

Donald C. Callahan Jr.
(Your Name(s))

30 Mercer St. W. Keansburg, NJ 07734
(Your Mailing Address)

(732) 609-0269
(Your Daytime Telephone Number)

Superior Court of New Jersey
Chancery Division
General Equity

Citi Mortgage, Inc.
(Name of company or bank that filed the foreclosure complaint)

Plaintiff(s),

Vs.

Donald C. Callahan Jr.
(Name of first defendant listed on the complaint)

Defendant(s),

Monmouth County
County where the property is located or
"Mercer" for an objection to the Order to Show Cause
Docket No F- 017318-13

CIVIL ACTION

OBJECTION TO: (select one)

- Order to Show Cause
- Corrected Notice of Intention to Foreclose

I/We Donald C. Callahan Jr., the defendant(s) in the foreclosure matter
(filing party or parties)

Foreclosure docket # F-051669-10 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.)

I Donald C. Callahan Jr. have been trying to work with Citi Mortgage Inc. to get a mortgage modification or at the least put what I owe on the back end of my loan so I can start repaying my mortgage. I do not want to lose my home as it is my primary residence and also now my disabled brother and his families primary residence as they lost their home during Super Storm Sandy in Union Beach, NJ.

1). I have been trying to work with Citi Mortgage for well over a year trying to get a modification. I have been dealing with a Mrs. Georgia Sharp-Homeowner Support Specialist via email (georgia.sharp@citi.com), & (host.citilinkdocs@citi.com), phone 866-915-9417 x0475321 & fax 866-963-0651 since I believe 9/2012.

2). I have sent as requested; Proof of income, 4506T form, Hardship affidavit 710 form, bank statements, paystubs, tax info, signed Dodd-Frank Certificate, Notarized letter stating from 8/2008-12/2009 I was on workmans comp. due to back surgery, 1/2010-5/2012 I was unemployed & had no income, 6/2012-current I was working as a day laborer. I have sent all documents required multiple times and have confirmation of sent items. I have copies of all documentations sent (emails, faxes, etc.)

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.

8/11/13
Date

Donald C. Callahan Jr.
Signature
Donald C. Callahan JR.
Print or Type Name

RECEIVED

AUG 14 2013

Certification of Service

I hereby certify that on 08/12/2013 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 with return receipt

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 Theodore V. Wells, Esq.

Name Passaic County Courthouse, Chambers 100

Address Paul, Weiss, Rifkind, Wharton & Garrison LLP

Address Honorable Margaret Mary McVeigh

1285 Avenue of the Americas

71 Hamilton Street

New York, NY 10019

Paterson, NJ 07505

Attorney for Citi Mortgage Inc.

Attorney for _____

08/11/2013
Date


Signature

Donald C. Callahan Jr.
Print or Type Name

**How to File an Objection
to a Foreclosure Order to Show Cause
or to a Corrected "Notice of Intention to Foreclose"**

Superior Court of New Jersey - Chancery Division – General Equity

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 on a residential property 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. The Order to Show Cause, once entered by the court, will authorize the plaintiff or its servicer to serve corrected Notices of Intention to Foreclose on any or all defendant mortgagors or entities or individuals obligated on those mortgage debts for any presently pending foreclosure actions that were filed before February 28, 2012 (the date of the *Guillaume* decision). That means that in those cases the lender will be permitted to continue to prosecute those pending foreclosure actions.

If you are a party in a foreclosure action who has received an Order to Show Cause and a corrected "Notice of Intention to Foreclose," you have the right to object to the Order to Show Cause or to the corrected Notice of Intention to Foreclose issued in your specific foreclosure action. The attached Form may be used to submit any such objections.

Please Note That:

- If you wish to object to the Order to Show Cause, please include in your objection the docket number from the Order to Show Cause, which can be found on page 1 of the cover letter enclosed with the Order to Show Cause and corrected Notice of Intention to Foreclose.
- If you wish to object to the corrected Notice of Intention to Foreclose for your specific action, please use the docket number from the foreclosure complaint in your individual case. If you don't know the docket number of your foreclosure case, you can search a list of the docket numbers associated with the Order to Show Cause on the court's web site at www.njcourts.com/superior/otsc_search.htm.
- You must file your objection with the Superior Court Clerk's Office within 30 days of receiving the Order to Show Cause and corrected Notice of Intention to Foreclose, and you must serve a copy of your objection on the plaintiff's attorney. You must also mail a copy of your objection to the judge named in the cover letter.

Personally appearing at either the Superior Court Clerk's Office or at a county courthouse will not qualify as an objection. Nor will a telephone call. You must file a signed written document with the Superior Court Clerk's Office, Foreclosure Processing Services, either in person or by mail. The mailing address is: **Superior Court Clerk's Office, Foreclosure Processing Services**

**Attention: Objection to Notice of Intention to Foreclose
25 Market Street, P.O. Box 971
Trenton, New Jersey 08625-0971**

Note: Only objections that state the specific issues related to the corrected Notice of Intention to Foreclose or the Order to Show Cause will be considered. Any extraneous claims, defenses, or objections unrelated to the corrected Notice of Intention to Foreclose or the Order to Show Cause will not be considered and may disqualify the filing from consideration entirely. Other forms may be found on the New Jersey Courts On-Line Self-Help Center web page www.njcourts.com/prose/.