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SUPERIOR COURT  
CLERK'S OFFICE

K. Michelle Kline, Esq.  
Attorney at Law  
210 Mystic Dr.  
Egg Harbor Township, NJ 08234  
609-653-2830  
August 9, 2013

Superior Court Clerk's Office  
Foreclosure Processing Services  
Attn: Objection to Notice of Intention to Foreclose  
PO Box 971  
Trenton, NJ 08625

Re: Application of Citibank et. al.  
F-17318-13  
(CitiMortgage vs. Chacon and Portillo, F-2613-10 (Atlantic))

To the Clerk:

Enclosed for filing is an Objection to the Application filed by the Plaintiff to this matter.

By copy of this letter I have sent a copy to Plaintiff's Attorney and to the Honorable Judge Margaret Mary McVeigh.

Thank you for your attention to this matter.

Very truly yours,



K. Michelle Kline

cc. Theodore V. Wells, Esq.  
The Honorable Judge Margaret Mary McVeigh  
Carolina Portillo and Jose Chacon

K. Michelle Kline, Esq.  
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210 Mystic Dr.  
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Attorney for Defendants, Jose W. Chacon and Carolina Portillo,  
(CitiMortgage, Inc. vs. Jose W. Chacon and Carolina Portillo, Atlantic County No. F-  
21613-10)

In re Application by Citibank, N.A., et. al.  
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-17318-13  
Civil Action

Objection

Jose W. Chacun and Carolina Portillo, defendants in the matter of CitiMortgage, Inc. vs. Chacun and Portillo, et. al. , Docket No. F-2613-10) (Atlantic County) by and through their attorney, K. Michelle Kline, Esq., do hereby OBJECT to the entry of this order and in support thereof aver:

1. Plaintiff has conceded that there was an incorrect Notice of Intent to Foreclose issued in this case before Plaintiff CitiMortgage, Inc. proceeded with the filing of the Foreclosure Complaint.

2. The purpose of the New Jersey Fair Foreclosure Act is to give good Notice to homeowners who reside in their house so they understand fully and fairly the foreclosure process and what their rights are in attempting to protect their home from foreclosure.

3. By this current Motion and Order to Show Cause, the Plaintiff is attempting to remedy in a summary fashion the fact that incorrect Notices were given to a mortgager in a mortgage foreclosure action for a personal residence.

4. Defendants have a bona fide and meritorius defense to the Complaint in Foreclosure but because proper Notice was not given under the New Jersey Fair Foreclosure Act, they were not properly able to understand their rights and to assert their

defense.

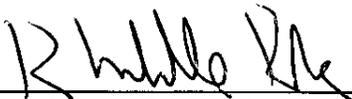
5. It is questioned how Defendants could have been able to adequately respond to Plaintiff's Complaint given that Plaintiff now admits that they were not given proper and adequate Notice under the New Jersey Fair Foreclosure Act.

6. Defendants want to explore with Plaintiff the possibility of alternatives to foreclosure but without proper notice of whom to talk to have been unable to do so.

7. Plaintiff should be required to issue a corrected Notice of Intent to Foreclose. so that Defendants will be given the Notice contemplated under the New Jersey statute.

87. The Action of CitiMortgage, Inc. vs. Chacun and Portillo, et. al., Defendants (Atlantic County, F-21613-10) should be marked "Contested" and referred to the Chancery Division of Atlantic County and Plaintiff should be directed to correctly plead the matter so that Defendants can be given an adequate opportunity to defend the Foreclosure after having been given the proper notice as required by the Statute.

Wherefore, for the foregoing reasons, Defendants object to the entry of this Order ; and in the alternative, if this Order is entered, Defendants demand that the Mortgage foreclosure of Citimortgage, Inc. vs. Chacun and Portillo, et. al., Defendants (Atlantic County, F-21613-10) shall be deemed "Contested" and that Defendants shall be allowed to properly defend the Foreclosure Action.

  
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K. Michelle Kline, Esquire

Date:

8/9/13