

IRA J. METRICK, ESQ.
57 West Main Street
Freehold, NJ 07728
732-863-1660
Attorney for Defendants, David and Karin Singer

RECEIVED

NOV 25 2013

SUPERIOR COURT
CLERK'S OFFICE

IN RE APPLICATION BY JPMORGAN
CHASE BANK, N.A. TO ISSUE
CORRECTED NOTICES OF INTENT TO
FORECLOSE ON BEHALF OF IDENTIFIED
FORECLOSURE PLAINTIFFS IN
UNCONTESTED CASES

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY

DOCKET NO. F-030403-13

Civil Action

OBJECTION TO ORDER TO SHOW CAUSE

Defendants, David and Karin Singer, hereby respond to the applicant's Order to Show Cause in the above captioned matter. Defendant was previously involved in a foreclosure action under Docket No. F-34173-10. However, that foreclosure action was dismissed by the Superior Court Clerk on October 11, 2013 for Lack of Prosecution. There is currently no pending foreclosure action. Please accept this written objection to JPMorgan's Order to Show Cause to issue corrected notices of intent to foreclose for the following reason:

OBJECTION: The Order to Show Cause to Serve Corrective Notices of Intent is inapplicable to Defendant as there is no underlying foreclosure action.

JPMorgan Chase Bank, N.A. filed the above captioned Order to Show Cause to serve Corrective Notices of Intent to Foreclose in "pending foreclosure cases in New Jersey." Plaintiff's motion papers specifically state they are seeking relief "by way of summary action to issue corrective notices... in "pending, pre-judgment, uncontested foreclosure cases listed on Exhibits 1 through 28." Defendant is not a party to a pending foreclosure action and therefore is not a proper party to this OTSC.

In 2010 MetLife Home Loans instituted a foreclosure action against David Singer under docket number "SWC-F-034173-10." (Exhibit A). No action was taken on the file after 2010. On September 6, 2013, the Superior Court Clerk's Office, Foreclosure Processing Services, issued a Notice of Dismissal for Lack of Prosecution to Zucker Goldberg & Ackerman, LLC on behalf of the Plaintiff. (Exhibit B). In early October, 2013, Plaintiff's counsel filed a certification to prevent the dismissal, arguing that it would be manifestly unjust to dismiss the matter. (Exhibit C). As can be seen from the top right corner of the certification, the application by Plaintiff's counsel was **denied** because it failed to set forth exceptional circumstances. On October 11, 2013 the Superior Court of New Jersey dismissed without prejudice for lack of prosecution the foreclosure action against David Singer, docket number SWC-F-034173-10. (Exhibit D).

Although the foreclosure matter was dismissed because of Plaintiff's lack of prosecution in October of 2013, Plaintiff served Mr. Singer with the Notice of Order to Show Cause by way of letter dated November 5, 2012. (Exhibit E). With no pending active foreclosure action Plaintiff is free to issue a Notice of Intent to Foreclose, but is without grounds to seek an Order from this Court to serve corrective notices of intent under U.S Bank, N.A. Guillaume, 209 N.J. 449 (2012) which authorizes such action only as it relates to *pending, uncontested* foreclosure matters.

Additionally, as the defendant is not a proper party to this Order to Show Cause, Plaintiff has been served with a Notice of Frivolous Litigation, seeking that Plaintiff formally amend the Order to show cause to exclude the Defendant. (Exhibit F)

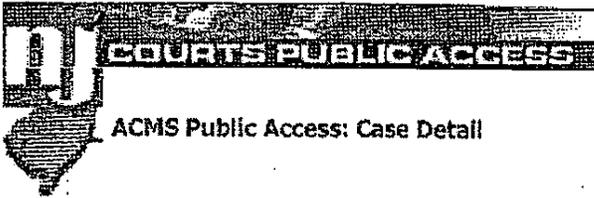
For the reasons stated above and for those reasons that may be raised in any additional objections, it is respectfully requested that JPMorgan Chase Bank's Order to Show Cause be

denied in its entirety and/or denied as to the specifically identified homeowner, David and Karin Singer. It is also respectfully requested the counsel fees be awarded in favor of Mr. Singer for bringing this action against him when he is not appropriately within the defined class or to which Plaintiff has no cause of action under the law.

Respectfully Submitted,

Ira J. Metrick, Esquire

EXHIBIT A



ACMS Public Access: Case Detail



VENUE: SUP CLERK COURT: GENL EQUI DOCKET #: F 034173 10 CASE VENUE : MON	
CASE TITLE : METLIFE HOME LOANS VS SINGER DAVID	
CASE FILED DATE : 06 30 2010	CASE TYPE : ORF RESIDENT F
CASE STATUS : CLOSED	CASE INITIATION TYPE: C COMPLAINT
DISPOSITION TYPE : DISMISSED	DATE DISPOSED : 10 11 2013
DISCOVERY DATE :	ARGUMENT REQST DATE : 00 00 0000
CASE PARTY COUNT : 008	JUDGMENT ENTERED : NO
FIRST ANSWER DATE :	ACTUAL SERVICE DATE :
EXPECTD SERVICE DATE:	CONSOLIDATION STATUS:
CONSOLIDATION TYPE :	DATE TRANSFERRED OUT:
TRANSFER FROM VENUE : TO	LAST PROCEEDING DATE:
LAST PROCEEDING TYPE:	PENDING ACTION DATE : 00 00 0000
PENDING ACTION :	DEMAND AMOUNT : 0.00
UNDISTRIBUTED AMOUNT: 0.00	DENOVO INDICATOR : NO
DF ATTORNEY/PRO SE : NO DF HAS AN ATT	
CMP DISPUTE RESOLUTN: TRIAL	TITLE 59 INDICATOR : NO
JURY REQUEST : NO JURY	CASE IMPOUNDED : NO
DATE ENTERED : 07 06 2010	

EXHIBIT B

SUPERIOR COURT CLERK'S OFFICE
FORECLOSURE PROCESSING SERVICES
PO BOX 971
MOUNTAIN VIEW, NJ 08625-0971

FORECLOSURE DISMISSAL NOTICE

DATE: SEPTEMBER 06, 2013
RE: METLIFE HOME LOANS VS SINGER DAVID
DOCKET: SWC F -034173-10
PARTY: METLIFE HOME LOANS

PLEASE TAKE NOTICE THAT ON OCTOBER 06, 2013 (30 DAYS FROM THE DATE OF THIS NOTICE),
THE CLERK WILL DISMISS THE ABOVE CASE FOR LACK OF PROSECUTION WITHOUT PREJUDICE
PURSUANT TO RULE 4:64-8 UNLESS ONE OF THE FOLLOWING PAPERS IS FILED:

- > AMENDED COMPLAINT
- > REQUEST FOR DEFAULT OR MOTION TO ENTER DEFAULT OUT OF TIME
- > MOTION TO: STRIKE ANSWER, ENTER JUDGMENT OR FOR SUMMARY JUDGMENT
- > PROOF OF BANKRUPTCY FILING OR OTHER CONDITION THAT STAYS THE CASE
- > AFFIDAVIT OR CERTIFICATION ASSERTING THAT FAILURE TO FILE OR TAKE THE NEXT
REQUIRED ACTION IS DUE TO EXCEPTIONAL CIRCUMSTANCES

FOR FURTHER INFORMATION, PLEASE CALL (609) 421-6100 BETWEEN
8:30 AM - 4:30 PM OR SCCO.MAILBOX@JUDICIARY.STATE.NJ.US.

LEONARD B ZUCKER
ZUCKER GOLDBERG & ACKERMAN LLC
200 SHEFFIELD ST STE 101

LISABETH ANN STROM, ESQ.
ACTING CLERK OF SUPERIOR COURT

MOUNTAINVIEW NJ 07092

EXHIBIT C

DENIED: Certification does not set forth exceptional circumstances.

134142
ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Plaintiff
200 Sheffield Street, Suite 101
Mountainside, NJ 07092-0024
1-908-233-8500

JPMorgan Chase Bank, National Association	:	SUPERIOR COURT OF NEW JERSEY
	Plaintiff,	CHANCERY DIVISION
vs.	:	MONMOUTH COUNTY
	:	DOCKET NO. F-34173-10
SINGER, DAVID, et al.	:	
	Defendant(s)	<u>Civil Action</u>
	:	
	:	CERTIFICATION RE
Denise Carlon, Esq	:	NOTICE FROM CLERK
	:	

_____ hereby certifies:

1. I am an attorney at law of the State of New Jersey and an Associate with the law firm of Zucker, Goldberg & Ackerman, LLC, attorneys for plaintiff. I am familiar with the records maintained by the firm in the ordinary course of business in connection with its representation of plaintiff in this matter, have personally reviewed same, and am familiar with the facts set forth herein.
2. On December 20, 2010, the Honorable Mary Jacobson, P.J.Ch. issued an Order to Show Cause against the biggest six mortgage servicers in New Jersey directing them to appear and show cause why they should be allowed to proceed with actions in the state of New Jersey.
3. Contemporaneously, on December 20, 2010, the Honorable Glenn A. Grant, J.A.D. issued an Administrative Order appointing the Honorable Walter R. Barisonek, J.S.C., Ret. as a Special Master to review the processes and procedures of the "plaintiffs" that had filed more than

200 foreclosures in the previous twelve months. The initial proceeding encompassed twenty four entities, but was ultimately expanded to include any other entity that serviced loans for that plaintiff, thereby encompassing almost all servicers that service loans in New Jersey.

4. Contemporaneously, the Supreme Court issued “emergent amendments” to Court Rules 1:5-6, 4:64-1 and 4:64-2. The amendments required foreclosure counsel to communicate with an employee of the “plaintiff” and complete a Certification of Diligent Inquiry before the case could proceed.
5. The amendments to the Rules were fatally flawed as they required foreclosure counsel to communicate with an employee of the “plaintiff”, which was not possible in the majority of foreclosures as the plaintiff is generally a securitized trust that has no employees.
6. On January 31, 2011, after the issuance of the “emergent amendments” the Court issued a Notice to the Bar requesting comments on the amendments.
7. Over six months later, on June 9, 2011, the Court issued another amendment to the Court Rules allowing foreclosure counsel to communicate with an employee of the plaintiff or servicer.
8. Shortly thereafter, on August 8, 2011, the Appellate Division issued a published opinion in Bank of New York v. Laks, wherein it held that a Notice of Intention to Foreclose that failed to strictly comply with the requirements of the Fair Foreclosure Act rendered the notice deficient and required the dismissal of the foreclosure action. This brought into question the majority of the Notice of Intentions in the state.
9. Almost a year after Judge Jacobson filed her Order to Show Cause against the “Big 6”, orders were entered in August 2011 and September 2011. As part of the Order to Show Cause, a Special Master was appointed to review the policies and procedures of the Big 6

entities. Upon information and belief, the Special Master required the Big 6 to submit their policies and procedures. The Special Master commented on the procedures and asked for changes and modifications.

10. Upon information and belief, the Special Master is still reviewing and monitoring the Big 6.
11. On February 2, 2012, Judge Grant entered an Order closing the administrative proceeding against the "Middle 24" plaintiffs.
12. After the turmoil created by the Laks decision, the Supreme Court fast tracked a case dealing with the adequacy of Notices of Intention to Foreclose. On February 27, 2012, the New Jersey Supreme Court issued its opinion in U.S. Bank National Assoc., v. Guillaume. In its opinion, the Supreme Court held that strict compliance with the Notice of Intention to Foreclose requirements of the Fair Foreclosure Act is required and the failure to address any of the requisite elements rendered the Notice of Intention to Foreclose deficient. However, the Supreme Court specifically overturned the Appellate Divisions finding in the Laks case that dismissal was the only remedy.
13. Thereafter, in the wake of the turmoil created by the Guillaume opinion, on April 4, 2012, Chief Justice Stewart Rabner issued an Order in furtherance of the Guillaume opinion, establishing an Order to Show Cause procedure creating a mechanism to allow servicers to seek authority of the Court to cure NOI's that did not comply with the requirements of the Fair Foreclosure Act in an omnibus action.
14. On October 29, 2012, the eastern sea coast of the United States was ravaged by Hurricane Sandy. The resulting damage crippled New Jersey and resulted in the entire state being deemed a disaster area by the Federal Emergency Management Agency (FEMA).

15. As a result of the disaster and the resulting declaration of the state as a disaster area, any loan in foreclosure insured by FHA/HUD/VA, as well as many owned by private investors were placed on hold. These holds precluded foreclosure counsel from taking any steps to proceed forward with the actions until the FEMA holds were removed. The holds were put in place almost immediately after the hurricane and were not released until March 2013.
16. The past three years have seen unprecedented changes in the mortgage servicing industry. The Court has made it clear that it expects mortgage servicers to take steps to ensure the quality and accuracy of the documents that are being filed with the Court. The development of these procedures, the vetting of the processes, the training of employees on the procedures and processes has required an exceptional level of detail and time to ensure they comply with the desire of the Court. Our clients have taken this request to heart and have made substantial modifications to their procedures, including additional levels of review, to ensure the quality and accuracy of documents. It would be patently unjust for the Court to demand that servicers modify their procedures and processes and then punish the servicers for compliance with this demand.
17. Accordingly, it would be manifestly unjust for this case to be dismissed for lack of prosecution.
18. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

By Denise Carlton, Esq.

DATED:

Denise Carlton, Esq

EXHIBIT D

SUPERIOR COURT CLERK'S OFFICE
FORECLOSURE PROCESSING SERVICES
PO BOX 971
MORRISTOWN, NJ 08625-0971

FORECLOSURE DISMISSAL ORDER

DATE: OCTOBER 11, 2013
RE: METLIFE HOME LOANS VS SINGER DAVID
DOCKET: SWC F -034173-10
PARTY: NOVADEBT

IT IS HEREBY ORDERED THAT PURSUANT TO RULE 4:64-8, THE ABOVE-CAPTIONED MATTER HAS BEEN DISMISSED WITHOUT PREJUDICE FOR LACK OF PROSECUTION. REINSTATEMENT OF THE MATTER AFTER DISMISSAL MAY BE REQUESTED BY A MOTION FOR GOOD CAUSE.

FOR FURTHER INFORMATION, PLEASE CALL (609) 421-6100 BETWEEN THE HOURS OF 9:30 AM - 4:30 PM OR SCCO.MAILBOX@JUDICIARY.STATE.NJ.US.

MICHELLE M. SMITH, ESQ.

CLERK OF SUPERIOR COURT

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Office of the Clerk
Richard J. Hughes Justice Complex
P.O. Box 971
Trenton, New Jersey 08625-0971
(609) 421-6100

FORECLOSURE DISMISSAL ORDER

DATE: October 11, 2013
PARTY: NOVADEBT
RE: METLIFE HOME LOANS VS SINGER DAVID
DOCKET: SWC F-034173-10

It is hereby ordered pursuant to Rule 4:64-8, that the above captioned matter has been dismissed without prejudice for lack of prosecution. Reinstatement of the matter after dismissal may be permitted only by filing a motion for good cause.

For further information, please contact the Superior Court Clerk's Office by calling (609) 421-6100 between the hours of 8:30 am - 4:30 pm or sending an email to SCCO.Mailbox@judiciary.state.nj.us.

MICHELLE M. SMITH, ESQ.

CLERK OF THE SUPERIOR COURT OF NEW JERSEY

EXHIBIT E

Chase (FL5-5110)
P.O. Box 44120
Jacksonville, FL 32231-4120



11/05/2013
CERTIFIED MAIL: Return Receipt Requested and First Class Mail

DAVID A SINGER
2 CRESTWOOD DRIVE
FREEHOLD, NJ 07728-1713



Re: Order to Show Cause: In re Application by JPMorgan Chase Bank, N.A., to Issue Corrected Notices of Intent to Foreclose on Behalf of Identified Foreclosure Plaintiffs in Certain Uncontested Cases (Superior Court of New Jersey, Chancery Division, Passaic County, Docket No.: F-030403-13)

Borrower Name: DAVID A SINGER
Loan Number: 4500314723
Plaintiff Name in Foreclosure action: JPMorgan Chase Bank, National Association
Docket Number in Foreclosure action: F-34173-10

Dear DAVID A SINGER:

Please be advised that the New Jersey Supreme Court recently held in *U.S. Bank N.A. v. Guillaume*, 209 N.J. 449 (2012), that mortgage lenders seeking to foreclose must comply with the New Jersey Fair Foreclosure Act's requirement that a Notice of Intention to Foreclose set forth the name and address of the lender.

Why You Are Receiving This Letter

You are receiving this letter because you are the defendant in a pending foreclosure action, and it is believed that the Notice of Intention to Foreclose served upon you prior to the commencement of the foreclosure action did not comply with the requirements of the Fair Foreclosure Act and/or JPMorgan Chase Bank, N.A. ("Chase"), the servicer of your loan, may lack sufficient information to adequately confirm mailing of the original Notice of Intention to Foreclose.

By the court's Order to Show Cause dated September 23, 2013, and in compliance with the Supreme Court's opinion in *U.S. Bank N.A. v. Guillaume*, Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage, gave permission to Chase to serve, along with the Order to Show Cause, corrected Notices of Intention to Foreclose on all defendant mortgagors/parties obligated on the debt in pending foreclosure actions filed before February 28, 2012.

The docket number for your foreclosure action may be found in the subject line of this letter.

Information About the Order to Show Cause and Verified Complaint

Enclosed with this letter is a copy of the Order to Show Cause and a copy of the verified complaint filed with the Order to Show Cause. The verified complaint lists the following lenders in the following counts of the verified complaint:

1. Ahmanson Obligation Company
2. BAC Home Loan Servicing
3. Bank of America
4. Capital Financial Mortgage
5. Citibank
6. Countrywide
7. CTX Mortgage Company
8. Deutsche Bank
9. EMC Mortgage Corporation
10. Federal Home Loan Mortgage Corporation
11. First Horizon Home Loans
12. Federal National Mortgage Association
13. Homesales, Inc.
14. HSBC
15. Investors Savings Bank
16. JPMorgan Chase Bank, N.A.
17. LaSalle Bank
18. Metlife
19. PNC Bank
20. Sterling Home Mortgage Company
21. Sunset Mortgage
22. The Bank of New York
23. US Bank
24. Union Federal Mortgage Corporation
25. Union Mortgage Corp.
26. Wachovia
27. Washington Mutual
28. Wells Fargo

The verified complaint sent to you does not include the attachments. The verified complaint with attachments, which list the foreclosure actions in which the above-named lenders are the plaintiffs, will be made available on the New Jersey Courts web site at <http://www.judiciary.state.nj.us/>.

Information About the Corrected Notice of Intention to Foreclose

Also enclosed with this letter is the corrected Notice of Intention to Foreclose. It allows you an additional 35 days in which to cure the default without having to pay the plaintiff's court costs and attorneys' fees. It also 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 plaintiff; and information about retaining counsel and borrower assistance. If you fail to cure the default by the date set forth in the corrected Notice of Intention to Foreclose, the foreclosure action against you will proceed.

With the passage of time since the foreclosure action was filed against you, the lender on your loan may have changed from the named plaintiff in the foreclosure action. The corrected Notice of Intention to Foreclose lists the name and address of the current lender on your loan.

Questions about the Notice of Intention to Foreclose

Should you have questions with regard to your loan or the corrected Notice of Intention to

Foreclose, please contact:

Overnight/Regular Mail: Bruno Mejia
Chase
Attention: Collections Department
Mail Code: OH4-7356
3415 Vision Drive
Columbus, OH 43219-6009

Phone: 1-800-848-9380

Additional contact information is provided in the corrected Notice of Intention to Foreclose.

How to File an Objection

You have the right to object to the enclosed Order to Show Cause (the process by which the court gave the plaintiff permission to serve the corrected Notice of Intention to Foreclose). To do so, you must file a written objection under the docket number for the Order to Show Cause.

You also have the right to object to the enclosed corrected Notice of Intention to Foreclose. To do so, you must file a written objection under the docket number for the foreclosure action in your individual case. The docket number for your foreclosure action may be found in the subject line of this letter.

For either type of objection, you must set forth with specificity the basis of the objection, and file the objection with the Superior Court Clerk's Office on or before December 20, 2013 at the following address:

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 serve a copy of the objection on the plaintiff's attorney at Morgan, Lewis & Bockius LLP, 502 Carnegie Center, Princeton, NJ 08540-6241 (Attention: JPMorgan Chase Order to Show Cause), and mail a copy of the objection to Judge McVeigh at:

The Superior Court of New Jersey, Passaic County Courthouse
71 Hamilton Street
Chambers 100
Paterson, NJ 07505

Your personal appearance at the Superior Court Clerk's Office or your local courthouse will not qualify as an objection. A telephone call will not protect your rights; you must file your objection and serve it on the plaintiff's attorney if you want the court to hear your objection to the relief the plaintiff is seeking. If you file a specific written objection, the case will be sent to a Judge for resolution. You will be informed by the Judge of the time and place of the hearing on your objection.

Questions about Filing an Objection

Should you have questions related to the procedure for filing an objection, please visit the New Jersey Courts On-Line Self-Help Center at <http://www.judiciary.state.nj.us/prose/index.htm>. You may also contact the Superior Court Clerk's Office at 1-609-421-6100, or at SCCOForeclosure.Mailbox@judiciary.state.nj.us.



If you are represented by an attorney in your foreclosure case, you should notify him or her that you received these papers. These papers are not being sent directly to your attorney if you have one.

If you cannot afford an attorney, you may apply for free legal assistance online at www.lsnjlaw.org or call the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529) or call the Legal Services office in the county where you live. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is attached.

Enclosures

- Copy of the Order to Show Cause
- Copy of the Verified Complaint
- Directory for Local Services Offices and Lawyer Referral Services
- Corrected Notice of Intention to Foreclose

We are attempting to collect a debt, and any information obtained will be used for that purpose.

If you are represented by an attorney, please refer this letter to your attorney and provide us with the attorney's name, address, and telephone number.

To the extent your original obligation was discharged, or is subject to an automatic stay of bankruptcy under Title 11 of the United States Code, this notice is for compliance and/or informational purposes only and does not constitute an attempt to collect a debt or to impose personal liability for such obligation. However, a secured party retains rights under its Security Instrument, including the right to foreclose its lien.

BR377

EXHIBIT F

Ira J. Metrick

ATTORNEY AT LAW

57 WEST MAIN STREET · FREEHOLD, NJ 07728
TEL: (732) 863-1660 · FAX: (732) 863-1949

November 14, 2013

Via Certified and Regular Mail

Kristofor T. Henning, Esq.
Morgan Lewis & Bockius, LLP
502 Carnegie Center
Princeton, New Jersey 08540-6241

**Re: Order To Show Cause: In Re Application By JPMorgan Chase Bank,
N.A., To Issue Corrected Notice Of Intent To Foreclose On Behalf Of
Identified Foreclosure Plaintiffs In Certain Uncontested Cases.
David A. Singer & Karin Singer
Former Docket No. F- 34173-10**

Dear Mr. Henning:

Pursuant to the above captioned matter, please be advised that this office represents Mr. & Mrs. Singer, named defendants in your OTSC application. By Order dated October 11, 2013, the Superior Court dismissed the foreclosure action filed against the Singers for lack of prosecution. Accordingly, they are not proper parties to the Order To Show Case and your action against them violates New Jersey Court Rule 1:4-8, regarding Frivolous Litigation.

I have enclosed a copy of the Order for Dismissal for your convenience. If your application against Mr. & Mrs. Singer is not withdrawn within 28 days from your receipt of this correspondence an application for sanctions, together with counsel fees, will be filed. If this matter is scheduled to be heard by the Court in less than 28 you are required to request an adjournment of such Hearing.

Please be guided accordingly.

Very truly yours,



Ira J. Metrick

IJM:cmf
Enc.
CC: Client

IRA J. METRICK
Member of NY & NJ Bars
Email: ira@metricquesq.com

Ira J. Metrick
ATTORNEY AT LAW, LLC

57 WEST MAIN STREET
FREEHOLD, NJ 07728
TEL: (732) 863-1660 · FAX: (732) 863-1949

*Of Counsel
CHRISTINE M. FRIEDMAN
Member of NJ & DE Bars

November 22, 2013

Via Priority Mail
Superior Court Clerk, Foreclosure Processing Services
Attention: Objection to Notice of Intention to Foreclose
25 W. Market Street
PO Box 971
Trenton, NJ 08625

RECEIVED

NOV 25 2013

SUPERIOR COURT
CLERK'S OFFICE

IN RE: Application by JPMorgan Chase Bank, N.A. et als. to Issue Corrected Notices of
Intent to Foreclose on Behalf of Identified Foreclosure Plaintiffs
Docket No. F-030403-13

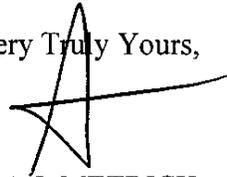
Dear Sir/Madam:

Please be advised that this office represents Defendants, David and Karin Singer, with regard to the above captioned matter. Enclosed herewith please find the original of Defendants' objection to the Order to Show Cause.

Kindly file same and return a filed copy via email to ira@metricquesq.com.

Thank you for your attention in this matter.

Very Truly Yours,


IRA J. METRICK

IJM:af

Enc.

cc: Clients
Honorable Margaret Mary McVeigh, P.J.Ch. (via priority mail)
Morgan, Lewis & Bockius LLP (via priority mail)