

Plaintiff or Filing Attorney Information:

Name Enas Eldemenky
NJ Attorney ID Number _____
Address 457 Black Oak Ridge Road
Wayne, NJ, 07470
Telephone Number 913-652-1374

RECEIVED

DEC 12 2013

SUPERIOR COURT
CLERK'S OFFICE

Superior Court of New Jersey
Chancery Division Mercer County
County where the property is located or "Mercer" for an
objection to the Order to Show Cause

General Equity Part

Docket No F- 085457-13

PNC BANK, N.A.,
Plaintiff,

(Name of company or bank that filed the foreclosure
complaint)

v.

Enas Eldemenky,
Defendant.

(Name of first defendant listed on the complaint)

CIVIL ACTION

OBJECTION TO: (select one)

Order to Show Cause
Corrected Notice of Intention to Foreclose

I/We Enas Eldemenky, the defendant(s) in the foreclosure matter
(filing party or parties) hereby object

(caption and docket number if different from above)
to the Plaintiff's filing of the (select one)

Order to Show Cause Corrected Notice of Intention to Foreclose for the following specific reasons:
(Describe specific objections in numbered paragraphs. Please attach additional pages if necessary.)

See Attachments

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.

Date 12-9-13

Enas Eldemenky
Signature
Enas Eldemenky
Print or Type Name

Certification of Service

I hereby certify that on 12-9-13 I sent my objection to the following parties by: (Select which mailing method you chose. If you sent it by both regular and certified mail, check both.

regular mail certified mail other _____

List each party to the lawsuit; send your opposition to the attorney if the party is represented by counsel; if the party is pro se you may send the papers directly to that individual.

Name Brian C. Nicholas, Esq.

Name Enas Eldemerkj

Address 200 Sheffield Ave, Suite 101
Maintainside, NJ, 07092

Address 457 Black Oak Ridge Road
Wayne, NJ, 07470

Attorney for PNC Bank, N.A.

Attorney for Enas Eldemerkj

12-9-13
Date

Enas Eldemerkj
Signature

Enas Eldemerkj
Print or Type Name

Enas Eldemenky
457 Black Oak Ridge Road
Wayne, NJ 07470
Docket No.: F-035457-13
(973) 652-1374

Plaintiff **TO:**

PNC Bank, N.A.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION

Vs. Mercer COUNTY

Enas Eldemenky

DOCKET NO. F- 035457-13

Defendant

Civil Action
Objection To Order To Show Cause

Objection To Order To Show Cause

1. Defendant, Enas Eldemenky, objects to the case that PNC Bank has brought upon the Superior Court of New Jersey in regards to the mortgage loans on the 18th of October 2013. Defendant initially purchased the house under her name when having a full-time job and making a stable salary as a research associate at Lundbeck Research USA in Paramus, NJ; however, was laid off from September 30, 2009. Defendant's husband, Magdey Salah, had a diner in Roselle Park for three years but lost the entire ownership and business in the summer of 2010. Because of these hard financial times Defendant, Enas Eldemenky, asked PNC multiple times for a loan modifications on the mortgage for another forty years, to make affordable payments of 2000-2500 dollars per month. If the Defendant does not receive this loan modification the monthly mortgage payments would be at 5000 dollars per month, which is absolutely out of reach.

2. In addition, a representative from Welch real estate came to the Defendant's house to inspect the value and saw that the value has depleted almost 100,000 dollars less to the market price at which the house was bought for. In that case it makes no sense for the Defendant to be paying an excessive amount of money to the cost that does not amount nearly to the value of the house. This letter of objection is simply to ask PNC to accept the offer for a loan modification since to works out best for both the family and PNC, or at least consider the Defendant for government-assisted programs. Defendant has five children and an elderly mother that is on disability living under this shared house, it is important of an essence to work with the financial situation the Defendant is placed upon.

Conclusion, Defendant, requests that PNC bank works with the financial needs before continuing the foreclosure procedures and come into consideration with a loan modification.

Enas Eldemenky
457 Black Oak Ridge Road
Wayne, NJ 07470

Enas Eldemenky

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