

SUPERIOR COURT OF N.J.

REC'D

MAR 21 2011

GRAHAM CURTIN
A Professional Association
4 Headquarters Plaza
P.O. Box 1991
Morristown, New Jersey 07962-1991
(973)-292-1700
Attorneys for BAC Home Loans Servicing, LP

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

RICHARD CULLEN, of full age, hereby certifies as follows:

1. I am a partner in the law firm of McGuireWoods LLP, with offices located at 901 East Cary Street, Richmond, Virginia 23219-4030 Together with O'Melveny & Myers LLP, McGuireWoods LLP is counsel for foreclosure plaintiff BAC Home Loans Servicing, LP ("Bank of America") I make this certification in support of my application for admission *pro hac vice* in this matter pursuant to R 1:21-2

2. I am a member in good standing and am admitted to practice before the bar of the State of Virginia, as well as the United States Supreme Court, and the United States Court of Appeals for the Fourth and Eleventh Circuits. I am not under suspension or disbarment by any court, and there are no disciplinary proceedings filed or pending against me in any court I have never been denied admission or disciplined by any Court. I recognize and will abide by my continuing obligation to advise the Court of the institution of any disciplinary proceedings pursuant to R 1:21-2(a)(1)(D).

3. I will be associated in this matter with Thomas R. Curtin, Esq., George C. Jones, Esq., and Kathleen N. Fennelly, Esq., of the law firm of Graham Curtin, A Professional

Association, co-counsel of record in this matter, whose firm is qualified to practice in the State of New Jersey under R.1:21-1.

4 My firm has a long-standing attorney-client relationship with Bank of America. Bank of America has asked that I assist our local counsel in the litigation of this matter. I am familiar with the facts, issues and pleadings in this action, and my acting as attorney for Bank of America in this matter will not cause any delay in the conduct of the proceedings. My participation in this case through my admission *pro hac vice* will facilitate the orderly representation of my client's interests in this matter.

5. I agree to:

a. Pay all fees required by R. 1:20-1(b) and the Lawyers' Fund for Client Protection pursuant to R. 1:28-1 within ten (10) days and submit an affidavit of compliance;

b. Abide by the New Jersey Court Rules, including all disciplinary rules;

c. Notify this Court immediately of any matter affecting my standing at any court to which I am admitted, and

d. Have all pleadings, briefs and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey

6. I consent to the appointment of the Clerk of the Supreme Court as agent upon whom service of process may be made for all actions against me or my firm that may arise out of my participation in this matter.

7 I am aware that no delay in discovery, motions, trial or any other proceeding shall occur or be requested by reason of my inability to be in attendance.

8. I understand that automatic termination of my *pro hac vice* admission will occur for failure to make the required annual payment to the Ethics Financial Committee and the New Jersey Lawyers' Fund for Client Protection.

9. I further am aware that noncompliance with any of these requirements shall constitute grounds for termination of my *pro hac vice* admission.

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.

DATED January 4, 2011



RICHARD CULLEN



SUPERIOR COURT OF N.J.

REC'D

MAR 21 2011

Kathleen N Fennelly
Direct Dial 973-401-7106
kfennelly@GrahamCurtin.com

March 21, 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

Dear Ms. Perez:

Together with the firms of McGuire Woods, LLP and O'Melveny & Myers LLP, we represent BAC Home Loans Servicing, LP ("Bank of America") Enclosed for filing please find an original and one (1) copy of Bank of America's Consent Application for the pro hac vice admission of Richard Cullen, Esq , and J. William Boland, Esq., of McGuire Woods LLP and John D. Adams, Esq , and Brian D. Boyle, Esq., of O'Melveny & Myers LLP.

Kindly file same and return a copy stamped "filed" in the enclosed, self-addressed, stamped envelope. I have enclosed an additional self-addressed, stamped envelope for the Court's convenience in returning a conformed copy of the Order should it meet with the Court's approval.

Please bill any filing fee to our firm's Superior Court Filing Account No. 83200.

Very truly yours,

KATHLEEN N. FENNELLY

KNF/ljl
Enclosures

cc: Hon. Mary C. Jacobson, P.J.Ch. (w/c encs , via hand delivery)
Edward Dauber, Esq. (w/c encs., via electronic mail)
All Counsel of Record (w/c encs , via electronic mail)