/exhibits to the verified complaint, which list the specific foreclosure cases involved, will be available on the New Jersey Court's website at <http://www.judiciary.state.nj.us/>. If you are unsure of the docket number for your foreclosure case, you can access that information on the Court's website by conducting a search of the lists of cases involved. If you do not have access to a computer or have trouble locating the information on the Court's website, you can contact a representative of Plaintiff who can assist you with locating information about your foreclosure case, which number is set forth below.

How to File an Objection

If you wish to object to the issuance of or content of the Corrected NOI or the Order, the Order sets forth that you have until _____ in which to object. The Order provides that any objections/opposition shall be made in writing and the original objection/opposition must be filed with the Clerk of the Superior Court:

Superior Court Clerk's Office, Foreclosure Processing Services
Attention: Objection to Notice of Intention to Foreclose
P.O. Box 971
Trenton, New Jersey 08625

You must also send a copy of your objection/opposition directly to the Judge handling the Order (who is checked below):

- The Honorable Margaret Mary McVeigh
Passaic County Courthouse, Chambers 100
71 Hamilton Street
Paterson, New Jersey 07505
- The Honorable Paul Innes
Mercer County Courthouse
175 S. Broad Street
Civil Law Post Office Box 8068
Trenton, New Jersey 08650

And you need to send a copy of the objection/response to our counsel:

Stern & Eisenberg, PC
1040 N. Kings Highway, Suite 407
Cherry Hill, New Jersey 08034
(opposition to Corrected NOI)

Personally appearing at the hearing scheduled in the Order to Show Cause without formally filing an objection as set forth above, will not qualify as an objection. A telephone call will not protect your rights; if you want to file an objection/opposition you must do so in writing and file it with the Court and serve copies on the Judge and Counsel as set forth above, if you want the Court to hear your objection/opposition to the relief that is sought by the servicer and lender.

Questions about Filing an Objection

For any questions about the objection procedure you may visit <http://www.judiciary.state.nj.us/prose/index.htm>. You may also contact the Superior Court Clerk's Office at (609) 421-6100, or at SCCOFOreclosure.Mailbox@judiciary.state.nj.us.

Contacting the Servicer about the Notice of Intent

If you have any questions concerning your loan, please call _____ at (____) _____ - _____ . Additional contact information is provided in the Corrected NOI.

Sincerely,

Statebridge Company, LLC

Enclosures:

Order to Show Cause

Corrected Notice of Intent to Foreclose

Verified Complaint

Exhibit 1

List of Foreclosure Lawsuits Count One

Borrower Name(s) (Last Name, First Name)	Doclet Number	County	Plaintiff Name	Last Four Digits of Servicer Acct Number	NOI DEFICIENCY REASON	Attorney	Attorney File No.
Mark Willis, Karen Willis	F-002183-12	Union	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	7896	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	069054
LeAnn Borromeo, Joseph C. Borromeo	F-12724-09	Mercer	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	3902	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	65758
Nikki Cummings, June Cummings	F-21209-09	Passaic	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	5250	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	64076
Silvestre Debaruz	F-39826-09	Passaic	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	4921	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	64388
Christopher Domanski	F-55725-09	Ocean	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	5613	2A.50-56(c)(10), (11) - Lender Name/Address	Pluse, Becker & Saltzman	64863
Wayne Hais	F-47440-09	Cape May	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	5486	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	64877
Evelyn Gonzalez-Spivey	F-48633-09	Essex	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	4116	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	64895
Lorraine Flemmings, Robin Flemmings	F-53981-09	Passaic	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	5689	2A.50-56(c)(10), (11) - Lender Name/Address	Pluse, Becker & Saltzman	65116
Madeline Collas	F-57049-09	Somerset	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	5365	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	65163
Kahreen Cunningham	F-57541-09	Burlington	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	5428	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	65179
Dina M. Sedlack, William E. Sedlack	F-60190-09	Camden	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	6311	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	65273
Eduardo Belloq	F-62052-09	Hudson	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	6147	2A.50-56(c)(10), (11) - Lender Name/Address	Pluse, Becker & Saltzman	65304
Kenneth C. Strat	F-3010-10	Essex	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	5857	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	65459
Julie Daniels	F-2483E-10	Gloucester	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	4518	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	66113
Ricarte Rodriguez, Lysette Rodriguez	F-053752-10	Somerset	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	5439	2A.50-56(c)(10), (11) - Lender Name/Address	Pluse, Becker & Saltzman	66246
Paul C. Saurier, Donna J. Saurier	F-039598-10	Essex	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	5576	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	66247
Andy P. Johnson	F-059453-10	Camden	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	6059	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	66254
Erri Goldberg	F-20890-10	Monmouth	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	13566	2A.50-56(c)(10), (11) - Lender Name/Address	Pluse, Becker & Saltzman	67269
Angel Colon, Lenides Colon	F-003079-11	Cumberland	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	4006	2A.50-56(c)(10), (11) - Lender Name/Address	Pluse, Becker & Saltzman	67566
Jose Vazquez, Mag-aitz Ortiz	F-003075-11	Atlantic	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	3514	2A.50-56(c)(10), (11) - Lender Name/Address	Pluse, Becker & Saltzman	67718
Marta Natalia Herrera	F-008615-11	Mercer	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	3594	2A.50-56(c)(11) - Lender Address	Pluse, Becker & Saltzman	67924
John Siano, Gloria Siano	F-13311-04	Sussex	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	3536	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	67975
Stanley George, Rosemary George	F-007793-12	Ocean	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	3944	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	66241
Michael Harmon	F-43672-09	Hudson	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	4296	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	072132
Aimee Moore	F-31160-09	Cape May	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	5420	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	072139
Robbie Mowla	F-50814-09	Monmouth	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	5387	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	072144
Oiga Garcia	F-006031-11	Atlantic	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	10520	2A.50-56(d)(11) - Lender Name/Address	Pluse, Becker & Saltzman	072333
Carole Hartman	F-004710-11	Salem	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Prudom Master Grantor Trust	10871	2A.50-56(c)(10), (11) - Lender Name/Address	Pluse, Becker & Saltzman	072394

Julian Douglas	F-17827-09	Atlantic	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Pratum Master Grantor Trust	5623	2A,5P-56(d)(11) - Lender Name/Address	Stern & Eisenberg	1400.0067
Shane Cosh	F-17914-09	Mercer	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Pratum Master Grantor Trust	4850	2A,5P-56(d)(11) - Lender Name/Address	Stern & Eisenberg	1400.0048
Robert Graham	F-255-09	Burlington	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Pratum Master Grantor Trust	3226	2A,5P-56(d)(11) - Lender Name/Address	Stern & Eisenberg	1400.0108
Diane Hackett, William Hackett	F-3176-12	Mercer	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Pratum Master Grantor Trust	10484	2A,5P-56(d)(11) - Lender Name/Address	Stern & Eisenberg	1400.0102
Karen Hunter	F-4706-09	Union	The Bank of New York Mellon Trust Company, National Association as grantor trustee of the Pratum Master Grantor Trust	4669	2A,5P-56(d)(11) - Lender Name/Address	Stern & Eisenberg	1400.004

CERTIFICATION

Other than the Foreclosure Actions brought by the identified Foreclosure Plaintiffs in the Counts to the Complaint, pursuant to Rule 4:5-1, it is hereby stated that the matter in controversy is not the subject of any other action pending in any other Court or of a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading and the previous pleadings, if any, at the present time we know of no other parties that should be joined under Rule(s) 4:28 or 4:29 in the within action.

Stern & Eisenberg, PC

By: 

Steven K. Eisenberg, Esquire

CERTIFICATION

Pursuant to Rule 4:64-1(a), it is hereby stated that the Plaintiff did not obtain a title search in connect with the filing of this Complaint.

STERN & EISENBERG, PC

BY:

- Jacqueline F. McNally*

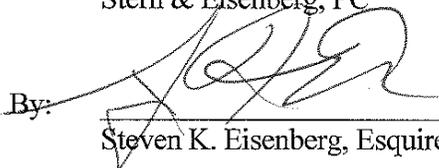
 STEVEN K. EISENBERG, ESQUIRE
 JACQUELINE F. MCNALLY, ESQUIRE
 KEVIN P. DISKIN, ESQUIRE
 DAVID M. LAMBROPOULOS, ESQUIRE
 LEN M. GARZA, ESQUIRE
 STACEY WEISBLATT, ESQUIRE
 OLIVER AYON, ESQUIRE
Attorney for Plaintiff

DATED: 12/10/12

CERTIFICATION

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Stern & Eisenberg, PC

By: 

Steven K. Eisenberg, Esquire