

GRAHAM CURTIN
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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

KATHLEEN N. FENNELLY, of full age, hereby certifies as follows:

1. I am an attorney at law of the State of New Jersey and a shareholder in the law firm of Graham Curtin, A Professional Association, attorneys for BAC Home Loans Servicing, LP ("Bank of America"). I make this Certification in support of the consent application to admit *pro hac vice* 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. Messrs. Cullen, Boland, Adams and Boyle will be associated with Thomas R. Curtin in handling this matter in accordance with R. 1:21-2(a)(2)

2. Graham Curtin, A Professional Association, is the New Jersey counsel of record in the within matter for Bank of America. Our client has requested that Messrs. Cullen, Boland, Adams and Boyle participate with us in the handling of this litigation.

3. Edward Dauber, Esq., has consented to the relief requested herein.

4. The certifications of Messrs. Cullen, Boland, Adams and Boyle are submitted in further support of this application.

5. As set forth in his Certification, Mr. Cullen is a member in good standing and 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. Mr. Cullen is not under suspension or disbarment by any court, and there are no disciplinary proceedings filed or pending against him in any court. He has never been denied admission or disciplined by any Court.

6. As set forth in his Certification, Mr. Boland is a member in good standing and admitted to practice before the bar of the State of Virginia, as well as the United States Supreme Court, the United States Court of Appeals for the Fourth Circuit, and the United States District Court for the Western and Eastern Districts of Virginia. Mr. Boland is not under suspension or disbarment by any court, and there are no disciplinary proceedings filed or pending against him in any court. He has never been denied admission or disciplined by any Court.

7. As set forth in his Certification, Mr. Adams is a member in good standing and admitted to practice before the bar of the State of Virginia and the District of Columbia, as well as the United States Supreme Court, the United States Court of Appeals for the Second, Fourth and District of Columbia Circuits, and the United States District Court for the Eastern and Western Districts of Virginia. Mr. Adams is not under suspension or disbarment by any court, and there are no disciplinary proceedings filed or pending against him in any court. He has never been denied admission or disciplined by any Court.

8. As set forth in his certification, Mr. Boyle is a member in good standing and admitted to practice before the bar of the District of Columbia and the State of California, as well as the United States Supreme Court, and several U.S. Courts of Appeals. Mr. Boyle is not under suspension or disbarment by any court, and there are no disciplinary proceedings filed or pending against him in any court. He has never been denied admission or disciplined by any Court.

9. It is respectfully submitted that there is good cause for admission of Messrs. Cullen, Boland, Adams and Boyle *pro hac vice* in this matter, because of their substantial attorney-client relationship with Bank of America. Messrs. Cullen, Boland, Adams and Boyle are familiar with the facts, issues and pleadings in this action, and no delay in the conduct of the proceedings would be occasioned by their acting as attorney for Bank of America in this matter.

10 My firm and I agree to be held responsible for Messrs. Cullen, Boland, Adams and Boyle, and will ensure that they observe the applicable rules.

I HEREBY CERTIFY that the statements made by me are true. I am aware that if any of the statements made by me are willfully false, I am subject to punishment.

DATED: March 18, 2011


KATHLEEN N. FENNEILY