



FIFTH THIRD BANK

5001 Kingsley Drive MD 1MOB10
Cincinnati, Ohio 45227
(513) 534-7077

July 19, 2011

VIA OVERNIGHT MAIL
Honorable Walter R. Barisonek, A.J.S.C.
Special Master
Superior Court of New Jersey
Union County Courthouse
2 Broad Street, Courtroom 101
Elizabeth, NJ 07207

RECEIVED
JUL 25 2011
SUPERIOR COURT
CLERK'S OFFICE

Re Administrative Order 01-2010
Docket No. F-238-11

Dear Judge Barisonek:

Enclosed please find the Certification of Fred E. Troncione on behalf of Fifth Third Bank in Response to the Administrative Order Direction Submission of Information from Residential Mortgage Foreclosure Pleadings and Document Irregularities dated April 25, 2011.

Please contact me if you have any questions or concerns.

Sincerely,

Therese Paul,
Senior Vice President
Assistant General Counsel
Fifth Third Bank

Enclosure

✓ Cc: Superior Court Clerk (via regular mail)



5001 Kingsley Drive MD 1MOB10
Cincinnati, Ohio 45227

SUPERIOR COURT OF NEW JERSEY
UNION VICINAGE
UNION COUNTY COURT HOUSE

IN THE MATTER OF RESIDENTIAL)
MORTGAGE FORECLOSURE)
PLEADINGS AND DOCUMENT)
IRREGULARITIES)
)
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)

Administrative Order 01-2010

Docket No. F-238-11

CERTIFICATION OF FRED E.
TRONCONE ON BEHALF OF FIFTH
THIRD BANK IN RESPONSE TO
ADMINISTRATIVE ORDER
DIRECTING SUBMISSION OF
INFORMATION FROM RESIDENTIAL
MORTGAGE FORECLOSURE
PLEADINGS AND DOCUMENT
IRREGULARITIES

FRED E TRONCONE, being of full age does hereby certify as follows

1 I am currently the Senior Vice President – Chief Collections Officer of Consumer Collections at Fifth Third Bank. In this capacity, I am responsible for overseeing operations in Collections, Loss Mitigation, Recovery and Default Servicing including Foreclosure, Bankruptcy and REO. As such, I have authority to make this certification on behalf of Fifth Third Bank in response to the Supplemental Administrative Order Directing Submission of Information in the Matter of Residential Mortgage Foreclosure Pleadings and Document Irregularities dated April 25, 2011

Response to Question 1(A)

1(A) State the processes and procedures you have to ensure that the certifications/affidavits submitted are based upon that person's personal knowledge or that person's review of business records which records would be admissible in evidence in a New Jersey Court. Describe the process and procedures in detail and attach a copy of any documents that establish the processes and procedures.

2. In the process currently used by Fifth Third Bank, our local counsel provides notice that an affidavit is required and request needed information to prepare the affidavit.

A Fifth Third Foreclosure Analyst ("Analyst") then reviews relevant business records contained in our operating system MortgageServ, including but not limited to, ownership, relevant dates, amount due, default date and the terms of the note along with other applicable systems and websites such as the DMDC to verify if a borrower is on active military duty. After all the needed information is gathered the Analyst will provide the information to our attorney to prepare the affidavit. The information provided to our attorney is from data which is housed and saved in MortgageServ.

Once the affidavit is prepared by our attorney it is sent to Fifth Third Bank for execution. The Analyst reviews the document and verifies the information in the prepared affidavit prior to execution. The analyst is required to print proof of items that he/she is attesting. If the affidavit is accurate the Analyst signs the affidavit in the presence of a notary employed by Fifth Third Bank and returns it to our attorney for filing.

The Analyst is required to put a copy of the executed affidavit along with the screen prints to prove each item is true in the loan's foreclosure file.

This process is outlined in the attached foreclosure procedure entitled Managing the Foreclosure labeled, Exhibit A. Fifth Third Bank is currently reviewing this

document execution policy and procedure to determine if enhancements to improve the process are available

Response to Question 1(B)(i)

State the processes and procedures you have in place to ensure that the individual who executes the certification/affidavit executed it according to law, and that the signature is a valid lawful signature

3. All affidavits are prepared by our local New Jersey counsel in accordance to applicable law Analysts and Bank Officers are required to execute affidavits under oath and in front of a notary, we do not use digital or signature stamps

Response to Question 1(B)(ii)

State the processes and procedures in place to ensure that the person executing the certification/affidavit, pursuant to paragraph (a), has the authority to act in behalf of the plaintiff/servicer

4. Only Foreclosure Analysts and Bank Officers are authorized to execute foreclosure certification/affidavits. If statutory law requires a Bank Officer to execute an affidavit Analysts our trained to send a task to a Bank Officer in their department to notify him/her that their signature is required. The process is outlined in the attached Exhibit A. If a new statute updates the requirement of a signature on an affidavit to be by a Bank Officer this information is updated in our procedures and communicated to staff

Response to Question 1(C)

State in detail your record keeping system to ensure that there is accurate up-to date entries of payments loan history assignments, or of any other transaction involving the mortgage If you are currently making or anticipating making any changes, state the changes to be made and when they will be implemented

- 5 Fifth Third has a detailed quality control plan to insure that transactions on the servicing system are checked for accuracy and comply with regulatory requirements. All findings are reported to management for review. A closure form is required to document changes have been made to correct negative findings Please see the attached Quality Control Plan labeled, Exhibit B. Quality Control findings are monitored by internal Audit and provided to outside regulators and investors as requested. We are advised by

our Compliance Department, our attorneys and Fiserv, our servicing system vendor, to remain aligned with current changes in State and Federal law.

Response to Question 1(D)

State the review process in place to ensure that any certification/affidavit submitted to the Court is accurate, based upon current information and that the person executing the document relied upon personal knowledge and/or business records which would be admissible in a New Jersey Court. If you are currently making or anticipate making any changes, state the changes to be made and when they will be implemented.

- 6 Fifth Third incorporates herein its answer for question 1(A). Analysts are required to put copies of screen prints proving items listed in affidavits are true along with a copy of the signed affidavit in the foreclosure file. In addition, there is a monthly audit conducted each month where management pulls a random selection of affidavits for each Analyst and conducts an accuracy review.

Response to Question 1(E)

State in detail any training programs you have in place for individuals completing certifications/affidavits to ensure that their knowledge of the contents of the certification/affidavits is based upon personal knowledge or business records which would be admissible in a New Jersey Court.

7. All Analysts as have received extensive training in document verification execution and the severity involved in signing legal documents incorrectly. In addition, all authorized officers and affidavit signers received further training and coaching from outside counsel regarding what it means to sign an affidavit, the repercussion of signing an affidavit unlawfully and when not to sign an affidavit. Annual training is provided to employees who review and execute affidavits.

Response to Question 1(F)

Describe in detail the process you have in place to ensure that foreclosure counsel is provided with current accurate information to support the preparation of any documentation counsel will be submitting to the court pursuant to Court Rule.

- 8 Fifth Third incorporates herein its answer for question 1(A). Analysts work directly with local counsel when communicating information for documentation that will be submitted to the court. In the case of affidavits, once notice is given that an affidavit is needed the attorney is provided with the necessary data to prepare the affidavit. If any

additional information is needed our attorney will work directly with the Analyst to obtain it. After the affidavit is prepared the Analyst is required to review and verify that all items, including data initially provided to the attorney to prepare the affidavit, is true and accurate prior to signing and returning the document to the attorney to be filed

Response to Question 1(G)

State the review process you and foreclosure counsel have in place for the final review of documents to be submitted to the Court pursuant to Rule 4 641 et seq

9. Fifth Third incorporates herein its answer for question 1(A) and 1(F).

Response to Question 1(H)

State whether you utilized or intend on utilizing any independent auditor to review the process and procedures mentioned in the above answers to ensure that you are in compliance with the mandates of Court Rule 4 641 et seq

10. In the winter of 2010 Fifth Third Bank employed an independent third party as well as an attorney firm to review our current processes and procedures. Our processes are also audited by a separate internal department.
11. I certify that the foregoing statements made by me are true I am aware that if any of the foregoing statements by me are willfully false, I am subject to punishment

July 19, 2011



Fred E. Troncone
Senior Vice President
Chief Collections Officer
Fifth Third Bank
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Cincinnati, OH 45227
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606 – Managing the Foreclosure

Effective Date: 11/30/2005
Issue Date: 6/23/2011
Reviewed Date: 6/23/2011
Topic Category: Foreclosure
Brad Griffith

606.1.2 – Responding To Foreclosure Counsel’s Request for Documentation To Support Entry of Judgment

To obtain final judgment in certain states, an affidavit must be provided. In such states, foreclosure counsel will prepare the affidavit to support the judgment. The information in the affidavit and any accompanying documentation, including ownership and amount due, must be reviewed for accuracy and verified. In most states, the affidavit must be notarized. Upon receipt of the documents from foreclosure counsel, the following steps must be undertaken:

- Review the information in the affidavit for accuracy based on a review of the relevant business records contained in MortgageServ, including but not limited to, ownership, relevant dates, amount due, default date and the terms of the note,
 - An ‘Affiant’ is an individual that is attesting to the facts within the Affidavit
 - Affidavits must be based on an affiant’s personal knowledge, meaning that person must be able to verify the information. Affiants should not attest to having personal knowledge of any information that is being given/told by someone else. Analyst should be absolutely certain that they have personal knowledge of the facts within the affidavit. Otherwise, Analysts should check with their Supervisor and/or work with counsel to modify the affidavit to either remove the data, if possible, or to re-word the statement so that it does not imply personal knowledge or confirmation of any information/data
 - Most affidavits require the state and county be listed just above the statement/body of the document. The state and county here should be the state/county in which the Affiant is executing the affidavit
 - Foreclosure Analysts should be sure that they are listed on the affidavit as “Foreclosure Analyst” or “Affiant”. No employee should be signing as “Officer”, unless they are absolutely positive that they have been assigned that title by Fifth Third Bank
 - While we generally foreclose in the name of Fifth Third Mortgage Company, affidavits executed and signed by an employee within the Foreclosure Department should state that person is an employee of Fifth Third Bank. Example: “Jane Doe, is an employee/Foreclosure Analyst of Fifth Third Bank, as servicer for Fifth Third Mortgage Company” or “Jane Doe is an employee of Fifth Third Bank and is authorized to make this affidavit on behalf of Fifth Third Mortgage Company”
 - Many affidavits reference the Plaintiff (Fifth Third Mortgage Company) as the “Owner and Holder of the Note and Mortgage”. Affiants must be sure that this statement is accurate. Affiants should review those documents to verify the ownership, as well as verify that the original loan documents referenced are, in fact, held by the entity claimed in the affidavit. If the Note and Mortgage are held by another entity, the Affidavit should be edited to reflect that entity
 - If exhibits are referenced in the Affidavit, the person attesting should be sure that those documents are attached and should verify their accuracy
 - **Affiant Signatures** - Affiants should not sign an affidavit until after they have reviewed all of the facts and documents referenced within that affidavit. Affidavits should not have any blank spaces



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when the affiant is signing the document. The individual making the affidavit and listed as the person in the body attesting to the facts must sign the affidavit. Signature lines should have the affiant's name and title printed below the signature line.

- **Notarizing an Affidavit** – When affidavits are notarized, it must be done with both Notary and Affiant present. The document must be sworn to before an officer authorized to administer oaths (i.e. a notary). A Notary must administer the oath as required by state law. Notaries may NOT notarize an affidavit unless they have administered the oath and it has been signed by the Affiant in presence of the Notary. A Notary must not be notarizing any documentation if their commission has expired, until that commission has been renewed.
- When an affidavit is required to be notarized the staff member assigned to the account must send one of the following CIT's to their assigned notary based on the type of document.
 - **Task 784 'Notary Needed – Affidavit'** This is the task that analysts will be using to inform their assigned notary that they need an affidavit notarized. Affidavits that can be filled out and signed by analysts are the only affidavits for this specific task.
 - **Task 785 "Notary Needed – AVP/VP"** This is the task that analysts will be using to inform their assigned notary that they need a document signed by Brad Griffith, Michele McCoy, or any other AVP or VP at Fifth Third. Specifying the person needed and if there are witnesses required should also be noted.
 - **Task 786 "Notary Needed – LNA/LMA"** This is the task that analysts will be using to inform Ben Heckert (#21159) that they need a Lost Note Affidavit, Lost Mortgage Affidavit, Lost Assignment Affidavit, or any other affidavit of Lost document. The document will be sent to the Central File Room for execution and notarization.
- Those persons signing the affidavit must be sure that they can attest to all of the information in the Affidavit. If the affiant is confused or unsure about the information in the Affidavit, the affiant should consult with counsel in order to clarify or have the information removed if it is not necessary.
- Calculating the judgment figures
 - Analyst should use the 'Create Bid' function via the FCL work screen in order to obtain the accurate amounts to be claimed in the Affidavit.
 - Once on the create bid screen, if there is already a bid enter for the loan, add a new bid by place 'a' in the A/C/D field and click submit. This provides a new calculation and the amounts provided are good through the date that is currently set as the follow-up date for the 605 task on the foreclosure workstation. The F/C Sale Date on the create bid screen should be changed to the "good through" date provide on the Affidavit. If there is no good through date, Affiants should confirm with counsel on what date judgment figures should be good through.
 - The original column will adjust the amounts of interest and late charges with respect to the F/C Sale date provided.



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- The principal, Escrow, Drm Advances & Other Fees will remain the same as those amounts will only show true data as to what has been advanced/accrued to date
- The late charges in the 'Current' column should be adjusted to show the proper amount for total late charges through the good through date provided by counsel, or total late charges, including uncollected late charges, up and to the acceleration date (indicated by the date that the breach letter was sent on the 'Del/Breach' screen)
 - Late charges through good through date are populated in the 'Original Column' on the create bid screen once the F/C Sale Date is changed. This number can be typed into the 'Current' column
 - If the Affidavit indicates Late charges prior to acceleration, we can only claim late charges up to the date that the breach letter is sent. That late charge amount should be calculated as follows
 - Navigate to 'Cus/total' screen and place a 'y' in the Uncollected View field and hit enter. Uncollected late charges are indicated in the Uncollected box by "Uncol Late Chargs"
 - The late fees should be added up to the date that the most recent breach letter was sent (on 'Del/Breach' screen). For breach letters sent prior to the 17th of the month, the late fee for the month should not be included
 - The uncollected late charges and late fees should be added together to obtain the total late charges prior to acceleration. That amount should be placed in the Late Charges field under the Current column in the 'Create Bid' screen
- The Drm Advances under the Current column on the create/bid screen pull amounts identified as fee type 040 on the Cus/Fee/Review screen. This amount should be adjusted to indicate only amounts collectable and able to be claimed on the judgment affidavit. Affiants are to consult with the Foreclosure Attorney before including any Atty fees/costs in the Drm Advances. Any amounts uncollectable should be subtracted from the Drm Advances in the Current column
- 'Other Fees' under the Current column on the create/bid screen pull amounts on the Cus/Fee Review screen that are NOT identified as fee type 040. This amount will need to be adjusted if the judgment figures are requested to be good thru a prior date. Affiants will need to subtract any fee amounts that were assessed after the good thru date from the 'Other fees' in the Current Column
- Once the items in the Current column match what is to be claimed on the judgment Affidavit, the create bid should be identified and saved



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- Identify the create bid by typing a description of the bid/judgment in one the empty fields. The description should indicate “jgmt fig” and have the date that the create bid was completed. Example “jgmt fig 1 27 11”
- Place ‘b’ in the Letter? Field and click submit, then return
- Creating the bid populates a bid amount on the FCL info screen. This needs to be deleted as the create bid was created for a judgment affidavit, not for a foreclosure bid. Go to the FCL Info screen and remove the amount in the Bid Amount field
- Breaking down Escrow. Many Affidavits have escrow and broken down into taxes & insurance. The total amount of escrow determined from the create bid can be broken down to provide the amounts requested on the affidavit
 - Navigate to Dis/History screen
 - Type ESC in the Dsp field to display all escrow disbursement transactions
 - The most recent escrow disbursements should be reflected in the Affidavit. The sum of the disbursements should not exceed the total escrow balance
- Breaking down Fees. Many Affidavits have Fees broken down into property inspections, property maintenance, BPOs, NSF fees, etc. The ‘Other Fees’ from the create bid screen can be broken down to provide the amounts requested on the affidavit
 - Navigate to the Cus/Fee Review screen in order to view the different fee descriptions. Fee type 040 is not included in ‘Other Fees’. In order to view a breakdown of each description, place an ‘s’ in the field to the left of the fee type and hit enter. This will provide a list of all assessments for that fee type. Only assessments made prior to the good thru date requested on the affidavit should be included
 - The sum of all assessments for all fee types should equal the total amount of ‘Other Fees’ from the create bid screen
- If any of the information on the affidavit is inaccurate, an email must be sent to foreclosure counsel alerting them to the error and requesting that it be fixed,
- If the affidavit is accurate, or upon receipt of the corrected affidavit, it must be signed and properly notarized if required,
- The affidavit must be returned to foreclosure counsel and a copy maintained,
- A notation must be made in the system that the affidavit was signed and returned to foreclosure counsel



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Change Control Tracking

Review Cycle (check one)

Quarterly	<input type="checkbox"/>
Semi-Annual	<input type="checkbox"/>
Annual	<input checked="" type="checkbox"/>

Change Type (check one)

New Procedure	<input type="checkbox"/>
Review Only – No Changes	<input checked="" type="checkbox"/>
Major Change	<input type="checkbox"/>
Minor Change	<input type="checkbox"/>

Reason for Change (check one)

Audit finding	<input type="checkbox"/>
Process Change	<input type="checkbox"/>
Annual Update	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>

*Fill out Version # and Document Owner for all procedures

*Fill out Revision Date and Description of Change fields for updated procedures ONLY

Version #	Document Owner	Revision Date	Description of Change
15	Brad Griffith	N/A	N/A
16	Brad Griffith	1/14/2011	Added affidavit verbiage
17	Brad Griffith	4/22/11	Added process for Foreclosure during charge off scenarios
18	Brad Griffith	6/23/2011	Added Notary verbiage



FIFTH THIRD BANK™

**Mortgage Loan Servicing
Quality Control
Assessment Plan**



MISSION STATEMENT

Mortgage Loan Servicing Operations has adopted and put into effect this Assessment Plan in order to monitor the overall quality of loan servicing and to assure that our employees and independent contractors are in compliance with company policies and investor and mortgage insurer requirements including the requirements of HUD, VA, Fannie Mae, Freddie Mac, and Ginnie Mae ("Agencies") Periodic reviews are based, where possible, on a statistical sampling chosen at random, as well as targeted and discretionary samples of the mortgage loans that we service The program provides for direct feedback to management so that line management can establish procedure for effective corrective measures when deficiencies are identified The program is available for agency review

SYSTEM INTEGRITY AND REPORTING

It is the responsibility of the QC Manager to ensure the completion of reviews of our servicing activities The QC Manager reports to the Sr Consumer/Mortgage Loan Manager The Manager has complete access to all departments and records of this company for use in Self Assessment reviews Each employee of this company must cooperate fully with the QC Manager in performance of the reviews Any employee of this company who has knowledge that any of the policies and procedures of this company or the requirements of any of our investors or mortgage insurers or governmental agencies or any provision of the law has been violated, should notify management of this information immediately Fifth Third Bank is required to report any violations of law or regulation, false statements or other program abuses by the borrower, employees or any other party to the HUD Regional Office, the HUD Area Office or to the HUD Regional Office of Inspector General, the Secretary of the Veterans Administration, FNMA, FHLMC, Private Investors and to any other interested state or federal agencies or investors

ENFORCEMENT

The QC Analyst must make a written report to management of each review The report identifies any discrepancies found and any indications of generalized problems or trends and makes recommendations for corrective action The report is distributed to the senior managers, line managers, any functional supervisors or leads No closure forms are required but QC reserves the right to go back and review previous errors brought to management attention for correction Scores less than 80% are subject to additional loan level review to determine the seriousness of the trending problem The QC Analyst is responsible for discussing trends with Line Management on an "as needed" or regular periodic basis to offer clarification and assistance in further training or recommendations to procedure changes that will help to correct the problem(s) When management has reviewed and accepted the assessment, the QC Analyst should move the assessment into the appropriate QC file on the S Drive

The review effort is a continual process on a schedule that permits alterations and modifications as conditions warrant Calendars are reviewed monthly within the weekly Staff Meeting to insure that assessments are completed when scheduled Exceptions will be documented in the Comment Section of each calendar to reflect any assessment that is deferred and why Assessments will normally be done on a monthly basis A summary of each calendar showing the scores of the previous month and the upcoming plan for the current month will be distributed by the QC Manager to all levels of loan servicing management for comment or recommended changes by the 5th working day of the month Any suggestions or changes will be incorporated into the current calendar with comments noted QC will expect senior and line management to be proactive in making timely corrections to loans and procedure when deficiencies are reported to them



PURPOSE AND OBJECTIVE

The purpose of the Loan Servicing Assessment Plan is to determine on an on-going basis that each area is functioning properly in order that corporate and industry standards for performance and customer service are consistently met and to identify areas of operating deficiency, errors and omissions, unfavorable patterns or trends, intentional misconduct or fraudulent activity

The primary objectives of this Assessment Plan are to

Assure compliance with the requirements issued by HUD/FHA, VA, FNMA, FHLMC, applicable private investors and private insurers

Assure compliance with Federal and state regulations that apply to mortgage loan servicing

Assure Loan Servicing policies and standards are known and adhered to by all loan-servicing personnel

Assure Loan Servicing operating procedures are maintained in written format within each respective functional area and that they are revised in a timely manner to reflect changes in agency, investor, or insurer requirements

Assure Loan Servicing are aware of all Agency issuances updates, including regulations, handbooks, mortgagee letters, circulars, etc , which are relevant to servicing activities

Assure that appropriate levels of management are informed so that prompt and effective corrective measures are taken and documented when deficiencies are identified

Assure that the Assessment Plan process occurs in a timely manner in order to reduce risk caused by inappropriate practices

Assure a Business Continuity Plan (BCP) is in place The Loan Servicing Manager and his/her designees will manage the BCP

The Quality Control Group updates the FITCH PCA system quarterly with SOX testing results

COMPLIANCE REVIEW PROCEDURES

The Servicing Assessment Plan is designed to encompass all areas of loan servicing and all servicing personnel The review effort is a continual process on a schedule that permits alterations and modifications as conditions warrant

Individual cases for review are selected at random using a statistical sampling method This sample will include all Bank charters including the Tennessee Charter (Bank 36 – 42 - 43) (No Longer applicable due to Charter Consolidation on 9/30/09 QC will no longer specify loans previously in the OCC or TN Charter) The review sample will be expanded if a pattern of deficiencies or fraudulent activity is noted Additionally, the QC Group may also conduct reviews targeted toward a certain issue, employee or loan type using a non-random selection method

Members of Quality Control Group will perform assessments according to the QC schedule



The review effort is a continual process on a schedule that permits alterations and modifications as conditions warrant. Calendars are reviewed monthly within the weekly Staff Meeting to insure that assessments are completed when scheduled.

Reports and worksheets used in completing the review are kept as part of the permanent review file. The review file will be maintained in the Quality Control folder on the S Drive for the purpose of follow-up on correction items noted in the review for a period of at least 3 rolling years with the current year as the 4th. The review file is then archived on-line in accordance with the Bank Retention Policy.

The following pages identify critical control points to be examined and the process to examine within each area of loan servicing. Agency regulations, handbooks and mortgagee letters and written guides published by private mortgage insurers and the company's investors are the ultimate authority on whether the company's employees have acted properly in servicing the loan. Procedures should reflect these requirements and line management is expected to keep procedures updated as changes occur.

Process Owner	Assessment	Frequency
Customer Care	Loss Mitt Modifications/Default	Quarterly
Customer Care	Loss Mitt Modifications/Escrow	Quarterly
Customer Care	Loss Mitt Modifications/SLK	Quarterly
Customer Care	Modifications/SLK	Monthly
Customer Care	Modifications/5/3	Monthly
Customer Care	Balloon Resets	Monthly
Customer Care	Construction Rollovers/SLK	Quarterly
Customer Care	Construction Rollovers/Customer Care	Quarterly
Customer Care	Construction Rollovers/Legal Support	Quarterly
Customer Care	Amortization Schedules - Customer Care/SLK	Quarterly
Customer Care	Loss Draft-5/3	Monthly
Customer Care	Loss Draft - AMIG	Monthly
Customer Care	Loss Draft - Consumer	Monthly
Customer Care	SCRA	Monthly
Customer Care	Policy and Procedure Assessment- Customer Care	Semi Annually
Customer Care	Buydowns	Monthly
Customer Care	Fair Credit Reporting Mortgage (Compliance)	Monthly
Customer Care	Coupon Orders (SLK)	Monthly
Customer Care	Address Changes/Soc Sec and Death Certificates (SLK)	Monthly
Customer Care	Credit Bureau- SLK	Monthly
Escrow	Compliance- Homeowners Protection Act PMI Cancel (I)	Quarterly
Escrow	Task 243	Quarterly
Escrow	Loan Activation (PMI) 5/3	Quarterly
Customer Care	Modifications/705 letter	Monthly



Legal Support	Partial Releases	Quarterly
Customer Care	Reg Z - ARM Servicing	Monthly
Customer Care	Arm Indexes	Monthly
Escrow	MIP Premiums (HUD)	Quarterly
Customer Care	Arm Servicing- HUD	Quarterly
Customer Care	Credit Bureau- HUD	Quarterly
Customer Care	Task Assessment - Customer Care	Monthly
Customer Care	Customer Service- Tasks (HUD)	Quarterly
N/A	Compliance- Safeguarding- Legal Support	Quarterly
Customer Care	Special Loans Fees and Charges-HUD	Quarterly
Systems Support	Purging Loans	Monthly
Customer Care	Unintentional Balloon	Monthly
Cashiering	Cash Control Desk	Quarterly
Cashiering	Internal Ticket	Quarterly
Cashiering	Unapplied- Cashiering	Monthly
Cashiering	Payoffs	Monthly
Cashiering	Return Items- Cashiering	Monthly
Cashiering	Rebate Due to Customer	Monthly
Cashiering	Short Payoffs- Cashiering	Monthly
Cashiering	Misapplied Payments -Cashiering	Monthly
Cashiering	Escrow Balances on Paid Off Loans	Monthly
Cashiering	Payoff Research	Monthly
Cashiering	Missing Payments	Monthly
Cashiering	Payoff Refunds	Monthly
Cashiering	Freddie Mac Curtailment Reversals	Monthly
Cashiering	Policy and Procedure Assessment- Cashiering	Semi Annually
Cashiering	Extensive CSH Tasks (500)	Monthly
Cashiering	Holdover Acct Review 145912	Monthly
Cashiering	Bank Checks - Mortgage and Consumer	Monthly
Cashiering	Payment Clearing - 70471609	Monthly
Systems Support	Insufficient Fund Fees	Semi Annually
Cashiering	Compliance- Safeguarding- Cashiering	Quarterly
Cashiering	Customer Service - Misapplied Payment - HUD	Monthly
Cashiering	Payoffs (HUD)	Monthly
File Room	Payoffs (HUD)	Monthly
Escrow	Payoffs (HUD)	Monthly
Legal Support/Post Closing	Assumptions	Quarterly
Lien Release	Compliance-Safeguarding - Lien Release and Document Custody	Quarterly



HUD	New Loans (HUD)	Quarterly
Escrow	Compliance- RESPA & Escrow Management -HUD	Quarterly
investor reporting	Compliance-Transfer of Servicing-Investor Reporting - HUD	Quarterly
Escrow	Hazard Process-HUD	Quarterly
HUD	Analysis Process - HUD	Quarterly
Escrow	Compliance- Safeguarding- Escrow	Quarterly
investor reporting	Compliance- Safeguarding - Investor Reporting and Holdovers	Quarterly
Escrow	TASK 229	Monthly
Escrow	B-Service - 5/3	Monthly
Escrow	B-Service - Core Logic	Monthly
Escrow	CoreLogic Adjustment Requests (T) 5/3	Monthly
Escrow	CoreLogic Adjustment Requests (T) Core Logic	Monthly
Escrow	Delete Escrow - 5/3	Monthly
Escrow	NEW REO Setup - 5/3	Monthly
Escrow	AMIG	Monthly
Escrow	Analysis Past Due (A)	Quarterly
Escrow	Hazard Process (I)	Quarterly
Escrow	Forced Order (I) - Escrow	Quarterly
Escrow	Forced Order (I) - AMIG	Quarterly
Escrow	Official Check/Stop Payment Approval - Escrow	Quarterly
Escrow	Official Check/Stop Payment Approval - Cashiering	Quarterly
Escrow	Adjustment Request - Taxes	Quarterly
Escrow	Adjustment Request - Insurance	Quarterly
Escrow	Adjustment Request - Analysis	Quarterly
Escrow	CoreLogic Current Billing (T)	Quarterly
Escrow	Policy and Procedure Assessment- Escrow	Semi Annually
Escrow	Compliance- RESPA & Escrow Management	Quarterly
Escrow	Compliance- 1994 National Flood Insurance Act (I)	Quarterly
Cashiering	Compliance- RESPA & Transfer of Servicing - Cashiering	Quarterly
Investor Reporting	Compliance- RESPA & Transfer of Servicing - Investor Reporting	Quarterly
Investor Reporting	Remittances	Quarterly
Investor Reporting	Policy and Procedure Assessment- Investor Accounting	Semi Annually



Investor Accounting	Compliance- RESPA & Transfer of Servicing - Investor Accounting	Quarterly
Systems Support	Interest on Escrow	Semi Annually
Escrow	Compliance- RESPA & Transfer of Servicing - Escrow	Quarterly
Post Closing	Compliance- RESPA & Transfer of Servicing - Post Closing	Quarterly

LANDMAN CORSI BALLAINE & FORD P.C.

A NEW YORK PROFESSIONAL CORPORATION

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1617 JFK Boulevard
Philadelphia, PA 19103
Tel (215) 561-8540

July 21, 2011

VIA FEDERAL EXPRESS

Hon. Walter R. Barisonek, A.J.S.C. (Retired)
(Special Master/Recall Judge)
Union County Courthouse
2 Broad Street, Courtroom 101
Elizabeth, NJ 07207

RECEIVED

JUL 25 2011

SUPERIOR COURT
CLERK'S OFFICE

**Re: In the Matter of Residential Mortgage Foreclosure
Pleadings & Document Irregularities
Docket No.: F-238-11**

Dear Judge Barisonek:

This firm represents Federal Home Loan Mortgage Corporation ("Freddie Mac") in the above matter.

In furtherance of your request at a conference on May 12, 2011, in a May 17, 2011 Certification, Freddie Mac provided Your Honor with a list of each of its servicers that services a substantial number of loans (more than 500) in the State of New Jersey, as of May 4, 2011, that is not already subject to the Matter of Residential Mortgage Pleading and Document Irregularities, Docket No. F-059553-1, Order to Show Cause or the December 20, 2010 Administrative Order 01-2010 and Supplemental Administrative Order 01-2010. The following is a list of those servicers:

- Provident Funding Associates, L.P.;
- Mortgage Access Corp. DBA Weichert Financial Services;
- Cenlar FSB;
- The Provident Bank;
- Affinity Federal Credit Union;
- New York Community Bank;

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Hon. Walter R. Barisonek, A.J.S.C. (Retired)
July 21, 2011
Page 2

- Fifth Third Bank;
- Columbia Bank;
- Central Mortgage Company;
- VNB Mortgage Services, Inc.;
- Flagstar Capital Markets Corporation;
- Branch Banking & Trust Company;
- Everbank;
- Green Planet Servicing, LLC;
- Oceanfirst Bank;
- Fidelity Bank; and
- Lehman Brothers Holdings, Inc.

Aside from Lehman Brothers Holdings, Inc. ("Lehman"), which is in bankruptcy and its loans are being serviced by Aurora Loan Services LLC (which already has submitted a response on June 6, 2011), Freddie Mac has contacted each of the servicers' representatives to inform them about Your Honor's April 25, 2011 Order ("the Order") and Your Honor's request that each submit a certification or affidavit pursuant to the Order.

Accordingly, attached please find submissions from the following servicers:

- Provident Funding Associates, L.P. (letter response and exhibits) (Ex. A);
- Mortgage Access Corp. DBA Weichert Financial Services (Ex. B);
- Cenlar FSB (filed on June 10, 2011 on behalf of Sovereign Bank) (Ex. C);
- The Provident Bank (Ex. D);
- New York Community Bank (Ex. E);
- Fifth Third Bank (Ex. F);
- Columbia Bank (Ex. G);
- Central Mortgage Company (Ex. H);
- VNB Mortgage Services, Inc. (Ex. I);
- Flagstar Capital Markets Corporation (filed on behalf of Federal National Mortgage Association) (Ex. J);
- Branch Banking & Trust Company (Ex. K);
- Everbank (Ex. L);
- Green Planet Servicing, LLC (Ex. M);

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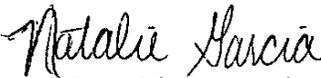
Hon. Walter R. Barisonek, A.J.S.C. (Retired)
July 21, 2011
Page 3

- Oceanfirst Bank (Ex. N); and
- Fidelity Bank (Ex. O).

All the servicers listed in Freddie Mac's May 17, 2011 Certification have responded, except for Lehman and Affinity Federal Credit Union ("Affinity"). Lehman, as noted above, is relying upon Aurora Loan Services LLC for its servicing. Due to miscommunications, Affinity is in the process of reviewing the Order and will communicate to Freddie Mac if it intends to respond.

Thank you for your consideration of this matter.

Respectfully submitted,


Natalie Garcia

NG:mc

cc: Clerk, Superior Court of New Jersey (w/encl.) (via reg. mail)

A

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The Mortgage Price Leader

July 8, 2011

E. Shannon Pastras
Associate General Counsel
Freddie Mac

RE: New Jersey Administrative Order

Ms. Pastras,

Provident Funding Associates, L.P., ("Provident Funding"), is in receipt of your request for information in connection with Administrative Order 0-1-2010 issued by the superior court of New Jersey dated April 25, 2011. Based on our follow-up conversation, we understand that Freddie Mac is requesting this information from Provident Funding as a servicer of mortgages in New Jersey. Based on the information outlined in the Administrative Order, we would offer the following information to Freddie Mac:

In October 2010 Provident Funding received an inquiry from the Iowa Attorney General's office, whom we were told was representing a larger group of state attorneys general, regarding our procedures for foreclosure processing. In response to that inquiry Provident Funding provided the Iowa Attorney General with a comprehensive written response supplemented by specific information regarding our foreclosure processing written policies and procedures as well as an example of the Foreclosure Review Worksheet which is an integral part of our foreclosure processing procedures. We have included a complete copy of that response letter and package of information for your review. After such materials were filed with the Iowa Attorney General, we had no further inquiry from their office. This information was also provided to various other third parties who made separate but similar inquiries of Provident Funding. To date, we have had no additional inquiry from any of those parties.

Subsequently, in December 2010 we received a copy of Standard & Poor's 'Ratings Direct' notice entitled "S&P Continues To Monitor U.S. Residential Servicers' Foreclosure Processes And Outlines Servicer Review Process". Such publication required those servicers who are part of S&P's Select Servicer program to provide them with written verification and documentation of policies and procedures for foreclosure processing. While the publication did allow for such review and documentation to be compiled from a Provident Funding internal source within audit, compliance or legal, Provident Funding deemed it appropriate to engage our external auditors to perform certain agreed-upon procedures to assist the Company in evaluating the effectiveness of our policies and internal controls around foreclosure processing. We have included a complete copy of the S&P publication, Provident Funding's response, and the complete report issued by our auditors. Such materials were filed with S&P on April 8, 2011. To date, we have had no additional inquiry from S&P regarding this information.

As noted in these materials, given Provident Funding's low delinquency rates relative to other larger servicers, the sheer volume of loans in the foreclosure process at any given time is insignificant relative to such other servicers, therefore Provident Funding is able to ensure that individual attention is given to each foreclosure action by a designated foreclosure specialist throughout the process, resulting in no deficiencies in our foreclosure affidavit preparation and attestation processes. Specifically, for the period from January 1, 2009 through June 30, 2011, for properties located in the state of New Jersey, Provident Funding completed just 12 foreclosures, as compared to the completion of 79 HAMP modifications and 22 traditional modifications in the same period of time, representing a workout-to-foreclosure ratio of 8.4 over a two and one-half year period. We believe these statistics demonstrate the quality of the portfolio and the Company's commitment to pursuing work-out and resolution of defaulted loans whenever possible.

We believe that all of the information included with this letter is responsive to the request for information included in the Administrative Order. However we are more than will to provide additional information if you feel anything is unclear or requires a more detailed response. We welcome an ongoing dialog regarding these topics.

Sincerely,
Provident Funding Associates, L.P.


Michelle C. Blake
Chief Administrative Officer

enclosures

cc: Lori Pica, Provident Funding, Chief Operating Officer
Adam Carmel, Provident Funding, SVP Loan Servicing

1633 Bayshore Hwy , Ste. 155, Burlingame, CA 94010

650/652-1300

- Original Notes are retained by the investor's assigned custodian and the original Deed and Title policy are retained in house
- Copies are retained in the Proviscan system, which is a virtual storage system of files. The original files can be retained on site or in an off-site storage facility

The documents will be ordered from and returned to the applicable parties. Requestor must record the tracking number while receiving documents and while mailing out documents.

9.3. Follow up and Managing Foreclosure Timelines (12/2/2009 3 59 32 PM)

The processor will be responsible for timely follow up on each process during the Foreclosure. Any delays by a vendor or attorney will be brought to the attention of management immediately. Management will produce weekly and monthly reports to review the status of loans in FC.

9.4. Monitoring Foreclosure Events (12/2/2009 3 59 51 PM)

All foreclosure specialists to monitor foreclosure events on daily basis to make sure that all the follow ups are done on regular basis with attorney/trustee.

Foreclosure manager to track team's progress on completing foreclosure events on daily and weekly basis.

9.5. Completing FC Documents (12/2/2009 4 00 15 PM)

When a Foreclosure has been initiated it may be necessary to provide the Attorney/Trustee with signed and/or notarized documents to proceed with the foreclosure action. The documents may include Substitution of Trustee, Affidavit of Military Status, Assignment of Mortgage, Assignment of Deed, Affidavit of debt etc. It is imperative that these documents are executed accurately and returned to the requestor within 48 hours.

Ensure that the mortgage information is correct, i.e., loan number, borrower information, mortgage information, beneficiary etc.

Note: The Attorney/Trustee Office will complete certain information on the document.

Signature information is typed on the document and submitted for signature by an officer of the Company. Occasionally, there will be a requirement for a Witness Signature. This Signature can be signed by a Supervisor as well as a foreclosure specialist.

Once signatures are obtained, a Notary in the company must notarize the document.

Copies of executed document(s) are scanned in the system for records, and the executed and notarized document is then returned to the requestor via overnight mail to ensure timely return. Tracking number is to be noted in the system.

9.6. Loss Mitigation and Foreclosure Action (12/2/2009 4 00 38 PM)

The Loss Mitigation Department's goal is to reduce loss to the company, investors and insurers. Foreclosure and REO are costly, therefore alternative options to foreclosures necessary in order to minimize the loss to Provident Funding Associates, L.P. and its Investors.

Diligent/Proactive efforts will be made to pursue workout options during the foreclosure.

Periodic calls will be made throughout the foreclosure process to solicit the borrowers and determine if their circumstances have changed and to discuss possible workout solutions.

Periodic mailings will take place throughout the foreclosure process in an attempt to reach the borrower and try to determine if the borrowers circumstances have changed and to discuss possible workout solutions.

Loss Mitigation team will constantly be working and dealing with borrower to provide any assistance upon request. If the loss mitigation specialist feels that a workout is feasible, they will review the case with management, then refer and discuss with the investor and/or MI Company in order to receive approval on workout option and to determine if the foreclosure should be placed on hold.

9.7. Delinquent Taxes (12/2/2009 4 01 02 PM)

The status of property taxes must always be reviewed when a loan is in foreclosure. Failure to pay delinquent taxes could result in our security being

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October 14, 2010

Iowa Attorney General
Attn: Patrick Madigan
1305 E. Walnut Street
Des Moines, IA 50319

Provident Funding
1633 Bayshore Highway
Suite 155
Burlingame, CA 94010

RE: Compliance with Foreclosure Affidavit and Notarization Requirements

Dear Mr. Madigan,

Provident Funding Associates, L.P. ("Provident Funding") welcomes the opportunity to respond to your inquiry pertaining to our foreclosure process, and specifically the procedures surrounding the execution of documents. By way of background, Provident Funding is recognized by Freddie Mac as the #1 ranked servicer, amongst the twenty-five largest servicers in the nation, and it has consistently maintained a ranking with Freddie Mac among their top 5 servicers for the past year. A critical component of the ranking provided by Freddie Mac includes the recognition of our comprehensive, compliant and efficient loss mitigation efforts and procedures. Within the past year, Provident Funding has been examined by Freddie Mac, Fannie Mae, Standard & Poor's, and KPMG on behalf of Freddie Mac. Those audits included within their scope an examination of all aspects of our loan servicing operations, including review and inquiry into our foreclosure processing. No adverse findings were identified related to any aspect of foreclosure processing and compliance. In addition, over the past year, Provident Funding has been examined by over 10 individual state lending/banking regulatory agencies, and no adverse findings were identified related to any aspect of foreclosure processing and compliance.

As part of its written Foreclosure Policies and Procedures, Provident Funding has consistently utilized two primary controls to insure foreclosure proceedings were executed in accordance with applicable law and investor guidelines. First, Provident Funding assigns a dedicated Foreclosure Specialist to each loan. That Foreclosure Specialist therefore has personal knowledge of the foreclosure file, to exclusively handle the file from start to finish, and to obtain a review and signatures on documents, as required, from an experienced and authorized default

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department supervisor. In addition, Provident Funding utilizes a Foreclosure Review Worksheet to ensure that all information is reviewed and verified for compliance with applicable regulations and guidelines, prior to referral of the loan to foreclosure.

All information included on the Foreclosure Review Worksheet is generated from Provident Funding's proprietary loan servicing system. Within that system, there is a comprehensive set of data validation rules that help to ensure the completeness and accuracy of all data elements at a loan level. Therefore any and all items of information and events pertaining to the foreclosure process are automatically populated by the system and are not subject to human interpretation or error. This ensures that the mortgage information is correct, including loan number, borrower information, property address, jurisdiction, mortgage information, beneficiary, etc.

In addition to our proprietary system, with its robust controls, as well as the other checks and balances described above, Provident Funding has built a foreclosure process that is consistent with our overall corporate culture of a zero tolerance policy for exceptions.

These controls have been consistently in effect, and Provident Funding's management has no reason to believe that any foreclosure was completed which was not in full compliance with applicable state regulations and investor guidelines. Notwithstanding this fact, Provident Funding has initiated an audit of the foreclosure actions completed in the past 12 months, to review the documentation for evidence of compliance with Provident Funding's Policies & Procedures and its systems of internal control, which are designed to ensure that all foreclosure actions are completed in accordance with applicable state regulations.

For the period from July 1, 2009 to September 30, 2010, Provident Funding has successfully modified, through HAMP or a traditional modification, 3,308 loans. Provident Funding is committed to dedicating substantial resources, talented and experienced employees, and capital to the loss mitigation process. It also acts on behalf of the owners of the loans we service and foreclosed on 2,835 loans within that same period of time. Provident Funding continues to be fully committed to preserve home ownership, while also adhering to investor guidelines throughout the foreclosure process.

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Enclosed for your review is a copy of Provident Funding's Foreclosure Policies & Procedures, as well as a copy of a sample Foreclosure Review Worksheet. In addition, we have included statistical information that summarizes the volume of foreclosures relative to traditional and HAMP loan modifications completed by Provident Funding from July 1, 2009 through September 30, 2010.

Very Truly Yours,
Provident Funding



Adam S. Carmel
Vice President
Loan Servicing Manager

Provident Funding
Statistics on Foreclosure and Modification Activity
for the period from 7/1/09 to 9/30/10

State	Foreclosure Sales	HAMP Modifications	Traditional Modifications	Total Modifications	Workout / Foreclosure Sale Ratio
AK	1	0	1	1	1 00
AL	5	3	3	6	1 20
AR	9	6	1	7	0 78
AZ	543	357	55	412	0 76
CA	789	838	212	1050	1 33
CO	54	46	11	57	1 06
CT	38	63	15	78	2 05
DC	0	0	0	0	No Foreclosure Sales
DE	1	3	1	4	4 00
FL	116	229	32	261	2 25
GA	117	54	15	69	0 59
HI	0	4	0	4	No Foreclosure Sales
IA	4	1	3	4	1 00
ID	8	7	3	10	1 25
IL	113	156	17	173	1 53
IN	18	16	5	21	1 17
KS	5	2	1	3	0 60
KY	8	7	6	13	1 63
LA	18	6	4	10	0 56
MA	28	113	20	133	4 75
MD	30	44	15	59	1 97
ME	1	5	3	8	8 00
MI	151	71	14	85	0 56
MN	114	83	12	95	0 83
MO	32	12	4	16	0 50
MS	0	2	1	3	No Foreclosure Sales
MT	7	3	2	5	0 71
NC	29	20	8	28	0 97
ND	0	1	0	1	No Foreclosure Sales
NE	1	3	0	3	3 00
NH	1	7	0	7	7 00
NJ	8	61	10	71	8 88
NM	3	1	1	2	0 67
NV	158	92	31	123	0 78
NY	2	13	5	18	9 00
OH	42	39	9	48	1 14
OK	17	7	3	10	0 59
OR	36	39	6	45	1 25
PA	15	21	5	26	1 73
RI	8	20	4	24	3 00
SC	9	8	2	10	1 11
SD	1	0	1	1	1 00
TN	13	5	1	6	0 46
TX	59	24	7	31	0 53
UT	101	104	17	121	1 20
VA	37	28	20	48	1 30
VT	0	3	0	3	No Foreclosure Sales
WA	75	68	17	85	1 13
WI	8	7	1	8	1 00
WV	2	1	0	1	0 50
WY	0	0	1	1	No Foreclosure Sales
	2835	2703	605	3308	1 17

Total loans serviced as of 9/30/10

228,856

Section 9: Foreclosure Policies

9.1. Foreclosure Approval (12/2/2009 3 59 04 PM)

Unless arrangements have been made to bring the loan current, or a formal workout is in process, then the initiation of Foreclosure should begin by the 105th day of delinquency

Upon the expiration of the 30-day demand/Breach letter, foreclosure manager to assign foreclosure eligible list to foreclosure specialists within 2 business days of the expiration. The foreclosure specialist to go through their assigned list and review foreclosure worksheet to verify eligibility of the loan for referral. Once the foreclosure specialist reviews through the worksheet, the file becomes ready for referral. Foreclosure specialist to refer file to the appropriate foreclosure attorney. However, while reviewing the file, if foreclosure specialist finds any issues or certain activity did not take place and further work is necessary, they are responsible to bring up such cases to foreclosure manager. Foreclosure manager will then review the file and take appropriate action to resolve the issue.

9.2. Ordering Loan Documents (12/2/2009 3 59 15 PM)

Upon expiration of the breach letter and no resolution to the delinquency can be obtained, the loan is immediately referred to the appropriate Foreclosure attorney or Trustee. In some cases original loan documents are required to file the initiation of foreclosure. However, in most states, we may provide the attorney/trustee with copies of the loan documents.

- Original Notes are retained by the investor's assigned custodian and the original Deed and Title policy are retained in house
- Copies are retained in the Proviscan system, which is a virtual storage system of files. The original files can be retained on site or in an off-site storage facility.

The documents will be ordered from and returned to the applicable parties. Requestor must record the tracking number while receiving documents and while mailing out documents.

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Foreclosure manager to track team's progress on completing foreclosure events on daily and weekly basis.

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When a Foreclosure has been initiated it may be necessary to provide the Attorney/Trustee with signed and/or notarized documents to proceed with the foreclosure action. The documents may include Substitution of Trustee, Affidavit of Military Status, Assignment of Mortgage, Assignment of Deed, Affidavit of debt etc. It is imperative that these documents are executed accurately and returned to the requestor within 48 hours.

Ensure that the mortgage information is correct, i.e., loan number, borrower information, mortgage information, beneficiary etc.

Note: The Attorney/Trustee Office will complete certain information on the document.

Signature information is typed on the document and submitted for signature by an officer of the Company. Occasionally, there will be a requirement for a Witness Signature. This Signature can be signed by a Supervisor as well as a foreclosure specialist.

Once signatures are obtained, a Notary in the company must notarize the document.

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Loss Mitigation team will constantly be working and dealing with borrower to provide any assistance upon request. If the loss mitigation specialist feels that a workout is feasible, they will review the case with management, then refer and discuss with the investor and/or MI Company in order to receive approval on workout option and to determine if the foreclosure should be placed on hold.

9.7. Delinquent Taxes (12/2/2009 4 01 02 PM)

The status of property taxes must always be reviewed when a loan is in foreclosure. Failure to pay delinquent taxes could result in our security being

extinguished (wiped out) should a tax sale be held

For escrowed loans, the tax department will continue to advance the taxes until the foreclosure sale

For non-escrowed loans, the decision to advance taxes is made case-by-case. Failure to pay delinquent taxes could result in our security being extinguished (wiped out) should a tax sale be held

Tax department to pay all DQ/Due taxes 7-10 days prior to foreclosure sale date

If a borrower says the taxes have been paid or they are on a payment plan with the county, they will be required to provide a copy of the receipt for the taxes paid, or a copy of any repayment agreement. Proof must be received within three working days. If not received, the borrower will be contacted and the file reviewed with the foreclosure Supervisor/Manager

Tax advances over \$5,000.00 must be approved by the department supervisor/manager. A Review Committee must approve any tax advances over \$10,000.00

Any additional advance payments or fee payments must be approved by investor and/or by supervisor/manager in advance

Note: The attorney must approve all tax advances after judgment has been entered. In some states advances after judgment cannot be recovered

9.8. Environmental Issues (12/2/2009 4:08:21 PM)

While a loan is in foreclosure, property inspections, Brokers Price Opinions or Appraisals will be ordered to establish property condition or value. Another purpose is to determine whether any conditions exist on the property that could expose Provident Funding to environmental risk if the property is acquired.

The Property Preservation specialist is responsible for reviewing the inspections report when it is received.

When the inspection or valuation is received, review the Comment section pertaining to location and/or use of the property. The following may indicate an environmental issue or concern:

- Properties within a one-mile radius of a Superfund site
- Property adjacent to a refuse or waste disposal site
- Warehouse facilities for storage of chemicals or petroleum products
- Manufacturing facilities
- Properties adjacent to, gas stations, car washes, salvage/wrecking yards, automotive repair facilities, dry cleaners, print shops, metal shops
- Properties within 2000 feet of an oil refinery

Review the Comment section pertaining to the condition of the property. The following:

- Above ground storage tanks
- Any mention of hazardous waste
- Stained soils
- Asbestos
- Radioactive material
- Pesticides, paints or herbicides
- Polychlorinated biphenyls
- Radon

If any of the above issues are noted, Property Preservation specialist to inform foreclosure specialist assigned on the file, who then will inform assigned attorney/trustee about the issues.

An Environmental Hazard Detection Report (EHDR) will be ordered from the property inspection company. This is a general report for potential hazards including, chemicals, storage tanks and land usage.

Upon receipt of the inspection, the results will be reviewed with the foreclosure manager.

The file will then be presented to a Review Committee of others, i.e. Legal, SVP, Default Supervisor, VP etc. At that time a determination will be made if any legal issues may exist regarding our liability, before proceeding with a Phase I environmental site assessment.

We may also become aware of environmental risk during a conversation with the borrower.

Under no circumstances should a Provident Funding employee advise borrowers or influence their decision regarding environmental risk matters, especially in regard to the disposal of any toxic material known to be on the property.

If the borrower has told the employee that there may be possible environmental risk on a property, advise the foreclosure supervisor/manager. A decision will be made if an Environmental Hazard Detection Report (EHDR) needs to be ordered.

If, an Environmental Hazard Detection Report (EHDR) is required and is ordered, upon receipt:

The Review Committee and/or the legal department will determine if a Phase I environmental site assessment is necessary, order the Phase I. The Phase I will determine if the site may be contaminated with hazardous or toxic substances or wastes because of current or past site activities, unauthorized dumping or disposal, or migration of contaminants from adjacent or nearby properties.

Note: At a minimum, a Phase I study should include:

- A review of historical records

- A review of readily available files and databases maintained by regulatory agencies
- A field reconnaissance of the subject site and adjacent properties

If potential contamination or contamination sources are identified by these three tasks, the site's environmental setting should also be characterized with readily available data

If a Phase I study is completed, it will be forwarded to the foreclosure manager

The foreclosure manager will review it with the default manager to determine if a problem exists

If the Phase I study results recommend a Phase II, the file will be referred to legal and senior management for review

The cost of Phase II, the asset value and the potential cost to correct the problem will be evaluated to determine the next course of action (charge-off or acquisition)

The typical pooling and servicing agreements include the following statement pertaining to properties with environmental hazards "Notwithstanding the foregoing, prior to instituting foreclosure proceedings or accepting a deed-in-lieu of foreclosure with respect to any Mortgaged Property, the Master Servicer shall make, or cause to be made, inspection of the Mortgaged Property in accordance with the Accepted Servicing Practices and, with respect to environmental hazards, such procedures as required by the provisions of the Federal National Mortgage Association's selling and servicing guide applicable to single-family homes and in effect on the date hereof. The Master Servicer shall be entitled to rely upon the results of any such inspection made by others. In cases where the inspection reveals that such Mortgaged Property is potentially contaminated with or affected by hazardous wastes or hazardous substances, the Master Servicer shall promptly give written notice of such fact to the Certificate Insurer, the Trustee and each Class A Certificate holder. The Master Servicer shall not commence foreclosure proceedings or accept a deed-in-lieu of foreclosure for Mortgaged Property with respect to this paragraph without obtaining the written consent of the Certificate Insurer

9.9. Valuations/BPO's and Appraisals (12/2/2009 4 08 53 PM)

To establish the Current Fair Market Value of a property, a BPO (Broker's Price Opinion) and/or appraisal is ordered on loans during the foreclosure process. The Fair Market Value will be used in preparing the bidding instructions for the attorney/trustee and/or performing a loss analysis.

The approximate date to order a value is 30 days prior to the FC sale.

On all the loans where RFC is the investor, BPO must be ordered within 30 days of the first legal action.

BPO must be ordered via www.bpodirect.com on all Freddie Mac loans. On all the loans where Freddie is not the investor, order BPO from www.nvs.disposolutions.com.

The type of valuation ordered is a BPO in most cases, and an appraisal if it becomes an REO.

If the request for a BPO, take into consideration and /or include the following:

If the BPO is to be ordered with photos
 Is the BPO to be ordered with access to the property
 Is the BPO to be ordered with both access and photos
 What type of form is to be used?
 Property Type
 Listing agent (if applicable)
 Listing agent phone number (if applicable)
 Pending foreclosure sale
 Any comments related to the property or FC

If the request for a Appraisal, take into consideration and /or include the following:

If ordering drive by appraisal
 If ordering full interior appraisal
 What type of form to be used
 Property type
 Listing agent (if applicable)
 Listing agent phone number (if applicable)
 Pending foreclosure
 Any comments related to the property or FC

9.10. Bidding Instructions, MI Approval (12/2/2009 4 09 20 PM)

All loans in foreclosure with active MI policies must have Bidding Instructions approved by the MI Company policy holder before their submission to an attorney.

It is the responsibility of the foreclosure specialist handling the file to submit the prepared bidding instructions to the MI companies to obtain their approval of the bid.

9.11. Foreclosure Bidding Instructions (12/2/2009 4 10 14 PM)

Provident Funding Associates, L.P. must provide the foreclosure attorney or Trustee with bidding instructions for the foreclosure sale/auction. In order to determine the correct bid, a number of factors are to be considered. The location of the property, the loan type, the mortgage insurer and the investor all play a role in determining the bid. Bidding instructions should be in compliance with all investor, agency and state requirements. Failure to provide the correct bid to the foreclosure attorney or Trustee can result in significant loss to the Company.

Determine if there are specific bidding instructions for the investor and MI Company.

A bidding form will be completed and include all applicable information.

Instructions will be provided to the attorney/trustee and a copy retained in the FC file

9.12. IRS Reporting (8/22/2005 8 58 21 AM)

IRS regulations require that information returns be filed when Provident Funding, or the owner of record acquires an interest in a property in full or partial satisfaction of the secured debt or when we have reason to know that a property has been abandoned (Sales to third party bidders are also reported)

Loans in warehouse, 1099A reporting will be reported under PF's tax identification number, 77-0323586

Loans owned by FreddieMac, FannieMae and other investors will be reported under that investors name

After an event that triggers a reporting requirement occurs, the information must be reported to the IRS before February 28 of the year following the calendar year in which the event occurred

Provident Funding must furnish the mortgagor with a completed IRS Form 1099A statement on or before January 31 of that year The form must show Provident Funding's or the owner/investor name and address, and include a statement that the information is being reported to the IRS

Various scenario's are considered and handled differently

The foreclosure sale has been held and there is no redemption/confirmation period
The foreclosure sale has been held and there is a redemption/confirmation period
A deed-in-lieu of foreclosure has recorded

9.13. Ordering Loan Documents (8/22/2005 8 59 12 AM)

Upon expiration of the breach letter and no resolution to the delinquency can be obtained, the loan is immediately referred to the appropriate Foreclosure attorney or Trustee In some cases original loan documents are required to file the initiation of foreclosure However, in most states, we may provide the attorney/trustee with copies of the loan documents

Original Notes are retained by the investor's assigned custodian and the original Deed and Title policy are retained in house

Copies are retained in the original base file The base files are retained on site or in an off-site storage facility

The documents will be ordered from and returned to the applicable parties

9.14. Property Inspections (10/11/2007 11 21 29 AM)

When a loan is in Foreclosure, a property inspection is required (Exhibit COLL09) The premises must be inspected to determine the physical condition and the occupancy status

Timing

The inspection must be made between the 45th and 60th day of delinquency and every month thereafter until satisfactory arrangements have been made

Type

A drive by inspections will be ordered for loans in Foreclosure and Preforeclosure A contact inspection will be ordered on all other loans

Results

The results of each inspection will be documented on the Property Inspection screen
Any property that is vacant or in poor condition will be reviewed further and brought to the attention of the department supervisor
Vacancies will be reported to the Insurance department to determine necessary coverage

Fees/costs

The inspection cost will be assessed to each loan at a loan level Upon reinstatement the fee will be collected

Bills/Invoices

Invoices will be reviewed for accuracy and discrepancies will be discussed with management All bills will be paid promptly

9.15. Quoting Payoff for Loans in Foreclosure (8/22/2005 9 01 03 AM)

The foreclosure processor is responsible for coordinating payoff requests received directly from borrowers, attorneys and other lien holders, while the loan is in foreclosure It is the policy of Provident Funding Associates, L P to require all requests for payoff figures to be in writing, and processed through the Payoff Department

The processor is responsible for the correct calculations of payoff figures and quoting them to the appropriate parties

If a request for payoff figure is received from the borrower or lien holder, the processor will determine what effective date (if different from current date) should be used for calculations

The payoff statement must be produced by the FC Processor and provided to the Foreclosure processor for referral to the attorney/trustee

If a payoff request is received from the attorney, figures should be provided directly to them The total due should be calculated without their fees included (this of course would only be outstanding fees not paid previously out of corporate advance)

Payoff MUST include Principal Balance, Interest due, Late Charges, NSF, Legal Fees, Other Fees (i e BPO, Appraisal, Property Inspection etc), applicable payoff fees and take into consideration and funds in unapplied

9.16. Quoting Reinstatement for Loans in Foreclosure (8/22/2005 9 01 44 AM)

The processor is responsible for the correct calculations of reinstatement figures and quoting them to the appropriate parties

If a request for reinstatement figures is received from the borrower or lien holder, the processor will determine what effective date (if different from current date) should be used for calculations

If a reinstatement request is received from the attorney, figures should be provided directly to them. The total due should be calculated without their fees included (this of course would only be outstanding fees not paid previously out of corporate advance)

Reinstatement MUST include all Payments, Late Charges, NSF, Legal Fees, Other Fees (i.e. BPO, Appraisal, Property Inspection etc.), and take into consideration and funds in unapplied

9.17. Reporting Foreclosure Status to MI Companies (8/22/2005 9 06 21 AM)

When a borrower defaults on a loan and the loan has Mortgage Insurance (MI), the delinquency must be reported to the appropriate MI Companies. Typically, the first reporting will occur when the loan becomes 3 to 4 months past due. Provident Funding's policy is to notify the MI Companies at approximately 65 days past due utilizing the standard Notice of Default form. These forms will be produced monthly on loans that meet the criteria, the loans will be documented and the forms mailed to the appropriate MI Companies

In addition, if a loan remains delinquent, and the loan is referred to Foreclosure, the status of that loan must be reported to the MI Company until the loan becomes an REO or is cured. The Monthly Delinquency Status form will be completed each month and forwarded to the MI Company

9.18. Returned Mail (8/22/2005 9 15 48 AM)

The mailroom will forward all mail that was returned from the post office as undelivered, related to loans in Foreclosure, to the Foreclosure department staff

If there is a new mailing address on the returned item, the responsible person in the collection department will determine if the letter is still valid and should be forwarded to the address. If so, the address will be changed on our system, the item forwarded and a notation made of such

The address may be changed with no further action if the following conditions are met
The loan is a Second Home or Non-Owner Occupied Refinance or Purchase
OR
The loan is more than one year old

The address may be changed and a notification must be sent
IF
The loan is an Owner Occupied property
AND
The loan is less than one year old

All other items returned, (i.e. Insufficient address, No such address, Moved left no address, Unclaimed etc.), will be noted on the comment screen. A note will be made as to the item that was returned and the reason for the return

Depending on the status of the foreclosure and the item returned, the Foreclosure attorney may need to be notified

9.19. Reviewing the TSG/Title (8/22/2005 9 16 43 AM)

The foreclosure attorney or Trustee obtains title reports, Trustee Sale Guarantees or Title Abstracts during the foreclosure process. The initial title rundown is a continuation from the time the loan originated to the time the first legal action is filed. The title report reflects all matters that affect the property being foreclosed. Items such as liens senior or junior to the Deed/Mortgage, judgments, IRS liens, property taxes and notification/service requirements are all reflected here. Additional updates are ordered when necessary, as the foreclosure process continues. These are known as "title continuation reports" or "date-downs"

When a title report is received, it must be thoroughly reviewed. Any problems that reflect on the report must be corrected prior to the foreclosure sale

Items to be reviewed are as follows

- Has there been any change in ownership
- Status of property taxes
- Do any other liens exist
- Review the beneficial interest
- Are there any other liens and/or judgments
- Is there an HOA

If any adverse matters exist, the TSG and specific issues will be brought to the immediate attention of management for further action

9.20. Short Payments for Loans in Foreclosure (8/22/2005 9 17 41 AM)

The processor will determine if the funds are sufficient to bring the loan current. If the funds are sufficient, the funds will be immediately applied to the loan and the Foreclosure attorney will be immediately notified to close the case

If the funds are not sufficient the processor must review the loan history and comments to determine if any arrangements were previously made to accept the short payment. If arrangements were not made between the borrower and the Foreclosure department or attorney, the processor must then contact the borrower to discuss

The processor must determine the following

Why the required payment amount in full was not sent?
 Will the borrower be sending in the balance and when?
 Is the borrower experiencing any financial difficulty?

Discuss with the borrower the importance of remitting the difference as soon as possible in order to avoid continued foreclosure activity. If the borrower is experiencing a financial hardship, discuss with the borrower arrangements to remit the difference. If the borrower is unable to pay or cannot continue to remit the full, required monthly mortgage payments in the future, they will need to begin discussions on available workout options.

If sufficient efforts have been made to reach the borrower regarding the short funds and no contact is made, the loan will be referred to the department Supervisor for review. If it is determined that no further efforts would result in the collection of funds, then the funds will be returned to the borrower with an explanation.

9.21. Valuations/BPO's and Appraisals (8/22/2005 9 18 56 AM)

To establish the Current Fair Market Value of a property, a BPO (Broker's Price Opinion) and/or appraisal is ordered on loans during the foreclosure process. The Fair Market Value will be used in preparing the bidding instructions for the attorney/trustee and/or performing a loss analysis.

The approximate date to order a value is 30 days prior to the FC sale.
 The type of valuation ordered is a BPO in most cases, and an appraisal if it becomes an REO.

If the request for a BPO, take into consideration and /or include the following:

If the BPO is to be ordered with photos
 Is the BPO to be ordered with access to the property
 Is the BPO to be ordered with both access and photos
 What type of form is to be used
 Property Type
 Listing agent (if applicable)
 Listing agent phone number (if applicable)
 Pending foreclosure sale
 Any comments related to the property or FC

If the request for a Appraisal, take into consideration and /or include the following:

If ordering drive by appraisal
 If ordering full interior appraisal
 What type of form to be used
 Property type
 Listing agent (if applicable)
 Listing agent phone number (if applicable)
 Pending foreclosure
 Any comments related to the property or FC

9.22. Bidding Instructions, MI Approval (4/14/2006 1 09 21 PM)

All loans in foreclosure with active MI policies must have Bidding Instructions approved by the MI Company policy holder before their submission to an attorney.

It is the responsibility of the foreclosure processor handling the file to submit the prepared bidding instructions to the MI companies to obtain their approval of the bid.

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FORECLOSURE REVIEW WORKSHEET

Loan Number: 4917100040 Date: 9/15/2010
Property Address: 8254 ETHAN DR , FISHERS, IN 46038
Due Date: 7/1/2010
First Payment Date: 12/1/2007
Demand Date: 8/13/2010
UPB: \$180,502.49
Original Balance: \$189,000.00
Original LTV: 90.0000%
Investor: FHLMC
Product: Conforming 30 Yr
MI: MGIC
Recourse: No
Property Type: PUD
Hold 1st and 2nd Liens: No

CHECKLIST

Unapplied Balance: \$0.00
Payment after Demand Letter: No
Payoff: No
Repay/FB: No
Bankruptcy: No
Military: No
Loan Sold: No

Borrower Contact: Yes
Date of Last Collection Call: 9/13/2010
Date of Last Contact: 9/23/2009
Reason for Default: Abandonment of Property
Loss Mit Sent: 3/2/2009

Foreclosure Representative: _____ Date: _____

Supervisor: _____ Date: _____

Provident Funding®
The Mortgage Price Leader

April 6, 2011

Standard & Poor's

RE: Servicer monitoring of foreclosure processes

To Whom It May Concern;

Provident Funding Associates, L.P., ("Provident Funding"), has engaged our auditors, Moss Adams, to perform certain agreed-upon procedures to assist management of Provident Funding in evaluating the effectiveness of our policies and internal controls around foreclosure processing. While Provident Funding does maintain an internal audit function within our loan servicing division, management deemed it appropriate to engage our auditors to assist in this process, in response to Standard & Poor's publication dated December 9, 2010

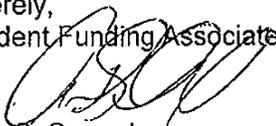
Enclosed for your review, is the report issued by Moss Adams in connection with this review, dated April 6, 2011. Their report also includes a detailed worksheet that identifies the sample selected by them and the results of the individual tests performed related to each foreclosure in the sample. Management would point out to Standard & Poor's that Moss Adams had no errors identified in their testing.

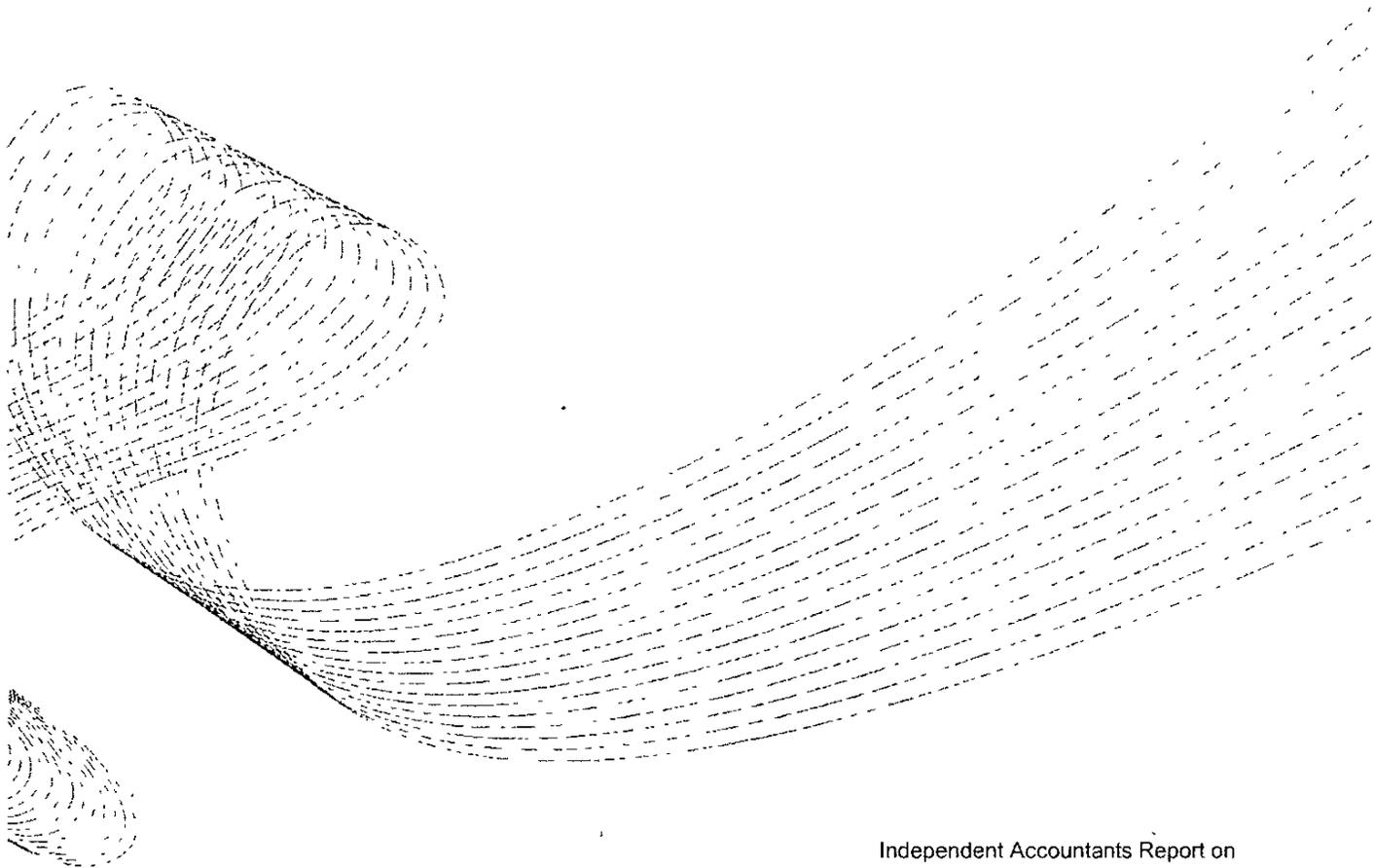
As noted previously by Provident Funding in information prepared in response to inquiry by the Iowa Attorney General, (a copy of which is attached and was previously provided to Standard & Poor's), Provident Funding's policies and procedures and system of internal controls are designed to be in compliance with individual state laws governing foreclosure processes. Further, the system of internal controls includes procedures for monitoring the foreclosure process throughout, and for curing any deficiencies which may result during the process.

Management would note that given Provident Funding's low delinquency rates relative to other larger servicers, the sheer volume of loans in the foreclosure process at any given time is insignificant relative to such other servicers, therefore Provident Funding is able to ensure that individual attention is given to each foreclosure action by a designated foreclosure specialist throughout the process, resulting in no deficiencies in our foreclosure affidavit preparation and attestation processes.

We would welcome any questions you may have regarding the information included herein.

Sincerely,
Provident Funding Associates, L.P.


Adam S. Carmel
EVP, Loan Servicing



Independent Accountants Report on
Applying Agreed-Upon Procedures
Provident Funding Associates, L.P.

For the period of January 1, 2009, through September 30, 2010

MOSS ADAMS LLP

Certified Public Accountants | Business Consultants

Acumen. Quality Answers.

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**INDEPENDENT ACCOUNTANTS REPORT ON
 APPLYING AGREED-UPON PROCEDURES**

To the Management
 Provident Funding Associates, L P

We have performed the procedures that are enumerated below, which were agreed to by the management of Provident Funding Associates, L P (PFA), solely to assist you in evaluating your compliance with proper foreclosure affidavit and document attestation processes as outlined in the Standard and Poor's (S & P) Global Credit Portal RatingDirect, dated December 9, 2010

The management of PFA is responsible for the information included in Schedule I and Schedule II (Schedules) This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants The sufficiency of these procedures is solely the responsibility of PFA Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose

All documentation and information obtained in performing the procedures were obtained from the management of PFA, unless otherwise specified The agreed-upon procedures, and the results of those procedures, were as follows

We obtained foreclosure policies and procedures from PFA over the foreclosure documentation process and tested management's compliance with section 9 2 and 9 5 by performing the following

We obtained from management, a listing by state, of all foreclosures processed for the period from January 1, 2009, to September 30, 2010 (Population consists of 3,483 foreclosures as enumerated on a PFA-provided foreclosure report) From the listing we performed the following

- a) Selected the top ten states that have the largest number of foreclosure filings (the ten states account for 80 6 % of all foreclosures - 2,809 out of 3,483)
- b) Agreed the total foreclosed loans per state to the listing of total foreclosures Randomly selected three loans from each of the top ten states for additional testing Randomly selected loans so as to include a sample from various foreclosure specialists and a sample from different attorneys within each of the top ten states Using this sample of loans, we performed additional tests for compliance with PFA foreclosure policies as described below

Results - See schedule II for loans selected for testing

We obtained a current (through March 18, 2011) loan history report generated from the servicing system for each selected loan, obtained a copy of the signed Note, and agreed the following items contained in the loan history report to the copy of the signed Note

- a) Loan number
- b) Borrower name
- c) Interest rate
- d) Payment amount

Results - See schedule II Step {A} for testing - no exceptions noted

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We obtained a copy of the recorded Deed of Trust or Mortgage and agreed the following items to the copy of the signed Note

- a) Borrower name
- b) Property address
- c) Original loan amount

Results - See schedule II Step {B} for testing - no exceptions noted

We obtained a copy of the recorded Notice of Substitution of Trustee or Quit Claim Deed and agreed the following items to the copy of the recorded Deed of Trust

- a) Borrower name
- b) Property address or legal property description

Results - See schedule II Step {C} for testing - no exceptions noted

We obtained an internal listing of approved foreclosure specialists and an internal list of notaries employed by PFA from management and a copy of the Warranty Deed, Affidavit of Prove-Up, or Assignment of Deed and performed the following procedures

- a) Agreed the legal property description included in the Warranty Deed, Affidavit of Prove-Up, or Assignment of Deed to the legal property description recorded in the Deed of Trust
- b) Noted approval of documents evidenced by foreclosure specialist's signature on copy of Warranty Deed, Affidavit of Prove-Up, or Assignment of Deed
- c) To the extent the documents were notarized, noted notary signature contained in notary stamp (or acknowledgement) and affixed to the document. Also noted that notary term had not expired and notary was an employee of PFA
- d) Agreed principal balance, interest rate, and default date to the loan history report

Results - See schedule II Step {D} for testing - no exceptions noted

We obtained a copy of the 30-day demand letter sent to the borrower identified in our loan selection and performed the following

- a) Agreed the loan number and property address to a copy of the signed Note
- b) Confirmed that demand letter date was at least 30 days prior to the date of the referral letter obtained below in the next testing section

Results - See schedule II Step {E} for testing - no exceptions noted

We obtained copy of the attorney referral letter for each loan selected and performed the following

- a) Agreed original loan contained in the referral letter to the amount contained in a copy of the Deed of Trust
- b) Agreed date interest paid to, unpaid principal balance, monthly payment, and monthly late charge to the loan history report
- c) Agreed the interest rate included in the referral letter to a copy of the signed Note
- d) Agreed attorney used to the approved foreclosure attorneys provided by PFA's servicing system

Results - See schedule II Step {F} for testing - no exceptions noted

We were not engaged to and did not conduct an audit, the objective of which would be the expression of an opinion on the information contained in the accompanying Schedules. Accordingly, we do not express

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such an opinion. Had we performed additional procedures, other matters may have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the management of Provident Funding Associates, L.P., and Standard and Poor's, and is not intended to be, and should not be, used by or disclosed to anyone other than these parties without our prior written authorization.

Moss Adams LLP

San Francisco, California
April 6, 2011

SCHEDULE I

Section 9: Foreclosure Policies

9.1. Foreclosure Approval (12/2/2009 3:59:04 PM)

Unless arrangements have been made to bring the loan current or a formal workout is in process, then the initiation of Foreclosure should begin by the 165th day of delinquency.

Upon the expiration of the 30-day demand/Breach letter, foreclosure manager to assign foreclosure eligible list to foreclosure specialists within 2 business days of the expiration. The foreclosure specialist to go through their assigned list and review foreclosure worksheet to verify eligibility of the loan for referral. Once the foreclosure specialist reviews through the worksheet, the file becomes ready for referral. Foreclosure specialist to refer file to the appropriate foreclosure attorney. However, while reviewing the file, if foreclosure specialist finds any issues or certain activity did not take place and further work is necessary, they are responsible to bring up such cases to foreclosure manager. Foreclosure manager will then review the file and take appropriate action to resolve the issue.

9.2. Ordering Loan Documents (12/2/2009 3:59:15 PM)

Upon expiration of the breach letter and no resolution to the delinquency can be obtained, the loan is immediately referred to the appropriate Foreclosure attorney or Trustee. In some cases original loan documents are required to file the initiation of foreclosure. However, in most states, we may provide the attorney/trustee with copies of the loan documents.

- Original Notes are retained by the Investor's assigned custodian and the original Deed and Title policy are retained in house.
- Copies are retained in the Proviscan system, which is a virtual storage system of files. The original files can be retained on site or in an off-site storage facility.

The documents will be ordered from and returned to the applicable parties. Requestor must record the tracking number while receiving documents and while mailing out documents.

9.3. Follow up and Managing Foreclosure Timelines (12/2/2009 3:59:32 PM)

The processor will be responsible for timely follow up on each process during the Foreclosure. Any delays by a vendor or attorney will be brought to the attention of management immediately. Management will produce weekly and monthly reports to review the status of loans in FC.

9.4. Monitoring Foreclosure Events (12/2/2009 3:59:51 PM)

All foreclosure specialists to monitor foreclosure events on daily basis to make sure that all the follow ups are done on regular basis with attorney/trustee.

Foreclosure manager to track team's progress on completing foreclosure events on daily and weekly basis.

9.5. Completing FC Documents (12/2/2009 4:00:15 PM)

When a Foreclosure has been initiated it may be necessary to provide the Attorney/Trustee with signed and/or notarized documents to proceed with the foreclosure action. The documents may include Substitution of Trustee, Affidavit of Military Status, Assignment of Mortgage, Assignment of Deed, Affidavit of debt, etc. It is imperative that these documents are executed accurately and returned to the requestor within 48 hours.

Ensure that the mortgage information is correct i.e. loan number, borrower information, mortgage information, beneficiary, etc.

Note: The Attorney/Trustee Office will complete certain information on the document.

Signature information is typed on the document and submitted for signature by an officer of the Company. Occasionally there will be a requirement for a Witness Signature. This Signature can be signed by a Supervisor as well as a foreclosure specialist.

Once signatures are obtained, a Notary in the company must notarize the document.

Copies of executed document(s) are scanned in the system for records, and the executed and notarized document is then returned to the requestor via overnight mail to ensure timely return. Tracking number is to be noted in the system.

9.6. Loss Mitigation and Foreclosure Action (12/2/2009 4:00:38 PM)

The Loss Mitigation Department's goal is to reduce loss to the company, investors and insurers. Foreclosure and REO are costly, therefore alternative options to foreclosure necessary in order to minimize the loss to Provident Funding Associates, L.P. and its investors.

Diligent/Proactive efforts will be made to pursue workout options during the foreclosure.

Periodic calls will be made throughout the foreclosure process to solidify the borrowers and determine if their circumstances have changed and to discuss possible workout solutions.

Periodic mailings will take place throughout the foreclosure process in an attempt to reach the borrower and try to determine if the borrowers' circumstances have changed and to discuss possible workout solutions.

Loss Mitigation team will constantly be working and dealing with borrower to provide any assistance upon request. If the loss mitigation specialist feels that a workout is feasible, they will review the case with management, then refer and discuss with the investor and/or MI Company in order to receive approval on workout option and to determine if the foreclosure should be placed on hold.

9.7. Delinquent Taxes (12/2/2009 4:01:02 PM)

The status of property taxes must always be reviewed when a loan is in foreclosure. Failure to pay delinquent taxes could result in our security being

http://pfnet.provident.com/policy_uw/policy.aspx?type=&ProgramSection=27&Section=9&showEdit=0 10/14/2010

extinguished (wiped out) should a tax sale be held

For escrowed loans, the tax department will continue to advance the taxes until the foreclosure sale

For non-escrowed loans, the decision to advance taxes is made case-by-case. Failure to pay delinquent taxes could result in our security being extinguished (wiped out) should a tax sale be held

Tax department to pay all DC/Due taxes 7-10 days prior to foreclosure sale date

If a borrower says the taxes have been paid or they are on a payment plan with the county they will be required to provide a copy of the receipt for the taxes paid, or a copy of any repayment agreement. Proof must be received within three working days. If not received, the borrower will be contacted and the file reviewed with the foreclosure Supervisor/Manager

Tax advances over \$5,000.00 must be approved by the department supervisor/manager. A Review Committee must approve any tax advances over \$10,000.00

Any additional advance payments or fee payments must be approved by investor and/or by supervisor/manager in advance

Note: The attorney must approve all tax advances after judgment has been entered. In some states advances after judgment cannot be recovered

9.8. Environmental Issues (12/2/2009 4:08:21 PM)

While a loan is in foreclosure, property inspections, Brokers Price Opinions or Appraisals will be ordered to establish property condition or value. Another purpose is to determine whether any conditions exist on the property that could expose Provident Funding to environmental risk if the property is acquired

The Property Preservation specialist is responsible for reviewing the inspections report when it is received

When the inspection or valuation is received, review the Comment section pertaining to location and/or use of the property. The following may indicate an environmental issue or concern:

- Properties within a one-mile radius of a Superfund site
- Property adjacent to a refuse or waste disposal site
- Warehouse facilities for storage of chemicals or petroleum products
- Manufacturing facilities
- Properties adjacent to, gas stations, car washes, salvage/wrecking yards, automotive repair facilities, dry cleaners, print shops, metal shops
- Properties within 2000 feet of an oil refinery

Review the Comment section pertaining to the condition of the property. The following:

- Above ground storage tanks
- Any mention of hazardous waste
- Stained soils
- Asbestos
- Radioactive material
- Pesticides, paints or herbicides
- Polychlorinated biphenyls
- Radon

If any of the above issues are noted, Property Preservation specialist to inform foreclosure specialist assigned on the file, who then will inform assigned attorney/trustee about the issues

An Environmental Hazard Detection Report (EHDR) will be ordered from the property inspection company. This is a general report for potential hazards including chemicals, storage tanks and land usage

Upon receipt of the inspection, the results will be reviewed with the foreclosure manager

The file will then be presented to a Review Committee of others, i.e. Legal, SVP, Default Supervisor, VP, etc. At that time a determination will be made if any legal issues may exist regarding our liability before proceeding with a Phase I environmental site assessment

We may also become aware of environmental risk during a conversation with the borrower

Under no circumstances should a Provident Funding employee advise borrowers or influence their decision regarding environmental risk matters, especially in regard to the disposal of any toxic material known to be on the property

If the borrower has told the employee that there may be possible environmental risk on a property, advise the foreclosure supervisor/manager. A decision will be made if an Environmental Hazard Detection Report (EHDR) needs to be ordered

If an Environmental Hazard Detection Report (EHDR) is required and is ordered, upon receipt

The Review Committee and/or the legal department will determine if a Phase I environmental site assessment is necessary, order the Phase I. The Phase I will determine if the site may be contaminated with hazardous or toxic substances or wastes because of current or past site activities, unauthorized dumping or disposal, or migration of contaminants from adjacent or nearby properties

Note: At a minimum, a Phase I study should include

- A review of historical records

- A review of readily available files and databases maintained by regulatory agencies
- A field reconnaissance of the subject site and adjacent properties

If potential contamination or contamination sources are identified by these three tasks, the site's environmental setting should also be characterized with readily available data.

If a Phase I study is completed, it will be forwarded to the foreclosure manager.

The foreclosure manager will review it with the default manager to determine if a problem exists.

If the Phase I study results recommend a Phase II, the file will be referred to legal and senior management for review.

The cost of Phase II, the asset value and the potential cost to correct the problem will be evaluated to determine the next course of action (charge-off or acquisition).

The typical pooling and servicing agreements include the following statement pertaining to properties with environmental hazards: "Notwithstanding the foregoing, prior to instituting foreclosure proceedings or accepting a deed-in-lieu of foreclosure with respect to any Mortgaged Property, the Master Servicer shall make, or cause to be made, inspection of the Mortgaged Property in accordance with the Accepted Servicing Practices and with respect to environmental hazards, such procedures as required by the provisions of the Federal National Mortgage Association's selling and servicing guide applicable to single-family homes and in effect on the date hereof. The Master Servicer shall be entitled to rely upon the results of any such inspection made by others. In cases where the inspection reveals that such Mortgaged Property is potentially contaminated with or affected by hazardous wastes or hazardous substances, the Master Servicer shall promptly give written notice of such fact to the Certificate Insurer, the Trustee and each Class A Certificate holder. The Master Servicer shall not commence foreclosure proceedings or accept a deed-in-lieu of foreclosure for Mortgaged Property with respect to this paragraph without obtaining the written consent of the Certificate Insurer."

9.9. Valuations/BPO's and Appraisals (12/2/2009 4:08:53 PM)

To establish the Current Fair Market Value of a property, a BPO (Broker's Price Opinion) and/or appraisal is ordered on loans during the foreclosure process. The Fair Market Value will be used in preparing the bidding instructions for the attorney/trustee and/or performing a loss analysis.

The approximate date to order a value is 30 days prior to the FC sale.

On all the loans where RFC is the investor, BPO must be ordered within 30 days of the first legal action.

BPO must be ordered via www.bpodirect.com on all Freddie Mac loans. On all the loans where Freddie is not the investor, order BPO from www.nvs.dispositions.com.

The type of valuation ordered is a BPO in most cases and an appraisal if it becomes an REO.

If the request for a BPO, take into consideration and/or include the following:

If the BPO is to be ordered with photos
Is the BPO to be ordered with access to the property
Is the BPO to be ordered with both access and photos
What type of form is to be used
Property Type
Listing agent (if applicable)
Listing agent phone number (if applicable)
Pending foreclosure sale
Any comments related to the property or FC

If the request for a Appraisal, take into consideration and/or include the following:

If ordering drive by appraisal
If ordering full interior appraisal
What type of form to be used
Property type
Listing agent (if applicable)
Listing agent phone number (if applicable)
Pending foreclosure
Any comments related to the property or FC

9.10. Bidding Instructions, MI Approval (12/2/2009 4:09:20 PM)

All loans in foreclosure with active MI policies must have Bidding Instructions approved by the MI Company policy holder before their submission to an attorney.

It is the responsibility of the foreclosure specialist handling the file to submit the prepared bidding instructions to the MI companies to obtain their approval of the bid.

9.11. Foreclosure Bidding Instructions (12/2/2009 4:10:14 PM)

Provident Funding Associates, L.P. must provide the foreclosure attorney or Trustee with bidding instructions for the foreclosure sale/auction. In order to determine the correct bid, a number of factors are to be considered. The location of the property, the loan type, the mortgage insurer and the investor all play a role in determining the bid. Bidding instructions should be in compliance with all investor, agency and state requirements. Failure to provide the correct bid to the foreclosure attorney or Trustee can result in significant loss to the Company.

Determine if there are specific bidding instructions for the investor and MI Company.

A bidding form will be completed and include all applicable information.

Instructions will be provided to the attorney/trustee and a copy retained in the FC file

9.12. IRS Reporting (8/22/2005 8:58:21 AM)

IRS regulations require that information returns be filed when Provident Funding or the owner of record acquires an interest in a property in full or partial satisfaction of the secured debt or when we have reason to know that a property has been abandoned. (Sales to third party bidders are also reported.)

Loans in warehouse, 1099A reporting will be reported under PF's tax identification number, 77-0323586

Loans owned by FreddieMac, FannieMae and other investors will be reported under that investor's name

After an event that triggers a reporting requirement occurs, the information must be reported to the IRS before February 28 of the year following the calendar year in which the event occurred

Provident Funding must furnish the mortgagee with a completed IRS Form 1099A statement on or before January 31 of that year. The form must show Provident Funding's or the owner/investor's name and address, and include a statement that the information is being reported to the IRS.

Various scenarios are considered and handled differently:

The foreclosure sale has been held and there is no redemption/confirmation period.
The foreclosure sale has been held and there is a redemption/confirmation period.
A deed-in-lieu of foreclosure has recorded.

9.13. Ordering Loan Documents (8/22/2005 8:59:12 AM)

Upon expiration of the breach letter and no resolution to the delinquency can be obtained, the loan is immediately referred to the appropriate Foreclosure attorney or Trustee. In some cases, original loan documents are required to file the initiation of foreclosure. However, in most states, we may provide the attorney/trustee with copies of the loan documents.

Original Notes are retained by the investor's assigned custodian and the original Deed and Title policy are retained in house.

Copies are retained in the original base file. The base files are retained on site or in an off-site storage facility.

The documents will be ordered from and returned to the applicable parties.

9.14. Property Inspections (10/11/2007 11:21:29 AM)

When a loan is in foreclosure, a property inspection is required (Exhibit COLL09). The premises must be inspected to determine the physical condition and the occupancy status.

Timing

The inspection must be made between the 45th and 60th day of delinquency and every month thereafter until satisfactory arrangements have been made.

Type

A drive-by inspection will be ordered for loans in foreclosure and preforeclosure. A contact inspection will be ordered on all other loans.

Results

The results of each inspection will be documented on the Property Inspection screen. Any property that is vacant or in poor condition will be reviewed further and brought to the attention of the department supervisor. Vacancies will be reported to the insurance department to determine necessary coverage.

Fees/costs

The inspection cost will be assessed to each loan at a loan level. Upon reinstatement, the fee will be collected.

Bills/invoices

Invoices will be reviewed for accuracy and discrepancies will be discussed with management. All bills will be paid promptly.

9.15. Quoting Payoff for Loans in Foreclosure (8/22/2005 9:01:03 AM)

The foreclosure processor is responsible for coordinating payoff requests received directly from borrowers, attorneys and other lien holders, while the loan is in foreclosure. It is the policy of Provident Funding Associates, L.P. to require all requests for payoff figures to be in writing and processed through the Payoff Department.

The processor is responsible for the correct calculations of payoff figures and quoting them to the appropriate parties.

If a request for payoff figure is received from the borrower or lien holder, the processor will determine what effective date (if different from current date) should be used for calculations.

The payoff statement must be produced by the FC Processor and provided to the Foreclosure processor for referral to the attorney/trustee.

If a payoff request is received from the attorney, figures should be provided directly to them. The total due should be calculated without their fees included (this of course would only be outstanding fees not paid previously out of corporate advance).

Payoff MUST include Principal Balance, Interest due, Late Charges, NSF, Legal Fees, Other Fees (i.e. BPO, Appraisal, Property Inspection, etc.), applicable payoff fees and take into consideration and funds in unapplied.

9.16. Quoting Reinstatement for Loans in Foreclosure (8/22/2005 9 01 44 AM)

The processor is responsible for the correct calculations of reinstatement figures and quoting them to the appropriate parties.

If a request for reinstatement figures is received from the borrower or lien holder, the processor will determine what effective date (if different from current date) should be used for calculations.

If a reinstatement request is received from the attorney, figures should be provided directly to them. The total due should be calculated without their fees included (this of course would only be outstanding fees not paid previously out of corporate advance).

Reinstatement MUST include all Payments, Late Charges, NSF, Legal Fees, Other Fees (i.e. BPO, Appraisal, Property Inspection, etc.) and take into consideration and funds in unapplied.

9.17. Reporting Foreclosure Status to MI Companies (8/22/2005 9 05 21 AM)

When a borrower defaults on a loan and the loan has Mortgage Insurance (MI), the delinquency must be reported to the appropriate MI Companies. Typically, the first reporting will occur when the loan becomes 3 to 4 months past due. Provident Funding's policy is to notify the MI Companies at approximately 65 days past due, utilizing the standard Notice of Default form. These forms will be produced monthly on loans that meet the criteria. The loans will be documented and the forms mailed to the appropriate MI Companies.

In addition, if a loan remains delinquent and the loan is referred to Foreclosure, the status of that loan must be reported to the MI Company until the loan becomes an REO or is cured. The Monthly Delinquency Status form will be completed each month and forwarded to the MI Company.

9.18. Returned Mail (8/22/2005 9 15 48 AM)

The mailroom will forward all mail that was returned from the post office as undelivered, related to loans in Foreclosure, to the Foreclosure department staff.

If there is a new mailing address on the returned item, the responsible person in the collection department will determine if the letter is still valid and should be forwarded to the address. If so, the address will be changed on our system, the item forwarded, and a notation made of such.

The address may be changed with no further action if the following conditions are met:

The loan is a Second Home or Non-Owner Occupied Refinance or Purchase

OR

The loan is more than one year old

The address may be changed and a notification must be sent

IF

The loan is an Owner Occupied property

AND

The loan is less than one year old

All other items returned (i.e. insufficient address, No such address, Moved left no address, Unclaimed, etc.), will be noted on the comment screen. A note will be made as to the item that was returned and the reason for the return.

Depending on the status of the foreclosure and the item returned, the Foreclosure attorney may need to be notified.

9.19. Reviewing the TSG/Title (8/22/2005 9 16 43 AM)

The foreclosure attorney or Trustee obtains title reports, Trustee Sale Guarantees or Title Abstracts during the foreclosure process. The initial title rundown is a continuation from the time the loan originated to the time the first legal action is filed. The title report reflects all matters that affect the property being foreclosed. Items such as liens senior or junior to the Deed/Mortgage, judgments, IRS liens, property taxes and notification/service requirements are all reflected here. Additional updates are ordered when necessary as the foreclosure process continues. These are known as "title continuation reports" or "data-downs".

When a title report is received, it must be thoroughly reviewed. Any problems that reflect on the report must be corrected prior to the foreclosure sale.

Items to be reviewed are as follows:

Has there been any change in ownership?

Status of property taxes?

Do any other liens exist?

Review the beneficial interest?

Are there any other liens and/or judgments?

Is there an HOA?

If any adverse matters exist, the TSG and specific issues will be brought to the immediate attention of management for further action.

9.20. Short Payments for Loans in Foreclosure (8/22/2005 9 17 41 AM)

The processor will determine if the funds are sufficient to bring the loan current. If the funds are sufficient, the funds will be immediately applied to the loan and the Foreclosure attorney will be immediately notified to close the case.

If the funds are not sufficient, the processor must review the loan history and comments to determine if any arrangements were previously made to accept the short payment. If arrangements were not made between the borrower and the Foreclosure department or attorney, the processor must then contact the borrower to discuss.

The processor must determine the following:

http://pfnet.provident.com/policy_uw/policy.aspx?type=&ProgramSection=27&Section=9&showEdit=0 10/14/2010

SCHEDULE II

Why the required payment amount in full was not sent?
Will the borrower be sending in the balance and when?
Is the borrower experiencing any financial difficulty?

Discuss with the borrower the importance of remitting the difference as soon as possible in order to avoid continued foreclosure activity. If the borrower is experiencing a financial hardship, discuss with the borrower arrangements to remit the difference. If the borrower is unable to pay or cannot continue to remit the full, required monthly mortgage payments in the future, they will need to begin discussions on available workout options.

If sufficient efforts have been made to reach the borrower regarding the short funds and no contact is made, the loan will be referred to the department Supervisor for review. If it is determined that no further efforts would result in the collection of funds, then the funds will be returned to the borrower with an explanation.

9.21. Valuations/BPO's and Appraisals (8/22/2005 9:18:56 AM)

To establish the Current Fair Market Value of a property, a BPO (Broker's Price Opinion) and/or appraisal is ordered on loans during the foreclosure process. The Fair Market Value will be used in preparing the bidding instructions for the attorney/trustee and/or performing a loss analysis.

The approximate date to order a value is 30 days prior to the FC sale.
The type of valuation ordered is a BPO in most cases, and an appraisal if it becomes an REO.

If the request for a BPO, take into consideration and /or include the following:

If the BPO is to be ordered with photos
Is the BPO to be ordered with access to the property
Is the BPO to be ordered with both access and photos
What type of form is to be used
Property Type
Listing agent (if applicable)
Listing agent phone number (if applicable)
Pending foreclosure sale
Any comments related to the property or FC

If the request for an Appraisal, take into consideration and /or include the following:

If ordering drive by appraisal
If ordering full interior appraisal
What type of form to be used
Property type
Listing agent (if applicable)
Listing agent phone number (if applicable)
Pending foreclosure
Any comments related to the property or FC

9.22. Bidding Instructions, MI Approval (4/14/2006 1:09:21 PM)

All loans in foreclosure with active MI policies must have Bidding Instructions approved by the MI Company policy holder before their submission to an attorney.

It is the responsibility of the foreclosure processor handling the file to submit the prepared bidding instructions to the MI companies to obtain their approval of the bid.

PROVIDENT FUNDING ASSOCIATES, L.P.
SCHEDULE II
FORECLOSURE TESTING

No	Loan No	State	Referral Attorney	Foreclosure Specialist	Referral Date	Demand Printed Date	FC Property Sale Date	Interest Rate	P & T Pmt	Esc	Current UPB	Paid to Date	(A)	(B)	(C)	(D)	(E)	(F)
1	9517010146	AZ	CAL-WESTERN RECONVEYANCE CORP	P Thivedi	10/20/2009	9/15/2009	3/29/2010	5.875%	1,194.91	177.24	194,503.48	7/1/2009	X	X	X	X	X	X
2	416120179	AZ	Max Default Services	M Yeung	1/23/2010	12/15/2008	9/29/2009	6.000%	2,055.47	233.71	332,677.69	10/1/2008	X	X	X	X	X	X
3	1117081889	AZ	Max Default Services	N Belz	6/22/2010	5/14/2010	9/28/2010	6.750%	2,066.76	293.17	309,711.45	3/1/2010	X	X	X	X	X	X
4	216100095	CA	Max Default Services	D Li	9/18/2009	8/14/2009	1/12/2010	5.750%	1,451.40	283.17	302,900.00	6/1/2009	X	X	X	X	X	X
5	1117081875	CA	Max Default Services	M Yeung	12/18/2008	11/14/2008	7/15/2009	6.250%	1,276.04	229.370	245,000.00	9/1/2008	X	X	X	X	X	X
6	1819010294	CA	Max Default Services	K Fetherolf	5/25/2010	4/15/2010	9/30/2010	4.750%	1,231.09	1,778.09	229,370.26	2/1/2010	X	X	X	X	X	X
7	4213020025	FL	Ben Ezra & Katz, P.A.	R Huerta	2/27/2008	1/15/2008	5/12/2008	6.500%	500.82	1,778.09	80,822.59	11/1/2007	X	X	X	X	X	X
8	1117100401	FL	DAVID J STERN P.A.	M Yeung	10/21/2008	9/15/2008	9/16/2009	6.500%	1,747.35	706.89	274,412.10	7/1/2008	X	X	X	X	X	X
9	9518070532	FL	Florida Default Law Group	P Thivedi	2/11/2009	(A)	4/15/2010	6.375%	1,931.50	-	309,600.00	9/1/2008	X	X	X	X	(A)	(A)
10	2717100859	GA	Elks, Painter, Ratterree & Adams LLP	W Ruchle	2/9/2009	8/15/2008	6/2/2009	6.750%	972.25	677.13	148,302.42	11/1/2008	X	X	X	X	X	X
11	4614120028	GA	McCurry & Candler LLC	P Thivedi	8/18/2009	7/15/2009	12/1/2009	5.125%	1,374.43	372.66	236,676.26	1/1/2009	X	X	X	X	X	X
12	4617010004	GA	Elks, Painter, Ratterree & Adams LLP	P Soboda	11/10/2009	10/9/2009	9/7/2010	7.000%	723.18	218.90	185,394.68	6/1/2009	X	X	X	X	X	X
13	4717070135	IL	CODILLIS & ASSOCIATES	N Belz	9/24/2009	8/14/2009	6/15/2010	6.875%	1,734.29	-	255,878.10	5/1/2009	X	X	X	X	X	X
14	4717020159	IL	Johnson Blumberg & Associates LLC	K Fetherolf	11/23/2009	10/15/2009	7/13/2010	6.500%	986.03	-	151,739.67	7/1/2009	X	X	X	X	X	X
15	9517110157	IL	WELTMAN WEINBERG & REIS CO L.P.A.	L Malobabich	8/20/2009	7/15/2009	7/27/2010	7.000%	1,264.07	435.51	187,043.90	4/1/2009	X	X	X	X	X	X
16	1117060864	MI	Gerner & Kearns Co L.P.A.	E Chen	4/26/2010	3/15/2010	7/29/2010	6.750%	778.32	253.32	116,511.54	1/1/2010	X	X	X	X	X	X
17	915020052	MI	Trott & Trott	L Malobabich	6/22/2010	3/2/2010	8/19/2009	4.875%	666.80	-	115,694.52	2/1/2010	X	X	X	X	X	X
18	2317030149	MI	Trott & Trott	P Thivedi	1/9/2009	10/15/2008	8/19/2009	6.125%	729.13	206.38	117,556.68	8/1/2008	X	X	X	X	X	X
19	3517090042	MIN	Gerner & Kearns Co L.P.A.	D Chin	2/9/2010	12/15/2008	5/13/2010	6.875%	1,320.43	287.24	196,668.57	10/1/2008	X	X	X	X	X	X
20	3518002027	MIN	Wilford & Geske Attorneys at Law	K Sturek	3/25/2010	2/15/2010	6/4/2010	5.800%	567.79	124.69	97,549.84	12/1/2009	X	X	X	X	X	X
21	9517011229	MIN	Gerner & Kearns Co L.P.A.	K Fetherolf	5/16/2010	3/15/2010	8/3/2010	7.000%	3,073.70	691.56	447,804.15	1/1/2010	X	X	X	X	X	X
22	1116070364	NV	Max Default Services	W Runkle	4/24/2009	3/13/2009	8/18/2009	6.500%	1,611.77	199.65	248,036.32	1/1/2009	X	X	X	X	X	X
23	1117011975	NV	The Cooper Castle Law Firm LLP	P Thivedi	11/10/2009	10/15/2009	8/19/2010	6.250%	1,641.20	249.41	250,360.56	8/1/2009	X	X	X	X	X	X
24	1115071167	NV	Max Default Services	K Sturek	3/9/2010	1/15/2010	9/22/2010	3.750%	1,266.81	190.06	251,280.76	11/1/2009	X	X	X	X	X	X
25	2217080402	UT	Max Default Services	D Chin	7/28/2009	5/15/2009	3/25/2010	6.750%	1,076.67	139.27	163,457.88	3/1/2009	X	X	X	X	X	X
26	9517010400	UT	Max Default Services	W Runkle	6/18/2009	2/13/2009	10/28/2009	6.375%	1,300.77	180.13	205,960.16	12/1/2008	X	X	X	X	X	X
27	2217020083	UT	Max Default Services	S Contreras	8/26/2008	7/15/2008	1/14/2009	6.875%	1,872.25	266.77	280,983.83	5/1/2008	X	X	X	X	X	X
28	1116101118	WA	Max Default Services	R Huerta	10/2/2009	8/25/2009	4/9/2010	6.500%	758.48	146.67	116,603.18	3/1/2009	X	X	X	X	X	X
29	5818010016	WA	Max Default Services	E Chen	3/12/2010	1/15/2010	8/6/2010	5.375%	1,012.29	302.33	226,000.00	11/1/2009	X	X	X	X	X	X
30	5517080163	WA	Max Default Services	S Contreras	6/10/2009	3/13/2009	3/26/2010	6.750%	1,984.71	543.98	301,602.06	1/1/2009	X	X	X	X	X	X

(A) Loan was sold with servicing rights and is being serviced by the loan purchaser

B

Mortgage Access Corp. d/b/a Weichert Financial Services
225 Littleton Road
Morris Plains, New Jersey 07950

IN THE MATTER OF RESIDENTIAL
MORTGAGE FORECLOSURE PLEADING
AND DOCUMENT IRREGULARITIES

Administrative Order 01-2010

Docket No F-238-11

ADMINISTRATIVE ORDER DIRECTING
SUBMISSION OF INFORMATION FROM
RESIDENTIAL MORTGAGE
FORECLOSURE PLAINTIFFS
CONCERNING THEIR DOCUMENT
EXECUTION PRACTICES TO A
SPECIAL MASTER

I, Rosemary Lucarelli, Servicing Manager, of Mortgage Access Corp. d/b/a Weichert Financial Services ("MAC"), do hereby certify as follows

1 I am the Servicing Manager for MAC. I have been employed by MAC for approximately nineteen (19) years and have been in my present position for almost four (4) years. I am the MAC officer in the best position to provide this Certification and to explain MAC's processes for servicing a loan, including referring a loan to foreclosure and providing

information necessary to prosecute and complete a foreclosure. I have knowledge of the facts set forth in this Certification based on personal experience, as well as a personal review of business records where necessary. I am familiar with the contractual relationship with the servicer for MAC, Dovenmuehle Mortgage, Inc. ("DMI"). I am authorized to make this Certification on behalf of MAC.

2. MAC is licensed in 43 states as a mortgage lender and/or mortgage broker (N.M.L.S. Entity ID 2731). MAC is licensed with the New Jersey Department of Banking and Insurance as a residential mortgage lender.

3. MAC services mortgage loans held in its portfolio and on behalf of certain financial institutions that are buyers/investors of residential mortgage loans originated by MAC, including the Federal National Mortgage Association ("FNMA"). Notwithstanding, the designation of MAC as the servicer of certain residential mortgage loans, MAC does not directly service such residential mortgages. For residential mortgage loans in which MAC is servicing on behalf of FNMA, MAC has a contractual relationship with Dovenmuehle Mortgage, Inc. ("DMI"), whereby DMI subservices such residential mortgage loans on behalf of MAC. Per the agreement with DMI, the servicing of all residential mortgage loans owned by FNMA is performed in accordance with FNMA's servicing guide. Further, any questions related to acceptance of payments after the foreclosure complaint is filed or appropriate loss mitigation alternatives are resolved by DMI in accordance with FNMA's servicing guide, unless other applicable legal requirements control.

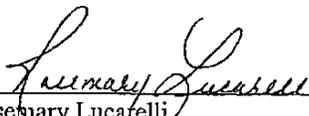
4. During 2010, DMI on behalf of MAC, engaged in the servicing of FNMA where such residential mortgage loans were secured by real estate located in New Jersey.

5. In preparation for this Certification, I have reviewed documents and records concerning MAC's contractual relationship with DMI relative to FNMA loans.

6. In connection with the subservicing of FNMA residential mortgage loans by DMI and in response to the Administrative Order Directing Submission Of Information From Residential Mortgage Foreclosure Plaintiffs Concerning Their Document Execution Practices To A Special Master, attached as Exhibit A hereto is a certification provided by Mary K. Przybyla, Senior Vice President of Dovenmuehle Mortgage, Inc., dated July 19, 2011.¹

I 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: July 20, 2011



Rosemary Lucatelli
Servicing Manager of Mortgage Access Corp d/b/a
Weichert Financial Services

¹ In response footnote 1 on page 4 of the Certification of Mary K. Przybyla, MAC has granted signature authority to DMI employees to execute foreclosure documents

IN THE MATTER OF RESIDENTIAL	:	Administrative Order 01-2010
MORTGAGE FORECLOSURE PLEADING	:	Docket No. F-238-11
AND DOCUMENT IRREGULARITIES	:	ADMINISTRATIVE ORDER
:	:	DIRECTING SUBMISSION OF
	:	INFORMATION FROM
	:	RESIDENTIAL MORTGAGE
	:	FORECLOSURE PLAINITIFFS
	:	CONCERNING THEIR
	:	DOCUMENT EXECUTION
	:	PRACTICES TO A SPECIAL
	:	MASTER
	:	

I, Mary K. Przybyla, Senior Vice President of Dovenmuehle Mortgage, Inc. ("DMI"), do hereby certify as follows:

1 DMI is a servicer of residential mortgage loans for various financial institutions who are seller/servicers of residential mortgage loans in which Fannie Mae is the investor. DMI operates under a contractual relationship with its clients; DMI does not acquire any interest in the mortgage loans nor are the mortgage loans assigned to DMI. DMI's client remains the owner of the servicing rights to the mortgage loans. DMI may additionally service mortgage loans for such clients that are held in the client's portfolio or for which the client owns the servicing rights but the investors are agencies or entities other than Fannie Mae. Any questions related to acceptance of payments after the foreclosure complaint is filed or appropriate loss mitigation alternatives are resolved in accordance with Fannie Mae's servicing guide, unless other applicable legal requirements control.

2. I am the Senior Vice President of Operations for DMI. I have been employed by DMI for more than thirty (30) years and have been in my present position for almost twenty (20) years. I am the DMI officer in the best position to provide this Certification and to explain DMI's processes for referring a loan to foreclosure, providing information necessary to prosecute a

foreclosure, and executing the documents necessary to complete a foreclosure. I have knowledge of the facts set forth in this Certificate based on personal experience as well as a personal review of business records where necessary. I am one of the DMI employees authorized to execute foreclosure documents and execute such documents on a daily basis. I am familiar with, and a user of, DMI's systems and databases (including DMI's servicing platform, the Lender Processing Services, Inc.'s MSP System) used to process and maintain records related to DMI's loan servicing and foreclosure operations. The core of these systems is DMI's mortgage servicing platform provided by Lender Processing Services, Inc. (the "MSP System"). The MSP System is used by financial institutions nationwide and provides a software capability on which to process and record many servicing functions such as loan set-up, cashiering, escrow administration, customer service, collections and default administration, investor remitting and reporting, corporate accounting and regulatory reporting. Additionally, DMI uses LPS's NewTrak system to manage and track foreclosure activity, including communications with foreclosure counsel, and LPS's DeskTop for loss mitigation. These systems are ancillary to, and integrated with, the MSP System. The MSP System includes a record of all transactions while DMI services the loans—payment applications (including breakdown of principal, interest, escrow and fees), disbursements (such as tax and insurance payments, property preservation costs, and foreclosure fees and costs). The MSP also contains contact notes related to customer service, collections, loss mitigation, escrow and foreclosure activities. In addition to contact records retention on the MSP System, DMI also uses imaging systems to maintain copies of documents and communications. I am authorized to make this Certification on behalf of DMI.

3. My responsibilities include oversight of all default areas of DMI, including the Collections and Mortgage Disposition (foreclosure) Departments. I am responsible for supervision of the operations of these departments. To that end, I have daily interactions with the department managers as well as discussions with assistant managers, supervisory personnel and staff as needed to address the operations of these departments. I have been involved in the development of DMI's policies and procedures related to the handling of mortgage foreclosures; this involvement includes review of workflow processes and legal requirements, determination of staffing needs and departmental organization, and review of process reports used to track performance of foreclosure functions. I am responsible for enforcing the company's policies and adherence to government and client requirements.

4. DMI has policies and procedures in place to ensure that certifications/affidavits signed by DMI to be submitted in connection with mortgage foreclosures are based upon the signer's personal knowledge or that person's review of business records maintained by DMI and/or provided to DMI by the Agency. These policies and procedures are not contained in a specific written policy; however, DMI processes foreclosure referrals, interaction with counsel and execution of document based on timetables, reports and procedural steps imbedded in the foreclosure applications used by DMI. For example, there are templates for various types of foreclosures based on jurisdiction and loan type. These templates include timelines for foreclosure, a logical sequence for the foreclosure action, and checklist steps for various functions to be performed. Reports used for monitoring foreclosure activity are generated from information maintained on the system. These policies and procedures are described as follows:

- A. When a mortgagor has been delinquent over a period of time without curing the default, DMI generates letters to the mortgagor informing them of the gravity of the situation. If the default is not cured and there are no other options left, then DMI will refer the loan to foreclosure in accordance with the Fannie Mae servicing guide. Prior to making the referral, DMI's Collections Department does a pre-referral review of the loan to confirm that the loan is actually in default and foreclosure is merited. This pre-referral review includes a review of loan status (due date, loan balance, reasons for default), occupancy status, and loss mitigation status.
- B. Copies of the relevant loan documents, such as the note, mortgage, assignments, title policy and HUD-1 closing statement, are either sent to DMI by the subservicing client or are obtained by DMI from the document custodian holding the original documents. Original documents are retained in the origination file and DMI does not obtain original documents unless required in the foreclosure action. Copies of other relevant documents or information such as breach letters, payment histories and account information (due date, loan balance, interest rate, accrued interest, escrow balances or advances, and other sums which may be recoverable in the foreclosure) maintained on the MSP System are made from records DMI keeps in the ordinary course of business. This package of document copies and information is sent to the foreclosure counsel along with a referral letter containing other pertinent information, such as the name in which the foreclosure is to be conducted and the final title holder (such as the U.S. Department of Housing and Urban Development in the case of a mortgage loan insured by the Federal Housing Administration). This referral letter is prepared based on a review of information contained on the MSP System. At a minimum, counsel is set a copy of the note and mortgage, the default/acceleration letter, and basic loan information (including borrower Social Security Number and mailing address, if different from the property address, the due date of the loan, amount of principal balance, interest rate). This process is conducted by the Document Specialists under the supervision of a supervisor and the Assistant Manager and Manager of the Mortgage Disposition Department.
- C. The foreclosure counsel must acknowledge receipt of the referral package. This acknowledgment is done through LPS's NewTrak system. The foreclosure counsel will order a title search to confirm the record holder of the mortgage lien. Thereafter, foreclosure counsel drafts the complaint and other documents required to be submitted to the court, including certifications/affidavits to be signed on behalf of the plaintiff, pursuant to the rules and regulations of the jurisdiction in which the complaint is filed. All documents filed in the foreclosure action, including certifications and affidavits, are prepared by foreclosure counsel. Additionally, counsel will prepare any other documents, such as mortgage assignments, if needed. If additional information is needed by counsel to prepare documents after the foreclosure is filed (such as updated information on tax, insurance or mortgage insurance payments and advances for a certification of additional amounts due), the Document Specialist will provide updated figures

based on the then-current information on the MSP System. No foreclosure documents are prepared by DMI. Documents are transmitted to DMI electronically in full form. In many instances, foreclosure counsel also provide instructions with regard to the relevant dates and execution steps needed to assure accuracy of the information to be submitted to the courts.

- D. Upon receipt of the proposed certification/affidavit (such as the certification of amount due or certification for additional amounts due), the documents are reviewed for factual accuracy, based on the business records, by Document Specialists in DMI's Mortgage Disposition Department. The Document Specialists are all DMI employees. The Document Specialists have the authority to review documents and to request corrections of documents. The Document Specialists have the responsibility to compile the supporting documentation for presentation with the document to be signed. The Document Specialists do not have the authority to sign documents.
- E. Any foreclosure document that requires signature by DMI in the foreclosure process is reviewed. The documents are reviewed in hardcopy form. DMI does not customarily review the foreclosure complaint prior to filing but relies on its foreclosure counsel for the accuracy, legal sufficiency and completeness of the documentation under state law and local court rules. When DMI reviews the complaint for foreclosure review certification, however, each allegation in the complaint is reviewed and verified based on copies of the note, mortgage and assignments, title policy or other relevant documents and on information on the MSP System. When DMI reviews the certification of amounts due, each amount stated in the certificate is verified against information on the MSP System and payment histories.
- F. The determination to make corrections is based on a comparison of the document prepared by counsel to DMI's business records. If the Document Specialist has questions about the proposed document, communications with counsel may be in writing or by telephone; however, generally, communication is in writing. If corrections are necessary, foreclosure counsel is advised and asked to make revisions to the document. The requests for corrections are communicated to foreclosure counsel in writing. Upon receipt of the revised certification/affidavit, the document is again reviewed for factual accuracy by a Document Specialist.
- G. If corrections are not necessary or a satisfactorily revised document is received, the Document Specialist prepares a package containing an execution copy of the document to be signed, as prepared by counsel, and photocopies of all necessary supporting back-up documentation from the business records to substantiate and verify the factual statements contained in the certification/affidavit. This substantiating documentation may be copies of the loan documents, title policies, MSP System screen prints, archived documents such as payment histories, year-end statements, escrow analyses, ARM notices or other prior communications with the borrower as are relevant to the statements in the document. In many

instances, this backup documentation replicates documents provided to foreclosure counsel in the foreclosure referral package or during the course of the foreclosure. These substantiating documents are not provided by the foreclosure counsel but are retrieved from DMI's business records

- H. As a quality control process, the package is then reviewed by a supervisor or paralegal, comparing the statements in the document to be executed to the supporting documentation and again verifying the accuracy of the statements. The package is not prepared by the supervisor or paralegal but the supervisor or paralegal may instruct the Document Specialist to ask for further revisions or to obtain further substantiating information. The quality control process is not in writing at this time. The process is based on the experience of the supervisor or paralegal and the premise of a line-by-line review of each statement in the document and a confirmation that the back-up documentation fully supports the accuracy of the statement.
- I. The document to be signed is then presented, with the back-up documentation, to a person authorized to sign documents. DMI's subservicing agreement list specific DMI personnel that have signing authority in the client's name in order to initiate and prosecute foreclosure proceedings; the client will adopt appropriate corporate resolutions to document that signature authority.¹ I am one of the persons who have signing authority, to act on behalf of the plaintiff, pursuant to the subservicing agreement. The DMI employees authorized by our clients to execute documents on their behalf vary but all of the designated employees are officers of DMI. To the extent possible, if the volume of documents to be signed and personnel availability permits, DMI's standard priority is to have those DMI officers directly involved in default administration departments execute the documents as they are most familiar with the foreclosure files. Other DMI officers who have been granted signature authority by the subservicing client are also authorized to execute foreclosure documents if needs demand. These officers are generally the managers or assistant managers of other DMI operating departments and many have prior default administration experience. These other signers have the same access to DMI's business records and staff as the signers in the default administration departments. All individuals authorized to sign for DMI are, however, fully familiar with DMI's business records and its foreclosure document execution policies and procedures. All authorized signers are familiar with, and users of, the MSP System. The document execution process, and the requirements for personal knowledge and business records familiarity, does not vary based on which officer is signing the document.
- J. In addition to the review performed by the Document Specialists and their supervisor or paralegal, the document and supporting documentation is reviewed by the signer. This review is an essential element of the signer's being able to

¹ Not all DMI subservicing clients grant signature authority to DMI employees. In that case, foreclosure documents are sent to the client for execution

execute the document based on personal knowledge of the facts or a review of DMI's business records. It is only secondarily a quality control process. If the signer requires further information, the signer may reject the package and ask for further revisions to the document (in which case the processes described above are repeated). The signer may also ask for further substantiating support or personally review other business records (such as reviewing screens on the MSP System or archived document images) to confirm the statements contained in the certification/affidavit are correct. The signer may also discuss the case history with other staff members.

- K. If the signer is satisfied with the document and the supporting documentation, the document is signed in the presence of a notary public and, if necessary, any required witnesses. The notaries and witnesses, if any, are also all DMI employees. All DMI authorized signers are personally known by the DMI notaries and by any witness. It is DMI's policy that no one executes any certifications or affidavits unless they have reviewed the documents and business records personally. The persons signing certifications and affidavits understand the purposes served by such documents in the foreclosure proceeding.
- L. The signed documents and supporting documentation is returned to the Document Specialists for further processing. This processing includes scanning the document and supporting information to DMI's records archives and delivery of the original document to foreclosure counsel.

5. DMI relies on the instructions of foreclosure counsel with regard to the execution of documents. All documents are manually executed by the individual named in the certification or affidavit. DMI does not use rubber stamps, or use electronic or facsimile signatures nor is any person authorized to sign on behalf of another person. As previously described above, only a limited number of DMI employees are authorized to sign documents used in foreclosure. Clerical and processing staff are not permitted to sign documents. Temporary employees are not permitted to sign documents. No outside vendor is permitted to sign documents.

6. DMI uses the MSP System as its mortgage loan servicing platform. Records of payments and other transactions (such as tax or insurance escrow processing or collections activity) is maintained on the MSP System. Loan history for the period the loan is serviced by DMI is maintained on the MSP System or in electronic archives. Almost all DMI employees have access to the MSP System. Access is controlled through a user ID assigned to each employee and a password created by the employee according to DMI's security protocols. Access is limited to certain screens and functionalities based on the requirements of the individual's job description. Most employees have the authorization to make entries or process transactions on those portions of the MSP System to which they have been granted access consistent with the functions they perform. (Employees in the Cashiering Department will have access to post payments but employees in other departments will not have such access. Collectors have access to make entries on collections screens related to collections calls. Employees in the pre-payoff group of the Release Department have authority to order payoff statements.) Entries are identified to the person's user ID. The ability to edit or delete prior entries is limited to

designated staff members within a department and must be authorized by the department manager. System access and functional permissions are reviewed on a quarterly basis. If a borrower establishes that he or she made payments that were not credited to the account, adjustments to the loan record on the MSP System will be made. These adjustments will be reflected on the payment history as well as in other MSP System records. If any loss mitigation activity is being successfully pursued during pendency of the foreclosure, DMI will advise the foreclosure to place the action on hold. If the loss mitigation is not successfully completed, we will direct the counsel to proceed with the foreclosure. Any other information that may impact the foreclosure proceeding is also communicated to counsel; similarly, counsel will advise us of any matters that need to be addressed. These communications are typically communicated by email or by an entry in LPS's NewTrak system.

7 The review process DMI has in place to ensure any certification/affidavit signed by DMI and submitted to the Court is accurate, based on current information and executed by a person in reliance on personal knowledge and/or the business records as been described in Item 4 above. DMI does not presently contemplate making any changes to its document execution policies and procedures. It is, however, working on the development of written policies that reflect its operational practices and a specifically designed component of its training program for foreclosure document execution

8. As described in Item 4 above, the individuals signing foreclosure document are all familiar with DMI's business records and document execution policies and procedures. Special training by DMI's Legal Department has been provided to those employees authorized to sign documents with regard to the document execution requirements and the legal issues surrounding document execution. This assistance is provided in an advisory and compliance capacity. DMI's Legal Department is not routinely involved in the daily foreclosure document execution process but is available to provide assistance if needed to clarify procedures or address a general legal question pertaining to a specific document problem. Document Specialists and management of the Mortgage Disposition Department have been trained to consult with foreclosure counsel if there are questions concerning document execution that may impact the foreclosure in question. If and as signature authority is granted to additional employees, training will be provided to assure that those employees fully understand DMI's policies and procedures and the legal process of foreclosure. DMI relies on foreclosure counsel to advise it if state document execution requirements change or new document requirements are imposed. Supplemental training will be provided to all authorized signers on an "as needed" basis to address any changes in foreclosure document execution requirements. Additionally, DMI periodically arranges training sessions for Mortgage Disposition Department staff to be conducted in its offices by foreclosure counsel. These training sessions cover a variety of topics including document execution. Management of the Mortgage Disposition Department keeps a log of who attends such training sessions and the subject matter of such training sessions. It does not test with regard to its training program nor does it award certificates for attendance.

9. DMI provides information to foreclosure counsel, upon request, as necessary to provide current information (such as copies or originals of loan documents or loan history) for the stage of foreclosure for which the counsel is preparing documents to be submitted to the Court. Counsel is responsible, however, for confirmation of information (such as the proper party

plaintiff) and advising DMI of any noted discrepancies that need to be addressed and resolved prior to submission to the Court

10. DMI is working with foreclosure counsel to develop protocols sufficient to comply with the final review procedures presently required under Rule 4:64-1 et. seq. Many of our foreclosure counsel have provided specimen checklists for this purpose and we are using them as a basis for review. As noted, however, our standard practices are to conduct a line-by-line review of any complaint or other document for which we are providing a foreclosure document review certification.

11. At present, DMI does not intend to utilize any independent auditor to review the policies and procedures described herein. We are, however, in the process of developing an audit program to be implemented by our Internal Audit Department to evaluate our compliance with foreclosure document execution policies and procedures. This process is intended to confirm the accuracy of the documents submitted and adherence to the procedures established in the document execution process designed to ensure such accuracy.

12. As a servicer, DMI follows its client's instructions with regard to loss mitigation and mortgage modifications. In the case of Fannie Mae loans, loss mitigation and mortgage modifications are offered and processed in accordance with Fannie Mae's servicing guide.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge, information and belief; I am aware that if any of the foregoing statements made by me are willfully false that I am subject to punishment.

Dated. July 19, 2011



Mary K. Przybyla, Senior Vice President
Dovenmuehle Mortgage, Inc.

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In the matter of Residential Mortgage Foreclosure Pleadings and Document Irregularities	Administrative Order 0-1-2010 Docket #F-238-11
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Certification of Cenlar FSB

I STEVEN T. GRANER hereby certify as follows:

1. I am the VICE PRESIDENT, OPERATIONS of Cenlar FSB ("Cenlar") and
2. Cenlar has conducted a thorough review of its foreclosure processes, including but not limited to the processes surrounding the completion and execution of affidavits and certifications. We have reviewed the following processes in response to that review and in some instances, have implemented or enhanced these processes:

a. We have organized a specialized team within our Foreclosure Department that perform a comprehensive review of the contents of an affidavit or certification¹.

b. Affidavits are prepared by foreclosure counsel utilizing information from our servicing system. We forward attorneys "screen shots" from the system that contain the information necessary for the attorney to draft the affidavit.

c. Upon receipt of a proposed affidavit, two separate individuals review the information contained within the affidavit. These individuals review not only the financial information set forth but to the extent an affidavit refers to documents, they compare that information to the loan or other documents referenced in the affidavit.

d. Each reviewer then completes a separate checklist indicating that the reviewer has personally reviewed and compared the information contained within the affidavit to

¹ For the purposes of this certification, the term "affidavit" will be used to mean "affidavit or certification"

the corresponding system data or to the documents referenced within the affidavit and each certifies the information to be accurate.

e. One of the reviewers will then sign the affidavit in the presence of a Notary.

f. Following execution and notarization of an affidavit it, along with supporting information, is forwarded to our internal audit department. The affidavits are reviewed again for completeness and accuracy of the contents. Any affidavit with errors is returned to the foreclosure area for correction. If the audit department personnel have questions, they seek direction from a member of our legal department.

g. Prior to a loan going to Sheriff Sale, affidavits are reviewed again for completeness by a member of our legal department.

h. A copy of our procedures are attached hereto as Exhibit I.

3. All members of our foreclosure or bankruptcy areas that may be asked to sign affidavits have and will go through training regarding the proper review and execution processes of legal documents, including affidavits. The training includes the need to differentiate between reliance on business records and statements that are based on someone's personal knowledge. The individuals are taught not to sign a document that is based on the personal knowledge of someone other than the reviewer. When an affidavit is stated to be based on personal knowledge, the individual with the personal knowledge would sign the affidavit. The training also includes recognizing what types of documents must be signed before a notary. Additionally we have training of notaries and the proper execution of documents, including the notary's obligation to ensure that the affiant executes the document in the notary's presence and that the document is complete with no blanks.

4. The individuals who sign affidavits, do so as fact witnesses attesting to truthfulness of the information contained therein. No one is permitted to sign on behalf of another and all affidavits are personally executed by the affiant.

5. Cenlar utilizes Lender Processing Systems's MSP ("LPS"), which is a leading mortgage servicing system used in the mortgage servicing industry. LPS is the primary record-keeping mechanism for Cenlar loan servicing data. Data entry can be facilitated in an automated or manual fashion, e.g. payment data is automatically uploaded from our lock box and Cenlar staff may type notes and comments directly into LPS to further document day to day servicing activity. Cenlar's Cash Management Department performs a daily reconciliation comparing cash received and payments applied into the system of record. Any discrepancies are quickly addressed and ultimately corrected. All other transactions regarding the mortgage loan are similarly noted and documented within LPS. Other record keeping systems are also used. For example, LPS Process Management system is used to track and store assignments that have been prepared, reviewed and executed

6. Please see paragraph 2 above regarding the review process followed by Cenlar personnel. We believe the process we have implemented ensures the accuracy and completeness of affidavits submitted.

7. All personnel who are authorized to review and execute affidavits have completed training specially designed to help them identify inconsistencies between the statements

contained in the affidavit as compared to the documents or other data referenced within the affidavit.

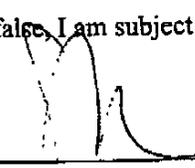
8. Cenlar provides its foreclosure counsel information in support of the preparation of documentation through LPS. The information provided is the same information which is used to determine the accuracy of the affidavit. This documentation includes, but may not be limited to screen images of financial information being placed on the affidavit and copies of applicable loan documents.

9. As noted above in paragraph 2, Cenlar utilizes a minimum of three reviews to verify the accuracy of affidavits: one by the foreclosure technician, one by the affiant and one by our audit department

10. We have not utilized nor intend to utilize an independent auditor to review our processes or procedures. The Cenlar servicing and foreclosure processes have been and continue to be reviewed by our internal Audit Department. We are constantly reviewing our processes for ways to improve and introduce new procedures to improve our performance.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the aforesaid statements made by me are wilfully false, I am subject to punishment.

Dated: 5/26/11


STEVEN T. KOVACIC
VICE PRESIDENT, DEFAULT

Document Execution 1.09 Foreclosure

Summary

Centlar utilizes the services of LPS Default Solutions ("LPS") to assist in the processing of foreclosures and bankruptcies ("Process Management"). At varying stages during a foreclosure or bankruptcy proceeding it will become necessary for certain documents to be drafted requiring execution by Centlar personnel. Process Management is a system that allows foreclosure and bankruptcy technicians (Processors) and supervisors and managers to exchange documents and other information concerning a proceeding electronically.

Any financial information needed for an affidavit, verification or certification ("Document"), such as but not limited to total debt figures, reinstatement figures, escrow and corporate advance breakdowns are provided by LPS to the assigned attorney via Centlar's servicing system (MSP). LPS provides the following screen shots to the attorney: REIN, PAY3 & PAY4, SER1, DLQ1, DLQH, DDCH, TAX2 and HAZ1 (Exhibit I). The attorney is to utilize the information on these screen shots to complete the Document.

The attorney obtains assignee or vesting information utilizing Process Management. A title search is conducted for all accounts by the foreclosure attorney. If the title search results indicate title is in a different name than what has been provided in Process Management, the attorney notifies Centlar of the discrepancy and will correct the chain of title by preparing any necessary assignments.

All Documents are prepared by the assigned attorney and are to be executed by employees of Centlar in keeping with these procedures after a review of the accuracy of the information set forth in the document, including the capacity in which they are asked to sign. Anyone signing should sign only in their capacity as employees of Centlar and never as an employee of any other entity. If Centlar services a loan for others and is not a party to the proceeding, then Centlar should be identified as "servicing agent for" or some other representative capacity. At no time should a Centlar employee execute a Document in any other capacity. If there is any question, it should be raised to Centlar Legal or to the preparing attorney (See attached Exhibit II as examples.)

All other documents (Assignments, Deeds, etc....) should only be executed as authorized in an applicable Power of Attorney or Corporate Resolution granted to Centlar. Copies of the resolutions or powers are maintained by the Default Servicing administrative assistant. The procedures for proper execution of these documents are contained elsewhere.

LPS has no signing authority from Centlar to execute documents on Centlar's behalf. In addition, LPS has no authority allowing LPS to execute documents on behalf of MERS.

Procedure

The following procedures are to be followed by Centlar employees when executing of Documents.

Signature Required Process:

- 1) Document execution is a three step process. (i) the designated attorney submits a Document for signature, (ii) the review of the Document for completeness and accuracy by Centlar employees and finally (iii) the execution of the Document and its return to the attorney.
 - a) Step1 – the attorney advises Centlar via Process Management that a Document has been uploaded.

- Within this step the attorney will also note the type of Document uploaded as well as specify any special instructions with regards to completion and/or execution of the Document.
- b) Step 2 – Cenlar foreclosure and/or bankruptcy processor will review the Document as outlined in the document execution process below and following review will advise the attorney via Process Management of the status of the Document by selecting an item from a drop down menu. Each selection on the drop down menu is defined below.
- **Document accepted and prepared for execution** The Foreclosure Representative has reviewed the Document for accuracy, agrees with its contents, and has printed the Document for execution.
 - **Document Rejected/Revision Needed.** After review, the responsible employee has found an inconsistency or error in the Document and indicates the revision that is needed. This option will close this process and open the Document Revision Process (see Document Revision Process below)
 - **Document Revised by Client and Prepared for Execution.** If Cenlar made changes to the Document selecting this option will advise the attorney that changes were made and that the Document has been printed for execution.
 - **Document Forwarded to Investor.** Selecting this option advises the attorney that the Document appears to be correct, however, Cenlar does not have authority to sign and will forward onto the authorized party, e.g. the investor, for execution.
- c) Step 4 – Cenlar acknowledges that the Document has been executed by updating the event in Process Management and returns to the attorney.

Document Review Process:

- 1) As part of the Affidavit review process, the Affidavit of Amount Due script in LPS (Cenlar's system of record) is utilized to verify data provided in the Affidavit requiring execution. Once the script has been completed, a copy of the results is documented on PL05 (FC999) in LPS

The following steps are followed by the Foreclosure Representative for Affidavits that include amounts due

- Enter the smart key button on Director which then scans through every screen for figures.
- Amount Due Affidavit screen shot appears with mortgage information such as borrower name, address, city, state, investor name, note date, principal balance, foreclosure start date, demand notice date and as of date (enter date affidavit is good through).
- Script then continues to run and the attached screen shot (Exhibit III) appears, which calculates amounts due.
- Adjustments can be made within the script to exclude uncollectable amounts and/or include amounts that have been billed but not yet paid (e.g. inspections ordered, BPOs ordered) If an adjustment is made, the Foreclosure Representative will document FOR2 in LPS with the adjustment amount and the reason for same.

- The Foreclosure Representative reviews the data provided from the script and compares to the calculations in the Affidavit provided by the attorney
 - Upon confirmation of the figures, the script is complete and a document is placed in PL05 (FC999) along with a note in FOR2 stating amount due affidavit completed
 - The Manager conducting the 2nd review of the Affidavit will utilize the document in PL05 (FC999) to verify accuracy
- 2) An affidavit checklist (Exhibit IV) is also utilized by both the Foreclosure Representative and the Manager conducting the 2nd review. The following steps are followed are part of this process:
- The Foreclosure Representative reviews affidavit for accuracy by utilizing the Foreclosure Representative Affidavit Checklist.
 - The Foreclosure Representative executes and dates the checklist to confirm each item has been reviewed for accuracy
 - The Foreclosure Representative submits the affidavit along with all supporting documentation that the affidavit requires to management for review.
 - The Manager reviews the affidavit for accuracy by utilizing the Manager Affidavit Checklist.
 - The Manager executes and dates the checklist to confirm each item has been reviewed for accuracy.
 - Management submits affidavit and checklist back to the Foreclosure Representative.
 - The Foreclosure Representative sends the affidavit to audit for final review and approval
 - This is tracked by the Foreclosure Representative opening the DOCAUD task. Once audit approves the affidavit the DOCAUD task is closed by the Foreclosure Representative
 - Once the affidavit has been approved by audit, the executed affidavit and checklists are uploaded into Document Management.

Document Revision Needed Process

- 1) This process is used when Cenlar advises the attorney that a revision is needed to a Document.
 - a) A Revised Document Request is noted in Process Management via a drop down box as noted in Step 2 above. This will advise the attorney that the Document needs to be revised for one or more of the following reasons:
 - Cosmetic – Date/Typo/Address/Blank Field
 - Cosmetic – Notary Info
 - Cosmetic – Title/ Signer Name/Officer Reference
 - Cosmetic – Wording Change requested
 - Entity Related
 - Financial Error - Escrow or Suspense
 - Financial Error – Interest, Penalties or Fees
 - Financial Error – Payment Related
 - Financial Error- Principal Balance or Total Amount Due
 - Wrong Doc Uploaded/Doc Not Required

For each revision, the Processor will complete the requested revisions box indicating the revision is that is needed.

Document Execution Process

- 1) The Processor handling the matter must review the Document submitted for execution by verifying the information indicated in the Document, by reviewing the various applicable screens in MSP, utilizing the checklist, running the affidavit of amount due script in MSP and reviewing the applicable documents. This includes financial data as well as non-financial information contained in the Document. Upon completion of the Processor's review and if no revisions appear necessary to the Processor, the Document is forwarded to the proper executing employee as set forth on Exhibit II attached.
- 2) If the Document is a foreclosure affidavit and/or certification, the Late Stage Risk Manager conducts a second review utilizing the Manager Checklist to verify that all statements made in the document are true and complete, including that it sets forth the proper capacity of the signor.
- 3) If the Document is a bankruptcy affidavit, the Processor handling the matter must review the Document submitted for execution by verifying the information indicated in the Document, by reviewing the various applicable screens in MSP. This includes financial data as well as non-financial information contained in the Document. Upon completion of the Processor's review and if no revisions appear necessary to the Processor, the Document is executed by the Processor and/or forwarded to the proper executing employee as set forth on Exhibit II attached.
- 4) Where notarization is necessary, the execution of all Documents occurs within the presence of a Notary Public who advises that the signer is under oath or is otherwise satisfied that the signer understands that he or she is under oath when signing the Document. The notary will then complete the necessary jurat. A companywide notary log is updated by the default notary, which identifies account number for notarized document, document name, date of notarization and the name of the notary.

Reports:

The following reports are available to monitor the above procedure:

- 1) Revision Trending
 - This report tracks the age, category and completion of revision of requests.
- 2) Document forward Scorecard
 - This scorecard identifies Document execution volume as well as turn-around time.
- 3) FC999 Exception Report
 - This report identifies accounts where an affidavit has been submitted to audit for review but did not have a FC999 letter generated.

Training:

Upon appointment as a notary, an employee is provided with the New Jersey Notary Public Manual. On an annual basis, training will be conducted for employees who notarize documents for Centar. This training will provide a refresher overview of the notary's obligations as well as address any changes related to the notarizing of documents.

EXHIBIT I

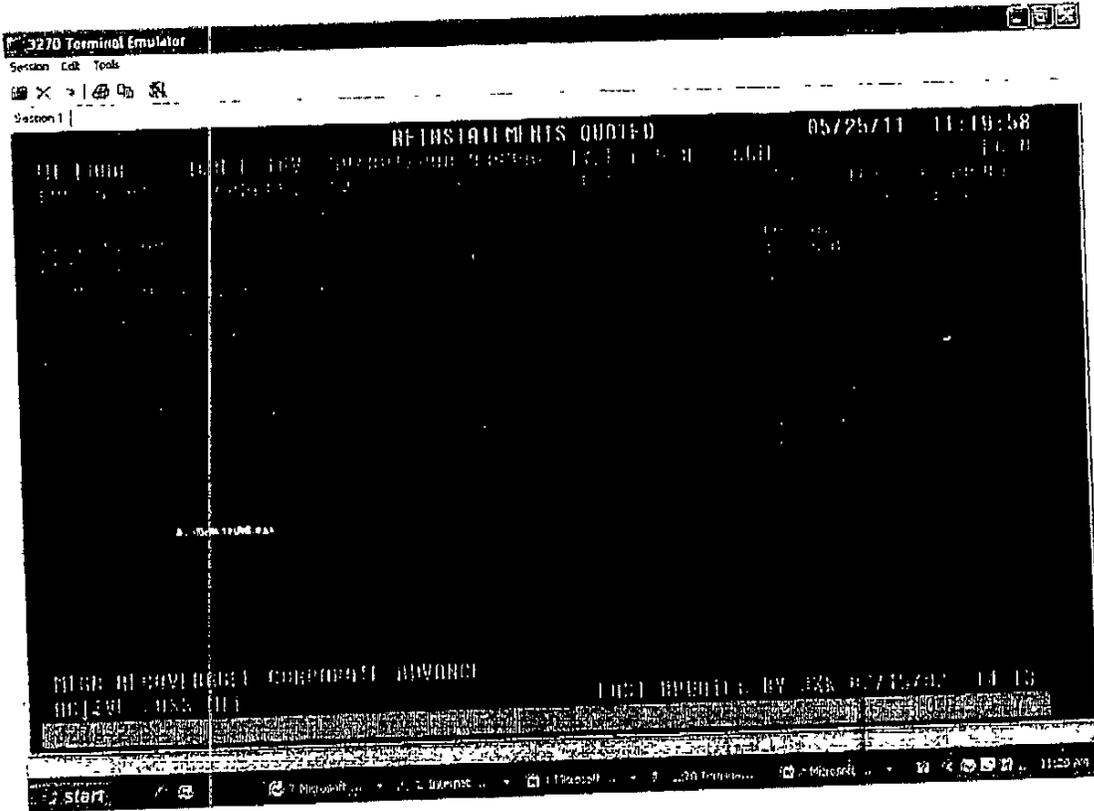


EXHIBIT 1

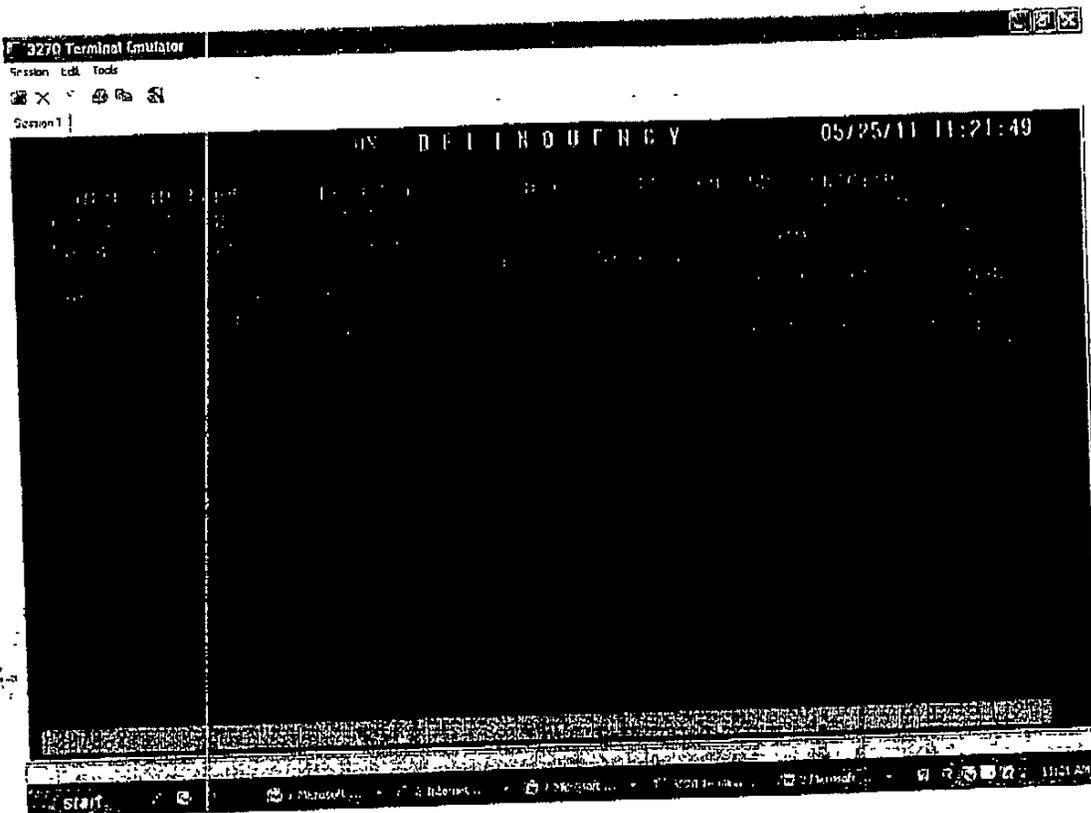


EXHIBIT 1

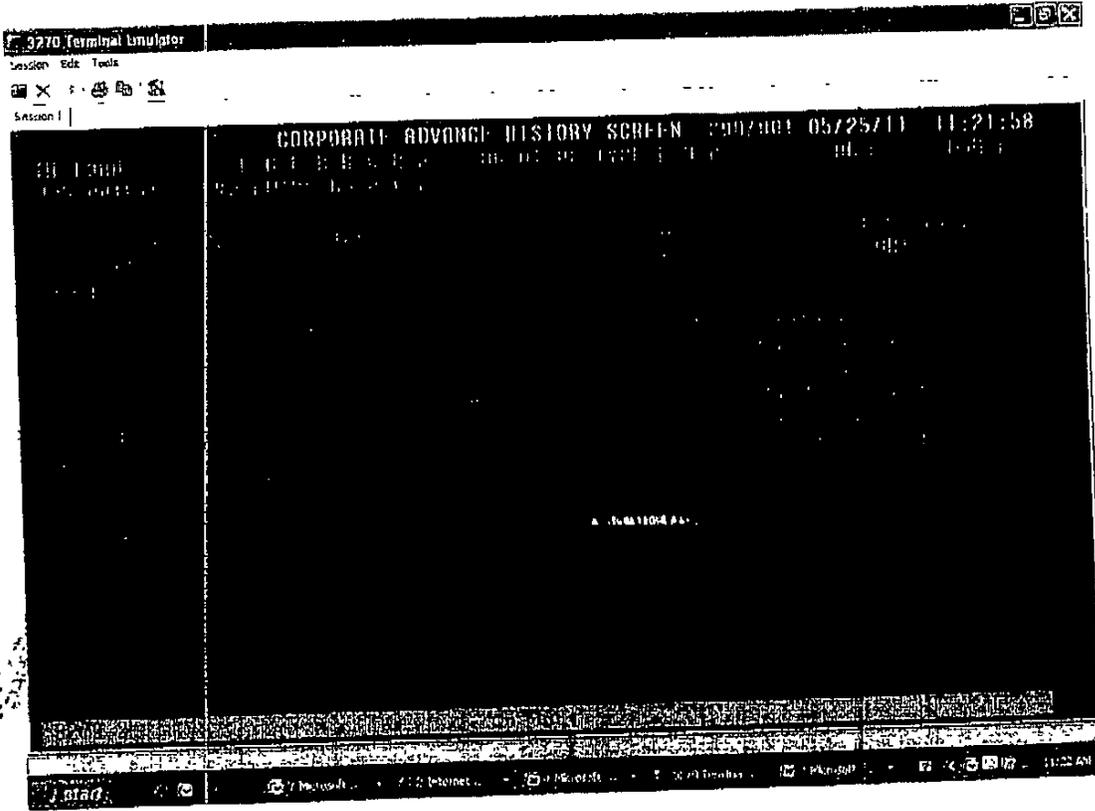


EXHIBIT I

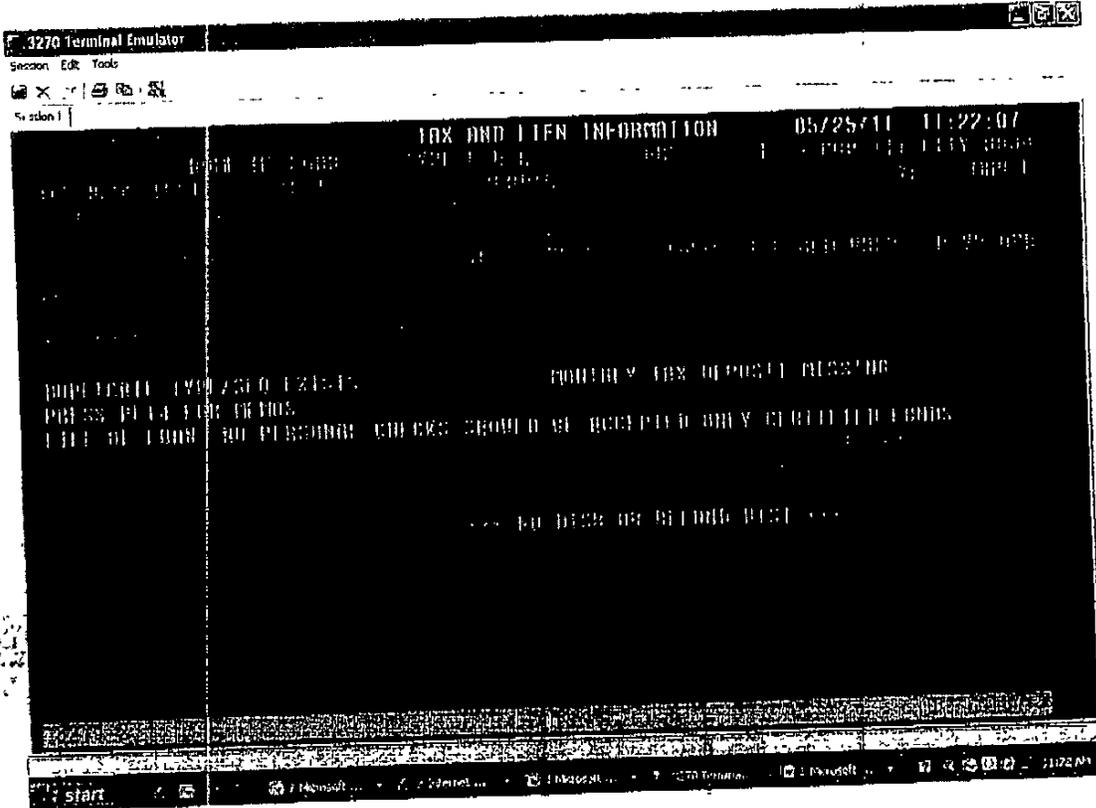


EXHIBIT I

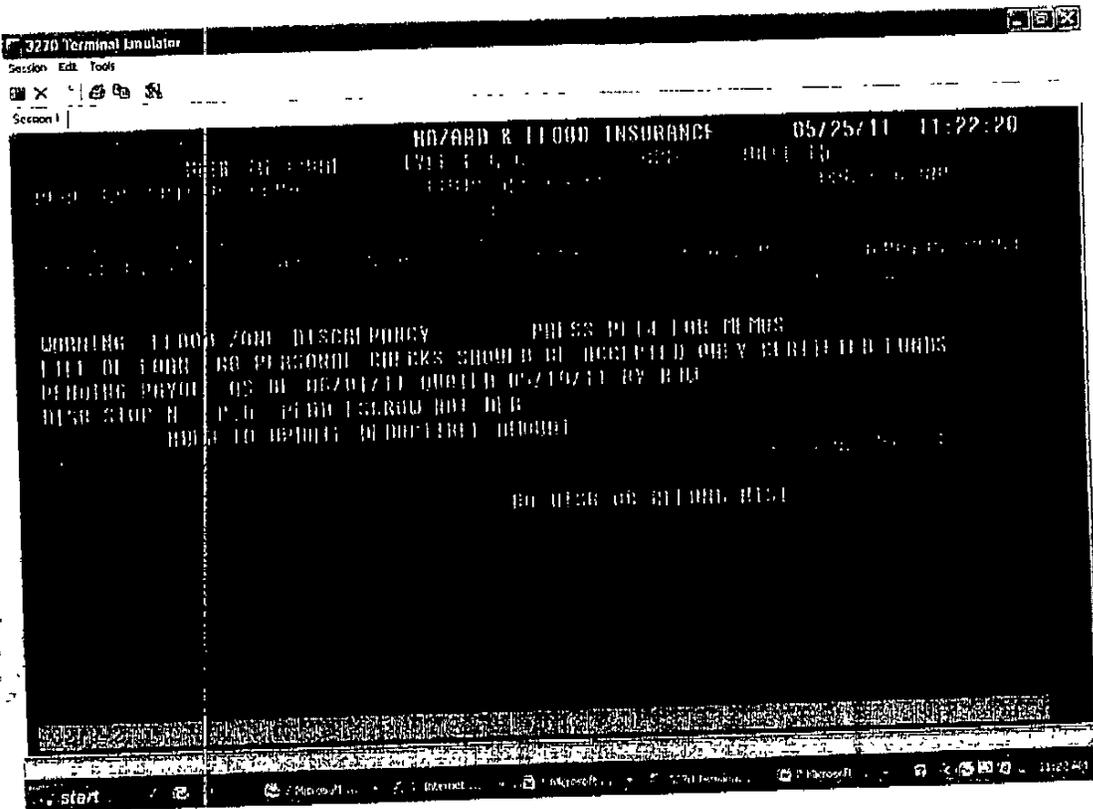


Exhibit II

Document			
Foreclosure Affidavits	<p>Payoff amounts are provided to the attorney via screen prints by LPS. The attorney updates the affidavit with the information provided and submits to Cenlar for review and execution. The affidavit is reviewed by the Foreclosure Processor for accuracy by reviewing the Payoff information in MSP and submitted to the Late Stage Risk Manager who reviews the statements in the affidavit as well as the Plaintiff name for accuracy and execution.</p>	Default Late Stage Risk Manager	Foreclosure/Bankruptcy Manager and/or Designee
Bankruptcy Affidavits	<p>Payoff amounts are provided to the attorney via screen prints by LPS. The attorney updates the affidavit with the information provided and submits to Cenlar for review and execution. The affidavit is reviewed by the Bankruptcy Processor for accuracy and execution. The Bankruptcy Processor will refer to the the payoff information in MSP and/or other data in MSP to verify accuracy (i.e. Note Date, Borrowers Name, Address). The Bankruptcy Processor will also verify the entity name is correct by referring to client action in the name of matrix.</p>	Bankruptcy Processor	Foreclosure/Bankruptcy Manager and/or Designee
Assignments	<p>Foreclosure Processor reviews for accuracy in final vesting. If assignment reflects questionable assignor, the Processor will review Title for correct chain of Title. Signor confirms signing authority based on POA. Foreclosure Processor confirms Cenlar is executing in its full capacity. Action in the name of, and as signing agent (or) signor confirms signing authority based on POA.</p>	Various depending upon the POA	Various depending upon the POA
Substitution of Trustee	<p>The Late Stage Risk Manager reviews the statements in the affidavit as well as the Plaintiff name for accuracy and execution.</p>	Default Late Stage Risk Manager	Foreclosure/Bankruptcy Manager and/or Designee
Verifications (State Requirement)	<p>Foreclosure Processor reviews vesting information to ensure deed is correct. Processor will refer to client requirements and SSE foreclosure guidelines when confirming. Signor confirms signing authority based on POA.</p>	Various depending upon the POA	Various depending upon the POA
Deeds	<p>Late Stage Risk Manager reviews the information indicating the loss mitigation options and reviews for accuracy. Based on the statements made, the Late Stage Risk Manager will refer to the Loss Mitigation status and/or delinquency effects in LIDS and DLOS.</p>	Default Late Stage Risk Manager	Foreclosure/Bankruptcy Manager and/or Designee
Loss Mitigation Affidavits (Due Diligence)	<p>The Late Stage Risk Manager will review the statements made and confirm if accurate and will provide deny or agree to attorney. The Late Stage Risk Manager will refer to original documents, loan history, loan comments, delinquent amounts due as well as any other figures stated when responding.</p>	Default Late Stage Risk Manager	Foreclosure/Bankruptcy Manager and/or Designee
Motion for Summary Judgment (Verif. Statements Made)			

Exhibit III

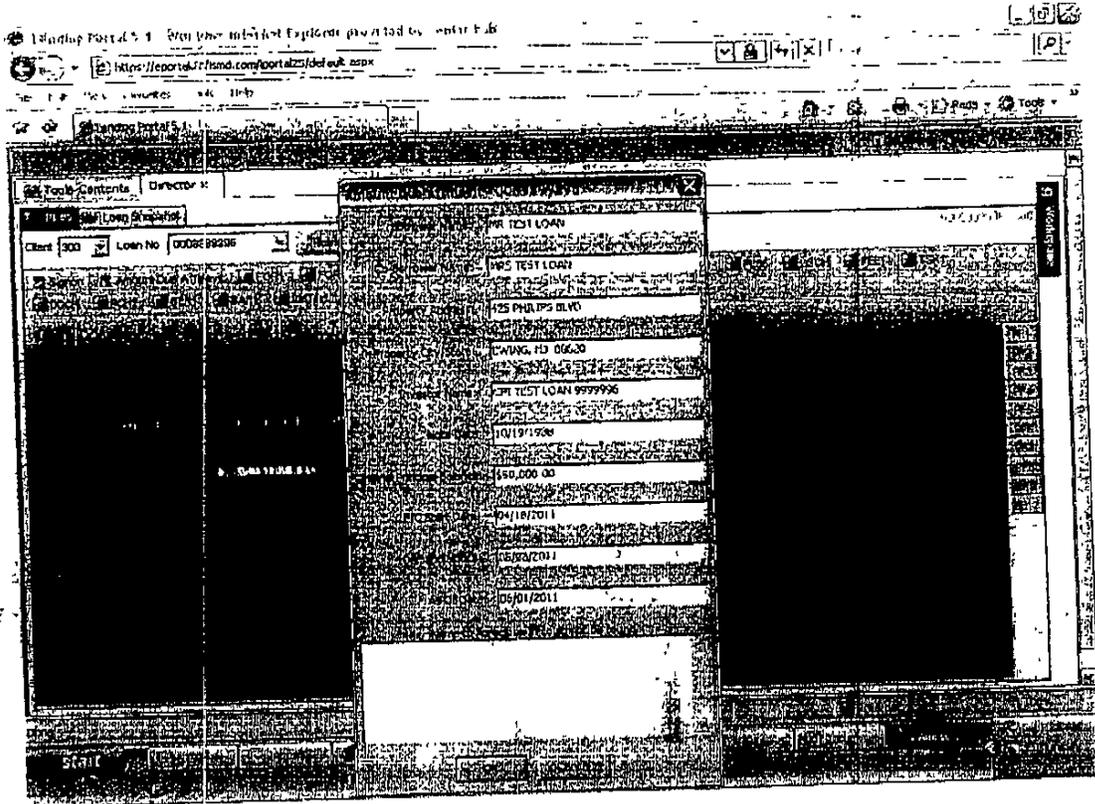


Exhibit III

Amount Due AYR3647: 0009999996 As of Date: 06/01/2011

Rec Corp Adv Bal - \$107.65

POC/Appeals
 Property Preservation
 Prev Bankruptcy Fees/Costs
 Property Inspections
 Misc

	MSP	Modified
	\$0.00	\$0.00
	10.00	\$0.00
	10.00	\$0.00
	\$100.65	\$100.65
	\$0.00	\$0.00
Total	\$100.65	\$100.65

Additional Research needed, variances - \$7.00

Year	Paid	Due
Tax 2011	\$0.00	\$0.00
Tax 2010	\$0.00	\$0.00
Tax 2009	\$0.00	\$0.00
Subtotal	\$0.00	\$0.00
Interest	\$0.00	\$1,700.00
MPI/PMI	\$0.00	\$3.00
Credits	(\$12.00)	\$3.00
Total	(\$512.00)	\$3,390.00

Item	Amount
Prepaid	\$2,910.00
Tax 2011	\$0.00
Tax 2010	\$0.00
Tax 2009	\$0.00
Subtotal	\$0.00
Interest	\$1,700.00
MPI/PMI	\$0.00
Credits	(\$12.00)
Total	\$4,698.00

Exhibit III

Tools Contents Director x

Client: 300 Loan No: 0000819908 Ref: [icon]

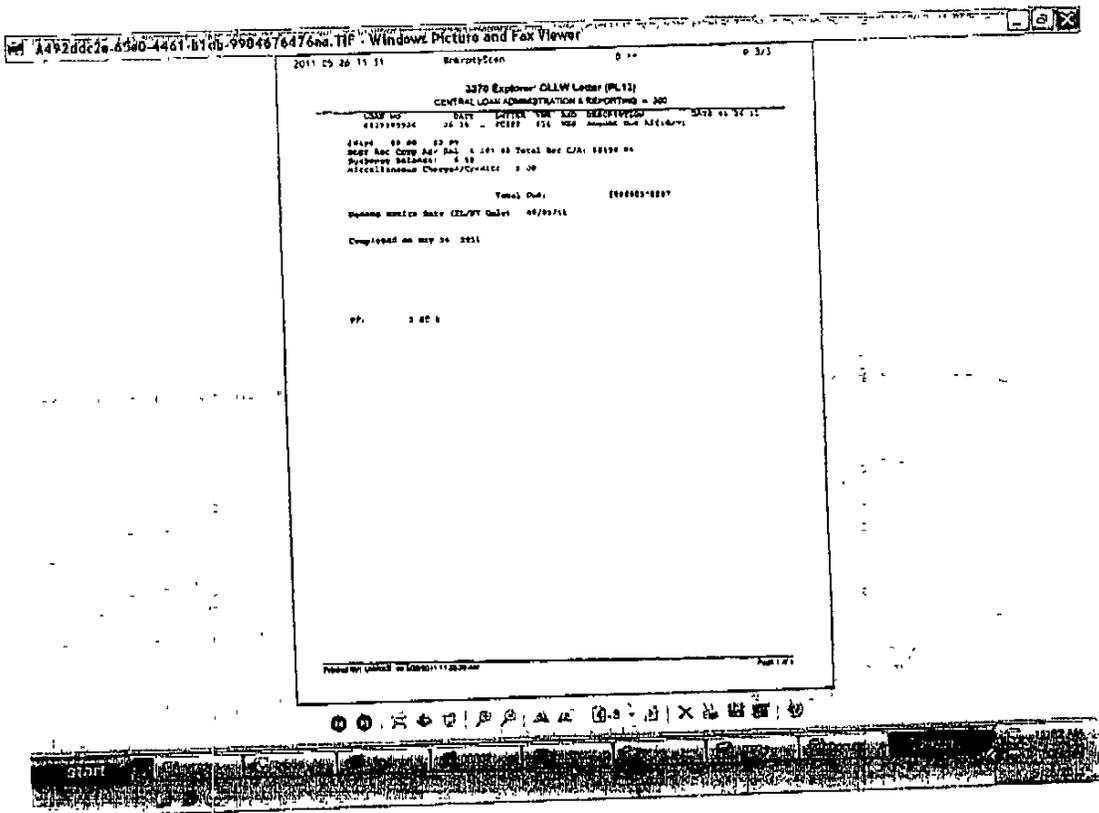
Amount Due Fees PMS PLOS LSOR PEE TSN

PMS PLOS LSOR PEE TSN

Name: Amount Due Affidavit

Principal Balance	\$2,500.00
Subsidiary Balance	\$0.00
Accrued Late Charges	\$10.00
Pre-closure Start Date	04/18/2011
Restricted Escrow Balance	\$0.00
Escrow Advance Balance	\$0.00
Investor Bank Number	250 - CR TEST LOAN 9998899
Orig Date	10/19/998
Orig Loan Amt	\$50,000.00
Orig Lender Name (Uniform)	MRS TEST LOAN
Co-Mortgagee Name (Uniform)	MRS TEST LOAN
Orig Balance	\$3657
Second Delinquent Balance (if applicable)	
Due Date (Next Pmt)	06/01/2008
Enclosure-Attr Code	
New Corp Adv Balance	\$107.85

Exhibit III



Affidavit Checklist

Manager

- The person who is signing the affidavit has confirmed that the correct name stamp has been updated for all blanks in all applicable spaces.
- I have reviewed the Note and Mortgage to confirm the information in the affidavit and those documents are attached to the affidavit.
- The information regarding the figures in the affidavit has been verified and the supporting business records attached, if such information has been stated in the affidavit.
- I have reviewed and verified the statements made in the affidavit with regard to judgment amounts and have attached supporting business records
- The plaintiff's name listed on the affidavit is in the same name as the entity which holds the note.
- Cenlar FSB has been properly noted in the affidavit as servicing agent for the plaintiff.
- Any exhibits mentioned in the affidavit are attached as stated in the affidavit.
- Cenlar is only the custodian of records in reference to servicing.
- Ensure Cenlar is not listed as the document custodian; however, that we have the knowledge as to who the document custodian is and to where the documents are located.
- I am the individual signing the affidavit as an employee of Cenlar FSB Any other information regarding my ability to execute is included.
- I have reviewed the affidavit and all blanks in the affidavit, including my name and title have been filled in and are accurate.

Signature

Date

D

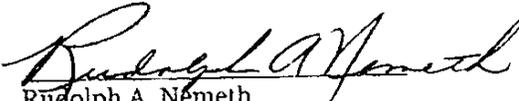
STATE OF NEW JERSEY)
) SS:
COUNTY OF MIDDLESEX)

AFFIDAVIT

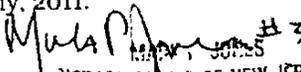
RUDOLPH A. NEMETH, of full age, being duly sworn according to law, upon his oath deposes and says:

1. I am the First Vice President of the Asset Recovery Department of The Provident Bank ("Provident"), a New Jersey savings bank which was chartered in 1839. In discharging my duties in the Asset Recovery Department, I am personally familiar with the facts set forth in this Affidavit. I am authorized to make this Affidavit on behalf of Provident in response to the request for information dated June 29, 2011 (the "Information Request") from Counsel for the Federal Home Loan Mortgage Corporation ("Freddie Mac").
2. Provident has been an approved Seller/Servicer for Freddie Mac since 1981, and as such, services Freddie Mac residential mortgages in accordance with the policies and procedures contained in the Freddie Mac Seller/Servicer's Guide (the "Policies and Procedures").
3. In response to Freddie Mac's Information Request, Provident advises that it currently services 1,741 residential mortgages for Freddie Mac, of which 14 loans (0.8%) are currently in foreclosure, and one (1) loan is currently in bankruptcy.
4. The original loan files for all active mortgages are maintained and secured in hard copy by Provident at its Administrative Offices in Iselin, New Jersey. Certified true copies of the loan documents, or the originals on an as needed basis, are made available to outside counsel. If it is necessary to remit the original loan documents to outside counsel, Provident maintains a record of the date, and to whom, they are sent.
5. Provident does not employ any systems offered or maintained by Lender Processing Services, Inc. (a/k/a the "LPS System") for recording, collecting or reporting mortgage loan remittances. Provident employs the Horizon System, a proprietary product of FIS, Inc. for all its banking and mortgage-related data processing requirements.
6. Access to the Horizon system is password protected and only eight employees are authorized to post entries to any borrower accounts. The Horizon system can generate a detailed payment/transaction history at any time upon the request of an authorized user. The payment/transaction history identifies all changes to an account and the employee who made the change, thereby creating a security trail

7. In the course of pursuing foreclosure judgments, Provident follows the Foreclosure Certification Process set forth in detail on Exhibit A attached hereto. As noted in Exhibit A, only three (3) Department Officers are authorized to execute Certifications in foreclosure actions and only these three authorized officers provide outside counsel with a completed Certification Checklist, a representative example of which is attached hereto as Exhibit B. These Department Officers collectively have more than 50 years of experience in the loan workout and asset recovery disciplines.
8. Signatures on affidavits signed by the Department Officers are notarized exclusively by notaries public who are employees of Provident. The three authorized officers are personally known to the notaries.
9. Provident retains a finite number New Jersey law firms to represent its interests in pursuing foreclosure judgments. Each of the firms is Freddie Mac-approved and, as such, each should have knowledge of the Policies and Procedures. These firms have been selected based upon the personal experience of Provident's asset recovery officers as well as its staff of in-house attorneys.
10. In the course of communicating with the borrowers in any pending foreclosure action, Provident's outside law firms consistently afford any borrower the opportunity to speak directly with Provident's Foreclosure Specialists if the borrower expresses a desire to discuss a restructure or other modification of their mortgage in an effort to avoid foreclosure.
11. Provident's Internal Audit Department periodically reviews the Asset Recovery Department's compliance with the Policies and Procedures for initiating foreclosure actions, and reports its findings to management. In addition, as an approved Seller/Servicer, Provident is subject to periodic examinations by Freddie Mac to assess its compliance with Freddie Mac's Seller/Servicer guidelines and the Policies and Procedures.
12. I have full faith and confidence in the accuracy and veracity of the information contained in the certifications and affidavits made by Provident in New Jersey foreclosures, given the size of Provident's Freddie Mac residential mortgage portfolio, its established foreclosure procedures and the limited number of bank officers authorized to execute certifications and affidavits on its behalf in foreclosure proceedings.


 Rudolph A. Nemeth

Sworn and subscribed to
before me this 15th day of
July, 2011.


 # 31867
 NOTARY PUBLIC OF NEW JERSEY
 My Comm. Expires SEPT 23, 2016

Foreclosure Certification Process

The procedure to prepare and certify Foreclosure Certifications of Amount Due in connection with the filing of a Final Judgment in a foreclosure action is as follows:

1. In order to file a 'final judgment' of foreclosure, a certification of proof of amount due needs to be completed.
2. Outside Counsel supplies a Certification of Amount Due form which is to be completed and returned to Counsel via email.
3. A Foreclosure Specialist reviews all basic information to verify the account in question (name of borrower, property address, note rate, date of origination etc.)
4. The Specialist prints out all information needed to prepare the necessary amounts from the loan system:
 - a. Collection Contact Screen;
 - b. Mortgage Loan Information Screen,
 - c. Payoff Inquiry Screen; and
 - d. Borrower Transaction History Screens
5. The Specialist completes the Certification using figures from the above printouts (rough draft).
6. The Specialist transcribes the figures from rough draft to original Certification and prints (principal, interest due from default date, late fees up to date of filing complaint, escrow disbursements from default date, property inspection fees and associated costs).
7. The Specialist forwards the original Certification, copies of all pertinent documents, copies of relevant data screens and the loan file to one of three Department Officers to review, confirm and execute (Sign and Date Certification).
8. Upon execution, the original certification is forwarded to Outside Counsel and a copy along with the attached back-up screens, are placed in the borrower's file.
9. A note is placed in the borrower's electronic file and on the loan Collection System verifying that the process is complete.
10. Upon receipt by Outside Counsel, the figures on the Certification are reviewed and forwarded to the Court for filing

A second certification, called *Certification of Additional Amounts Due* is prepared prior to the foreclosure sale. This certification provides an accounting of additional expenses or disbursements incurred subsequent to the submission of the initial certification.

If the foreclosure is contested, additional affidavits or certifications may be required

October 14, 2010

EXHIBIT B

NEW JERSEY COMPLAINT CERTIFICATION CHECKLIST

Loan #.
Firm File #:
Borrower Name:
NAME OF PLAINTIFF:

Instructions: THE PURPOSE OF THIS CHECKLIST IS FOR
TO FILE AN ATTORNEY CERTIFICATION OF DILIGENT INQUIRY ASSERTING THAT THE FIRM
HAS COMMUNICATED WITH THE PLAINTIFF OR SERVICER AND CONFIRMED THE ACCURACY OF
COMPLAINT. THIS IS BASED ON THE AMENDED RULE WHICH BECAME EFFECTIVE ON JUNE
9, 2011.

TO COMPLETE THIS CHECKLIST YOU WILL NEED:

- The COMPLAINT
- The NOTE
- The MORTGAGE
- Any and all ASSIGNMENTS OF MORTGAGE

1. Name of checklist reviewer who personally reviewed the complaint:

_____ Dated: _____
 TITLE OF REVIEWER: _____

2. JOB DESCRIPTION of checklist reviewer: _____

3. If SERVICER signing this checklist, what is the relationship with
Plaintiff?: _____

I have confirmed the authority of servicer to act on behalf of
Plaintiff (you must check this off)

COMPLAINT

5. Is the Plaintiff (SEE CAPTION) correct according to your company's
business records?

- Yes, the plaintiff name matches our records.
- No, the plaintiff name does not match our records and should read:

6. Does the PERSON(S) WHO SIGNED THE NOTE (the obligor) see Paragraph 1 of
the Complaint, match your company's business records? (person responsible for
payment of the debt).

- Yes, the obligor(s) do match our records
- No, the obligor(s) do not match our records and should read

7. Does the entity to whom the debt is owed (the obligee)- see paragraph 1 of the Complaint-- match your company's business records?

- Yes, the obligee(s) do match our records.
- No, the obligee(s) do not match our records and should read:

_____.

8 Does the entity to whom the MORTGAGE is made (the MORTGAGEE) see paragraph 2 of the Complaint --match your company's business records?

- Yes, the mortgagee does match our records.
- No, the mortgagee does not match our records and should read:

_____.

9. Do(es) the persons who signed the MORTGAGE (the mortgagors) see paragraph 2 of the Complaint match your company's business records?

- Yes, the mortgagors match our records.
- No, the NAME MISSING IS/ARE: _____.

10. Does the original amount of the Note and Mortgage (see Paragraph 1) match your company's records?

- Yes, the original amount of the note and mortgage matches our records.
- No, the original amount should read: _____.

THE MORTGAGE

1. Is the following information regarding the mortgage accurate:

- DATE of the NOTE AND MORTGAGE matches our records.
- Recording date of the mortgage matches our company records.
- The book and page numbers of recorded mortgage match our records.
- The county of recording matches our records.

If any of the above is incorrect, please note below which item must be corrected: _____.

2. Does the complaint correctly set forth that the mortgage is a purchase money mortgage?

- Not applicable, this is not a purchase money mortgage
- Yes, this is a purchase money mortgage
- No, the complaint does not correctly set forth purchase money mortgage

DESCRIPTION OF THE PROPERTY- SEE SCHEDULE A TO COMPLAINT

1 Does the "commonly known address" for the property match your company

business records?

- Yes, it matches our records.
- No, the "commonly known address" does not match our records and should read: _____.

2. Do the lot and block (and/or) qualifier number match your company's business records?

- Yes, they match our records.
- No, they do not match our records and should read: _____.

LOAN MODIFICATION

- NOT APPLICABLE, there is no loan modification according to our company business records.
- Yes, there is a loan modification and the terms are properly set forth in the complaint and match our records.
- No, the terms are not accurate accordingly to our records and should be _____.

ASSIGNMENT OF MORTGAGE

Every assignment in the complaint is to be reviewed. If there is incorrect information, indicate which assignment your response is correcting. If there are no assignments, select "N/A".

- N/A - no assignments of record. GO TO NEXT SECTION.
 - Yes, the date of assignment matches our records.
 - Yes, the assignor name matches our records.
 - Yes, the assignee name matches our records.
 - Yes, the recording date matches our records.
 - Yes, the book and page numbers match our records.
- IF ANY INFORMATION IS INACCURATE, PLEASE CORRECT HERE:

NOTICE OF INTENT TO FORECLOSE (NOI)

Do your company's business records show that the NOI was sent to all who signed the NOTE at both the mortgage premises and any alternate mailing address?

- Yes, the NOI was sent to everyone who signed the NOTE at the correct addresses as per our records
- No, the NOI was not sent to _____ or at the

address _____

DEFAULT INFORMATION

Does the DEFAULT date match your business records?

Yes, the default date matches our records.

No, the default date does not match our records and should read:

I confirm to the best of my information, knowledge, and belief that the foregoing responses are true and correct.

(Signature of reviewer)

Dated.
Borrower Name:

E

**CERTIFICATION OF RYAN SABO IN SUPPORT OF NYCB MORTGAGE
COMPANY, LLC'S RESPONSE TO THE REQUEST OF FREDDIE MAC**

I am currently an Assistant Vice President and the Foreclosure Manager of NYCB Mortgage Company, LLC ("NYCB"). As Assistant Vice President and Foreclosure Manager of NYCB, I have personal knowledge of and am fully familiar with the NYCB foreclosure operations, including as they relate to procedures for the State of New Jersey. I submit this Certification to Freddie Mac in response to the request of Freddie Mac to provide information about NYCB's policies and procedures regarding the accuracy, content and execution of any certification/affidavit filed with a court in a foreclosure proceeding, as follows.

a) State what processes and procedures you have to ensure that the certifications/affidavits submitted are based upon that person's personal knowledge or that person's review of business records which records would be admissible in evidence in a New Jersey Court. Describe the processes and procedures in detail and attach a copy of any documents that establish the processes and procedures.

1(a) NYCB has policies and procedures that mandate the required steps for the review and execution of foreclosure-related affidavits and documents, so that the person executing has personal knowledge.

Attached are copies of i) Section IV (o), Foreclosure, of the Loan Administration Policy, and ii) the section of the Foreclosure Procedures relating to "Preparation of Judgment figures, Affidavits, Complaints, Declarations and Acknowledgements".

The process for the preparation, review, and completion of certifications/affidavits is as follows:

The affidavit is prepared based upon the business records of NYCB as contained on the loan servicing system, "Loan Serv", which contains all information related to a loan, to which the Foreclosure Specialist has access in order to review and confirm information and the status of a loan. The Foreclosure Specialist will review the affidavit to verify the content in the affidavit against the information contained on the loan servicing system. They will review the loan payment history, fees and expenses, borrower and loan information, and loan payoff figures. The Foreclosure Specialist is also required to review the affidavit to ensure all information in the affidavit is factually correct. The Foreclosure Specialist has been authorized by NYCB to execute the affidavit in accordance with applicable county and state law, pursuant to the direction of local foreclosure counsel.

b)i. State the processes and procedures you have in place to ensure that the individual who executes the certification/affidavit executed it according to law, and that the signature is a valid lawful signature.

1(b)(i) While all Foreclosure specialists are located in Cleveland, Ohio, each Foreclosure Specialist is assigned to specific geographic area and has been authorized by NYCB to execute those documents relating to foreclosures within their assigned area. They have access to the information relating to foreclosure files that is contained in the loan serving system. Foreclosure counsel is expected to advise NYCB of all requirements relating to the

preparation, execution and submission of foreclosure documents in accordance with applicable law. In the event a document requires notarization, it will be notarized in accordance with the laws of the State of Ohio, where the Foreclosure Department is located. All such documents are required to be signed in the presence of a notary. Currently there are two notaries in the foreclosure department.

ii. State the processes and procedures in place to ensure that the person executing the certification/affidavit, pursuant to paragraph (a), has the authority to act on behalf of the plaintiff/servicer.

1(b) (ii) The NYCB Foreclosure Specialists have been authorized to sign specific documents on behalf of the NYCB. NYCB maintains a Foreclosure Approval Matrix that designates which documents the Foreclosure Specialist is authorized to execute. Periodic audits and reviews are conducted by internal and external auditors and Compliance Department personnel to ensure compliance with the Approval Matrix.

c) State in detail your record keeping system to ensure that there is accurate up-to-date entries of payments, loan history, assignments, or of any other transaction involving the mortgage. If you are currently making or anticipate making changes, state the changes to be made and when they will be implemented.

1(c) NYCB uses the Loan Serv Servicing system. All mortgage loan servicing transactions are tracked on the system in real time. Loan servicing transactions include any payments or application of funds (fees, late charges, etc.) as well as any type of notes entered by various departments (default, general servicing, and collection). An automated task tracking function is also utilized by the system to ensure and monitor when tasks are opened and completed. Payment histories are stored on the servicing system for three years and older histories are archived in NYCB's OnBase (document imaging and report) storage software. OnBase is used to store original loan documents, system generated letters (e.g. breach, etc.), other customer correspondence, archived pay histories, as well as all various Loan Serv system reports.

d) State the review process you have in place to ensure that any certification/affidavit submitted to the Court is accurate, based upon current information and that the person executing the document relied upon personal knowledge and/or business records which would be admissible in a New Jersey Court. If you are currently making or anticipate making any changes, state the changes to be made and when they will be implemented.

1(d) All certifications/affidavits are based on the personal knowledge of the Foreclosure Specialist or review of the business records contained on the loan servicing system by the Foreclosure Specialist who is assigned to the file and who executes the documents (see 1a regarding the process).

e) State in detail any training programs you have in place for individuals completing certifications/affidavits to ensure that their knowledge of the contents of the certification/affidavit is based upon personal knowledge or business records which would be admissible in a New Jersey Court.

1(e) The Foreclosure Specialists are experienced and well trained employees. The Foreclosure Specialists have an average of 5.3 years of experience in Bank/Foreclosure Related Areas. The management of the Foreclosure Department has an average of 19.5

years of experience in Bank/Foreclosure Related Areas. NYCB provides direct, on the job training, which includes the proper preparation and execution of foreclosure documents. Training is also provided by outside foreclosure counsel with regard to state-specific foreclosure laws and procedures. NYCB provides internal compliance training through a vendor company and employees are required to complete this training annually.

f) Describe in detail the process you have in place to ensure that foreclosure counsel is provided with current accurate information to support the preparation of any documentation counsel will be submitting to the Court pursuant to Court Rule.

1(f) As part of the initial referral package sent to foreclosure counsel, via a software application called Vendorscape, NYCB provides the foreclosure counsel with copies of the note, mortgage or deed-of-trust, title policy, any state required delinquency letter, breach/demand letters, title polices, payoff information and all other financial data needed for the foreclosure documentation. If foreclosure counsel needs more information, they contact the Foreclosure Specialist assigned to that file, who will then access the loan servicing system and provide foreclosure counsel with the requested information. By utilizing Vendorscape as the referral and communication software with foreclosure counsel, NYCB is able to keep a date/time stamped record of all foreclosure related documentation sent to foreclosure counsel and monitor such counsel's performance on foreclosure cases.

g) State the review process you and foreclosure counsel have in place for the final review of documents to be submitted to the Court pursuant to Rule 4:64-1 et. seq..

1(g) Foreclosure counsel or the Foreclosure Specialist prepare and review any documents that are to be submitted to the court. The Foreclosure Specialist reviews all documents filed in the foreclosure case. The Foreclosure Specialist is required to review the loan servicing system to ensure all financial and borrower information is accurate in all the documents filed. If there are any questions related to data or documentation, the Foreclosure Specialist will consult with management or foreclosure counsel, if needed. The documents that are executed by the Foreclosure Specialist are sent by the Foreclosure Specialist to foreclosure counsel to be filed with the court.

h) State whether you utilized or intend on utilizing any independent auditor to review the process and procedures mentioned in the above answers to ensure that you are in compliance with the mandates of Court Rule 4:64-1 et. seq..

1(h) Since October 2010, the Foreclosure Department has been subject to one internal and four external audits, which have reviewed the Foreclosure Department's foreclosure cases, policies and procedures.

I hereby certify that the foregoing statements made by me are true



Ryan Sabo

Dated 7/15/2011

O. Foreclosure

Each Foreclosure Specialist maintains the integrity of the account status, property preservation action, and/or updates the property value on their assigned portfolio of accounts. To accomplish these tasks, Foreclosure Specialists review all loans to ensure code assignments are correct, the Foreclosure Alert flag is active, and occupancy status and condition of the property are current and appropriate action taken to protect the Bank's collateral interest. Additionally, notify the legal counsel of any special requirements for a specific loan and track that the attorney has acknowledged this request.

1 Judgment figures, Affidavits, Complaints, Declarations and Acknowledgements

a. Preparation

i Foreclosure Specialists Role

- Have personal knowledge of the books and records of defaulted mortgage loans including and not limited to payment history, escrow payments, and advances made and received on mortgage loans
- Participate in the preparation of and have actual and personal knowledge of the facts stated in foreclosure legal documents.
- Responsible and accountable for ensuring Foreclosure Counsel has accurately prepared, reviewed and executed such documents

ii. Foreclosure Counsel

- Foreclosure Specialists work directly with Foreclosure Counsel in the preparation of:
 - Judgment figures
 - Affidavits
 - Complaints
 - Declarations
- Acknowledgments

b. Documentation

- i. Screen prints of the mortgage servicing records are attached to all legal documents executed
 - Sent with the legal documents to foreclosure counsel
 - Copies of this information will be retained and scanned into OnBase-OFA for future reference.

c. Execution of documents

- i. Foreclosure Specialist
 - Review of screen prints of information from the system of record
 - Review of records of the loan to review from the mortgage servicing records
- ii. Officer of Bank
 - If the Foreclosure Specialist is unable to execute certain documents because State law requires an officer of the bank to execute
 - Foreclosure Specialist will bring the legal foreclosure documents to review with an officer of the bank
 - Review of screen prints of information from the books
 - Review of records of the loan to review from the mortgage servicing records
 - The officer of the bank verifies the accuracy of the data
 - Utilizes screen prints
 - Accesses books and records where this information is stored to review and execute the legal document

d. Use of designated Notaries within the bank's Foreclosure Department

- i. Foreclosure documents are prepared and executed by the staff voluntarily and without duress
- ii. The Notary knows the person seeking notary services and that he she is the person described in, and who executed, the document

2 Vendorscape:

- a. Vendorscape system assigns each loan to a state specific template for a foreclosure timeline
 - i. Reduces risk of non-compliance with state guidelines as timelines and required tasks vary depending upon state requirements
 - ii. As a control for consistency between loans in the same state, the templates are utilized for all foreclosure referrals

- iii. Timelines for all loans, regardless of investor, are based upon Fannie Mae guidelines as they are the most stringent in turnaround
 - b. Assigns loans to a Foreclosure Attorney within each state
 - i. Increases efficiency and accuracy as they are familiar with their state and court requirements / constraints
 - ii. Centralizes the communication channel between the Foreclosure specialist and the attorney as all communication is routed through the Vendorscape system
 - Reduces delays and risk of non-compliance with Foreclosure deadlines if an employee is out
 - Interfaces with the servicing system to notate all correspondence
3. Attorney Requirements:
- a. Assigned attorney acknowledges receipt of the referral within Vendorscape
 - iii. Order Title Policy
 - No clear title
 - Title is reviewed to see if it can be cleared, or if a title claim will be filed to resolve problems
 - Title can be cleared
 - . Foreclosure Attorney will cure all title defects, and the foreclosure process will continue
 - Title claim is required to be filed
 - Foreclosure Attorney will handle the title claim on our behalf and work with Mortgage Legal Department with filing a claim against the title company
 - Once the title claim has been completed
 - . Loan will continue with the foreclosure process
 - . Title claim proceeds will be received from the Title Company and the loan will follow a charge off process.
 - b. Foreclosure Attorneys complete all required foreclosure timeline tasks
 - 1. Attorney's timely completion of tasks

- Monitored by Foreclosure Specialists to help ensure foreclosure timelines will be met on each individual loan.
 - This will ensure the property is foreclosed upon as quickly as possible to minimize losses to the Bank and enable us to resell the property quicker.
- ii. Attorney requires a reforecast of tasks
 - If a reforecast is required because of a delay, the Foreclosure Attorneys are required to document the Vendorscape processing system as to the reason of the delay, and when the task should be reforecast to.
 - This ensures the attorney does not just reforecast dates due to their delays and keeps us monitoring their activity for accuracy and timeliness.

4 Foreclosure Sale Date is Set:

- a. All required tasks are completed by the Attorney
- b. Based upon the Fannie Mae timelines for that particular state, the Foreclosure Attorney provides a Foreclosure Sale Date to the Foreclosure Specialist
- c. The Foreclosure Specialist orders a Broker Price Opinion (BPO) to determine the value of the property.
 - 1. The Foreclosure Specialist will complete the bidding instructions and submit to Default Risk Management for approval.
 - On Investor loans (with and without PMI) and on Bank Owned loans with PMI, Foreclosure Specialists prepare bidding instructions according to Investor and PMI guidelines and submit to foreclosure counsel.
 - On Bank Owned loans without PMI, Foreclosure Specialists prepare bidding instructions according to bank guidelines and submit to management for approval prior to submitting to foreclosure counsel.
 - MI guidelines supersede Investor and NYB guidelines if the loan has mortgage insurance.
 - Following their guidelines protects our rights of filing a claim.
 - If the loan does not have mortgage insurance, bidding should be based upon investor guidelines or NYB guidelines
 - For NYB guidelines, we will bid total debt or 80-100% of Fair Market Value determined by a Broker Price Opinion or appraisal

depending on the geographic location of the property.

- Loan Administration Officer and above corporate titles are able to determine and approve bidding instructions.

5 Foreclosure Sale is Completed:

a If property reverts back to the beneficiary:

1. The REO sale is reported based upon Investor or NYB requirements.

- For NYB, loan sale notifications are sent to Mortgage Accounting and the REO department to have the loan transferred into REO inventory.
- Certain states have a required redemption period, that the borrower can redeem the property.
 - If not redeemed by the redemption expiration date set by the state, the deed is recorded.
 - The foreclosure module is closed, and all foreclosure related expenses are submitted to Default Risk Management for approval.
 - . Based upon the signing authority approval matrix.
 - If the property is redeemed, the state requires redemption figures to be provided to the Foreclosure Attorney that will include escrow advances with proof of payments, and the attorney calculates the redemption figures.
 - Foreclosure Attorney receives redemption funds, and the Attorney files a certificate of redemption with the courts.
 - Charge off is submitted to Default Risk Management for approval
 - . Charge Off approval authority is based upon the foreclosure approval matrix
 - The foreclosure module is then closed and all foreclosure related expenses are submitted to Default Risk Management for approval.

- . Based upon the foreclosure approval matrix
- b. If property goes to third party:
 - i. Proceeds are monitored
 - o If proceeds are not received by a set date
 - We will need to request an additional deposit and extension or ask for a new sale date or have the sale revert back to the Bank or Investor.
 - o If 3rd party proceeds are received
 - A charge off request is submitted to Default Risk Management for approval
 - o Charge Off approval authority is based upon the foreclosure approval matrix.
 - o The foreclosure module is then closed, and all foreclosure related expenses are submitted to Default Risk Management
 - . Based upon the foreclosure approval matrix.

6 Controls & Quality Assurance:

- a. Vendorscape New Referral report is reviewed ongoing to ensure all loans referred are acknowledged by attorney's
- b. Weekly pipeline meeting held to review active foreclosure files
 - i. Focus on timeline adherence to Investor / NYB guidelines
- c. For accuracy and to mitigate delays in the foreclosure, a review of bidding instructions for foreclosure sales is conducted at least one week prior to any foreclosure sale
- d. Invoices submissions are sampled for each Foreclosure Specialist to ensure timely payment

Preparation of Judgment figures, Affidavits, Complaints, Declarations and Acknowledgments

Foreclosure Specialist have personal knowledge of the books and records of defaulted mortgage loans including and not limited to payment history, escrow payments, and advances made and received on mortgage loans. Employees of the bank participate in the preparation of and have actual and personal knowledge of the facts stated in foreclosure legal documents.

In addition, the bank's Foreclosure Specialists work with foreclosure counsel in the preparation of the Judgment figures Affidavits Complaints Declarations and Acknowledgments. The Foreclosure Specialists are responsible and accountable for ensuring they had accurately prepared, reviewed and executed such documents. Screen prints of the mortgage servicing records are attached to all legal documents executed. They will be sent with the legal documents to foreclosure counsel and copies of this information will be retained and scanned into hardfiles for future reference.

If the foreclosure specialist is unable to execute certain documents because a state law requires an officer of the bank to execute, they will bring the legal foreclosure documents including the screen prints of information from the books and records of loan to review with an officer of the bank. The officer of the bank has the available screen prints to verify the accuracy of the data, and also has have access to the books and records where this information is stored to review and execute the legal document.

There are several designated Notaries within the bank's Foreclosure Department. Foreclosure documents are executed by the staff voluntarily and without duress in the presence of a Notary. The Notary knows the person seeking notary services and that he/she is the person described in, and who executed, the document.

F

Response to Question 1(A)

1(A) State the processes and procedures you have to ensure that the certifications/affidavits submitted are based upon that person's personal knowledge or that person's review of business records which records would be admissible in evidence in a New Jersey Court. Describe the process and procedures in detail and attaché a copy of any documents that establish the processes and procedures.

2 In the process currently used by Fifth Third Bank, our local counsel provides notice that an affidavit is required and request needed information to prepare the affidavit

 A Fifth Third Foreclosure Analyst ("Analyst") then reviews relevant business records contained in our operating system MortgageServ, including but not limited to, ownership, relevant dates, amount due, default date and the terms of the note along with other applicable systems and websites such as the DMDC to verify if a borrower is on active military duty. After all the needed information is gathered the Analyst will provide the information to our attorney to prepare the affidavit. The information provided to our attorney is from data which is housed and saved in MortgageServ

 Once the affidavit is prepared by our attorney it is sent to Fifth Third Bank for execution. The Analyst reviews the document and verifies the information in the prepared affidavit prior to execution. The analyst is required to print proof of items that he/she is attesting. If the affidavit is accurate the Analyst signs the affidavit in the presence of a notary employed by Fifth Third Bank and returns it to our attorney for filing

 The Analyst is required to put a copy of the executed affidavit along with the screen prints to prove each item is true in the loan's foreclosure file

 This process is outlined in the attached foreclosure procedure entitled Managing the Foreclosure labeled, Exhibit A. Fifth Third Bank is currently reviewing this

document execution policy and procedure to determine if enhancements to improve the process are available.

Response to Question 1(B)(i)

State the processes and procedures you have in place to ensure that the individual who executes the certification/affidavit executed it according to law and that the signature is a valid lawful signature

- 3 All affidavits are prepared by our local New Jersey counsel in accordance to applicable law Analysts and Bank Officers are required to execute affidavits under oath and in front of a notary, we do not use digital or signature stamps

Response to Question 1(B)(ii)

State the processes and procedures in place to ensure that the person executing the certification/affidavit, pursuant to paragraph (a), has the authority to act in behalf of the plaintiff/servicer

- 4 Only Foreclosure Analysts and Bank Officers are authorized to execute foreclosure certification/affidavits If statutory law requires a Bank Officer to execute an affidavit Analysts are trained to send a task to a Bank Officer in their department to notify him/her that their signature is required The process is outlined in the attached Exhibit A If a new statute updates the requirement of a signature on an affidavit to be by a Bank Officer this information is updated in our procedures and communicated to staff

Response to Question 1(C)

State in detail your record keeping system to ensure that there is accurate up-to date entries of payments loan history, assignments, or of any other transaction involving the mortgage If you are currently making or anticipating making any changes, state the changes to be made and when they will be implemented

- 5 Fifth Third has a detailed quality control plan to insure that transactions on the servicing system are checked for accuracy and comply with regulatory requirements All findings are reported to management for review A closure form is required to document changes have been made to correct negative findings Please see the attached Quality Control Plan labeled, Exhibit B Quality Control findings are monitored by internal Audit and provided to outside regulators and investors as requested We are advised by

our Compliance Department our attorneys and Fiserv, our servicing system vendor, to remain aligned with current changes in State and Federal law

Response to Question 1(D)

State the review process in place to ensure that any certification/affidavit submitted to the Court is accurate based upon current information and that the person executing the document relied upon personal knowledge and/or business records which would be admissible in a New Jersey Court. If you are currently making or anticipate making any changes, state the changes to be made and when they will be implemented.

- 6 Fifth Third incorporates herein its answer for question 1(A). Analysts are required to put copies of screen prints proving items listed in affidavits are true along with a copy of the signed affidavit in the foreclosure file. In addition, there is a monthly audit conducted each month where management pulls a random selection of affidavits for each Analyst and conducts an accuracy review.

Response to Question 1(E)

State in detail any training programs you have in place for individuals completing certifications/affidavits to ensure that their knowledge of the contents of the certification/affidavits is based upon personal knowledge or business records which would be admissible in a New Jersey Court.

7. All Analysts as have received extensive training in document verification execution and the severity involved in signing legal documents incorrectly. In addition, all authorized officers and affidavit signers received further training and coaching from outside counsel regarding what it means to sign an affidavit, the repercussion of signing an affidavit unlawfully and when not to sign an affidavit. Annual training is provided to employees who review and execute affidavits.

Response to Question 1(F)

Describe in detail the process you have in place to ensure that foreclosure counsel is provided with current accurate information to support the preparation of any documentation counsel will be submitting to the court pursuant to Court Rule.

- 8 Fifth Third incorporates herein its answer for question 1(A). Analysts work directly with local counsel when communicating information for documentation that will be submitted to the court. In the case of affidavits, once notice is given that an affidavit is needed the attorney is provided with the necessary data to prepare the affidavit. If any

additional information is needed our attorney will work directly with the Analyst to obtain it. After the affidavit is prepared the Analyst is required to review and verify that all items, including data initially provided to the attorney to prepare the affidavit, is true and accurate prior to signing and returning the document to the attorney to be filed.

Response to Question 1(G)

State the review process you and foreclosure counsel have in place for the final review of documents to be submitted to the Court pursuant to Rule 4.641 et seq.

9 Fifth Third incorporates herein its answer for question 1(A) and 1(F)

Response to Question 1(H)

State whether you utilized or intend on utilizing any independent auditor to review the process and procedures mentioned in the above answers to ensure that you are in compliance with the mandates of Court Rule 4.641 et seq.

10 In the winter of 2010 Fifth Third Bank employed an independent third party as well as an attorney firm to review our current processes and procedures. Our processes are also audited by a separate internal department.

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

July 19, 2011



Fred E. Troncone
Senior Vice President
Chief Collections Officer
Fifth Third Bank
Madisonville Operations Building
5001 Kingsley Drive
MD 1MOB10
Cincinnati, OH 45227
Phone 513-358-0715
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606.1.2 – Responding To Foreclosure Counsel’s Request for Documentation To Support Entry of Judgment

To obtain final judgment in certain states, an affidavit must be provided. In such states, foreclosure counsel will prepare the affidavit to support the judgment. The information in the affidavit and any accompanying documentation, including ownership and amount due, must be reviewed for accuracy and verified. In most states, the affidavit must be notarized. Upon receipt of the documents from foreclosure counsel, the following steps must be undertaken:

- Review the information in the affidavit for accuracy based on a review of the relevant business records contained in MortgageServ, including but not limited to, ownership, relevant dates, amount due, default date and the terms of the note,
 - An ‘Affiant’ is an individual that is attesting to the facts within the Affidavit
 - Affidavits must be based on an affiant’s personal knowledge, meaning that person must be able to verify the information. Affiants should not attest to having personal knowledge of any information that is being given/told by someone else. Analyst should be absolutely certain that they have personal knowledge of the facts within the affidavit. Otherwise, Analysts should check with their Supervisor and/or work with counsel to modify the affidavit to either remove the data, if possible, or to re-word the statement so that it does not imply personal knowledge or confirmation of any information/data
 - Most affidavits require the state and county be listed just above the statement/body of the document. The state and county here should be the state/county in which the Affiant is executing the affidavit.
 - Foreclosure Analysts should be sure that they are listed on the affidavit as “Foreclosure Analyst” or “Affiant”. No employee should be signing as “Officer” unless they are absolutely positive that they have been assigned that title by Fifth Third Bank.
 - While we generally foreclose in the name of Fifth Third Mortgage Company, affidavits executed and signed by an employee within the Foreclosure Department should state that person is an employee of Fifth Third Bank. Example: “Jane Doe, is an employee/Foreclosure Analyst of Fifth Third Bank, as servicer for Fifth Third Mortgage Company.” or “Jane Doe is an employee of Fifth Third Bank and is authorized to make this affidavit on behalf of Fifth Third Mortgage Company.”
 - Many affidavits reference the Plaintiff (Fifth Third Mortgage Company) as the “Owner and Holder of the Note and Mortgage”. Affiants must be sure that this statement is accurate. Affiants should review those documents to verify the ownership, as well as verify that the original loan documents referenced are in fact, held by the entity claimed in the affidavit. If the Note and Mortgage are held by another entity, the Affidavit should be edited to reflect that entity.
 - If exhibits are referenced in the Affidavit, the person attesting should be sure that those documents are attached and should verify their accuracy.
 - **Affiant Signatures** - Affiants should not sign an affidavit until after they have reviewed all of the facts and documents referenced within that affidavit. Affidavits should not have any blank spaces.



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when the affiant is signing the document. The individual making the affidavit and listed as the person in the body attesting to the facts must sign the affidavit. Signature lines should have the affiant's name and title printed below the signature line.

- **Notarizing an Affidavit** – When affidavits are notarized, it must be done with both Notary and Affiant present. The document must be sworn to before an officer authorized to administer oaths (i.e. a notary). A Notary must administer the oath as required by state law. Notaries may NOT notarize an affidavit unless they have administered the oath and it has been signed by the Affiant in presence of the Notary. A Notary must not be notarizing any documentation if their commission has expired, until that commission has been renewed.
- When an affidavit is required to be notarized the staff member assigned to the account must send one of the following CIT's to their assigned notary based on the type of document.
 - **Task 784 “Notary Needed – Affidavit”** This is the task that analysts will be using to inform their assigned notary that they need an affidavit notarized. Affidavits that can be filled out and signed by analysts are the only affidavits for this specific task.
 - **Task 785 “Notary Needed – AVP/VP”** This is the task that analysts will be using to inform their assigned notary that they need a document signed by Brad Griffith, Michele McCoy, or any other AVP or VP at Fifth Third. Specifying the person needed and if there are witnesses required should also be noted.
 - **Task 786 “Notary Needed – LNA/LMA”** This is the task that analysts will be using to inform Ben Heckert (#21159) that they need a Lost Note Affidavit, Lost Mortgage Affidavit, Lost Assignment Affidavit, or any other affidavit of Lost document. The document will be sent to the Central File Room for execution and notarization.
- Those persons signing the affidavit must be sure that they can attest to all of the information in the Affidavit. If the affiant is confused or unsure about the information in the Affidavit, the affiant should consult with counsel in order to clarify or have the information removed if it is not necessary.
- **Calculating the judgment figures**
 - Analyst should use the 'Create Bid' function via the FCL work screen in order obtain the accurate amounts to be claimed in the Affidavit.
 - Once on the create bid screen, if there is already a bid enter for the loan, add a new bid by place 'a' in the A/C/D field and click submit. This provides a new calculation and the amounts provided are good through the date that is currently set as the follow-up date for the 605 task on the foreclosure workstation. The F/C Sale Date on the create bid screen should be changed to the “good through” date provide on the Affidavit. If there is no good through date, Affiants should confirm with counsel on what date judgment figures should be good through.
 - The original column will adjust the amounts of interest and late charges with respect to the F/C Sale date provided.



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- The principal, Escrow, Drm Advances & Other Fees will remain the same as those amounts will only show true data as to what has been advanced/accrued to date
- The late charges in the 'Current' column should be adjusted to show the proper amount for total late charges through the good through date provided by counsel, or total late charges, including uncollected late charges, up and to the acceleration date (indicated by the date that the breach letter was sent on the 'Del/Breach' screen)
 - Late charges through good through date are populated in the 'Original Column' on the create bid screen once the F/C Sale Date is changed. This number can be typed into the 'Current' column
 - If the Affidavit indicates Late charges prior to acceleration, we can only claim late charges up to the date that the breach letter is sent. That late charge amount should be calculated as follows
 - Navigate to 'Cus/total' screen and place a 'y' in the Uncollected View field and hit enter. Uncollected late charges are indicated in the Uncollected box by "Uncol Late Chrgs"
 - The late fees should be added up to the date that the most recent breach letter was sent (on 'Del/Breach' screen). For breach letters sent prior to the 17th of the month, the late fee for the month should not be included
 - The uncollected late charges and late fees should be added together to obtain the total late charges prior to acceleration. That amount should be placed in the Late Charges field under the Current column in the 'Create Bid' screen
- The Drm Advances under the Current column on the create/bid screen pull amounts identified as fee type 040 on the Cus/Fee/Review screen. This amount should be adjusted to indicate only amounts collectable and able to be claimed on the judgment affidavit. Affiants are to consult with the Foreclosure Attorney before including any Atty fees/costs in the Drm Advances. Any amounts uncollectable should be subtracted from the Drm Advances in the Current column
- 'Other Fees' under the Current column on the create/bid screen pull amounts on the Cus/Fee Review screen that are NOT identified as fee type 040. This amount will need to be adjusted if the judgment figures are requested to be good thru a prior date. Affiants will need to subtract any fee amounts that were assessed after the good thru date from the 'Other fees' in the Current Column
- Once the items in the Current column match what is to be claimed on the judgment Affidavit, the create bid should be identified and saved



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- Identify the create bid by typing a description of the bid/judgment in one the empty fields. The description should indicate “jgmt fig” and have the date that the create bid was completed. Example “jgmt fig 1 27 11”
- Place ‘b’ in the Letter? Field and click submit, then return
- Creating the bid populates a bid amount on the FCL info screen. This needs to be deleted as the create bid was created for a judgment affidavit, not for a foreclosure bid. Go to the FCL Info screen and remove the amount in the Bid Amount field
- Breaking down Escrow. Many Affidavits have escrow and broken down into taxes & insurance. The total amount of escrow determined from the create bid can be broken down to provide the amounts requested on the affidavit
 - Navigate to Dis/History screen
 - Type ESC in the Dsp field to display all escrow disbursement transactions
 - The most recent escrow disbursements should be reflected in the Affidavit. The sum of the disbursements should not exceed the total escrow balance
- Breaking down Fees. Many Affidavits have Fees broken down into property inspections, property maintenance, BPOs, NSF fees, etc. The ‘Other Fees’ from the create bid screen can be broken down to provide the amounts requested on the affidavit
 - Navigate to the Cus/Fee Review screen in order to view the different fee descriptions. Fee type 040 is not included in ‘Other Fees’. In order to view a breakdown of each description, place an ‘s’ in the field to the left of the fee type and hit enter. This will provide a list of all assessments for that fee type. Only assessments made prior to the good thru date requested on the affidavit should be included
 - The sum of all assessments for all fee types should equal the total amount of ‘Other Fees’ from the create bid screen
- If any of the information on the affidavit is inaccurate, an email must be sent to foreclosure counsel alerting them to the error and requesting that it be fixed,
- If the affidavit is accurate, or upon receipt of the corrected affidavit, it must be signed and properly notarized if required,
- The affidavit must be returned to foreclosure counsel and a copy maintained
- A notation must be made in the system that the affidavit was signed and returned to foreclosure counsel



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Change Control Tracking

Review Cycle (check one)

Quarterly	<input type="checkbox"/>
Semi-Annual	<input type="checkbox"/>
Annual	<input checked="" type="checkbox"/>

Change Type (check one)

New Procedure	<input type="checkbox"/>
Review Only – No Changes	<input checked="" type="checkbox"/>
Major Change	<input type="checkbox"/>
Minor Change	<input type="checkbox"/>

Reason for Change (check one)

Audit finding	<input type="checkbox"/>
Process Change	<input type="checkbox"/>
Annual Update	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>

*Fill out Version # and Document Owner for all procedures

*Fill out Revision Date and Description of Change fields for updated procedures ONLY

Version #	Document Owner	Revision Date	Description of Change
15	Brad Griffith	N/A	N/A
16	Brad Griffith	1/14/2011	Added affidavit verbiage
17	Brad Griffith	4/22/11	Added process for Foreclosure during charge off scenarios
18	Brad Griffith	6/23/2011	Added Notary verbiage

Exhibit B



**Mortgage Loan Servicing
Quality Control
Assessment Plan**



MISSION STATEMENT

Mortgage Loan Servicing Operations has adopted and put into effect this Assessment Plan in order to monitor the overall quality of loan servicing and to assure that our employees and independent contractors are in compliance with company policies and investor and mortgage insurer requirements including the requirements of HUD VA, Fannie Mae, Freddie Mac, and Ginnie Mae ("Agencies") Periodic reviews are based, where possible, on a statistical sampling chosen at random, as well as targeted and discretionary samples of the mortgage loans that we service The program provides for direct feedback to management so that line management can establish procedure for effective corrective measures when deficiencies are identified The program is available for agency review

SYSTEM INTEGRITY AND REPORTING

It is the responsibility of the QC Manager to ensure the completion of reviews of our servicing activities The QC Manager reports to the Sr. Consumer/Mortgage Loan Manager The Manager has complete access to all departments and records of this company for use in Self Assessment reviews Each employee of this company must cooperate fully with the QC Manager in performance of the reviews Any employee of this company who has knowledge that any of the policies and procedures of this company or the requirements of any of our investors or mortgage insurers or governmental agencies or any provision of the law has been violated, should notify management of this information immediately Fifth Third Bank is required to report any violations of law or regulation, false statements or other program abuses by the borrower, employees or any other party to the HUD Regional Office, the HUD Area Office or to the HUD Regional Office of Inspector General, the Secretary of the Veterans Administration, FNMA, FHLMC, Private Investors and to any other interested state or federal agencies or investors

ENFORCEMENT

The QC Analyst must make a written report to management of each review The report identifies any discrepancies found and any indications of generalized problems or trends and makes recommendations for corrective action The report is distributed to the senior managers, line managers, any functional supervisors or leads No closure forms are required but QC reserves the right to go back and review previous errors brought to management attention for correction Scores less than 80% are subject to additional loan level review to determine the seriousness of the trending problem The QC Analyst is responsible for discussing trends with Line Management on an "as needed" or regular periodic basis to offer clarification and assistance in further training or recommendations to procedure changes that will help to correct the problem(s) When management has reviewed and accepted the assessment, the QC Analyst should move the assessment into the appropriate QC file on the S Drive

The review effort is a continual process on a schedule that permits alterations and modifications as conditions warrant Calendars are reviewed monthly within the weekly Staff Meeting to insure that assessments are completed when scheduled Exceptions will be documented in the Comment Section of each calendar to reflect any assessment that is deferred and why Assessments will normally be done on a monthly basis A summary of each calendar showing the scores of the previous month and the upcoming plan for the current month will be distributed by the QC Manager to all levels of loan servicing management for comment or recommended changes by the 5th working day of the month Any suggestions or changes will be incorporated into the current calendar with comments noted QC will expect senior and line management to be proactive in making timely corrections to loans and procedure when deficiencies are reported to them



PURPOSE AND OBJECTIVE

The purpose of the Loan Servicing Assessment Plan is to determine on an on-going basis that each area is functioning properly in order that corporate and industry standards for performance and customer service are consistently met and to identify areas of operating deficiency, errors and omissions, unfavorable patterns or trends, intentional misconduct or fraudulent activity

The primary objectives of this Assessment Plan are to

Assure compliance with the requirements issued by HUD/FHA, VA, FNMA, FHLMC, applicable private investors and private insurers

Assure compliance with Federal and state regulations that apply to mortgage loan servicing

Assure Loan Servicing policies and standards are known and adhered to by all loan-servicing personnel

Assure Loan Servicing operating procedures are maintained in written format within each respective functional area and that they are revised in a timely manner to reflect changes in agency, investor, or insurer requirements

Assure Loan Servicing are aware of all Agency issuances updates, including regulations, handbooks, mortgagee letters, circulars, etc. which are relevant to servicing activities

Assure that appropriate levels of management are informed so that prompt and effective corrective measures are taken and documented when deficiencies are identified

Assure that the Assessment Plan process occurs in a timely manner in order to reduce risk caused by inappropriate practices

Assure a Business Continuity Plan (BCP) is in place. The Loan Servicing Manager and his/her designees will manage the BCP

The Quality Control Group updates the FITCH PCA system quarterly with SOX testing results

COMPLIANCE REVIEW PROCEDURES

The Servicing Assessment Plan is designed to encompass all areas of loan servicing and all servicing personnel. The review effort is a continual process on a schedule that permits alterations and modifications as conditions warrant.

Individual cases for review are selected at random using a statistical sampling method. This sample will include all Bank charters including the Tennessee Charter (Bank 36 -- 42 - 43) (No Longer applicable due to Charter Consolidation on 9/30/09. QC will no longer specify loans previously in the OCC or TN Charter). The review sample will be expanded if a pattern of deficiencies or fraudulent activity is noted. Additionally, the QC Group may also conduct reviews targeted toward a certain issue, employee or loan type using a non-random selection method.

Members of Quality Control Group will perform assessments according to the QC schedule.



The review effort is a continual process on a schedule that permits alterations and modifications as conditions warrant. Calendars are reviewed monthly within the weekly Staff Meeting to insure that assessments are completed when scheduled.

Reports and worksheets used in completing the review are kept as part of the permanent review file. The review file will be maintained in the Quality Control folder on the S Drive for the purpose of follow-up on correction items noted in the review for a period of at least 3 rolling years with the current year as the 4th. The review file is then archived on-line in accordance with the Bank Retention Policy.

The following pages identify critical control points to be examined and the process to examine within each area of loan servicing. Agency regulations, handbooks and mortgagee letters and written guides published by private mortgage insurers and the company's investors are the ultimate authority on whether the company's employees have acted properly in servicing the loan. Procedures should reflect these requirements and line management is expected to keep procedures updated as changes occur.

Process Owner	Assessment	Frequency
Customer Care	Loss Mitt Modifications/Default	Quarterly
Customer Care	Loss Mitt Modifications/Escrow	Quarterly
Customer Care	Loss Mitt Modifications/SLK	Quarterly
Customer Care	Modifications/SLK	Monthly
Customer Care	Modifications/5/3	Monthly
Customer Care	Balloon Resets	Monthly
Customer Care	Construction Rollovers/SLK	Quarterly
Customer Care	Construction Rollovers/Customer Care	Quarterly
Customer Care	Construction Rollovers/Legal Support	Quarterly
Customer Care	Amortization Schedules - Customer Care/SLK	Quarterly
Customer Care	Loss Draft-5/3	Monthly
Customer Care	Loss Draft - AMIG	Monthly
Customer Care	Loss Draft - Consumer	Monthly
Customer Care	SCRA	Monthly
Customer Care	Policy and Procedure Assessment- Customer Care	Semi Annually
Customer Care	Buydowns	Monthly
Customer Care	Fair Credit Reporting Mortgage (Compliance)	Monthly
Customer Care	Coupon Orders (SLK)	Monthly
Customer Care	Address Changes/Soc Sec and Death Certificates (SLK)	Monthly
Customer Care	Credit Bureau- SLK	Monthly
Escrow	Compliance- Homeowners Protection Act PMI Cancel (I)	Quarterly
Escrow	Task 243	Quarterly
Escrow	Loan Activation (PMI) 5/3	Quarterly
Customer Care	Modifications/705 letter	Monthly



Legal Support	Partial Releases	Quarterly
Customer Care	Reg Z - ARM Servicing	Monthly
Customer Care	Arm Indexes	Monthly
Escrow	MIP Premiums (HUD)	Quarterly
Customer Care	Arm Servicing- HUD	Quarterly
Customer Care	Credit Bureau- HUD	Quarterly
Customer Care	Task Assessment - Customer Care	Monthly
Customer Care	Customer Service- Tasks (HUD)	Quarterly
N/A	Compliance- Safeguarding- Legal Support	Quarterly
Customer Care	Special Loans Fees and Charges-HUD	Quarterly
Systems Support	Purging Loans	Monthly
Customer Care	Unintentional Balloon	Monthly
Cashiering	Cash Control Desk	Quarterly
Cashiering	Internal Ticket	Quarterly
Cashiering	Unapplied- Cashiering	Monthly
Cashiering	Payoffs	Monthly
Cashiering	Return Items- Cashiering	Monthly
Cashiering	Rebate Due to Customer	Monthly
Cashiering	Short Payoffs- Cashiering	Monthly
Cashiering	Misapplied Payments -Cashiering	Monthly
Cashiering	Escrow Balances on Paid Off Loans	Monthly
Cashiering	Payoff Research	Monthly
Cashiering	Missing Payments	Monthly
Cashiering	Payoff Refunds	Monthly
Cashiering	Freddie Mac Curtailment Reversals	Monthly
Cashiering	Policy and Procedure Assessment- Cashiering	Semi Annually
Cashiering	Extensive CSH Tasks (500)	Monthly
Cashiering	Holdover Acct Review 145912	Monthly
Cashiering	Bank Checks - Mortgage and Consumer	Monthly
Cashiering	Payment Clearing - 70471609	Monthly
Systems Support	Insufficient Fund Fees	Semi Annually
Cashiering	Compliance- Safeguarding- Cashiering	Quarterly
Cashiering	Customer Service - Misapplied Payment - HUD	Monthly
Cashiering	Payoffs (HUD)	Monthly
File Room	Payoffs (HUD)	Monthly
Escrow	Payoffs (HUD)	Monthly
Legal Support/Post Closing	Assumptions	Quarterly
Lien Release	Compliance-Safeguarding - Lien Release and Document Custody	Quarterly



HUD	New Loans (HUD)	Quarterly
Escrow	Compliance- RESPA & Escrow Management -HUD	Quarterly
investor reporting	Compliance-Transfer of Servicing-Investor Reporting - HUD	Quarterly
Escrow	Hazard Process-HUD	Quarterly
HUD	Analysis Process - HUD	Quarterly
Escrow	Compliance- Safeguarding- Escrow	Quarterly
investor reporting	Compliance- Safeguarding - Investor Reporting and Holdovers	Quarterly
Escrow	TASK 229	Monthly
Escrow	B-Service - 5/3	Monthly
Escrow	B-Service - Core Logic	Monthly
Escrow	CoreLogic Adjustment Requests (T) 5/3	Monthly
Escrow	CoreLogic Adjustment Requests (T) Core Logic	Monthly
Escrow	Delete Escrow - 5/3	Monthly
Escrow	NEW REO Setup - 5/3	Monthly
Escrow	AMIG	Monthly
Escrow	Analysis Past Due (A)	Quarterly
Escrow	Hazard Process (I)	Quarterly
Escrow	Forced Order (I) - Escrow	Quarterly
Escrow	Forced Order (I) - AMIG	Quarterly
Escrow	Official Check/Stop Payment Approval - Escrow	Quarterly
Escrow	Official Check/Stop Payment Approval - Cashiering	Quarterly
Escrow	Adjustment Request - Taxes	Quarterly
Escrow	Adjustment Request - Insurance	Quarterly
Escrow	Adjustment Request - Analysis	Quarterly
Escrow	CoreLogic Current Billing (T)	Quarterly
Escrow	Policy and Procedure Assessment- Escrow	Semi Annually
Escrow	Compliance- RESPA & Escrow Management	Quarterly
Escrow	Compliance- 1994 National Flood Insurance Act (I)	Quarterly
Cashiering	Compliance- RESPA & Transfer of Servicing - Cashiering	Quarterly
Investor Reporting	Compliance- RESPA & Transfer of Servicing - Investor Reporting	Quarterly
Investor Reporting	Remittances	Quarterly
Investor Reporting	Policy and Procedure Assessment- Investor Accounting	Semi Annually



Investor Accounting	Compliance- RESPA & Transfer of Servicing - Investor Accounting	Quarterly
Systems Support	Interest on Escrow	Semi Annually
Escrow	Compliance- RESPA & Transfer of Servicing - Escrow	Quarterly
Post Closing	Compliance- RESPA & Transfer of Servicing - Post Closing	Quarterly

G

In the Matter of Residential Mortgage)	
Foreclosure Pleading and Document)	Administrative Order 0-1-2010
Irregularities)	Docket #F-238-11

**CERTIFICATION OF CLAIRE V. FIEBIGER ON BEHALF OF COLUMBIA BANK
IN RESPONSE TO ADMINISTRATIVE ORDER 0-1-2010, DOCKET #F-238-11**

CERTIFICATION OF CLAIRE V. FIEBIGER

CLAIRE V. FIEBIGER (“Fiebiger”) hereby certifies and says:

- 1) This Certification is being submitted on behalf of Columbia Bank (“Columbia”) at the request of the Federal Home Loan Mortgage Corporation (“Freddie Mac”). By way of background, as of June 30, 2011, Columbia services 1,527 loans on behalf of Freddie Mac. Foreclosure litigation is pending with respect to five of those loans, as of June 30, 2011.

I am employed by Columbia as the Loan Administrative Officer, head of the Loan Servicing Department and have been so employed since 2003. My business address is 19-01 State Route 208 N, Fair Lawn, New Jersey 07410-9906. I have been employed by Columbia for 26 years and have held several management positions in our loan servicing area since 1988.

In my present position, I manage and direct the Loan Servicing Department. I have personal knowledge of all of Columbia’s policies and procedures as they apply, as pertinent here, to the loans in our residential portfolio as well as those loans which we service for others, including, as relevant here, Freddie Mac. I am authorized to make the statement that Columbia has policies and procedures in place to ensure that the information contained in any certification/affidavit submitted to the Court under Rule 4:64-1 is accurate and reliable.

- a) Columbia has designated two officers as eligible to verify, sign, and submit certifications/affidavits to be used in the foreclosure litigation process: James Mongiovi, Loan Servicing Officer, and me. Prior to the initiation of foreclosure litigation and at the stages as mandated by the Supreme Court of New Jersey, we two officers are responsible for being personally knowledgeable with respect to the details concerning the referable residential loan and are required to review all business records and loan documentation for said referable residential loan before submitting any authorization or documentation to foreclosure counsel (whether in-house or outside; in that regard, Fein, Such Kahn & Shepard, P.C. has been selected to act as foreclosure counsel with regard to the loans that Columbia services on behalf of Freddie Mac).
- b) The afore-described authorized officers are appointed by Columbia’s Board of Directors at Columbia’s annual meeting held in March of each calendar year. The officers have the powers and authority to perform such duties as generally pertain to their respective offices.

- c) Columbia utilizes Open Solutions Inc. ("OSI") as our core loan servicing/processing system to house and maintain all our business records, loan data, and mortgage account financial records. All mortgage financial transactions are posted into the OSI system using S1 Teller Software within our Loan Servicing Department and our 44 branches throughout the State of New Jersey. These postings commence when the particular loan is originated and postings continue to record each transaction pertaining to and through the life of the loan until it is satisfied at which time the loan is considered paid in full. In connection with OSI, Columbia utilizes a Collection and Recovery Manager Professional ("CARM-Pro") software manufactured by Intelligent Banking Solutions, Inc., to maintain, collate, and document each and every collection effort as well as all communications (written and/or verbal) between Columbia's six collection staffers authorized to engage in collection activities and each borrower.

Payment postings are received in several different manners; cash, check and through the Automatic Clearing House (ACH) system. These payments are processed through the S1 teller system and posted to their respective mortgage loan accounts as a credit, thereby reducing the outstanding loan balance. If a payment is not received within the time as set forth in the referenced loan documents, the account is flagged and transferred to the CARM-Pro system. The account is then assigned to a collector's work file to generate collection letters and phone calls. At this point, the collector must acquaint themselves with the loan file and the OSI account history in order to proceed with Columbia's normal and established collection policies and procedures.

Once all collection efforts have been exhausted, our collectors compile the following standard legal documents and financial information that is to be provided to counsel when Columbia authorizes counsel to proceed with the initiation of a residential mortgage foreclosure:

- 1) Statement of account (compiled from the loan history on the OSI system)
- 2) Copy of the recorded Mortgage
- 3) Copy of the Promissory Note
- 4) Copy of the Title Policy on file (and updated rundowns if necessary)
- 5) Copy of the Affidavit of Title, if any
- 6) Copy of the original Application and Credit Reports
- 7) Copy of the original appraisal
- 8) Copy of the collection history stored on CARM-Pro documenting every communication with the particular borrower(s)

These documents and records which are admissible as evidence in a New Jersey Court are compiled by one of Columbia's four collectors and then reviewed for accuracy by one of the two designated officers, James Mongiovi, Loan Servicing Officer, or me in my capacity as Loan Administration Officer before they are mailed to the designated counsel.

- d) Once the foreclosure counsel finishes preparing a certification or an affidavit to be submitted to the Court in connection with a Complaint, Motion, or other filing, counsel is required to transmit it to Columbia where the authorized officer (Mr. Mongiovi or me) must complete a verification or the New Jersey Complaint Certification Checklist required by Fein, Such Kahn & Shepard, P.C. attesting to the accuracy of the following information listed in the Complaint, Motion, or other filing:
- 1) The name of the obligor, mortgagor, obligee and mortgagee
 - 2) The amount of the debt secured by the mortgage
 - 3) The dates of execution of the note and mortgage
 - 4) The recording date, county recording office, and book and page recording reference of the mortgage securing the debt
 - 5) Whether the mortgage was a purchase money mortgage
 - 6) A description of the pertinent terms of the debt or mortgage and the facts establishing the default
 - 7) The default date
 - 8) The name of the original mortgagee and if necessary a listing of all assignments in the order of succession
 - 9) Full description of the subject property by street address, block and lot as shown on the municipal tax maps and the meets and bounds description included with the recorded mortgage
 - 10) Representation that the bank has complied with the pre-filing notice requirements of the Fair Foreclosure Act

At such time, the officer re-verifies and compares the actual mortgage file documents which are maintained in our lending file vault, located at Columbia's headquarters at 19-01. Route 208 N, Fair Lawn New Jersey 07410, along with the OSI payment histories and Columbia's business records and signs off on the verification/checklist to confirm to counsel that all the above listed information is accurate.

The accuracy of the information posted to our recordkeeping system OSI and CARM-Pro is tested for accuracy several times a year by way of several different channels. Customers are contacted via random independent internal and external audits, requesting customers to verify their existing loan balances. Annually, Columbia supplies each residential mortgage customer with a detailed history of every financial transaction that has been posted to the referable account. In addition, the OSI system documents any and all non-monetary file maintenance activity performed or executed on each and every loan and allows management to review these changes upon request. An example of this type of non-monetary activity would be the rate change on an adjustable rate mortgage. All six collectors and the two authorized officers are trained to review and understand the processing of payments and to spot inconsistencies and trends within our borrowers' accounts.

To document our review process and ensure that the certification/affidavit submitted to the Court is accurate, Columbia has created a duplicate foreclosure file, which is maintained within the collection area in a locked cabinet. This file contains all the documents which were originally sent to counsel as listed below:

- 1) Statement of account (compiled from the loan history on the OSI system)
- 2) Copy of the recorded Mortgage
- 3) Copy of the mortgage Note
- 4) Copy of the Title Policy on file (and updated rundowns if necessary)
- 5) Copy of the Affidavit of Title
- 6) Copy of the original Application and Credit Reports
- 7) Copy of the original appraisal
- 8) Copy of the collection history stored on CARM-Pro documenting every communication with our borrowers

In addition, a printed screen shot of the OSI's payment history (encompassing history activity from date of default to the current date) and payoff inquiry (including but not limited to outstanding loan balance, interest due, late fees, real estate taxes paid and any other associated fees) are placed into the foreclosure file as supporting documentation and is obtainable for filing with the Court if necessary.

- e) The foreclosure files are created by four collectors and then reviewed by the two approving officers (Mr. Mongiovi and me). Columbia's residential collection staff is seasoned; the shortest-tenured employee has been working in collections for 1.5 years. Training involves introducing a new employee to the OSI and CARM-Pro systems and teaching that employee the terms and conditions of each of Columbia's loan products offered. This training helps develop the employee with a full understanding and working knowledge of how payments are processed, collected and applied to each loan while becoming conversant and comfortable with the OSI and CARM-Pro systems. A collector having a minimum of two years collection experience is assigned to the process of completing and compiling the documentation needed for counsel to initiate the foreclosure process. (The first few files are completed with supervisory oversight.) These files are then reviewed and scrutinized by the approving officer. Currently our approving officers (Mr. Mongiovi and me) have worked in this capacity for the minimum of eight years and have reviewed and followed the mandates of the New Jersey Supreme Court and the Administrative Office of the Court and the Office of Foreclosure, with in-house counsel guidance.
- f) During the foreclosure process, if a change occurs in the loan status, such as we are notified of a bankruptcy filing or the need to advance taxes to protect our lien position has occurred, counsel will be apprised of the adjustments as soon as possible and asked to act accordingly.
- g) Once these adjustments have been addressed, Columbia's authorized officers (Mr. Mongiovi and me) would once again be required to re-certify the revised final certification/affidavit. This is completed by comparing again the actual mortgage file documents, the current payment histories and Columbia's business records. The officer then signs off on an updated verification/checklist to confirm that all the file information is accurate and can be submitted to the court pursuant to Rule 4:64-1 et seq.

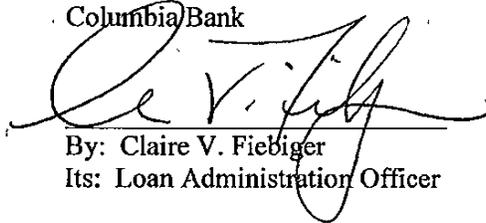
It should be noted that all certifications and affidavits that are submitted to the New Jersey Courts at any stage of the foreclosure process are signed either by Mr. Mongiovi or by me and we sign those documents only on personal knowledge and only after the contents of the document have been fully reviewed for accuracy.

- h) Columbia has an independent internal audit department which conducts an annual review of all our servicing policies and procedures including the foreclosure processes, since 1985. Our external financial auditors conduct a review of our policies and procedures annually along with our regulatory agency. In the past we have also been audited by Freddie Mac, Fannie Mae, FHLBNY to assure our compliance to their individual guidelines and all required state and federal mandates.

Pursuant to N.J. Court Rules R.1:4-4(b), I certify that the foregoing statements made by me are true.

Dated this 20th day of July, 2011.

Columbia Bank



By: Claire V. Fiebiger
Its: Loan Administration Officer

A

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

**Docket No. F-238-11
Administrative Order 0-1-2010
CERTIFICATION OF LOU ANN
HOWARD ON BEHALF OF
CENTRAL MORTGAGE COMPANY**

Comes now Lou Ann Howard, Senior Vice President for Central Mortgage Company, pursuant to Administrative Order 0-1-2010 dated April 25, 2011, and certifies to New Jersey Special Master Recall Judge Walter R. Barisonek, A.J.S.C. Ret , as follows:

1. I am Senior Vice President, Manager of Loan Servicing Operations, at Central Mortgage Company in Little Rock, Arkansas. I have been employed by Central Mortgage Company since 1999. I have held my current position of Senior Vice President, Manager of Loan Servicing Operations, for 12 years. The information certified to herein is based upon my personal knowledge or information gained through a personal review of Central Mortgage Company's business records, except where otherwise specified.

2. My duties as Senior Vice President, Manager of Loan Servicing Operations, include, but are not limited to, the supervision of the teams responsible for preparing, reviewing and signing, and providing quality control for all documents executed in connection with foreclosure proceedings. I have personally been involved in formulating the procedures used in

the preparation, review and execution of said documents, having personally reviewed and executed countless documents in my capacity as Senior Vice President

3. Central Mortgage Company is a company dedicated to the servicing of residential mortgages throughout the United States, including New Jersey. As a residential mortgage servicer, Central Mortgage Company undertakes payment collection, loss mitigation and collection efforts, including, as a last resort, foreclosure efforts if all attempts at keeping the customer in his/her respective property fail. In 2010, Central Mortgage Company instituted 106 foreclosure actions throughout the State of New Jersey. Approximately 37 of those foreclosure actions pertained to loans serviced on behalf of Federal Home Loan Mortgage Corporation (hereinafter referred to as "Freddie Mac"). The remaining foreclosure actions were loans serviced on behalf of either Federal National Mortgage Association (a/k/a Fannie Mae) or various investors from the private sector.

4. This certification is submitted in response to Hon. Walter R. Barisonek's Administrative Order 0-1-2010 dated April 25, 2011.

5. Beginning with paragraph 6, I set forth my testimony under lettered titles that coincide with the lettered subparagraphs of paragraph 1 of Judge Barisonek's administrative order.

Paragraph 1(a): Processes and procedures in place to ensure certifications/affidavits are based upon personal knowledge or review of business records.

6. Prior to the execution of a certification/affidavit for use in residential foreclosure proceedings, all supporting loan documentation referenced therein is thoroughly reviewed and compared to the information set forth within the certification/affidavit for accuracy. Such supporting documentation is copied from Central Mortgage Company's files and attached to the unsigned certification/affidavit. The intended signer of the certification/affidavit is responsible

for comparing the information contained within the supporting loan documentation to the information contained within the certification/affidavit. If discrepancies are found, the certification/affidavit will be amended to reflect the correct information derived from Central Mortgage Company's loan file and Servicing Director, Central Mortgage Company's loan servicing software explained in detail in later paragraphs.

7. An example of such a document that requires an extensive review of the loan file and the information saved within Servicing Director is the complaint for foreclosure. The complaint is prepared by foreclosure counsel and forwarded to Central Mortgage Company for review. Upon determining the accuracy of the information contained within the proposed complaint, Central Mortgage Company must complete a certification of diligent inquiry regarding the residential mortgage foreclosure complaint. On average, there can be up to 15 items of information that must be reviewed, deemed accurate, and certified to in the certificate of diligent inquiry. All information is derived directly from Central Mortgage Company's loan file and/or Servicing Director

8. In certain circumstances the certification/affidavit will include calculations based upon various figures pertaining to the loan, such as interest, the unpaid principal balance, fees and costs associated with the foreclosure, late charges, etc. In those circumstances, the foreclosure processor preparing the certification/affidavit will include a calculator tape setting forth the method that processor used to arrive at his/her final calculations. That tape is attached to the unsigned certification/affidavit and the individual signatory is charged with comparing the numbers to the current and most up-to-date account information located on Central Mortgage Company's computer system for accuracy. The signer is also charged with performing her own

calculations in order to make certain the final figures provided in the foreclosure documents are in fact correct.

9 An example of such a document that contains calculations is the proposed final judgment. As with the proposed complaint, a certification of diligent inquiry must be submitted with the final judgment figures. This certification requires the certifying party to confirm the accuracy of the amounts due and that copies of the loan documents submitted in support of the proposed final judgment are true and correct copies. Again, the information included on the proposed final judgment and corresponding certification of diligent inquiry are derived directly from Central Mortgage Company's loan file.

10. By requiring the extensive review of supporting loan documentation and loan figures, Central Mortgage Company is able to assert that each certification/affidavit is executed based on personal knowledge of the loan account and/or a personal review of the business records.

Paragraph 1(b)(i): Processes and procedures in place to ensure certification/affidavit is executed according to law, and that the signature is a valid lawful signature.

11. Central Mortgage Company has instituted a policy whereby only designated employees are authorized to execute certifications/affidavits prepared for use in residential mortgage foreclosure proceedings filed in the State of New Jersey. Those individuals include myself; Janice Davis, Vice President, Manager of Default Asset Management; and Teresa Swayze, Assistant Vice President. Central Mortgage Company does not utilize the services of outside contractors for the purpose of document execution. All documents are reviewed and signed internally in the physical presence of a Notary Public commissioned by the Secretary of State for the State of Arkansas.

12. Central Mortgage Company employs many individuals who are duly commissioned Notary Publics. However, only certain individuals are authorized to notarize documents intended for use in residential mortgage foreclosure actions. Those individuals are Gerald D. Brown, David Crane, Marisa Mosley, Melissa Sims, Michelle Kay Stewart, and Patty A. Watson. Attached hereto collectively as Addendum A are screen shots obtained from the Arkansas Secretary of State's website showing each of the aforementioned individuals' commission date, commission expiration date, and bond information. Addendum A also reflects each individual's status in good standing.

13. By limiting the number of individuals executing documents and the number of individuals notarizing those documents, Central Mortgage Company has fostered an atmosphere of familiarity and trust between the signer and the Notary Public. That familiarity and trust ensures the legality of each signature by allowing the Notary Public to recognize a signature and competently swear or affirm that the signatory is in fact who she purports to be.

Paragraph 1(b)(ii): Processes and procedures in place to ensure the person executing the certification/affidavit does so with proper authority.

14. As set forth above, only myself, Janice Davis, and Teresa Swayze are authorized to sign certifications/affidavits intended for use in residential mortgage foreclosure actions filed in the State of New Jersey. All three individuals are officers of Central Mortgage Company. Attached hereto as Addendum B is a copy of Central Mortgage Company's corporate resolution dated May 9, 2011. Said resolution specifically authorizes and empowers the aforementioned individuals to "execute all agreements, contracts, assignments, reports, mortgage documents, and other papers and documents of any kind" in the name of and on behalf of Central Mortgage Company.

15 Despite what could be perceived as common industry practices, Central Mortgage Company does not (and has never done so) utilize the services of outside contractors to execute documents used in residential mortgage foreclosure actions. By not adhering to such practices and by handling document execution internally, Central Mortgage Company ensures the individuals signing documents are in fact duly authorized and empowered by express written authority.

Paragraph 1(c): Record keeping system that ensures accurate up-to-date entries of payment, loan history, assignments, or other transactions involving the mortgage.

16. Central Mortgage Company utilizes Servicing Director, a computer program designed and developed by Harland Financial Solutions. Servicing Director is composed of various modules designed to fit the separate needs of the various individual departments within Central Mortgage Company. As information is added to Servicing Director, it is immediately made available to all users across the system.

17 Servicing Director is used for the posting of any and all transactions involving loans serviced by Central Mortgage Company, including, but not limited to, payments made and expenses incurred. Servicing Director saves and maintains information pertaining to the servicing of the loan throughout the life of the loan and thereafter, including loans that have been paid in full, transferred to another servicing entity, or disposed of post foreclosure sale.

18. Access to the various modules of Servicing Director is limited and based on user identification and department policies. Central Mortgage Company has the ability to set baseline access levels for employees depending upon the department in which they work. Conversely, Central Mortgage Company has the ability to extend wider access to certain employees if they have a legitimate business reason that requires additional access.

19. The ability to modify information or data entries saved on Servicing Director is restricted to those employees with a legitimate business reason and need or to members of senior management. While a foreclosure processor may be able to view the payment history or other specific information about the loan, he/she does not have the ability to modify or omit data. If a modification to the data is required, the processor must submit a request for such a revision to another employee with the appropriate access level to make the requested revision.

20. Ultimately, if a revision to the information saved within Servicing Director is required to be made, a history of that revision is recorded within the system. For example, changes to the posting or reversal of payments are reflected on the payment history for the loan.

21. For payment processing, mail is received from a post office box each day and delivered to Central Mortgage Company by courier at various times throughout the morning. The mail is opened and sorted according to the recipient's department. Payments are distributed to cashiers in a controlled, secured environment known as the cash room. The cash room is accessed by utilizing a card reader and is monitored by a surveillance camera that records the cash room while payments are being processed. Only a select few employees have been granted access to the cash room. All mailroom and cashiering employees are appropriately bonded.

22. Central Mortgage Company accepts various forms of payment, including checks, automatic drafts, telephone payments, wire transfers, and bill pay checks. All forms of payment are processed through the cash room.

23. Once payments are received, a customer information file is imported each day to the remittance processing system of Servicing Director for validation of the loan number, current payment amount, and any stop flags that have been placed on the account. The remittance processing system creates a lockbox extract file to input to Servicing Director for posting.

Payment activity is appropriately documented on each borrower's loan. Payments are processed the same day of receipt, regardless of the form of payment.

24. Updating of the loan servicing system is on a real time basis, occurring as payments are posted throughout the day.

Paragraph 1(d): Review process in place to ensure any certification/ affidavit submitted to the court is accurate, based upon current information and personal knowledge and/or business records.

25. Please see paragraphs 6 through 10 above.

Paragraph 1(e): Training programs that ensure contents of certification/ affidavit is based upon personal knowledge or business records.

26. Central Mortgage Company mandates each employee (whether hourly or salaried) must complete 40 hours of on-the-job training each year. To accomplish this requirement, Central Mortgage Company has a dedicated staff of individuals charged with the task of developing training materials and teaching courses relating to all aspects of the servicing industry, including, but not limited to, Central Mortgage Company's loan servicing computer system (Servicing Director), software training, functions of the various departments within Central Mortgage Company, and numerous other subjects pertaining to mortgage loan servicing.

27. In addition to the required 40 hours of annual training, the individuals assigned to the review and execution of documents intended for use in New Jersey residential mortgage foreclosures have a combined 88 years of experience in the mortgage servicing industry.

28. Inherent in that experience is the knowledge of the importance of executing documents based upon personal knowledge and/or a personal review of Central Mortgage Company's business records. As such, those individuals have been trained, either through individual training sessions, group training sessions, or reliance on their own personal experience, to recognize vital information located within the four corners of all loan documents.

or to locate additional servicing information held within Central Mortgage Company's loan servicing computer system in order to determine the accuracy of the information provided on the certifications/affidavits used in residential mortgage foreclosures. If any discrepancies are discovered, those individuals are competent and able to tap into their training and experience to locate the correct information and make the necessary changes prior to execution

Paragraph 1(f): Process in place to ensure that foreclosure counsel is provided with current accurate information to support the preparation of any documentation counsel will be submitting to the court.

29. When Central Mortgage Company makes the determination that a borrower has defaulted on his/her mortgage payment and all loss mitigation efforts have been exhausted, the loan will be sent through a foreclosure review process. During that process, an evaluation is made to determine if all pre-foreclosure requirements have been met, the proper notifications have been sent, and nothing will prevent the loan from being referred to foreclosure counsel. If foreclosure is approved, the loan file will be assigned to the appropriate foreclosure processor. If foreclosure is not approved, the loan file will be returned for the appropriate parties to correct the issue or issues preventing the loan from proceeding to foreclosure or, in certain circumstances, to further assist the borrower in avoiding foreclosure.

30. Once the loan file is assigned to the individual foreclosure processor, the original documents are ordered from Central Mortgage Company's records custodian. That collateral file contains the original mortgage, original note with endorsements or allonges, and original title policy/commitment. Upon receipt of the collateral file, the foreclosure processor will prepare the foreclosure referral to be sent to foreclosure counsel.

31. The foreclosure referral consists of copies of the original mortgage, the original note with all endorsements or allonges, and the original title policy/commitment along with

certain other information derived directly from Central Mortgage Company's loan servicing computer system. Each foreclosure processor is not only subject to the same training requirements set forth in paragraphs 26 through 28 above but has also gone through weeks of job-specific training that is closely monitored by that processor's immediate lead or supervisor. During that job-specific training period, the processor is instructed to copy the original mortgage, the original note with all endorsements and/or allonges, and the original title policy/commitment when preparing the foreclosure referral. The processor is also instructed on the exact information to extract from Servicing Director. By generating that information directly from the system, Central Mortgage Company is able to ensure the information provided to foreclosure counsel is accurate and up-to-date.

32. After the foreclosure referral Central Mortgage Company is periodically asked by foreclosure counsel to provide updated information. Where possible, that information is generated directly from the system. Occasionally, the information must be compiled manually, as in the instance of calculations based on various monetary or numerical figures associated with the loan. Central Mortgage Company is constantly working to update its processes to allow for more and more information to be generated directly from its computer system. With increased automation, Central Mortgage Company will significantly reduce human error and with it, the need to repeatedly provide the same information to foreclosure counsel. That will allow for Central Mortgage Company's foreclosure counsel to receive information quicker, thus ensuring the certifications/affidavits provided to the courts of New Jersey are as up-to-date and accurate as possible.

Paragraph 1(g): Process with foreclosure counsel for final review of documents.

33. After reviewing and cross-referencing each document intended for use in residential mortgage foreclosure actions filed in the State of New Jersey, and arriving at the conclusion that all information contained therein is accurate, current, and up-to-date, the individual charged with signing the document will execute the document in the physical presence of one of the aforementioned enumerated Notary Publics, if notarization is required for execution. Those executed documents are then sent by Federal Express, overnight delivery, to foreclosure counsel.

34. After receiving the executed foreclosure documents by Federal Express, Central Mortgage Company's foreclosure counsel will review the document and compare the information contained therein with the information provided by Central Mortgage Company, either with the foreclosure referral or attached as supporting documentation to the certification/affidavit. That information is the same information the individual signer reviews prior to executing the document. If the attorney is satisfied with the accuracy of the information, the attorney will execute his/her portion of the document (if required) and file same with the court. If the document is one that requires an attorney certification, that certification will also be executed and filed with the court. If however, an error is discovered, the document must be submitted to Central Mortgage Company for further review and re-execution. These steps will be repeated until both Central Mortgage Company and its attorney are satisfied with the accuracy of the information contained within the documents.

35. Pursuant to amended court rules, foreclosure counsel must now communicate with a representative of Central Mortgage Company in order to confirm the accuracy of all court filings. Counsel must then execute a certification which states the filings comport with the rules

of court. Central Mortgage Company has implemented a process whereby the signer of the document will communicate directly with foreclosure counsel and together review the executed document and all supporting documentation and/or calculations to verify that document's accuracy. Depending upon the attorney's preference, that communication may be in the form of electronic mail or a telephone call.

Paragraph 1(h): Independent auditor review.

36. When the so-called robo-signing crisis first came to light in 2010, Central Mortgage Company immediately conducted an internal audit of its processes and procedures for document review and execution across the country. That audit included working with foreclosure counsel to determine if Central Mortgage Company's procedures that were in place at the time were compliant with state laws regarding sworn affidavit testimony and other certifications or documents either filed with the court in a judicial foreclosure or recorded with the appropriate authorities in a non-judicial foreclosure.

37. The results of that audit assisted Central Mortgage Company in making the determination that it was in overall compliance with its document review and execution processes and procedures. To this date, Central Mortgage Company feels confident that it remains in compliance and has employed a team of individuals charged with the responsibility of monitoring the robo-signing crisis and all newly enacted legislation pertaining to loan servicing so as to ensure any necessary changes are immediately implemented to its processes and procedures. However, Central Mortgage Company does intend to elicit the services of an independent third party to review its processes and procedures in order to confirm it meets the standards and requirements expected of it by the courts of New Jersey.

I certify that the foregoing statements made by me are true and correct to the best of my knowledge and belief. I further certify that the foregoing statements are based upon my personal knowledge or information gained through a personal review of Central Mortgage Company's business records, except where otherwise specified. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment


Lou Ann Howard, Senior Vice President
Central Mortgage Company

Dated: July 20, 2011

ADDENDUM A

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GERALD D. BROWN

Address	MAUMELLE, AR
County	PULASKI
Status	Good Standing
Expiration Date	02/10/2020
Commission Date	02/10/2010
Bond Info	CONTRACTORS BONDING AND INSURANCE COMPANY
Filing Number	800172962

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DAVID CRANE

Address	BRYANT, AR
County	SALINE
Status	Good Standing
Expiration Date	11/01/2017
Commission Date	11/01/2007
Bond Info	AA Affiliated Assurance & Guaranty Company
Filing Number	800122722

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MARISA MOSLEY

Address	SHERWOOD, AR
County	PULASKI
Status	Good Standing
Expiration Date	11/22/2017
Commission Date	11/22/2007
Bond Info	Notary Public Underwriters
Filing Number	800121005

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MELISSA SIMS

Address	LITTLE ROCK, AR
County	PULASKI
Status	Good Standing
Expiration Date	03/01/2012
Commission Date	03/01/2002
Bond Info	NOTARY PUBLIC UNDERWRITERS
Filing Number	600108980

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MICHELLE KAY STEWART

Address	SHERWOOD, AR
County	PULASKI
Status	Good Standing
Expiration Date	01/23/2012
Commission Date	01/23/2002
Bond Info	WESTERN SURETY COMPANY
Filing Number	600108441

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PATTY A. WATSON

Address	JACKSONVILLE, AR
County	PULASKI
Status	Good Standing
Expiration Date	04/01/2020
Commission Date	04/01/2010
Bond Info	Arkansas Notary Bonding Inc.
Filing Number	800176315

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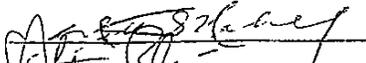
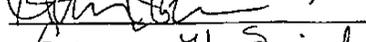
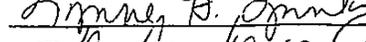
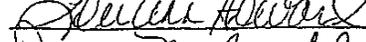
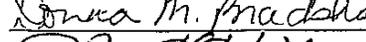
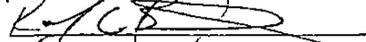
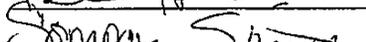
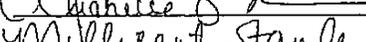
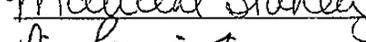
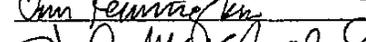
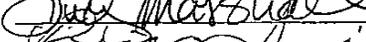
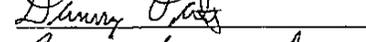
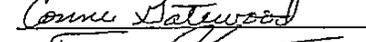
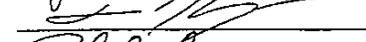


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ADDENDUM B

RESOLUTION OF BOARD OF DIRECTORS AND
 CERTIFICATE OF AUTHORIZED SIGNATURES
 OF CENTRAL MORTGAGE COMPANY

RESOLVED FIRST, that

William G Roehrenbeck		President and CEO
Steven Plaisance		EVP / Chief Operating Officer
Lynne H Spinks		Chief Financial Officer
Lou Ann Howard		Senior Vice President
Donna M Bradshaw		Senior Vice President
Tonya L Hill		Senior Vice President
Rodney C Bechdoidt		Senior Vice President
Elaine Rogers		Vice President
Karen Phelps		Vice President
Dorcas Tiller		Vice President
Michael Lott		Vice President
Janice Davis		Vice President
David Sharp		Vice President
Bucky Houser		Vice President
Sompom Smith		Assistant Vice President
Teresa Swayze		Assistant Vice President
Michelle Stewart		Assistant Vice President
Millicent Stanley		Assistant Vice President
Tim Remington		Investor Accounting Officer
Judy Marshall		Corporate Officer / Assistant Secretary
Pattishon Smith		Escrow Officer
Danny Oates		Collections Officer
Connie Gatewood		Structured Loans Officer
Tim Kenny		Mortgage Systems Officer
Ben A Coleman		Officer

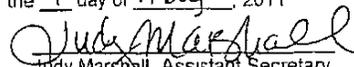
of this corporation, or any one or more of them, be and each of them is, hereby authorized and empowered in the name of and on behalf of this corporation and under its corporate seal, from time to time while these resolutions are in effect, to execute all agreements, contracts, assignments, reports, mortgage documents, and other papers and documents of any kind, to issue and endorse checks and drafts, and furnish any information required or deemed necessary or proper in connection with the foregoing

CERTIFICATION

I HEREBY CERTIFY that the foregoing is a true and correct copy of a resolution presented to and adopted by the Board of Directors of Central Mortgage Company at a meeting duly called and held at Siloam Springs, Arkansas, on the 9 date of May, 2011, at which a quorum was present and voted, and that such resolution is duly recorded in the minutes book of this corporation, that the officers named in said resolution have been duly elected or appointed to, and are present incumbents of, the respective offices set after their respective names

IN WITNESS WHEREOF, I set my hand and affix the seal of said corporation as of the 9 day of May, 2011

(Corporate Seal)


 Judy Marshall, Assistant Secretary

II

VALLEY NATIONAL BANK
Mortgage Services
1445 Valley Road
Wayne, New Jersey 07470
(973) 872-5520

<p>IN THE MATTER OF RESIDENTIAL MORTGAGE FORECLOSURE PLEADING AND DOCUMENT IRREGULARITIES</p>	<p>SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION</p> <p>Administrative Order 01-2010 Docket No. F-238-11</p> <p>CERTIFICATION OF VALLEY NATIONAL BANK IN RESPONSE TO ADMINISTRATIVE ORDER DIRECTING SUBMISSION OF INFORMATION FROM RESIDENTIAL MORTGAGE FORECLOSURE PLAINTIFFS CONCERNING THEIR DOCUMENT EXECUTION PRACTICES TO A SPECIAL MASTER</p>
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I, Paul Granski, of full age, do hereby certify as follows:

1 I am a Vice President of VALLEY NATIONAL BANK ("Valley"), and I am authorized to make this Certification. Valley is headquartered in Wayne, New Jersey. Valley is a national bank organized and existing under the laws of the United States.

2. This Certification is based upon personal knowledge or information obtained by my review of business records created by or for Valley, and maintained by Valley in the ordinary course of its business.

3. The Certification is submitted in response to the Administrative Order Directing Submission of Information from Residential Mortgage Foreclosure Plaintiffs concerning their Document Execution Practices to a Special Master (the "Administrative Order"). Valley is obligated to submit a response as a servicer of mortgage loans for Freddie Mac ("FHLMC").

4. As of June 30, 2011, Valley services 2,233 mortgages for FHLMC with aggregate outstanding principal balances totaling \$225,124,969. The delinquency rate for the FHLMC portfolio serviced by Valley is 2.1%, comprised of 65 loans in various stages of delinquency with unpaid principal balances totaling \$4,792,081.

5. The following are Valley's answers to the questions included in the Administrative Order:

Question 1. If you act in any capacity as a servicer of residential mortgages for your own institution or any other entity, you must answer the following questions to show whether you have processes and procedures in place to ensure that the information contained in any certification/affidavit submitted to the Court under Rule 4:64-1 *et. seq.* is accurate and reliable.

a) State what processes and procedures you have to ensure that the certifications/affidavits submitted are based upon that person's personal knowledge or that person's review of business records which records would be admissible in evidence in a New Jersey Court. Describe the processes and procedures in detail and attach a copy of any documents that establish the processes and procedures

Response: *All certifications/affidavits are prepared by a Foreclosure Specialist and then reviewed with the Collection Manager, who is a Vice President of Valley. In the Collection Manager's absence, a First Vice President of Valley reviews the certifications/affidavits with the Foreclosure Specialist*

All information for these documents is derived and collected from a review of Valley's systems or the relevant loan file. Foreclosure Specialists are familiar with the processes and procedures of the foreclosure department of Valley.

When it has been determined that a foreclosure action should be commenced on a defaulted loan, a foreclosure referral form is prepared by the Foreclosure Specialist and forwarded to the foreclosure attorney assigned to the matter with the following supporting documents from the loan file NOI Letter, Application, Note, Mortgage, Assignment of Mortgage, HUD-1, Title Policy, Attorney Referral/Instruction Letter, Statistic Sheet with Miser Screen shots of Payoff Inquiry, Escrow Inquiry and the Amount Due Inquiry Screens.

Legal counsel prepares all certifications/affidavits and returns the proposed document to Valley for verification and execution. The Foreclosure Specialist reviews the proposed certification/affidavit for accuracy by verifying the facts stated within the certification/affidavit against the loan file and Valley's systems. The Collection Manager then personally reviews the certification/affidavit and the relevant loan file to confirm that the facts, calculations and other information included in the certification/affidavit are accurate. The Collection Manager then executes the certification in accordance with New Jersey Court rules. All correspondence is delivered via UPS next day delivery.

b) i. State the processes and procedures you have in place to ensure that the individual who executes the certification/affidavit executed it according to law, and that the signature is a valid lawful signature.

Response. *All certifications/affidavits are signed by the Collection Manager, who is a Vice President In the Collection Manager's absence, a First Vice President of Valley signs the certifications/affidavits. The Collection Manager does not permit other employees to sign his name, or use a digital or mechanical stamp for his signature.*

b) ii. State the processes and procedures in place to ensure that the person executing the certification/affidavit, pursuant to paragraph (a), has the authority to act in behalf of the plaintiff/servicer.

Response: *Authority to execute certifications/affidavits is granted to Valley pursuant to the applicable Servicing Agreement between Valley, as servicer, and the plaintiff, as holder of the mortgage loan. Valley policy states that certifications/affidavits must be signed by the Collection Manager of the Collection Department In the Collection Manager's absence, a First Vice President of Valley is the only other officer authorized to sign certifications/affidavits.*

c) State in detail your record keeping system to ensure that there are accurate up-to date entries of payments, loan history, assignments, or of any other transaction involving the mortgage. If you are currently making or anticipate making changes, state the changes to be made and when they will be implemented.

Response: *Valley uses MISER as its core loan processing system for recording customer transactions, communications and account history. MISER was developed and is maintained by Fidelity Information Services, Inc. ("FIS"). FIS is an established technology provider to the banking industry, serving more than 14,000 clients in over 100 countries*

MISER offers comprehensive, integrated retail and commercial functionality for regional and national financial institutions. MISER delivers mission-critical, high-volume processing with proven reliability and efficiency

The posting of all payments or charges to a loan account are processed through MISER. The MISER system tracks all loan activity and the 'teller' number of the individual who processed the change This information becomes a permanent loan record.

No payments (cash, check or otherwise) received by Valley are posted to, or held in, any location or account or system other than MISER

d) State the review process you have in place to ensure that any certification/affidavit submitted to the Court is accurate, based upon current information and that the person executing the document relied upon personal knowledge and/or business records which would be admissible in a New Jersey Court. If you are currently making or anticipate making any changes, state the changes to be made and when they will be implemented.

Response: As explained in detail in the prior answers above, Valley employs a detailed validation process to ensure that certifications/affidavits are completed accurately and contain current information. Valley requires that the person executing a certification/affidavit has personal knowledge of the facts stated therein. In addition, Valley's internal audit department periodically selects and reviews selected loans in foreclosure status. Verification of amounts included in the certification/affidavits is part of these internal auditing processes.

e) State in detail any training programs you have in place for individuals completing certifications/affidavits to ensure that their knowledge of the contents of the certification/affidavit is based upon personal knowledge or business records which would be admissible in a New Jersey Court.

Response: In addition to the information included in the prior answers above, the Foreclosure Specialist and Collection Manager frequently review with the authorized attorneys that represent Valley any new or revised Court Rules or procedures.

f) Describe in detail the process you have in place to ensure that foreclosure counsel is provided with current accurate information to support the preparation of any documentation counsel will be submitting to the Court pursuant to Court Rule.

Response: Legal counsel prepares all certifications/affidavits and returns the proposed document to Valley for verification and execution. The Foreclosure Specialist reviews the proposed certification/affidavit for accuracy by verifying the facts stated within the certification/affidavit against the loan file and Valley's systems. The Collection Manager then personally reviews the certification/affidavit and the relevant loan file to confirm that the facts, calculations and other information included in the certification/affidavit are accurate. The Collection Manager then executes the certification in accordance with New Jersey Court rules and the certification/affidavit is returned to the foreclosure attorney via next day air (UPS). This validation process continues throughout the entire foreclosure process.

g) State the review process you and foreclosure counsel have in place for the final review of documents to be submitted to the Court pursuant to Rule 4:64-1 et. seq.

Response: In addition to the information included in the prior answers above, the foreclosure attorney forwards the certification/affidavit to Valley, together with a check list for validation of all detailed loan information and documentation, and any special instructions that must be completed by the person signing the certification. This checklist ensures a clear communication between the foreclosure attorney and the relevant Valley employee as to what information needs to be verified.

h) State whether you utilized or intend on utilizing any independent auditor to review the process and procedures mentioned in the above answers to ensure that you are in compliance with the mandates of Court Rule 4.64-1 et. seq.

Response: Valley utilizes its internal, independent audit department to audit its foreclosure processes. In addition, Valley's foreclosure processes are: (i) audited by an external accounting firm on a selected basis, (ii) subject to oversight and audit by FHLMC, and (iii) subject to examination by Valley's primary regulator, the Office of the Comptroller of the Currency.

J

IN THE MATTER OF RESIDENTIAL
MORTGAGE FORECLOSURE PLEADING
AND DOCUMENT IRREGULARITIES

SUPERIOR COURT OF NEW JERSEY
ADMINISTRATIVE ORDER: 01-2010
DOCKET NO.: F-00238-11

CERTIFICATION OF SHARON MORGAN ON BEHALF OF FLAGSTAR BANK

1. I am currently an Assistant Vice President for Flagstar Bank ("Flagstar"). I have been employed with Flagstar since February 11, 2008 in various capacities, primarily focused on default issues. I have been employed in the mortgage industry since 1984. I joined Flagstar in February, 2008 and from that time through 2010, I was employed in Loss Mitigation. From May 2010 through November, 2010, I served as an Assistant Vice President – Assistant Manager for Foreclosure. From November 2010, through the present, I have served as Assistant Vice President – Manager of Foreclosure and Bankruptcy. Based on my work experience and work with Flagstar, I have personal knowledge of and am fully familiar with the Flagstar foreclosure operations, including as they relate to procedures for the State of New Jersey.

2. I submit this Certification in response to the request by Federal National Mortgage Association ("Fannie Mae") to assist in its response to the April 25, 2011 Order directing Fannie Mae and certain other named Respondents to provide information about their policies and procedures regarding the accuracy, content and execution of any certification/affidavit filed with the Court.

1.a. STATE WHAT PROCESSES AND PROCEDURES YOU HAVE TO ENSURE THAT THE CERTIFICATIONS/AFFIDAVITS SUBMITTED ARE BASED UPON THAT PERSON'S PERSONAL KNOWLEDGE OR THAT PERSON'S REVIEW OF BUSINESS RECORDS WHICH RECORDS WOULD BE ADMISSIBLE IN

EVIDENCE IN A NEW JERSEY COURT. DESCRIBE THE PROCESSES AND PROCEDURES IN DETAIL AND ATTACH A COPY OF ANY DOCUMENTS THAT ESTABLISH THE PROCESSES AND PROCEDURES.

3. Flagstar has developed policies and procedures to mandate the required steps for the review and execution of foreclosure-related affidavits and documents. As with any other process, Flagstar continues to review and revise its policies and procedures on an as needed basis.

4. The step-by-step process for the preparation, review and completion of affidavits is as follows.

5. When a loan account is in default and a foreclosure must commence, a referral will be sent to the foreclosure counsel chosen for that account. The necessary information will be provided to foreclosure counsel for the referral, including but not limited to, a copy of the note, the mortgage/deed of trust, assignments, notification of the intention to foreclosure and any other necessary information and then, will send those documents to foreclosure counsel so that foreclosure counsel can draft the necessary documents for the foreclosure.

6. Communications between Flagstar and its foreclosure counsel is primarily through a desktop application called LPS Desktop. LPS Desktop is a task based processing system and has the ability to upload, store and provide access to loan documents. Foreclosure counsel can access these documents and can communicate with Flagstar through the LPS Desktop. So, for example, when Flagstar is communicating with foreclosure counsel with regard to the information in the complaint or the progress of the foreclosure, one such avenue of their communication would be through LPS Desktop. Other methods of communication include email, telephone and fax.

7. For those jurisdictions that require verification of the foreclosure complaint by the plaintiff or the servicer, after the complaint has been drafted by foreclosure counsel in accordance with the local pleading requirements, it is sent to Flagstar for review and verification. The Flagstar employee in the Foreclosure Department will review and compare the information in the Complaint against the Flagstar business records and if the complaint is correct, the complaint will be verified and sent back to foreclosure counsel. This is the same person who will ultimately sign the affidavit, also known as an Authorized Signer. If the complaint is not correct, the Signer will return the draft to foreclosure counsel and request that it be corrected. In New Jersey, I understand that the revisions to the Court Rules requires that New Jersey foreclosure counsel confer with a Flagstar employee who will verify and confirm that the information in the complaint is correct. Flagstar is working on a process for that requirement and will ensure that it is compliant with the New Jersey Court Rules. Given that Flagstar already has a process in place to review and verify complaints for other jurisdictions that require such verification, this new requirement for New Jersey will be worked into the process.

8. After the foreclosure has proceeded to the point of final judgment, which may require an affidavit concerning the debt owed, foreclosure counsel will contact Flagstar through LPS Desktop and request information, including judgment figures, in order to prepare a draft of the necessary affidavit. The Foreclosure Department will pull the requested information from the current Flagstar servicing platform, known as GCC, and will provide that information to the foreclosure counsel through the LPS Desktop system.

9. Upon receipt of the draft affidavit, the Reviewer is required to verify the content in the affidavit against the loan transaction documents, the loan data in the GCC System and/or

both as required by the content of the affidavit. Specifically, the Signer must confirm the following information:

- paid to date
- principal balance
- interest, including rate
- late charges
- per diem
- costs and escrow

If the affidavit contains loan payoff figures, the figures must be verified against data and business records residing in GCC.

10. After the information in the affidavit is confirmed based upon the business records, the representative will make a note in the GCC system that the affidavit has been reviewed. The Signer will also print out copies of the screen prints from GCC on the information relevant to the contents of the affidavit and will attach those documents to the draft affidavit.

11. If the information in the draft affidavit is incorrect, the LPS Desktop step will be denied and the Signer will send the draft affidavit back to the foreclosure counsel through the LPS Desktop, will make a note in the GCC system of said corrections. The Signer will hold the original affidavit until a corrected affidavit is received back from foreclosure counsel.

12. Upon receipt of the corrected affidavit, the Signer will verify that the corrections have been made and will note in the GCC system that foreclosure counsel made the corrections. The Signer will review the affidavit and the relevant copies of the business records that support the affidavit.

13. Flagstar currently has four (4) Authorized Signers. The Authorized Signers meet daily to review affidavits and the supporting business records. The meetings include notaries who will witness signatures and notarize the affidavits. The typical time for the review and execution of an affidavit of indebtedness is three to five business days.

14. Upon receipt of the affidavit, the Authorized Signer will verify the content of the affidavit and will review all supporting documentation. The Authorized Signer conducts an independent review against the business records contained in the document packet to ensure that the data contained in the affidavit is accurate and true. Only then will the affidavit be executed by the Authorized Signer. Specifically, the Authorized Signer must verify (and as required by the affidavit content):

- the name of the borrower;
- the delinquency;
- the total indebtedness;
- the recoverable balance, escrow and other fees;
- the foreclosing entity; and
- that the loan account is still in default and has not been reinstated.

15. If any information in the affidavit or supporting documentation is incorrect, the draft affidavit is rejected in LPS Desktop and revisions are requested from foreclosure counsel. Any revision to the content of the document will require preparation of a new original document reflecting the revision.

16. After execution of the affidavit, the Authorized Signer or a representative will image the document into LPS Desktop and the original is sent via overnight delivery to the foreclosure counsel.

1.b.i. STATE THE PROCESSES AND PROCEDURES YOU HAVE IN PLACE TO ENSURE THAT THE INDIVIDUAL WHO EXECUTES THE CERTIFICATIONS/AFFIDAVITS EXECUTED IT ACCORDING TO LAW, AND THAT THE SIGNATURE IS A VALID LAWFUL SIGNATURE

17. The prior responses are incorporated here. As set forth above, Flagstar has four (4) Authorized Signers and those Authorized Signers meet daily with the Flagstar notaries and at those meetings, review the affidavits and business records and sign the affidavits. Further, Flagstar does not use digital signatures or stamp signatures.

1.b.ii. STATE THE PROCESSES AND PROCEDURES IN PLACE TO ENSURE THAT THE PERSON EXECUTING THE CERTIFICATIONS/AFFIDAVITS, PURSUANT TO PARAGRAPH (a) HAS THE AUTHORITY TO ACT IN BEHALF OF THE PLAINTIFF/SERVICER

18. Flagstar services loans for itself and government entities such as Fannie Mae and Freddie Mac.

19. All of Flagstar's foreclosures are commenced in the name of Flagstar.

1.c. STATE IN DETAIL YOUR RECORD KEEPING SYSTEM TO ENSURE THAT THERE IS ACCURATE UP TO DATE ENTRIES OF PAYMENTS, LOAN HISTORY, ASSIGNMENTS, OR OF ANY OTHER TRANSACTION INVOLVING THE MORTGAGE. IF YOU ARE CURRENTLY MAKING OR ANTICIPATE MAKING CHANGES, STATE THE CHANGES TO BE MADE AND WHEN THEY WILL BE IMPLEMENTED

20 As set forth above, Flagstar currently uses a proprietary system known as GCC. Only Flagstar employees have access to the Flagstar GCC system. A particular employee's access to the information in the GCC system is mandated by job title and job necessity. Flagstar's IT Department controls security access issues based upon employee level and job title by password. The GCC system keeps track of access to the system by password and will also record any changes to the information in the system. Foreclosure counsel and other third party vendors do not have access to change critical loan information in the GCC system. However,

Flagstar is currently in the process of changing its servicing platform and phasing out the GCC system.

21. Flagstar is currently in the process of switching its mortgage servicing platform to MSP and anticipates that the changeover to this new system will be completed in the fall of 2011. The Flagstar employees are currently undergoing extensive training on the MSP system. The MSP software application system is a mortgage servicing product of LPS. MSP will be used for the posting of any and all transactions involving Flagstar's loans, including but not limited to payments made and expenses incurred. MSP will house information pertaining to the servicing of the loan throughout the life of the loan.

22. Access to GCC (soon to be MSP) is limited and based upon user identification (individual login numbers) and department policies. The ability to modify the information and entries contained in GCC is limited only to employees that have a legitimate business reason and need to modify entries. While an employee may be able to view the payment history or other specific information about the loan, they will not have the ability to modify the data unless their job requires such access. If a change to the data is required and the employee does not have the appropriate access, they would have to submit a request for such a revision to an employee with the required access.

23. If revisions are made to the critical loan data, that revision will be tracked and recorded in the GCC system. The MSP system has a similar tracking function.

1.d. STATE THE REVIEW PROCESS YOU HAVE IN PLACE TO ENSURE THAT ANY CERTIFICATIONS/AFFIDAVITS SUBMITTED TO THE COURT IS ACCURATE, BASED UPON CURRENT INFORMATION AND THAT THE PERSON EXECUTING THE DOCUMENT RELIED UPON PERSONAL KNOWLEDGE AND/OR BUSINESS RECORDS WHICH WOULD BE ADMISSIBLE IN A NEW JERSEY COURT. IF YOU ARE CURRENTLY MAKING OR ANTICIPATE MAKING ANY CHANGES, STATE THE CHANGES TO BE MADE AND WHEN THEY WILL BE IMPLEMENTED

24. Flagstar incorporates herein its prior responses. In light of the recent revisions to the New Jersey Court Rules, Flagstar is reviewing its policies and procedures to ensure compliance. As set forth above, Flagstar currently reviews and verifies the information in complaints for those jurisdictions that require that verification process. Flagstar will ensure that its process for the verification of the information contained in a complaint and communication with foreclosure counsel is included, as required by the recent Rule revisions in New Jersey.

1.e. STATE IN DETAIL ANY TRAINING PROGRAMS YOU HAVE IN PLACE FOR INDIVIDUALS COMPLETING CERTIFICATIONS/AFFIDAVITS TO ENSURE THAT THEIR KNOWLEDGE OF THE CONTENTS OF THE AFFIDAVITS IS BASED UPON PERSONAL KNOWLEDGE OR BUSINESS RECORDS WHICH WOULD BE ADMISSIBLE IN A NEW JERSEY COURT.

25. Flagstar employs training on a one-on-one basis for new employees and for existing employees on updates and revisions to its policies and procedures. This allows Flagstar the ability to monitor the training to ensure that the employee understands the process.

1.f. DESCRIBE IN DETAIL THE PROCESS YOU HAVE IN PLACE TO ENSURE THAT FORECLOSURE COUNSEL IS PROVIDED WITH CURRENT ACCURATE INFORMATION TO SUPPORT THE PREPARATION OF ANY DOCUMENTATION COUNSEL WILL BE SUBMITTING TO THE COURT PURSUANT TO COURT RULE

26. Flagstar's foreclosure counsel have access to information about the loan accounts through the LPS Desktop system and can also communicate through LPS via a tool called intercom, which is akin to an email system. Counsel can also communicate with Flagstar via email, telephone and fax.

1.g. STATE THE REVIEW PROCESS YOU AND FORECLOSURE COUNSEL HAVE IN PLACE FOR THE FINAL REVIEW OF DOCUMENTS TO BE SUBMITTED TO THE COURT PURSUANT TO RULE 4:64-1 ET. SEQ.

27. As set forth above, prior to final execution of the affidavit, Flagstar's Authorized Signer will ensure that the information in the affidavit is correct. If it is not correct, it will be

rejected and sent back to counsel to fix the errors. The Signer will retain the affidavit until the new and corrected affidavit is provided.

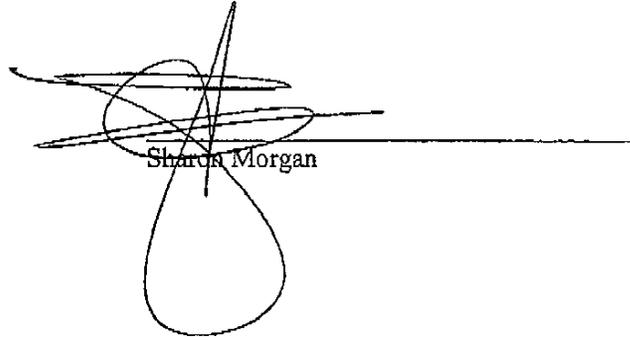
28. Flagstar also ensures that before a foreclosure is either filed or proceeds, that it is appropriately in foreclosure. Flagstar has a Foreclosure Committee that meets to discuss and ensure that specific loan accounts should be in foreclosure. That Committee will review the accounts for eligibility in loss mitigation programs. In addition, if at any point in the foreclosure process, the loan account is reinstated, paid off or the loan is successfully modified, Flagstar will ensure that its foreclosure counsel is notified. Flagstar does not accept partial payments on loans in foreclosure and does not accept such payments unless there is a separate workout agreement with the borrower. Oftentimes, if there is a mediation process and potential loan modification, the foreclosure counsel is already aware of that process and usually involved. To the extent that foreclosure counsel is not involved, as set forth above, Flagstar will notify foreclosure counsel to either stay or dismiss the foreclosure action, as appropriate.

1.h. STATE WHETHER YOU UTILIZED OR INTEND ON UTILIZING ANY INDEPENDENT AUDITOR TO REVIEW THE PROCESS AND PROCEDURES MENTIONED IN THE ABOVE ANSWERS TO ENSURE THAT YOU ARE IN COMPLIANCE WITH THE MANDATES OF COURT RULE 4:64-1 ET. SEQ.

29. Yes, Flagstar has retained an independent auditor to review its process and procedures for foreclosures across the country, including New Jersey.¹

I 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.

¹ While Flagstar endeavors to provide the Court with timely and fully responsive answers to the Court's questions in these proceedings, on advice of counsel Flagstar reserves any applicable privileges which it might have. Flagstar will continue to provide the Court with any and all documents that the Court may request, subject to any limitations imposed by applicable federal or state law.



Sharon Morgan

Dated: 7-15-2011

K

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

Superior Court of New Jersey
Administrative Order 0-1-2010
Docket No. F-238-11

CERTIFICATION OF
RICHARD L. MILLER

1. I am an Assistant Vice President of Branch Banking and Trust Company (hereinafter "BB&T"). I have been employed by BB&T since November, 2000. I am currently the Foreclosure Manager for the Mortgage Lending division of BB&T.
2. In my capacity as Foreclosure Manager of BB&T I have personal knowledge of, and am familiar with, BB&T's foreclosure operations as they relate to the State of New Jersey.
3. I submit this certification in response to the letter of the Honorable Walter R. Barisonek dated April 25, 2011 that was forwarded to BB&T by the Federal Home Loan Mortgage Corporation ("Freddie Mac").
4. For the court's information, the Mortgage Lending division of BB&T currently services a total of 1,574 loans secured by real property located in the state of New Jersey of which 1,028 are being serviced on behalf of Freddie Mac. BB&T has 39 active foreclosure cases pending in New Jersey. Of this total, 10 of the loans are held by Freddie Mac. To date, BB&T has not completed any foreclosure actions in the state of New Jersey.
5. For the court's convenience, I have addressed the questions in Judge Barisonek's letter in the order that they were presented in said letter.

1(a) State the processes and procedures you have to ensure that the certifications/affidavits submitted are based upon that person's personal knowledge or that person's review of business records which records would be admissible in evidence in a New Jersey Court.

6. In the event BB&T is compelled to pursue foreclosure of a mortgage loan secured by property in New Jersey, BB&T retains outside counsel licensed to practice law in the state of New Jersey that has been approved and has access to the Lender Process Services ("LPS") case management software. Through this medium, the selected attorney is granted access to the BB&T mortgage loan servicing platform ("MSP").
7. The attorney is thereby able to utilize data available from MSP to prepare any certifications/affidavits that are required under applicable New Jersey law and rules and submit them to BB&T for execution. On some occasions, an attorney

may request that a BB&T Foreclosure Processor provide the relevant information to facilitate the preparation of the certification/affidavit. In either circumstance, the data that is used to complete the certification/affidavit is a business record generated from the BB&T loan servicing system.

8. Upon completion of the certification/affidavit by outside counsel, it must be submitted to the BB&T Foreclosure Processor who has been assigned to that particular loan file for a review of the accuracy of the information contained within the affidavit.
9. Once the BB&T Foreclosure Processor has determined that the information is accurate, or if not, has had the information corrected by the attorney who prepared the certification/affidavit, it is submitted to a Quality Control Foreclosure Documentation Processor for another review.
10. In the event that the document is confirmed to contain accurate information, it is then submitted to an officer within the Non-Performing Assets Department of the Mortgage Lending Division of BB&T for execution along with "screen shots" from the MSP system revealing the source of the information that is included within the document
11. Prior to execution of the certification/affidavit, the officer compares the information disclosed on the "screen shots" to the information contained in the certification/affidavit to confirm that it is correct. Only after completing such a review will the officer execute the certification/affidavit.
12. The certification/affidavit is then returned to the attorney by the BB&T Foreclosure Processor for filing with the appropriate court. BB&T relies on the advice of foreclosure counsel as to the admissibility of the certification/affidavit in a New Jersey Court.

1(b)(i) State the processes and procedures you have in place to ensure that the individual who executes the certification/affidavit executed it according to law, and that the signature is a valid lawful signature.

13. The Non-Performing Assets Department of the Mortgage Lending Division of BB&T is wholly located in Greenville, SC. The Foreclosure Department is a subpart of this department and consists of approximately twenty (20) individuals who work in close proximity with one another. They are managed by the Foreclosure Manager and interact on a regular basis with other officers within the Non-Performing Assets Department.
14. Any certification/affidavit relating to a foreclosure file may only be signed by the Foreclosure Manager or another officer within the Non-Performing Assets Department who is familiar with the BB&T foreclosure process

15. The officer will sign the certification/affidavit in the presence of a notary public in accordance with the provisions of the document. The BB&T Foreclosure Processors who have personal knowledge of the identity of the officers who execute certifications/affidavits serve as the notary publics attesting to the authenticity of the officers' signatures.

(1)(b)(ii) State the processes and procedures in place to ensure that the person executing the certification/affidavit, pursuant to paragraph (a), has the authority to act in behalf of the plaintiff/servicer.

16. As previously noted, only officers within the Non-Performing Assets Department of the Mortgage Lending Division of BB&T are authorized to execute certifications/affidavits on behalf of BB&T.
17. The Servicing Manager of the Mortgage Lending Division of BB&T who is an Executive Vice President of BB&T and who oversees all of the servicing functions of the Mortgage Lending Division of BB&T, including the Non-Performing Assets Department, designates those officers that are authorized to execute certifications/affidavits on behalf of BB&T. As a matter of information, the Servicing Manager's office is located in the same building as the Non-Performing Assets Department and he has frequent personal contacts with the officers of the Non-Performing Assets Department

(1)(c) State in detail your record keeping system to ensure that there is accurate up-to date entries of payments, loan history, assignments, or of any other transaction involving the mortgage.

18. The loan servicing system used by the Mortgage Lending Division of BB&T is the MSP system developed by Fidelity Information Services. This system is widely used in the conforming mortgage lending industry.
19. Payments may be transmitted to BB&T either by mail to a lockbox (predominant method), in person at one of our branch office locations, or mailed directly to our Servicing department. Payments are posted to an account on the date of receipt and reflected on the loan history the following day after posting
20. In the event that a loan is sold by BB&T to an investor with the servicing retained by BB&T, the identity of the new owner of the loan is noted in the system by our Investor Accounting Department and an automatic feed of this information is transmitted to MERS for reflection in the MERS database.
21. The investors to whom BB&T sells mortgage loans as well as the BB&T internal Audit Department and its external auditors conduct periodic reviews of the BB&T mortgage servicing department which include testing the accuracy and integrity of the data maintained within the MSP system

22. No changes are currently being made or anticipated being made to our current record keeping system.

(1)(d) State the review process you have in place to ensure that any certification/affidavit submitted to the Court is accurate, based upon current information and that the person executing the document relied upon personal knowledge and/or business records which would be admissible in a New Jersey Court.

23. As stated in the responses to request (1)(a), the certifications/affidavits submitted to a Court are prepared by a New Jersey licensed attorney who has access to the BB&T MSP system; they are reviewed by a BB&T Foreclosure Processor who was assigned to the account at the time that it was referred to the Foreclosure Department; they are further reviewed by a Quality Control Foreclosure Documentation Processor; and then the officer who actually executes the documents compares the data contained therein to select business records that are attached to the certifications/affidavits when they are submitted to the officer for execution. BB&T relies on the advice of the foreclosure counsel who prepares the documents as to the admissibility of such documents in a New Jersey Court.

(1)(e) State in detail any training programs you have in place for individuals completing certifications/affidavits to ensure that their knowledge of the contents of the certification/affidavit is based upon personal knowledge or business records which would be admissible in a New Jersey Court.

24. BB&T utilizes computer based education courses, class room instruction, and on-the-job training to teach its Foreclosure Department employees how to complete certifications/affidavits relating to mortgage foreclosures.
25. The training focuses on showing the employees what information is needed to properly complete the certifications/affidavits and how to access such information in the MSP system.
26. The employees are also provided with training on the use of the LPS system so that they are effectively able to communicate with outside counsel. This training enables the employees of the Foreclosure Department to assist outside counsel in preparing documents and thereby lessen the risk of errors being made in the initial stages of the preparation of the documents.
27. BB&T relies on the advice of foreclosure counsel who prepares the documents as to the admissibility of such documents in a New Jersey Court.

(1)(f) Describe in detail the process you have in place to ensure that foreclosure counsel is provided with current accurate information to support

the preparation of any documentation counsel will be submitting to the Court pursuant to Court Rule.

28. As previously mentioned, BB&T only engages outside counsel who access to the LPS case management software. By utilizing LPS, outside counsel is able to access the BB&T MSP system which provides the counsel with the exact account information that is available to the BB&T Foreclosure Processor.
29. In addition, when a loan is referred to a BB&T Foreclosure Processor this individual remains the primary point of contact for the foreclosure counsel throughout the foreclosure process. By limiting the number of individuals involved in the communications with outside counsel regarding a particular file, we believe that the risk of misinformation or misunderstanding by outside counsel is greatly reduced.
30. To the extent foreclosure counsel seeks assistance in completing a document, the BB&T Foreclosure Processor is available to provide such assistance to further ensure the accuracy of the information contained therein.

(1)(g) State the review process you and foreclosure counsel have in place for the final review of documents to be submitted to the Court pursuant to Rule 4:64-1 et. seq.

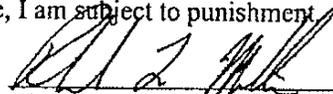
31. As previously explained, documents that are to be submitted to the Court are prepared by foreclosure counsel and then submitted to the BB&T Foreclosure Processor for review. The documents are subjected to a multi-level review at BB&T before being signed and returned to the foreclosure counsel. The foreclosure counsel is expected to conduct a final review of the documents before filing them with the Court to ensure their admissibility and compliance with New Jersey Court rules.

(1)(h) State whether you utilized or intend on utilizing an independent auditor to review the process and procedures mentioned in the above answers to ensure that you are in compliance with the mandates of Court Rule 4:64-1 et. seq.

32. The internal audit department of BB&T conducted a review of the BB&T Mortgage foreclosure process and determined that the information provided to foreclosure counsel to enable them to prepare affidavits was accurate.
33. The FDIC, as the primary regulator of BB&T, has also conducted satisfactory reviews of the BB&T Mortgage foreclosure process.
34. As a result, management of the BB&T Mortgage Lending division will continue to closely monitor the foreclosure process and engage internal resources to assist with the monitoring task but does not, at this time, intend to retain an

independent auditor to review the foreclosure process and procedures employed by BB&T.

I 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.


Richard L. Miller

Dated: July 14, 2011

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**SUPERIOR COURT OF NEW JERSEY
UNION VICINAGE**

IN THE MATTER OF RESIDENTIAL
MORTGAGE FORECLOSURE
PLEADINGS AND DOCUMENT
IRREGULARITIES

Administrative Order 0-1-2010

**AFFIDAVIT OF KELLIE
ROHLING ON BEHALF OF
EVERHOME MORTGAGE
COMPANY**

I, Kellie Rohling, am a Vice President of EverBank, successor by merger to EverHome Mortgage Company ("EverHome") I have reviewed EverHome's business records, am familiar with its business processes, and am qualified to make the following statements:

1. Foreclosure attorneys prepare the affidavits for EverHome to execute. The attorneys access EverHome's servicing system information, including imaged loan documents, and obtain the information necessary to prepare affidavits or declarations that are presented to the court pursuant to a foreclosure proceeding. All relevant information about a particular borrower's account is contained in the servicing system. After preparation by the attorney firm, the affidavits are forwarded to the EverHome Document Verification team for review and execution. The Document Verification Specialists validate each critical piece of information included in the affidavit, such as names, dates, note and mortgage information, military status, proper mailing of breach letters, and financial figures. This validation is completed by reviewing system and business records and comparing that information to the information contained in the affidavit. Once the accuracy of the affidavit is confirmed, the Specialist prepares the Document Execution Package, which includes a Document Verification Checklist, the actual document requiring execution, and all supporting business records necessary to support the accuracy of said document.
2. The completed package is presented to a signing officer for review and execution. After the officer has reviewed and validated the document against the documentation checklist and all supporting documents and business records, the officer signs the document under

oath in the presence of a notary. The complete package with supporting business records is imaged and the original signed document is returned to counsel who reviews the affidavit and files the affidavit with the court. A copy of the filed affidavit is then returned to EverHome who checks the filed affidavit against the affidavit that was initially provided to the attorney to file to ensure that nothing was altered during the process.

3. A binder containing corporate resolutions showing the valid election of signing officers is reviewed by a supervising member of the EverHome Document Verification team prior to the signing of affidavits in order to confirm the signing authority of officers at every signing event. Signing officers are provided training by members of the EverHome Legal Department with respect to affidavit signing issues, including appropriate standards of knowledge and documentation thereof.
4. Comprehensive audits of EverHome's affidavit execution and notarization processes were performed in 2010 and 2011 and will be periodically performed in the future to ensure compliance with all applicable laws, rules and requirements
5. EverHome's system of record has embedded programming that maintains data integrity; technology that provides effective communication throughout the servicing platform; tools that control the assessment of fees, to include fees associated with foreclosure action, and procedures that further validate data integrity during normal servicing activity, during loss mitigation, prior to foreclosure referral, during foreclosure and after the foreclosure sale has occurred.
6. The Foreclosure Review Unit reviews all loans eligible for potential foreclosure referral to ensure proper servicing has occurred to include proper delinquent notifications, loss mitigation solicitations have been generated and validate delinquency. The Foreclosure Review Unit coordinates with the Loss Mitigation Unit when loan is being reviewed for alternatives to foreclosure
7. Reporting is in place to ensure that Loss Mitigation escalate the review of loans that have a pending sale date to ensure that all efforts have been exhausted and communicated prior to the foreclosure sale. Loss mitigation efforts continue during foreclosure action.
8. The Foreclosure Department conducts additional review of all loans with an active foreclosure sale date to ensure that the appropriate action has taken place throughout the course of default servicing. This unit also conducts a review of the loan at the time the foreclosure sale results are received to determine if any loss mitigation activity was outstanding that may warrant rescinding the foreclosure sale.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

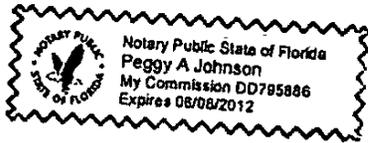
Executed this 20th day of July, 2011.



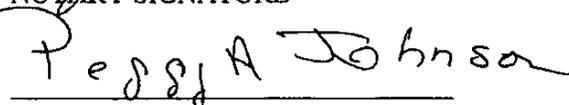
Kellie Rohling, Vice President

State of Florida)
)
County of Duval)

Sworn to and subscribed before me and signed in my presence this 20th day of July, 2011, as Kellie Rohling, a Vice President of EverBank, successor by merger to EverHome Mortgage Company, personally, known to me.





NOTARY SIGNATURE


NOTARY NAME PRINTED

(Seal)

M

In the Matter of Residential Mortgage Foreclosure Pleading and Document Irregularities	 	Superior Court of New Jersey Union County Docket No: F-238-11 Hon. Walter R. Barisonsek
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**CERTIFICATION OF THOMAS M. O'CONNELL
IN RESPONSE TO REQUEST FOR INFORMATION DATED APRIL 25, 2011**

I, Thomas O'Connell, do hereby certify as follows:

1. I am the Vice President of Default Servicing of Green Planet Servicing, LLC (hereafter referred to as GPS).
2. In this capacity, I am responsible for managing the overall operations of Default Servicing which includes Foreclosure Referral, Foreclosure, Bankruptcy, Loss Mitigation and Collections Departments at GPS. I am authorized to execute this Certification and do so based upon my personal knowledge of GPS's practices, policies and procedures as a residential mortgage loan servicer, and my review of GPS's business records maintained in the ordinary course of business.
3. I have managed the overall operations of the Foreclosure Referral, Foreclosure, Bankruptcy, Loss Mitigation and Collections Departments at GPS for four (4) years and I have thirty (30) years of experience in the residential mortgage default business.
4. I am authorized to make this Certification on behalf of GPS.
5. This Certification is submitted in response to the Administrative Order 0-1-2010 issued by the Honorable Walter R. Barisonsek on April 25, 2011.

Supporting facts and information regarding the reliability of the following information provided.

6. Throughout the entire year of 2010, only three (3) residential mortgage foreclosure actions in New Jersey had been commenced. We currently service less than 800 loans within New Jersey, with 794 of those loans having been purchased on November 15, 2010. Due to our detailed and hands-on policies and procedures, and with just eight (8) employees working directly under my supervision in one single location, I can attest to the direct personal attention that is provided for each foreclosure action. Additionally, I can attest to the detailed and thorough training that is provided for each employee both in their initial training and also as changes to state regulation occur

Question 1: If you act in any capacity as a servicer of residential mortgages for your own institution or any other entity, you must answer the following questions to show whether you have

processes and procedures in place to ensure that the information contained in any certification/affidavit submitted to the Court under Rule 4:64-1 et. Seq. is accurate and reliable.

1a. State what processes and procedures you have to ensure that the certifications/affidavits submitted are based upon that person's personal knowledge or that person's review of business records which records would be admissible in evidence in a New Jersey Court. Describe the processes and procedures in detail and attach a copy of any documents that establish the processes and procedures.

7. GPS's foreclosure referral function is located within the collections, loss mitigation, and bankruptcy departments. It is GPS's policy to only have either the Default Manager or Vice President of Default to execute certifications/affidavits in the foreclosure process after thorough review with the employees who had direct, hands-on knowledge of the loan through the entire duration the loan was with GPS. The steps to complete certifications/affidavits are as follows:

- a. The Foreclosure Specialist completes a review of the collection and loss mitigation activity with the supervisors of the Collections and Loss Mitigations Departments.
- b. The Foreclosure Specialist completes a review of the loan documents, amounts owed, payment histories, demands, property details, occupancy status, Notice of Intention to Foreclose, and if the loan is a high risk mortgage.
- c. The Default Manager completes and signs a checklist verifying the information in item 2 above.
- d. The check list is submitted to the Vice President of Default who verifies the accuracy of the items on the checklist
- e. After approval of the checklist by the Vice President of Default the Default Manager signs the certification/affidavit with an original signature.

1b. i. State the processes and procedures you have in place to ensure that the individual who executes the certification/affidavit executed it according to law, and that the signature is a valid lawful signature.

8. As stated in response to inquiry 1(a) above, GPS has limited the execution of certifications/affidavits to only the Default Manager or Vice President of Default, who have 11 years and 30 years of experience in residential default servicing respectively. All certifications/affidavits are executed with original signatures after two separate reviews of all information pertaining to the loan.

1b. ii. State the processes and procedures in place to ensure that the person executing the certification/affidavit, pursuant to paragraph (a), has the authority to act in behalf of the plaintiff/servicer.

9. GPS has granted the authority to execute certification/affidavits to the Default Manager and the Vice President of Default only. This authority was granted and certification is required by these individuals alone. After the required policies and reviews, they have the required direct knowledge of the facts regarding the mortgage.

1c. State in detail your record keeping system to ensure that there is accurate up-to-date entries of payments, loan history, assignments, or of any other transaction involving the mortgage. If you are currently making or anticipate making changes, state the changes to be made and when they will be implemented.

10. GPS maintains the loan records on Lenders Processing System (LPS) servicing system Mortgage Servicing Package (MSP). MSP stores up to date records on loan set-up, customer service, escrow administration, payment processing, investor reporting and default management workstations. GPS sends billing statements each month to all mortgagors except for mortgages on automatic monthly payments. The billing statement instructs the mortgagors to send the payment to GPS's lockbox in Dallas, Texas. The lockbox always processes payments on the same day it is received and also transmits the payment record to GPS that same business day. Additionally there is a daily reconciliation process for payments received both within the lockbox and outside the lockbox. The accuracy of this reconciliation process is ensured by our frequent monitoring of the internal accuracy of payment modification and application procedures. Payments rejected due to process stops are sent from the lock box by next day delivery to GPS for processing at GPS. GPS will process the lockbox rejects upon receipt with an effective date of the day received at the lockbox. The loan histories are updated at the time the payments are posted with effective dates. Customer contact and loss mitigation notes are updated immediately when any attempt to contact or contact is made with the mortgagor. Foreclosure and assignment records are maintained in the foreclosure comment notes and step templates maintained in MSP.

1d. State the review process you have in place to ensure that any certification/affidavit submitted to the Court is accurate, based upon current information and that the person executing the document relied upon personal knowledge and/or business records which would be admissible

in a New Jersey Court. If you are currently making or anticipate making any changes, state the changes to be made and when they will be implemented.

11. GPS performs multiple reviews prior to the execution of certifications/affidavits. These reviews include:

- a. The Foreclosure Specialist completes a review of the collection and loss mitigation activity with the supervisors of the Collections and Loss Mitigations Departments.
- b. The Foreclosure Specialist completes a review of the loan documents, amounts owed, payment histories, demands, property details, occupancy status, Notice of Intention to Foreclose, and if the loan is a high risk mortgage.
- c. The Default Manager completes and signs a checklist verifying the information in item 2 above.
- d. The check list is submitted to the Vice President of Default who verifies the accuracy of the items on the checklist.
- e. After approval of the checklist by the Vice President of Default the Default Manager signs the certification/affidavit with an original signature.

12. Although this process is an individual review, it is GPS's policy to always conduct a final review with the persons who had hands on experience with the loans and who had actually made the phone calls regarding the loan. Before the Default Manager or the Vice President of Default execute any document pertaining to the loan, each department supervisor has had a thorough discussion with either the Vice President of Default or the Default Manager regarding payment collection, loss mitigation history, etc

1c. State in detail any training programs you have in place for individuals completing certifications/affidavits to ensure that their knowledge of the contents of the certification/affidavit is based upon personal knowledge or business records which would be admissible in a New Jersey Court.

13. GPS currently maintains numerous databases to ensure that proper training and proper up-to-date knowledge is maintained among all employees. Databases such as AllRegs and Compliance Advisor provide daily updates regarding regulation requirements and/or changes. The information provided by these sources is reviewed by GPS's Senior Counsel and is then directed toward implementation within the business unit. At that point, GPS then utilizes TENA to ensure implementation has been properly applied.

14. With this procedure in place, the Foreclosure Specialists and the Default Manager are trained

by the Vice President of Default personally on changes in procedure. In addition, all GPS staff are thoroughly trained on the policies, procedures and servicing system functionality.

1f. Describe in detail the process you have in place to ensure that foreclosure counsel is provided with current accurate information to support the preparation of any documentation counsel will be submitting to the Court pursuant to Court Rule.

15. To ensure GPS only utilizes foreclosure counsel that is familiar with necessary protocol regarding residential mortgage foreclosure, we only use attorneys that are on the FHLMC approved list of attorneys in New Jersey.

16. Copies of the promissory note, endorsements, recorded mortgage, recorded assignment of mortgage, title policy, HUD1, current amount due, due date, and demand letters are transmitted to the foreclosure attorney's secured website. The documents are stored on the attorney's website by GPS's loan number and are reviewed by GPS employees to ensure the attorney has received all documents, and are assigned to the correct loan number. Any change in the status of the mortgage is communicated through the secured website as they occur to ensure the foreclosure attorney has up to date information.

1g. State the review process you and foreclosure counsel have in place for the final review of documents to be submitted to the Court pursuant to Rule 4:64-1 et. Seq..

17. The Foreclosure Specialist and Default Manager at GPS compare the checklist referenced in response to inquiry 1 (a) to compare the factual allegations contained in the Complaint and judgment that is available on the foreclosure attorney's secured website. The foreclosure attorney is notified of any discrepancies in the filing versus the records of GPS, and any changes are validated to revised documents.

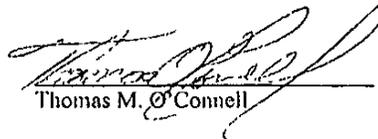
1h. State whether you utilized or intend on utilizing any independent auditor to review the process and procedures mentioned in the above answers to ensure that you are in compliance with the mandates of Court Rule 4:64-1 et. Seq..

18. GPS currently utilizes an independent third party audit process that reviews services, controls and operations annually. We also complete an internal audit on a quarterly basis. Additionally, we utilize TENA as a third party quality control to ensure we have applied the necessary regulations and that they have been implemented in accordance with both state and federal regulations.

2. If you are a plaintiff in uncontested residential foreclosure matters and any other entity, not a part of these proceedings or part of the "Big Six", acts as a servicer on those mortgages, secure the information requested in Question #1 from the entity that provides the servicing.

19. GPS is not a plaintiff in uncontested residential foreclosure matters in New Jersey in which any other entity is not part of these proceedings or are part of the "Big Six" acting as a servicer on those mortgages.

20. I certify 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.


Thomas M. O'Connell

Dated July 20, 2011

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IN THE MATTER OF RESIDENTIAL MORTGAGE FORECLOSURE PLEADINGS AND DOCUMENT IRREGULARITIES	: SUPERIOR COURT OF NEW JERSEY : CHANCERY DIVISION : UNION COUNTY : : DOCKET NO: F-238-11 : : <u>Civil Action</u> : : AFFIDAVIT PURSUANT TO ADMINISTRATIVE : ORDER 0-1-2010 : : : : :
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STATE OF NEW JERSEY
 COUNTY OF OCEAN SS.:

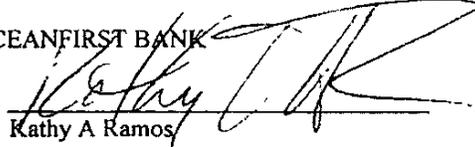
Kathy A Ramos, being duly sworn, deposes and says.

I am an Assistant Vice President of OceanFirst Bank ("OceanFirst") My responsibilities on behalf of OceanFirst include mortgage servicing for OceanFirst and for other institutions, and as such, I base my answers to the following questions either on personal knowledge or information gained through a personal review of business records which records would be admissible in a New Jersey Court.

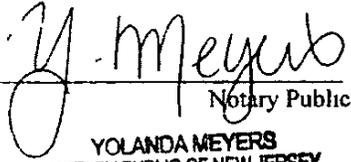
1. I answer the following questions to show that OceanFirst has processes in place to ensure that the information contained in any certification/affidavit submitted to the Court under Rule 4.64-1 et seq. is accurate and reliable.
 - a) The certifications and affidavits submitted to the Court under Rule 4:64-1 are personally reviewed by me and verified against loan documents and records in hand.
 - b) 1. My signature is witnessed and notarized by a Notary on staff.
 - ii. I am an Assistant Vice President of OceanFirst Bank in the Loss Mitigation division
 - c) Our current host system for loan payments and transactions is managed by OpenSolutions Our loan documents are electronically imaged and stored at an off site center managed by eGistics.
 - d) I personally review and execute the certifications and affidavits
 - e) n/a
 - f) Certifications are personally reviewed by me.
 - g) An email is submitted to me by the foreclosure attorney to conduct a due diligence review of the submitted Court documents. Documents for my review include the Lis Pendens, Summons and Verified Complaint, Affidavit and title search. I review the documents against our loan records and verify by initialing the Court documents that they are verified and accurate.
 - h) We have not utilized nor do we intend on utilizing an independent auditor

OCEANFIRST BANK

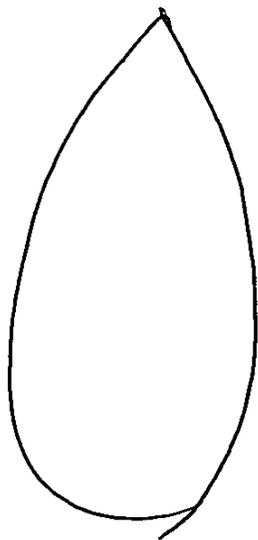
By:


Kathy A Ramos
Assistant Vice President

Sworn to and signed before me
on the _7th_ day of July, 2011.


Notary Public

YOLANDA MEYERS
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires July 8, 2014



Certification of Foreclosure Business Practices for the State of New Jersey

I, Bonnie J Voth, being of full age certify as follows:

1. I am a Senior Vice President of Fidelity Bank and am responsible for managing all operations of the Mortgage Servicing Department. I am authorized to execute this Certification and do so based upon my personal knowledge of Fidelity Bank's practices, policies and procedures related to foreclosure, bankruptcy and loss mitigation. Fidelity Bank is a national mortgage servicer with one servicing operation located in Wichita, Kansas.
2. I have managed the overall operations of the Default Department since January of 2002 and have been in the Mortgage Servicing business for approximately 25 years. All employees who review foreclosure referrals and sign Affidavits/Certifications ("Affidavits") for various courts across the nation have significant experience in the Servicing arena.
3. Fidelity Bank has three individuals within the Mortgage Servicing Department responsible for approving foreclosure referrals. Those individuals by title are as follows: the Senior Vice President in charge of Loan Servicing; the Assistant Vice President in charge of Default Operations; and the Assistant Vice President in charge of Customer Service and Collections. The individuals within these positions are experienced employees knowledgeable of the legal requirements associated with judicial foreclosure as it relates to the need for a thorough review of a file before providing an attestation for the court.
4. When Fidelity Bank's Collectors and/or Loss Mitigation staff have exhausted all efforts to work with the borrower, a foreclosure packet is prepared for review by all three servicing officers mentioned above. The following information is reviewed before the packet is given to the Foreclosure Processor for referral to an attorney:
 - a. The appropriate number of attempts at contact were made to the borrower as required by the investor
 - b. The correct letters were mailed to the borrower(s) based on the investor and or state requirements
 - c. The appropriate borrowers were notified of the default
 - d. Every possible attempt was made to offer or discuss loss mitigation
 - e. If a loss mitigation package was received, it was reviewed timely and accurately

If a loss mitigation packet is received during the review process, the packet is returned to the Collectors. While in loss mitigation review or HAMP trial period, no foreclosure packets are prepared for review by the three officers. If it is determined that another telephone call is necessary to further explain the loss mitigation process, or any of the above criteria is not appropriate, the packet is returned to the Collectors. This practice ensures that only those accounts deemed appropriate for foreclosure are forwarded to the Processor. If a loss mitigation packet is received during the foreclosure process, the Loss Mitigation Analyst and Foreclosure Processor stay in contact to ensure no foreclosure sale takes place without an appropriate review of the file.

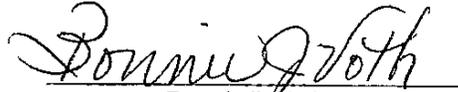
5. All Affidavits are signed by one of the three individuals that approved the foreclosure referral. If none of those individuals is available, another officer in the Mortgage Servicing Department reviews the account and signs the document. All Officers of the

Mortgage Servicing Department have the authority to act on behalf of Fidelity Bank in this regard

- 6 All mortgage payments received by Fidelity Bank are processed the date of receipt to ensure the borrowers' records are accurate
- 7 Affidavits to be presented in court are prepared by Fidelity Bank's New Jersey counsel with assistance from Fidelity Bank's tenured Foreclosure Analyst. Following receipt of the document for signature, the Foreclosure Analyst reviews the information to ensure it is accurate and presents the Affidavit along with any supporting documentation including screen prints to one of the three officers for signature. The officer reviews the Affidavit along with the supporting documentation prior to executing the Affidavit
- 8 Fidelity Bank's Mortgage Servicing Department is reviewed by an internal auditor, external financial auditors, OTS/OCC, various investors including Fannie Mae, Freddie Mac, Ginnie Mae, HUD and FHLB. Additionally, the Mortgage Servicing Department has a Quality Control Review in place for all areas of Servicing.

I 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: July 21, 2011



Bonnie J. Voth
SVP, Mortgage Servicing Operations