

FILED Jan 05, 2011

B-789
CL# 809636
\$3000
1-5-11

**McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

1300 Mount Kemble Avenue
P.O. Box 2075
Morristown, New Jersey 07962
(973) 993-8100

Attorneys for Respondents,
JPMorgan Chase Bank, N.A. and
Chase Home Finance, LLC

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JAN 05 2011

SUPERIOR COURT
CLERK'S OFFICE

**IN THE MATTER OF
RESIDENTIAL MORTGAGE
FORECLOSURE PLEADING AND
DOCUMENT IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
GENERAL EQUITY PART
MERCER COUNTY

DOCKET NO · F-059553-10

Civil Action

**NOTICE OF MOTION ON SHORT NOTICE
FOR THE ADMISSION *PRO HAC VICE*
OF JAMI WINTZ MCKEON, ESQ.**

To: Edward J. Dauber, Esq.
Greenberg, Dauber, Epstein & Tucker
One Gateway Center
Suite 600
Newark, New Jersey 07102

PLEASE TAKE NOTICE that Respondents, JPMorgan Chase Bank, N.A. and Chase Home Finance, LLC (collectively, "Chase"), by and through their counsel, Richard P Haber, Esq, McElroy, Deutsch, Mulvaney & Carpenter, LLP, hereby move on short notice before the Honorable Mary C Jacobson, P.J.Ch., Superior Court of New Jersey, 210 South Broad Street, Trenton, New Jersey for the *pro hac vice* admission of Jami Wintz McKeon, Esq., a partner with the law firm of Morgan, Lewis & Bockius LLP

PLEASE TAKE FURTHER NOTICE that this motion is brought on short notice because of the Order to Show Cause pending in this matter, returnable on January 19, 2011, at which

Chase wishes to have Ms. McKeon available to speak on its behalf. Accordingly, it is respectfully requested that the sixteen (16) day notice period for motions pursuant to Rule 1:6-3 be relaxed such that this motion can be decided by the Court prior to January 19, 2011.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Chase relies on the enclosed Certifications of Jami Wintz McKeon, Esq. and Richard P. Haber, Esq., and the proposed form of order submitted herewith.

PLEASE TAKE FURTHER NOTICE that Chase waives oral argument in connection with this motion unless opposition is filed and served.

McElroy, Deutsch, Mulvaney & Carpenter, LLP
Attorneys for Respondents,
JPMorgan Chase Bank, N.A. and
Chase Home Finance, LLC

By: 
Richard P. Haber

Dated: January 5, 2011

**McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

1300 Mount Kemble Avenue

P.O. Box 2075

Morristown, New Jersey 07962

(973) 993-8100

Attorneys for Respondents,

JPMorgan Chase Bank, N.A. and

Chase Home Finance, LLC

**IN THE MATTER OF
RESIDENTIAL MORTGAGE
FORECLOSURE PLEADING AND
DOCUMENT IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
GENERAL EQUITY PART
MERCER COUNTY

DOCKET NO.: F-059553-10

Civil Action

**CERTIFICATION OF
JAMI WINTZ MCKEON, ESQ.**

Jami Wintz McKeon, Esq. hereby certifies as follows:

1 I am Partner with the law firm of Morgan, Lewis & Bockius, LLP admitted to practice law in the State of California and the Commonwealth of Pennsylvania. I principally practice law in the State of California, and am a member in good standing of the bar of the highest court of California.

2. I am associated in this matter with New Jersey counsel of record qualified to practice pursuant to Rule 1 21-1

3 Respondents JPMorgan Chase Bank, N.A. and Chase Home Finance, LLC (collectively, "Chase") have requested my representation in this matter.

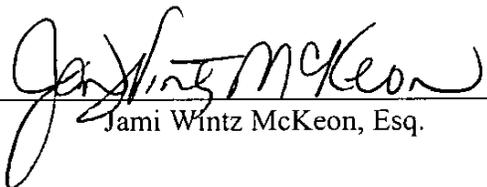
4. There are no disciplinary proceedings pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction. I understand that if I am

admitted *pro hac vice* in this matter, I have a continuing obligation during the period of such admission to promptly advise the court of the institution of new disciplinary proceedings.

5 Since approximately September, 2010, I have been deeply involved in Chase's comprehensive review, investigation, and remediation of foreclosure document execution practices, both nationally and specific to New Jersey. My firm and I have had an extended attorney-client relationship with Chase, and given that relationship, my involvement in this matter as described above, and the very serious nature of the matter before the Court, Chase has requested that I participate in its representation.

6. Based on the foregoing, I respectfully submit that good cause exists for my admission pursuant to Rules 1:21-2(b)(3)(A), (B), and (F), and ask the Court to grant me *pro hac vice* admission in this matter.

I hereby certify that the foregoing statements made by me are true to the best of my knowledge. I understand that if anything stated herein is willfully false I may be punished.



Jami Wintz McKeon, Esq.

Dated January 4, 2011

**McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

1300 Mount Kemble Avenue
P.O. Box 2075
Morristown, New Jersey 07962
(973) 993-8100
Attorneys for Respondents,
JPMorgan Chase Bank, N.A. and
Chase Home Finance, LLC

**IN THE MATTER OF
RESIDENTIAL MORTGAGE
FORECLOSURE PLEADING AND
DOCUMENT IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
GENERAL EQUITY PART
MERCER COUNTY

DOCKET NO.: F-059553-10

Civil Action

**CERTIFICATION OF
RICHARD P. HABER, ESQ.**

Richard P. Haber, Esq. hereby certifies as follows:

1. I am an attorney at law of New Jersey employed by McElroy, Deutsch, Mulvaney & Carpenter, LLP, counsel for Respondents, JPMorgan Chase Bank, N.A. and Chase Home Finance, LLC (collectively, "Chase") in the above matter. I make this Certification in support of Chase's motion on short notice seeking *pro hac vice* admission of Jami Wintz McKeon, Esq.
2. Since approximately September, 2010, my firm and I have been involved as Chase's New Jersey counsel in connection with its comprehensive review, investigation, and remediation of foreclosure document execution practices. During that time, I have worked closely with Ms. McKeon and find her to be a skilled attorney and person of integrity.
3. I am pleased to move the admission of Jami Wintz McKeon, Esq. *pro hac vice*, and do so on short notice because of the January 19, 2011 return date of the Court's Order to Show

Cause in this matter. Accordingly, it is respectfully requested that the sixteen (16) day notice period for motions pursuant to Rule 1:6-3 be relaxed such that this motion can be decided by the Court prior to January 19, 2011.

I hereby certify that the foregoing statements made by me are true to the best of my knowledge. I understand that if anything stated herein is willfully false I may be punished.

A handwritten signature in black ink, appearing to read 'R. P. Haber', is written over a horizontal line.

Richard P. Haber, Esq.

Dated: January 5, 2011

**McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

1300 Mount Kemble Avenue
P O. Box 2075
Morristown, New Jersey 07962
(973) 993-8100
Attorneys for Respondents,
JPMorgan Chase Bank, N.A. and
Chase Home Finance, LLC

**IN THE MATTER OF
RESIDENTIAL MORTGAGE
FORECLOSURE PLEADING AND
DOCUMENT IRREGULARITIES**

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
GENERAL EQUITY PART
MERCER COUNTY

DOCKET NO.: F-059553-10

Civil Action

CERTIFICATION OF SERVICE

Richard P. Haber, Esq. hereby certifies as follows:

1. I am an attorney at law of New Jersey employed by McElroy, Deutsch, Mulvaney & Carpenter, LLP, counsel for Respondents, JPMorgan Chase Bank, N.A. and Chase Home Finance, LLC (collectively, "Chase") in the above matter.

2. On January 5, 2011, I caused an original and one copy of Chase's Notice of Motion on Short Notice for the Admission *Pro Hac Vice* of Jami Wintz McKeon, Esq., Certifications of Jami Wintz McKeon, Esq. and Richard P. Haber, Esq; Proposed form of Order; and this Certification of Service to be hand-delivered as follows:

Jennifer M. Perez, Esq.
Acting Clerk of the Superior Court
Hughes Justice Complex
25 West Market Street
6th Floor, North Wing
Trenton, New Jersey 08625

3. On January 5, 2011, I caused a courtesy copy of all of the aforesaid papers to be hand-delivered to:

Honorable Mary C. Jacobson, P.J.Ch.
Superior Court of New Jersey
210 South Broad Street
Trenton, New Jersey 08625

4. On January 5, 2011, I caused a copy of all of the aforesaid papers to be served via hand-delivery as follows:

Edward J. Dauber, Esq.
Greenberg, Dauber, Epstein & Tucker
One Gateway Center
Suite 600
Newark, New Jersey 07102

I hereby certify that the foregoing statements made by me are true to the best of my knowledge. I understand that if anything stated herein is willfully false I may be punished.



Richard P. Haber, Esq.

Dated: January 5, 2011

**McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

1300 Mount Kemble Avenue
P.O. Box 2075
Morristown, New Jersey 07962
(973) 993-8100

Attorneys for Respondents,
JPMorgan Chase Bank, N.A. and
Chase Home Finance, LLC

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
GENERAL EQUITY PART
MERCER COUNTY

**IN THE MATTER OF
RESIDENTIAL MORTGAGE
FORECLOSURE PLEADING AND
DOCUMENT IRREGULARITIES**

DOCKET NO.: F-059553-10

Civil Action

**ORDER ADMITTING
JAMI WINTZ MCKEON, ESQ.
*PRO HAC VICE***

THIS MATTER being opened to the Court by Richard P. Haber, Esq., a New Jersey attorney and the attorney of record for Respondents, JPMorgan Chase Bank, N.A. and Chase Home Finance, LLC (collectively, "Chase"), seeking to permit Jami Wintz McKeon, Esq., an attorney admitted to the practice of law in the State of California and the Commonwealth of Pennsylvania, to participate with other counsel for Chase in all phases of this matter; and with it appearing that Jami Wintz McKeon, Esq. is a licensed attorney in good standing in the State of California, where she principally practices law; and with it appearing that counsel has been deeply involved in Chase's comprehensive review, investigation, and remediation of foreclosure document execution practices, both nationally and specific to New Jersey; and with it further appearing that counsel and her firm have had an extended attorney-client relationship with

8. *Pro hac vice admission* will automatically terminate for failure to make the initial and any annual payment required by Rule 1:20-1(b) and Rule 1:28-2

9. Non-compliance with any of the terms of this order shall constitute grounds for removal.

10 A copy of this order shall be served on all counsel of record within seven (7) days of the date hereof.

Honorable Mary C Jacobson, P.J.Ch.

This motion was:

opposed

unopposed

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP
ATTORNEYS AT LAW

1300 MOUNT KEMBLE AVENUE
P O BOX 2075
MORRISTOWN, NEW JERSEY 07962-2075
(973) 993-8100
FACSIMILE (973) 425-0161

RICHARD P. HABER
Direct dial (973) 425-8846
rhaber@mdmc-law.com

RECEIVED
JAN 05 2011
SUPERIOR COURT
CLERK'S OFFICE

January 5, 2011

Via Hand Delivery

Jennifer M. Perez, Esq.
Acting Clerk of the Superior Court
Hughes Justice Complex
25 West Market Street
6th Floor, North Wing
Trenton, New Jersey 08625

RE: IN THE MATTER OF RESIDENTIAL MORTGAGE FORECLOSURE
PLEADING AND DOCUMENT IRREGULARITIES
Docket No. F-059553-10
Order to Show Cause returnable January 19, 2011
MDMC File No. C0681-1031

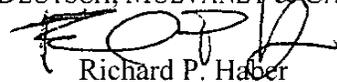
Dear Ms. Perez:

This firm is counsel to Respondents, JPMorgan Chase Bank, N.A. and Chase Home Finance, LLC (collectively, "Chase"). Enclosed for filing on behalf of Chase is an original and one copy of its Notice of Motion on Short Notice for the Admission *Pro Hac Vice* of Jami Wintz McKeon, Esq.; Certifications of Jami Wintz McKeon, Esq. and Richard P. Haber, Esq.; Proposed form of Order; and Certification of Service. Also enclosed is this firm's check for \$30 to cover the motion filing fee.

Kindly file these papers and return one copy to me in the envelope provided for your convenience. Thank you in advance for your courtesies in this matter.

Very truly yours,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP


Richard P. Haber

RPH/

Enclosures

cc. Hon. Mary C. Jacobson, P.J.Ch. (via hand delivery)
Edward J. Dauber, Esq. (via hand delivery)