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PHELAN HALLINAN & DIAMOND, PC
By: Brian Yoder, Esquire
Attorney ID: 008342008
400 Fellowship Road, Suite 100
Mount Laurel, NJ 08054
(856) 813-5500
Attorneys for Plaintiff

IN RE NOTICES OF INTENTION TO FORECLOSE SERVED BY GREEN TREE SERVICING LLC	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION DOCKET NO: F-46173-13 CIVIL ACTION **ORDER TO SHOW CAUSE TO PROCEED SUMMARILY PURSUANT TO R. 4:67-2**

This Matter being brought before the court by the law firm of Phelan, Hallinan & Diamond, P.C., attorneys for plaintiff, Green Tree Servicing LLC, seeking relief by way of summary action as set forth in Chief Justice Stuart Rabner's April 4, 2012 Order and based upon the facts set forth in the Verified Complaint filed herewith; and the Court having determined that this matter may be commenced by Order to Show Cause as a summary proceeding pursuant to R. 4:67-2 and for good cause shown;

IT IS on this 17th day of January, 2014,

ORDERED that the parties in interest listed in Exhibit B of the Certification of Sandra Williams appear and show cause on the 1st day of May, 2014 before the Honorable Margaret M. McVeigh, P.J. Ch., Superior Court, Chancery Division, at the Passaic

County Courthouse, 71 Hamilton Street, in Paterson, New Jersey at 10 AM o'clock, why judgment should not be entered as follows:

A. Green Tree Servicing LLC will issue a letter ("Explanatory Letter") to each Foreclosure Defendant in the form attached as Exhibit A to the Verified Complaint. The Explanatory Letter will explain

- the reason why the corrected NOI is being served;
- the procedure to follow in the event a Foreclosure Defendant wishes to object to the NOI;
- the individuals to contact with any questions; and
- their right to object to the corrected NOI or their right to cure the default within 35 days of the date of the corrected NOI.

B. Green Tree Servicing LLC will issue a corrected NOI in the form attached as Exhibit C to the Verified Complaint and shall attach such NOI to the Explanatory Letter referenced in paragraph 1 above. The corrected NOI will exclude attorneys' fees and foreclosure costs that have been incurred in the pending foreclosure cases. In accordance with the servicing guidelines and as required by N.J.S.A. 2A:50-56(e), the Explanatory Letter and corrected NOI will be sent by Green Tree Servicing LLC, the servicing agent.

C. Green Tree Servicing LLC will serve the corrected NOI, the Explanatory Letter, the Verified Complaint without exhibits, and a copy of this Order to Show Cause (collectively, the "OSC Package"), via certified mail, return receipt requested and regular mail at the last known address of the Foreclosure Department. The OSC Package shall be mailed within 45 days from the date

of this Order. For purposes of this Order to Show Case, Green Tree Servicing LLC may serve each marital couple residing at the same address with one OSC Package via certified mail and regular mail.

D. A copy of this Order to Show Cause and Verified Complaint shall be posted on the Judiciary Web Page at www.judiciary.state.nj.us. within 5 days. **

E. Plaintiff shall publish the legal notice of this action as set forth in Exhibit C to the certification of Vladimir Palma, Esq. on at least two days prior to March 25, 2014 in the following newspapers:

a. Star Ledger

b. Bergen Record

c. The Press of Atlantic City

d. The Gloucester County Times

F. Green Tree Servicing LLC shall file with the Court its proof of service of the OSC Package on Foreclosure Defendants in the Corrected NOI List in the matter consistent with this Order no later than nine (9) days before the return date.

G. You, Foreclosure Defendants, have the right to object in this proceeding to this Order to Show Cause (the process by which this Court gave Green Tree Servicing LLC permission to serve the corrected NOI). You must file an original copy of the written objection under the docket number listed on the first page of this Order for this case with Superior Court Clerk's office, Foreclosure Processing Services in Trenton, New Jersey and you must serve copies of the objection to both the Honorable Margaret Mary McVeigh and

** All attachments will be provided in searchable PDF files.

counsel for Green Tree Servicing LLC. To do so, you must set forth with specificity the basis for your objection and file your objection with the Suprioer Court Clerk's Office at the following address on or before **April 14, 2014**:

Clerk of the Superior Court, Foreclosure Processing Services
Attention: Objection to Notice of Intention to Foreclose
Hughes Justice Complex
25 Market Street
PO Box 971
Trenton, NJ 08625-0971

A copy of the objection to the Order to Show Cause must also be served upon the attorney for the Plaintiff at:

Vladimir Palma, Esq.
Phelan, Hallinan & Diamond, P.C.
400 Fellowship Road, Suite 100
Mount Laurel, NJ 08054

H. You, Foreclosure Defedants, also have the right to object to the corrected NOI that you will receive. You will also have 35 days from the date of the corrected NOI to cure your default. If you object to any of the contents of your corrected NOI, you must file written objection under the docket number for your foreclosure action. You must set forth with specificity the basis for your objection and file your objection with the Superior Court Clerk's Office on or before **April 14, 2014**:

Clerk of the Superior Court, Foreclosure Processing Services
Attention: Objection to Notice of Intention to Foreclose
Hughes Justice Complex
25 Market Street
PO Box 971
Trenton, NJ 08625-0971

A copy of the objection to the Order to Show Cause must also be served upon the attorney for the Plaintiff at:

Vladimir Palma, Esq.
Phelan, Hallinan & Diamond, P.C.
400 Fellowship Road, Suite 100
Mount Laurel, NJ 08054

I. Green Tree Servicing LLC may file and serve any written reply to any opposition papers received by April 21, 2014. The reply papers must be filed with the Clerk of the Superior Court in Mercer County, with a copy to Judge McVeigh and to each Foreclosure Defendant who filed an opposition.

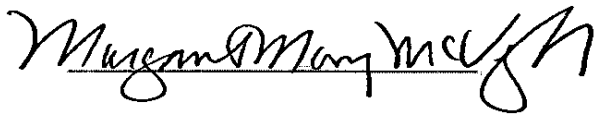
J. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is provided with the corrected NOI.

K. A proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the Court by Green Tree Servicing LLC no later than nine (9) days before the return date.

~~L. The court will entertain argument, but not testimony, on the return date of the Order to Show Cause, unless the court advised to the contrary no later than _____ days before the return date.~~

M. In the event a foreclosure action has been suspended or stayed as a result of a Bankruptcy filing or loss mitigation activity, the OSC Package shall not be sent unless and until the suspension or stay is lifted. In such circumstances, the following procedure shall be used. Green Tree Servicing LLC shall mail

the OSC Package within 45 days of the lifting of the stay or suspension of the foreclosure action. You, Foreclosure Defendnats, will have 35 days from the date of the corrected NOI in which to object to the corrected NOI or cure your default. Any objections to the relief set forth in this Order to Show Cause shall be made in writing to the Court in the County in which your foreclosure action is pending. You must also send a copy of your written papers to Green Tree Servicing LLC's attorney at Phelan Hallinan & Diamond, P.C., 400 Fellowship Road, Suite 100, Mt. Laurel, NJ 08054 or the Court handling your foreclosure action will not be able to consider your objection.



PHELAN HALLINAN & DIAMOND, PC
By: Brian Yoder, Esquire
Attorney ID: 008342008
400 Fellowship Road, Suite 100
Mount Laurel, NJ 08054
(856) 813-5500
Attorneys for Plaintiff

IN RE NOTICES OF INTENTION TO FORECLOSE SERVED BY GREEN TREE SERVICING LLC	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION DOCKET NO: **ATTORNEY CERTIFICATION IN SUPPORT OF ORDER TO SHOW CAUSE**

Vladimir Palma, Esquire, of full age, hereby certifies as follows:

1. I am an attorney licensed to practice in the State of New Jersey and an associate with the law firm of Phelan, Hallinan & Diamond, PC. I am the attorney responsible for this matter and in this capacity I am familiar with the facts of Plaintiff's Order to Show Cause and Verified Complaint. I make this certification in support of Plaintiff's application for an Order to Show Cause.
2. In addition to serving the Order to Show Cause by certified mail to the property address subject to the foreclosure and, if different, the borrower's last known address in Green Tree Servicing LLC's system of record, Plaintiff proposes providing notice of this action by publication.
3. Attached as **Exhibit C** is a copy of the Cover Letter that we received from the Office of Foreclosure that the Court has required be served with the new NOI.

4. Attached as **Exhibit D** is a copy of the notice plaintiff proposes be utilized for publication in the following newspapers:

   a. Star Ledger

   b. Bergen Record

   c. The Press of Atlantic County

   d. The Gloucester County Times

5. 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.

Brian Yoder, Esquire
Attorney for Plaintiff

Dated: 12/11/13

PHELAN HALLINAN & DIAMOND, PC
By: Brian Yoder, Esquire
Attorney ID: 008342008
400 Fellowship Road, Suite 100
Mount Laurel, NJ 08054
(856) 813-5500
Attorneys for Plaintiff

IN RE NOTICES OF INTENTION TO FORECLOSE SERVED BY GREEN TREE SERVICING LLC	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION DOCKET NO: **CERTIFICATION OF SERVICE**

I, Brian Yoder, do hereby certify as follows:

1. I am an attorney with the law firm of Phelan, Hallinan & Diamond, P.C. I am the attorney responsible for the above captioned matter.
2. On, December 11, 2013, our firm caused to be served the within Order to Show Cause, Verified Complaint, Certification of Sandra Williams, Certification of Brian Yoder, Esquire, and Letter Brief to the following persons:

   Honorable Margaret M. McVeigh, P.J.Ch.
   Courthouse Annex
   65 Hamilton Street
   Paterson, NJ 07505

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.

Phelan Hallinan & Diamond, P.C.

Brian Yoder

Brian Yoder, Esquire