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**VIA OVERNIGHT MAIL AND ELECTRONIC  
FILING**

June 17, 2011

The Honorable Walter R. Barisonek  
Superior Court Judge  
Union County Courthouse  
2 Broad Street, Courtroom 101  
Elizabeth, NJ 07207

Re: Certifications of PNC Bank, National Association, In Response To Request For  
Information Dated April 25, 2011  
Administrative Order 01-2010  
Docket Number F-238-11

Dear Judge Barisonek:

We represent PNC Bank, National Association ("PNC") in this matter. In response to this Court's Request For Information dated April 25, 2011 (the "Request"), enclosed please find the Certifications of PNC Bank, National Association ("PNC").

As PNC stated in its certifications dated February 11, 2011, PNC services primarily first-lien residential mortgage loans through PNC Mortgage, a division of PNC. PNC also services primarily subordinate lien residential mortgage loans through its Home Equity division. As detailed in the certifications filed today, formal training of PNC personnel is conducted by PNC University, a division of PNC. To comply with the Request, PNC submits certifications from all three divisions

PNC files today a total of eight certifications. The attached table identifies each person providing evidence, the division each represents, and the specific questions to which each responds.

DyKEMA

Hon. Walter R. Barisonck

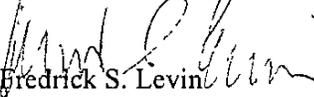
June 17, 2011

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Please do not hesitate to contact us if you have any questions.

Very truly yours,

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**PNC BANK, NATIONAL ASSOCIATION**

**Response To Request For Information Dated April 25, 2011**

<b>CERTIFICATION</b>	<b>RESPONDS TO QUESTIONS</b>
<b>PNC MORTGAGE</b>	
Anita Holbrook, Vice President and Manager of Late Stage Default Operations, PNC Bank, National Association	1, 1(a), (b), (c), (d), (e), (f), (g), (h)
Philip D. Cunningham III, Executive Vice President and Manager of Core Servicing Operations, PNC Bank, National Association	2
<b>PNC HOME EQUITY</b>	
Steven C. Cory, Senior Vice President and Default Management Executive, Lending Services, PNC Bank, National Association	1, 1(a), (b), (d), (e), (h), 2
Michael Grossberg, Senior Vice President and Default Senior Manager, Lending Services, PNC Bank, National Association	1(c)
Cynthia Donahue, Vice President and Manager of Centralized Customer Assistance, Account Servicing, PNC Bank National Association	1(c)
Kathleen Prorock, Vice President and Real Estate Department Manager, PNC Bank, National Association	1(f), (g)
<b>PNC UNIVERSITY</b>	
Laure Caldwell, Vice President and Business Training Manager, PNC Bank, National Association	1(e) (PNC Home Equity)
Pamela Richardson, Vice President and Business Training Manager, PNC Bank, National Association	1(e) (PNC Mortgage)

**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. Barisonek

**CERTIFICATION OF ANITA HOLBROOK  
IN RESPONSE TO REQUEST FOR INFORMATION DATED APRIL 25, 2011**

I, Anita Holbrook, do hereby certify as follows:

1. I am a Vice President of PNC Bank, National Association ("PNC").

2. PNC is engaged in retail banking, corporate and institutional banking, asset management, and residential mortgage banking, including mortgage servicing. Nationally, and in New Jersey, PNC services loans through PNC Mortgage, a division of PNC, through PNC's Home Equity division ("PNC Home Equity") and through third-party service providers. PNC Mortgage services primarily first-lien residential mortgage loans. PNC Home Equity services primarily subordinate lien residential mortgage loans such as home equity loans. PNC Mortgage and PNC Home Equity maintain separate servicing records.

3. This Court, in its Request For Information dated April 25, 2011 (the "Request"), directs foreclosure plaintiffs who filed 200 or more residential foreclosure actions in 2010 to respond to a number of questions relating to their foreclosure processes and procedures. I make this Certification to respond to the Request on behalf of PNC Mortgage.

4. I have over 25 years of experience in the mortgage servicing industry, including the last thirteen years with PNC Mortgage. During my tenure at PNC Mortgage, I have managed a number of default-related departments, including the breach, referral, foreclosure, bankruptcy, property preservation, claims, final liquidation, real estate-owned, and document attestation

departments. As a result of this experience, I am fully familiar with PNC's mortgage servicing processes and procedures

5. Prior to June 1, 2011, I was manager of Backend Default, the group within PNC Mortgage's Default Servicing Operations department that was directly responsible for initiation and prosecution of foreclosure actions. Prior to June 1, 2011, the Default Servicing Operations department, and thus my "Backend Default" group, was headed by Mr. James Stokes, Senior Vice President of PNC

6. Effective June 1, 2011, the Backend Default group that I managed became a separate department within PNC Mortgage and I was promoted to be the executive of PNC Mortgage responsible for that new department, which is now known as Late Stage Default Operations.

7 As a result of my prior and current responsibilities, I am fully informed of the processes and procedures employed to ensure that certifications are based on the signer's personal knowledge or that person's review of business records. In particular, I participated in the development of these processes and procedures and the processes and procedures for appointing and authorizing PNC employees to sign foreclosure-related documents on behalf of PNC. Currently, I am responsible for implementation and ensuring continued compliance with these processes and procedures by, among others, PNC Mortgage's Attestation Specialists, the PNC Mortgage employees who sign foreclosure-related documents Accordingly, I am fully familiar with the facts set forth in this certification

**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.**

8. As PNC certified in its Response To Supplemental Administrative Order dated January 31, 2011, PNC Mortgage serviced primarily first-lien residential mortgage loans in New

Jersey during 2010. Certification of James Stokes filed February 11, 2011, ¶ 2 (“Stokes (Feb 11) Cert.”). In 2011, PNC has continued to service primarily first-lien residential mortgage loans in New Jersey. Accordingly, PNC Mortgage provides the following response to Question No. 1.

**Question 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.**

9. PNC Mortgage has a number of policies and procedures in place to ensure that each certification<sup>1</sup> signed by a PNC Mortgage employee is based upon the certifier’s personal knowledge or review of business records that would be admissible in a New Jersey court.

10. Each certification signed by a PNC Mortgage employee is drafted in the first instance by foreclosure counsel based on information provided to foreclosure counsel from PNC Mortgage’s mortgage servicing systems (“MSS”) and associated loan documents (collectively, “Business Records”). (See Response to Question 1(c), below, for a detailed description of PNC Mortgage’s MSS. See Response to Question 1(f) for a description of PNC Mortgage’s processes and procedures for initial referral of a loan to foreclosure counsel and for PNC Mortgage’s review of the foreclosure complaint.)

11. Foreclosure counsel transmits the completed draft certification to PNC Mortgage. Upon receipt, the assigned PNC Mortgage Attestation Specialist reviews the draft certification for factual accuracy.

12. The Attestation Specialist may not sign a certification unless he or she can verify every factual assertion set forth in the draft. The Attestation Specialist is required to return to

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<sup>1</sup> PNC Mortgage only uses certifications, not affidavits, in New Jersey

foreclosure counsel (unsigned) any draft certification containing factual assertions set forth by the drafting attorney that cannot be verified.

13. To verify the information set forth in the draft, the Attestation Specialist uses his or her desktop computer to access loan-specific information from PNC Mortgage's Business Records. Upon accessing the relevant loan-specific information, the Attestation Specialist must compare each factual assertion set forth in the draft certification against the relevant Business Records.

14. To be sure that the Attestation Specialist verifies each factual assertion contained in the draft certification, the Attestation Specialist must complete a checklist (the "Attestation Checklist"). The Attestation Checklist enables PNC Mortgage to document that its Attestation Specialists personally review and verify (by review of Business Records) all factual information prior to signing a certification. The Attestation Checklist requires, among other things, verification (as applicable) of the borrower's name, property address, the plaintiff's name, the note date, the mortgage date, the unpaid principal balance, the interest rate and the accumulated interest owed, the escrow balance and escrow advances (if any), the last payment received, the military status of borrower, any late charges, any PMI insurance premiums paid by PNC, the cost of title work, any real estate taxes, property inspection fees or property preservation fees paid by PNC, any attorneys' or bankruptcy fees, any other fees charged to a borrower's account, the per diem interest, the original mortgage recording information, any factual assertions contained in any documents referenced in the draft certification, and any remaining factual assertions contained in the draft certification

15 Before the Attestation Specialist may execute the certification, he or she must sign the Attestation Checklist and affirm (a) his or her personal review of the information set forth in the

document, (b) that there were no discrepancies between the information set forth in the document and the information in PNC Mortgage's Business Records or the exhibits or attachments to the document, and (c) that he or she knows of no other reason why the document cannot be signed.

16. Upon verification of all factual assertions contained in the certification, the Attestation Specialist sends the certification to PNC Mortgage's Quality Assurance Department for further review. The work of the Quality Assurance Department is described in response to Question 1(d), below

17. All PNC employees that sign foreclosure-related documents, including PNC Mortgage Attestation Specialists, are warned that failure to comply with PNC's requirements regarding document attestation could result in disciplinary action against them.

**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.**

18. Foreclosure counsel prepares the certification using model forms prepared for New Jersey by PNC's national counsel (Dykema Gossett PLLC) and reviewed and approved by each of PNC's New Jersey foreclosure counsel. The model forms are designed: (a) to meet the formal requirements of a New Jersey certification, (b) to ensure that the certification supplies the substantive evidence required by New Jersey law, and (c) to ensure that evidence is presented in a manner that would be admissible in a New Jersey court

19. PNC prohibits its employees, including PNC Mortgage Attestation Specialists, from: (a) signing or affixing someone else's name to a certification (thereby ensuring that every signature is genuine), or (b) signing any certification without personal review of Business Records (thereby ensuring that the certification is based on personal knowledge or actual review of PNC Mortgage business records). Attestation Specialists are not permitted to use digital or mechanical signature stamps. Further, PNC requires that documents specifying that they must be

executed by a bank employee of a certain level (for example, Vice President or above) must be signed by a person with that requisite level of authority.

**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.**

20. PNC's Board of Directors, by corporate resolution, determines who is granted authority to execute foreclosure-related documents on behalf of PNC. It has delegated its power to appoint authorized signers to certain designated executives, including James Stokes, Senior Vice President of PNC Bank. Mr. Stokes is the person who, pursuant to the authority delegated to him and the process described below, authorizes PNC Mortgage Attestation Specialists to sign foreclosure-related documents on behalf of PNC.<sup>2</sup>

21. To become an Attestation Specialist who is authorized to sign foreclosure-related documents, a PNC employee must complete formal training on PNC's requirements for attestation and notarization of documents. (See Response to Question 1(e) for a description of PNC Mortgage's formal training program ) No PNC employee may sign an attested document on behalf of PNC without completing formal attestation and notarization training and obtaining formal authorization from PNC to sign attested documents.

22. Upon completion of formal training, the individual must take and pass a test on these attestation and notarization requirements to become signer of foreclosure-related documents.

23 After a prospective Attestation Specialist takes and passes this test, Mr Stokes is notified and, in turn, he certifies to the Corporate Secretary of PNC that the prospective

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<sup>2</sup> As noted above, Mr Stokes is the head of Default Servicing Operations, which previously included the Backend Default group to which Attestation Specialists once belonged. The Board of Directors has not yet adopted a corporate resolution authorizing me to grant Attestation Specialists authority to sign on behalf of PNC in light of the June 1 creation of the new Late Stage Default Operations department to which Attestation Specialists now belong.

Attestation Specialist has passed the test and is authorized to execute foreclosure documents, including certifications. The PNC Corporate Secretary will then issue a certificate of authority formally authorizing the new Attestation Specialist to execute foreclosure-related documents on behalf of PNC. The Corporate Secretary keeps a complete and up-to-date list of all people who are authorized to sign documents on behalf of PNC.

24. PNC Mortgage services loans for three distinct groups of investors PNC Mortgage Attestation Specialists who are authorized to sign on behalf of PNC in accordance with the process described above have full authority to sign certifications on behalf of all three groups of investors. These groups include

a. PNC-owned loans. PNC Mortgage services loans owned by PNC. Each Attestation Specialist authorized pursuant to the process described above has authority to sign for PNC.

b. Government-owned loans. PNC Mortgage also services loans owned by the Federal Home Mortgage Association (“Fannie Mae”), Federal Home Loan Mortgage Corporation (“Freddie Mac”) and Government National Mortgage Association (“Ginnie Mae”). These entities require PNC to foreclose loans owned by these entities in PNC’s name. These entities provide PNC Mortgage the requisite authority and assignments to foreclose their loans in PNC’s name. As such, Attestation Specialists authorized to sign on behalf of PNC (pursuant to the process described above) are fully authorized to sign certifications for government-owned loans serviced by PNC Mortgage.

c. Private investor-owned loans. PNC Mortgage, on behalf of PNC, also services loans owned by private investors, primarily securitization trusts. Typically, foreclosures for

these loans are filed in the name of the private investor who owns the loan<sup>3</sup> In such cases, the private investor grants PNC Mortgage power of attorney to pursue foreclosures on its behalf and to execute those documents necessary to do so. Accordingly, PNC Mortgage Attestation Specialists (authorized by PNC pursuant to the process described above) are fully authorized to sign certifications for loans owned by private investors serviced by PNC Mortgage.

**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 anticipate making changes, state the changes to be made and when they will be implemented.**

25. PNC Mortgage has several systems in place that comprise its record-keeping system for all of its servicing activity, loan documentation, and other transactions involving the loans it services. Collectively, I refer to these systems as PNC Mortgage's mortgage servicing systems ("MSS"). These systems include, but are not limited to, the following.

26. **ELI:** When PNC Mortgage originates loans, PNC Mortgage's Operations department boards all loan-level information into PNC Mortgage's MSS using a program called ELI ("Electronic Loan Interface") licensed by Lender Processing Services, Inc. ("LPS") After this information is loaded, the information is validated, so that any inconsistency in the data is corrected. Validation involves several layers of testing to ensure that loan level-data is properly entered into PNC Mortgage's MSS, that any discrepancies are resolved by review of original loan documentation in comparison to information contained in PNC Mortgage's Business Records, and that missing documents, if any, are identified and located, so that PNC Mortgage's

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<sup>3</sup> A small number of private investors request that PNC Mortgage prosecute foreclosures for their loans in PNC's name. In such cases, the private investor provides PNC Mortgage with the requisite authority and makes the necessary assignments to allow PNC Mortgage to prosecute the foreclosure in PNC's name.

Business Records are accurate and complete when PNC Mortgage commences servicing of each loan

27. When PNC Mortgage acquires loans for servicing, a similar boarding process takes place. PNC Mortgage engages in extensive procedures to “map” the data provided by the prior loan servicer (usually on data tapes or other electronic media) so that the data accurately translates from the systems used by the prior servicer onto PNC Mortgage’s MSS. PNC Mortgage tests the accuracy of the data mapping to ensure that all data transfers correctly to PNC Mortgage’s MSS. The information and data is again validated after the boarding is complete. I have participated in the transition of loans to PNC Mortgage, and am familiar with these processes, and based on that familiarity, have formed an opinion that the data provided by prior servicers contained on PNC Mortgage’s MSS is accurate and reliable.

28. **LPS-MSP:** To service its loans, PNC Mortgage uses one of the leading loan-servicing systems in the industry called LPS-MSP, licensed by LPS. LPS-MSP is a comprehensive, fully-integrated software product that automates all areas of loan servicing, including, among other things, loan setup and maintenance, customer service, cashiering (including receipt and posting of payments), escrow administration, loss mitigation, and default management. It is PNC Mortgage’s system of record.

LPS-MSP Entries Are Made In The Ordinary Course Of Business

29. It is the regular practice of PNC Mortgage to use LPS-MSP to contemporaneously record and maintain records of loan-specific or borrower-specific activities or transactions. PNC Mortgage employees input all such activities or transactions that they take relating to the servicing of the loan into LPS-MSP in the regular course of business. It is the regular practice of PNC Mortgage employees to enter into LPS-MSP information regarding loan-specific (or

borrower-specific) activities or transactions that they take at or near the time the activity or transaction occurs. Each PNC Mortgage employee has an obligation to enter only accurate and truthful information into LPS-MSP and to enter only information regarding transactions or activities that they personally conduct. PNC Mortgage depends on the accuracy of the information contained in LPS-MSP to conduct its day-to-day business operations.

#### The Data Contained In LPS-MSP Is Trustworthy

30. PNC Mortgage has a robust system of internal controls designed to ensure that LPS-MSP and all associated databases are functioning as intended, that automated records are correctly made and maintained, that data is accurate and up-to-date, entered and maintained in the regular course of business, and that the data stored is secure from unauthorized access or manipulation. Among other things:

31. All PNC Mortgage employees who are authorized to enter information into LPS-MSP receive training to qualify them to perform the specific tasks to which they are assigned. After completing this training, these employees then are required to follow standardized protocols when inputting information into the system. These protocols are intended to ensure that only accurate information is entered into LPS-MSP.

32. PNC Mortgage regularly tests that all transactions, including posting of payments, disbursements, and escrow entries, are entered timely and accurately. Among other things, LPS-MSP creates notifications identifying transactions that may not have posted correctly. These notifications are assigned to PNC Mortgage analysts who are charged with reviewing and resolving every exception.

33. Each PNC Mortgage employee has a unique ID and password, and employees are prohibited from sharing password information with each other. For an employee to obtain a

password, the employee must submit a formal request to his or her manager, who must approve the request. PNC Mortgage employees must change their passwords every 60 days, which limits the opportunity for unauthorized access to LPS-MSP.

34. PNC Mortgage employees can only update servicing records related to the processes for which they are responsible. For example, Loss Mitigation Specialists may only view when payments are posted; they are not able to input, delete, or otherwise process payments. These limits are enforced automatically by LPS-MSP based on access limitations associated with each employee's user ID and password.

35 Every quarter, PNC Mortgage performs a security verification, in which each manager of each PNC Mortgage department (including all departments outside of Default Servicing Operations) receives a list of employees who have access to LPS-MSP. The list identifies the employee and the level of access that the employee is allowed. The manager must affirmatively re-certify every quarter that the access allowed (as set forth on the list) for each of his or her subordinates is correct.

36 When an entry is made in LPS-MSP, the system automatically makes a record of the identity of the employee making the entry. LPS-MSP systems update nightly. Once this update occurs, an LPS-MSP entry cannot be deleted. The action taken can still be reversed or changed by a new entry but a record of the prior entry remains in the system such that a log of actions taken with respect to any account can always be viewed.

37. PNC Mortgage has implemented (and regularly monitors compliance with) all internal controls identified by LPS to its users (including PNC Mortgage) to be necessary

38. **LPS-PM:** PNC Mortgage uses another software product, called LPS Desktop Process Management ("LPS-PM") to transmit information to its foreclosure counsel. LPS-PM is

a proprietary, two-way communication system developed by LPS that PNC Mortgage, and many others in the industry, use to communicate with foreclosure counsel and transmit loan information. PNC Mortgage's use of LPS-PM to communicate with foreclosure counsel is described further, below, in its responses to Questions 1(f) and 1(g).

39. PNC Mortgage does not anticipate changing the uses of ELI, LPS-MSP or LPS-PM that are described herein.

**Question 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. If you are currently making or anticipate making any changes, state the changes to be made and when they will be implemented.**

40 Before filing with a court, each certification reviewed and approved for filing by a PNC Mortgage Attestation Specialist (in accordance with the procedure discussed in response to Question 1(a)) is reviewed and verified *de novo* by PNC Mortgage's Quality Assurance Department

41. The Quality Assurance Department is an independent group within PNC Mortgage with its own personnel and department manager. The Quality Assurance Department independently verifies each factual assertion contained in a draft certification by reviewing, among other things: (a) the certification, (b) a copy of the Attestation Specialist's completed and signed Checklist, and (c) the information contained in PNC Mortgage's Business Records

42. At present, the Quality Assurance Department engages in such *de novo* review of all attested documents (including New Jersey certifications) signed by a PNC Mortgage employee for submission to any court, including New Jersey courts. PNC Mortgage intends to continue *de novo* reviews by the Quality Assurance Department indefinitely. However, PNC, at some point,

may decide to reduce *de novo* reviews to a statistically significant sample (instead of *de novo* review of all attested documents).

43 Except as set forth herein, PNC Mortgage does not anticipate changing the review process followed by the Quality Assurance Department described herein.

**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/affidavit is based upon personal knowledge or business records which would be admissible in a New Jersey Court.**

44. As discussed above, PNC Mortgage employees, including Attestation Specialists, receive extensive training with respect to PNC's requirements relating to attestation, execution and notarization of documents to be submitted in foreclosure actions. Attestation Specialists also receive training on desktop procedures, which are step-by-step, screen-by-screen, instructions on how to locate and retrieve each piece of relevant information from PNC Mortgage's MSS. Attestation Specialists also receive training on how to use and complete the Attestation Checklists.

45. In addition, PNC employees, including Attestation Specialists, receive training to develop knowledge and familiarity with PNC Mortgage's MSS and data integrity procedures. Among other things, Attestation Specialists are taught that all of the systems are managed by Information Technology personnel who are responsible for ensuring that the systems are accurate and up-to-date and secure from unauthorized access. They are also taught PNC Mortgage procedures regarding the proper handling of passwords and system access. In my experience, this training is sufficient to permit the employee to form a judgment that system information is accurate for purposes of verifying factual assertions in documents requiring attestation.

46 Attestation Specialists receive their formal training from PNC University. PNC University is a separate division of PNC, with its own personnel and management structure.

PNC University personnel do not report to business-line managers such as myself. By separate certification, Pamela Richardson of PNC University, will describe in detail the formal training that PNC Mortgage Attestation Specialists receive.

47. As previously described, upon completing formal training regarding PNC's attestation and notarization procedures at PNC University, Attestation Specialists are required to take an exam administered and graded by PNC University.

48. PNC University notifies PNC Mortgage of those who pass the test. Only those persons who pass the test are authorized to sign documents on behalf of PNC.

**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.**

49. When a loan is first referred to foreclosure counsel, all of the relevant loan-level data and documentation maintained on LPS-MSP is loaded into LPS-PM. The information loaded includes, among other things, true and correct copies of the relevant note and mortgage, screenshots from LPS-MSP of key information including (but not limited to) the amount of debt secured by the mortgage, the unpaid balance, the default date, the names of the parties in interest, and information regarding compliance with pre-filing notice requirements.

50. Foreclosure counsel then prepares the complaint based upon the relevant information loaded into LPS-PM and its own due diligence. Foreclosure counsel then uploads the draft complaint to LPS-PM and transmits it back to PNC Mortgage, where it is reviewed in accordance with the procedures outlined in response to Question 1(g), below. If any factual assertion in the complaint under review cannot be verified, the Attestation Specialist must return the complaint to foreclosure counsel to be appropriately revised by foreclosure counsel and then returned to PNC Mortgage. Once the corrected complaint is returned to PNC Mortgage, it is

reviewed again in the manner described herein to be sure that all required corrections have been made.

51. Judgment packages, certifications of proof of amount due and certifications of additional sums due are prepared by foreclosure counsel and transmitted to PNC Mortgage for review in the same manner. At each stage of the proceeding, PNC Mortgage's Attestation Specialists verify the factual assertions set forth in the document being reviewed by comparison of that document to the information then contained PNC Mortgage's Business Records, including LPS-MSP. If the Attestation Specialist cannot verify even one factual assertion in the document under review (no matter how minor), he or she cannot approve or execute it, and instead, must return it to foreclosure counsel for correction.

52. PNC Mortgage's MSS are updated daily to incorporate all borrower or loan-related activities or transactions, including approved, stipulated re-payment schedules or other loss mitigation arrangements. PNC Mortgage Foreclosure Specialists receive daily notifications of any such activities or transactions and any relevant information is communicated timely to foreclosure counsel as part of the case monitoring process. Accordingly, all borrower or loan-related activities or transactions (whether occurring before or after the filing of a foreclosure complaint) are timely communicated to foreclosure counsel, and, documents filed in court are based on the most up-to-date information then available.

**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 4:64-1 et seq.**

53 To comply with Rule 4:64-1, PNC Mortgage Attestation Specialists are required to review every complaint, every judgment package, and every certification prepared for submission to court (including certifications of proof of amount due, certifications of additional sums due, and lost note certifications).

54 To ensure compliance with Rule 4:64-1, PNC Mortgage caused its national counsel (Dykema Gossett PLLC) to create master checklists for each category of document (“Rule 4.64 Checklists”). Each Rule 4-64 Checklist has been reviewed and approved by each of PNC Mortgage’s New Jersey foreclosure counsel.

55. PNC Mortgage uses separate checklists for: (a) the Complaint, (b) the Final Judgment Package, (c) the Certificate of Proof of Amount Due, and (d) the Certificate of Additional Sums Due. Each checklist tracks in detail the information that must be verified.

56. For each document under review for submission to court, the PNC Mortgage Attestation Specialist must complete the applicable Rule 4-64 Checklist. The PNC Mortgage Attestation Specialist performing the review must record on the checklist his or her name, title, and the date of the review. Each page of the checklist must be initialed by the reviewer. The reviewer must sign the checklist upon completing the review. No document may be submitted to court without completion of the applicable Rule 4:64 Checklist. These Rule 4 64 Checklists are in addition to the Attestation Checklists described in response to Question 1(a), which must also be completed.

57. After completion, the Rule 4:64 Checklist must be mailed or sent by overnight courier to foreclosure counsel.

58 If any factual assertion contained in the document to be submitted to court cannot be verified by comparison to the data contained in PNC Mortgage’s business records, the document may not be submitted to the court. Instead, foreclosure counsel must revise the document using the correct information noted by the Attestation Specialist.

59. If revisions are required, the full review process—with a clean Rule 4:64 checklist and, if the document is attested, a new Attestation Checklist—must be repeated after the

revisions are completed. Foreclosure counsel may not file any of these documents until each and every one of the corrections listed on the original Rule 4:64 checklist has been corrected and re-verified. Foreclosure counsel may not file any of these documents, or his or her own certification of diligent inquiry, until each and every one of the corrections listed on the original Rule 4:64 checklist has been made and re-verified by PNC Mortgage.

60. By order dated June 9, 2011, the New Jersey Supreme Court adopted further amendments to Rule 4:64-1 et seq. PNC Mortgage is in the process of analyzing what changes to its processes and procedures, if any, are required to comply with Rule 4:64-1 et seq. as amended on June 9, 2011. Any such changes will be adopted and implemented by PNC Mortgage before any further filing of foreclosure-related documents.

**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 4:64-1 et seq.**

61. Yes

**Question 2: If you are 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.**

62. By separate certification, Philip D. Cunningham III, Executive Vice President of PNC, provides a response to this question.

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.

  
Anita Holbrook  
Vice President  
PNC Bank, National Association

**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. Barisonek

**CERTIFICATION OF PHILIP D. CUNNINGHAM III  
IN RESPONSE TO REQUEST FOR INFORMATION DATED APRIL 25, 2011**

I, Philip D Cunningham III do hereby certify as follows:

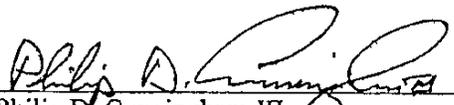
1. I am an Executive Vice President of PNC Bank, National Association ("PNC") and Manager of Core Servicing operations for PNC Mortgage, a division of PNC. I am fully familiar with the facts set forth in this certification.

2. This Court, in its Request For Information dated April 25, 2011 ("the Request"), directs foreclosure plaintiffs who filed 200 or more residential foreclosure actions in 2010 to respond to a number of questions relating to their foreclosure processes and procedures. I make this Certification to respond to Question No. 2 on behalf of PNC Mortgage.

3. In Question No 2, the Court asked. "If you are 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 "

4. Dovenmuehle Mortgage Inc previously serviced loans on behalf of PNC, including in New Jersey. As of today's date, however, the servicing of all of these loans has been transferred to PNC Mortgage. The transfers occurred on March 1, 2011, March 16, 2011, May 1, 2011, and May 16, 2011.

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.



Philip D. Cunningham III  
Executive Vice President  
PNC Bank, National Association

**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. Barisonek

**CERTIFICATION OF STEVEN C. CORY  
IN RESPONSE TO REQUEST FOR INFORMATION DATED APRIL 25, 2011**

I, Steven C. Cory, do hereby certify as follows

1. I am a Senior Vice President at PNC Bank, National Association ("PNC")

2. PNC is engaged in retail banking, corporate and institutional banking, asset management, and residential mortgage banking, including mortgage servicing. Nationally, and in New Jersey, PNC services loans through PNC Mortgage, a division of PNC, through PNC's home equity division ("PNC Home Equity") and through third-party service providers. PNC Mortgage services primarily first-lien residential mortgage loans. PNC Home Equity services primarily subordinate lien residential mortgage loans such as home equity loans. PNC Home Equity and PNC Mortgage maintain separate servicing records.

3. This Court, in its Request For Information dated April 25, 2011 ("the Request"), directs foreclosure plaintiffs who filed 200 or more residential foreclosure actions in 2010 to respond to a number of questions relating to their foreclosure processes and procedures. I make this Certification to respond to the Request on behalf of PNC Home Equity.

4. I am the executive at PNC responsible for servicing home equity and other consumer loans that are part of PNC Home Equity. In this capacity, I am responsible for default servicing including PNC Home Equity's mortgage foreclosure process. As the PNC Home Equity executive with overall responsibility for default servicing, I have personal knowledge of the processes and procedures employed to ensure that certifications are based on the signer's

personal knowledge or that person's review of business records. In particular, I participated in the development of these processes and procedures. Finally, as a PNC Bank Senior Vice President, and based on my 25 years of experience, and the several positions I have previously held with PNC Home Equity, I am generally familiar with PNC Home Equity's processes, procedures and practices related to servicing of home equity loans. I am also responsible for their implementation and for assuring compliance with them. Accordingly, I am fully familiar with the facts set forth in this certification.

**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.**

5. As I certified in PNC's Response To Supplemental Administrative order dated January 31, 2011, PNC Home Equity serviced primarily subordinate-lien residential mortgages in New Jersey during 2010. Certification of Steven C. Cory filed February 11, 2011, ¶ 19 and Ex. C ("Cory (Feb. 11) Cert"). In 2011, PNC Home Equity has continued to service primarily subordinate-lien residential mortgages in New Jersey. Accordingly, PNC Home Equity provides the following response to Question No. 1.

**Question 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.**

6. PNC Home Equity has a number of policies and procedures in place to ensure that each certification<sup>1</sup> signed by a PNC Home Equity employee is based upon the certifier's personal knowledge or review of business records that would be admissible in a New Jersey court.

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<sup>1</sup> PNC Home Equity uses only certifications, not affidavits, in New Jersey.

7 Each certification signed by a PNC Home Equity employee is drafted in the first instance by foreclosure counsel based on information provided to foreclosure counsel from PNC Home Equity's mortgage servicing systems ("MSS") and associated loan documents (collectively, "Business Records")

8. Foreclosure counsel transmits the completed draft certification to PNC Home Equity. Upon receipt, the assigned PNC Home Equity Foreclosure Specialist reviews the draft certification for factual accuracy

9. The Foreclosure Specialist may not sign a certification unless he or she can verify every factual assertion set forth in the draft. The Foreclosure Specialist is required to return to foreclosure counsel (unsigned) any draft certification containing factual assertions set forth by the drafting attorney that cannot be verified.

10. To verify the information set forth in the draft, the Foreclosure Specialist uses his or her desktop computer to access PNC Home Equity's Business Records. Upon accessing the relevant loan-specific information, the Foreclosure Specialist must compare each factual assertion set forth in the draft certification against the relevant Business Records

11. To be sure that the Foreclosure Specialist verifies each factual assertion contained in the draft certification, the Foreclosure Specialist must complete a checklist (the "Attestation Checklist"). The Attestation Checklist enables PNC Home Equity to document that its Foreclosure Specialists personally review and verify (by review of Business Records) all factual information prior to signing a certification. The Attestation Checklist requires, among other things, verification (as applicable) of: the borrower's name, property address, the plaintiff's name, the note date, the mortgage date, the unpaid principal balance, the interest rate and the accumulated interest owed, the escrow balance and escrow advances (if any), the last payment

received, the military status of borrower, any late charges, any PMI insurance premiums paid by PNC, the cost of title work, any real estate taxes, property inspection fees or property preservation fees paid by PNC, any attorneys' or bankruptcy fees, any other fees charged to a borrower's account, the per diem interest, the original mortgage recording information, any factual assertions contained in any documents referenced in the draft certification, and any remaining factual assertions contained in the draft certification.

12. Before the Foreclosure Specialist may execute the certification, he or she must sign the Attestation Checklist and affirm: (a) his or her personal review of the information set forth in the document, (b) that there were no discrepancies between the information set forth in the document and the information in PNC Home Equity's Business Records or the exhibits or attachments to the document, and (c) that he or she knows of no other reason why the document cannot be signed

13. Upon verification of all factual assertions contained in the certification, the Foreclosure Specialist sends the certification to PNC Home Equity's Quality Assurance Department for further review. The work of the Quality Assurance Department is described in response to Question 1(d), below.

14. All PNC employees that sign foreclosure-related documents, including PNC Home Equity Foreclosure Specialists, are warned that failure to comply with PNC's requirements regarding document attestation could result in disciplinary action against them

**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.**

15. Foreclosure counsel prepares the certification using model forms prepared for New Jersey by PNC's national counsel (Dykema Gossett PLLC) and reviewed and approved by each of PNC Home Equity's New Jersey foreclosure counsel. The model forms are designed

(a) to meet the formal requirements of a New Jersey certification, (b) to ensure that the certification supplies the substantive evidence required by New Jersey law, and (c) to ensure that evidence is presented in a manner that would be admissible in a New Jersey court.

16 PNC prohibits its employees, including PNC Home Equity Foreclosure Specialists, from: (a) signing or affixing someone else's name to a certification (thereby ensuring that every signature is genuine), or (b) signing any certification without personal review of business records (thereby ensuring that the certification is based on personal knowledge or actual review of PNC Home Equity's business records) Foreclosure Specialists are not permitted to use digital or mechanical signature stamps. Further, PNC requires that documents specifying that they must be executed by a bank employee of a certain level (for example, Vice President or above) must be signed by a person with that requisite level of authority

**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.**

17 PNC's Board of Directors, by corporate resolution, determines who is granted authority to execute foreclosure-related documents on behalf of PNC. It has delegated its power to appoint authorized signers to certain designated individuals I am one of the individuals to whom the Board has granted this authority.

18. To become a Foreclosure Specialist who is authorized to sign foreclosure related documents, an individual must complete formal training on PNC's requirements for attestation and notarization of documents (See Response to Question 1(e) for a description of PNC Home Equity's formal training program ) No PNC employee may sign an attested document on behalf of PNC without completing attestation and notarization training and obtaining formal authorization from PNC to sign attested documents.

19 Upon completion of formal training, the individual must take and pass a test on these attestation and notarization requirements to become signer of foreclosure-related documents. I am notified whenever an individual completes this attestation training program and passes the test. Once I have been so informed, I certify to the Corporate Secretary of PNC that the individual has passed, and is authorized to execute foreclosure documents including certifications. The Corporate Secretary will then issue a certificate formally authorizing the new Foreclosure Specialist to execute foreclosure documents on behalf of PNC. The Corporate Secretary keeps a complete and up-to-date list of all people who are authorized to sign documents on behalf of PNC.

20. PNC Home Equity services loans for two distinct groups of investors. PNC Home Equity Foreclosure Specialists who are authorized to sign on behalf of PNC in accordance with the process described above have full authority to sign certifications on behalf both groups of investors. These groups include:

a. PNC-owned loans PNC Home Equity services loans owned by PNC. Each PNC Home Equity Foreclosure Specialist authorized pursuant to the process described above has authority to sign for PNC.

b. Private investor-owned loans. PNC Home Equity, on behalf of PNC, also services loans owned by private investors, primarily securitization trusts. Typically, foreclosures for these loans are filed in the name of the private investor who owns the loan.<sup>2</sup> In such cases, the private investor grants PNC Home Equity power of attorney to pursue foreclosures on its

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<sup>2</sup> A small number of private investors request that PNC Home Equity prosecute foreclosures for their loans in PNC's name. In such cases, the private investor provides PNC Home Equity with the requisite authority and makes the necessary assignments to allow PNC Home Equity to prosecute the foreclosure in PNC's name.

behalf and to execute those documents necessary to do so. Accordingly, PNC Home Equity Foreclosure Specialists (authorized by PNC pursuant to the process described above) are fully authorized to sign certifications for loans owned by private investors serviced by PNC Home Equity.

**Question 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. If you are currently making or anticipate making any changes, state the changes to be made and when they will be implemented.**

21. Before filing with a court, each certification reviewed and approved for filing by a PNC Home Equity Foreclosure Specialist (in accordance with the procedure discussed in response to Question 1(a)) is reviewed and verified *de novo* by PNC Home Equity's Quality Assurance Department

22. The Quality Assurance Department is an independent group within PNC Home Equity with its own personnel and department manager. The Quality Assurance Department independently verifies each factual assertion contained in a draft certification by reviewing, among other things, (a) the draft certification; (b) a copy of the Foreclosure Specialist's completed and signed Checklist; and (c) the information contained in PNC Home Equity's Business Records

23. At present, the Quality Assurance Department engages in such *de novo* review of all attested documents (including New Jersey certifications) signed by a PNC Home Equity employee for submission to any court, including New Jersey courts. PNC Home Equity intends to continue *de novo* reviews by the Quality Assurance Department indefinitely. However, PNC,

at some point, may decide to reduce *de novo* reviews to a statistically significant sample (instead of *de novo* review of all attested documents)

24. Except as set forth herein, PNC Home Equity does not anticipate changing the review process followed by the Quality Assurance Department described herein

**Question 1(c): 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.**

25 As discussed above, PNC Home Equity employees, including Foreclosure Specialists, receive extensive training with respect to PNC's requirements relating to attestation, execution, and notarization of documents to be submitted in foreclosure actions. Foreclosure Specialists also receive training on desktop procedures, which are step-by-step, screen-by-screen, instructions on how to locate and retrieve each piece of relevant information from PNC Home Equity's MSS. Foreclosure Specialists also receive training on how to use and complete the Attestation Checklists.

26. In addition, PNC employees, including Foreclosure Specialists, receive training to develop knowledge and familiarity with PNC Home Equity's MSS and data integrity programs. For example, Foreclosure Specialists are taught that all of the systems are managed by Information Technology personnel who are responsible for ensuring that the systems are accurate and up to date and secure from unauthorized access. They are also taught PNC Home Equity's procedures regarding the proper handling of passwords and system access. In my experience, this training is sufficient to permit the employee to form a judgment that system information is accurate for purposes of verifying factual assertions in documents requiring attestation.

27 Foreclosure Specialists receive their formal training from PNC University. PNC University is a separate division of PNC, with its own personnel and management structure.

PNC University personnel do not report to business-line managers such as myself. By separate certification, Laurie Caldwell of PNC University will describe in detail the formal training that PNC Home Equity Foreclosure Specialists receive.

28. As previously described, upon completing formal training regarding PNC's attestation and notarization procedures at PNC University, Foreclosure Specialists are required to take an examination administered and graded by PNC University.

29. PNC University notifies PNC Home Equity of those who pass the test. Only those persons who pass the test are authorized to sign documents on behalf of PNC.

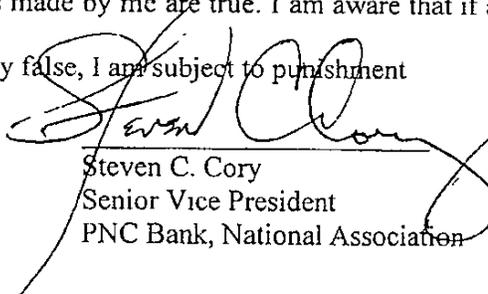
**Question 1(h):** State whether you utilized or intend on utilizing any independent auditor to review the process and procedures mentioned in the above answers to ensure that you are in compliance with the mandates of Court rule 4:64-1 et seq.

30. Yes.

**Question 2:** If you are plaintiff in uncontested residential foreclosure matters an 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.

31. As I certified in PNC's Response To Supplemental Administrative order dated January 31, 2011, PNC Home Equity did not itself, nor through any affiliate, contract with others to service loans owned by PNC in New Jersey during 2010. Cory (Feb 11) Cert., ¶ 22. This fact continues to be true through the present. Accordingly, no response to Question No. 2 is required from PNC Home Equity.

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.

  
Steven C. Cory  
Senior Vice President  
PNC Bank, National Association

**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. Barisonek

**CERTIFICATION OF MICHAEL GROSSBERG  
IN RESPONSE TO REQUEST FOR INFORMATION DATED APRIL 25, 2011**

I, Michael Grossberg, do hereby certify as follows:

1. I am a Senior Vice President of PNC Bank, National Association ("PNC") I am the Default Senior Manager, Lending Services, for PNC Home Equity. Among other things, my group is responsible for all default management, including foreclosure, of home equity loans.

2. My group manages home equity default servicing from its location in Brecksville, Ohio I am the site manager for default management at the Brecksville, Ohio location. I report directly to Steven Cory, who has overall responsibility for all three PNC consumer default locations, including the Brecksville location. Kathy Prorock, who reports to me, manages PNC Home Equity's Foreclosure Specialists at the Brecksville location.

3. I have 15 years experience in the banking industry, including 10 years in default management. Prior to becoming Default Senior Manager for the Brecksville site, I managed among other things, PNC Home Equity's Project Team, the Systems Administration Team, and the Business Strategy and Systems Support Team In these roles, I acted, and continue to act, as the business-side liaison to PNC's Information Technology group respecting the latter's role in establishing, maintaining and securing PNC Home Equity's mortgage servicing systems. I am therefore fully familiar with PNC Home Equity's mortgage servicing systems, and the policies and procedures followed by PNC Home Equity with respect to their use, maintenance, and security.

4. This Court, in its Request For Information dated April 25, 2011 (“the Request”), directs foreclosure plaintiffs who filed 200 or more residential foreclosure actions in 2010 to respond to a number of questions relating to their foreclosure processes and procedures. I make this Certification to respond to Question 1(c) on behalf of PNC Home Equity.

5. In Question 1(c), the Court asked: “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.”

6. PNC Home Equity has several systems that comprise its record-keeping system for all of its servicing activity, loan documentation, and other transactions involving the loans it services. Collectively, I refer to these systems as PNC Home Equity’s Mortgage Servicing Systems (“MSS”). These systems include, but are not limited to, the following:

PNC Home Equity’s Mortgage Servicing Systems

7. **ACLS**. PNC Home Equity uses ACLS (Advanced Consumer Lending System) to enter and maintain a record of loan-specific information including but not limited to the note date, unpaid principal balance, interest rate, accumulated interest owed, last payment received, original principal amount, and late charges.

8. **FDR**. PNC Home Equity also uses FDR (a system licensed by First Data Resources, LLC) to perform essentially the same functions as ACLS but for legacy National City Bank home equity (and other consumer) loans that are now serviced by PNC Home Equity as a result of the merger of National City Bank into PNC.

9. **RMS**. PNC Home Equity uses RMS (Recovery Management Systems) as the system of record for loan accounts that have been charged-off. Once an ACLS or FDR loan is

charged off, the loan-specific data about that loan automatically transfers to RMS. From that point forward, RMS hosts the data respecting such loans. Therefore, for charged-off loans, PNC Home Equity Specialists will access RMS (instead of ACLS or FDR) to verify information such as the borrower's name, the note date, the unpaid principal balance, the interest rate and accumulated interest owed, last payment received and late charges.

10. CACS. CACS (Computer Assisted Collections System) is the system of record used by PNC Home Equity for default loan servicing. Among other things, CACS is used to enter and maintain information about fees and costs incurred such as attorneys fees, title work, property inspection and preservation fees and other fees, and taxes paid on the account, and all other general collection activities.

11. CMS PNC Home Equity uses CMS (Collections Management System) for default loan servicing. CMS is used principally for legacy PNC home equity (and other consumer) loans held by private institutions but serviced by PNC. PNC plans to transition default servicing for these loans to CACS

12. LIS. PNC Home Equity uses LIS (Lending Image Source) to view electronic copies of imaged documents such as the mortgage, the note, and assignments. Foreclosure Specialists use LIS to verify the borrower's name and to view any documents referred to in attested documents such as a New Jersey certification.

#### MSS Entries Are Made In The Ordinary Course Of Business

13. It is the regular practice of PNC Home Equity to use its MSS to contemporaneously record and maintain records of loan-specific or borrower-specific activities or transactions. PNC Home Equity employees input all such activities or transactions that they take relating to the servicing of the loan into MSS in the regular course of business. It is the

regular practice of PNC Home Equity employees to enter into MSS information regarding loan-specific (or borrower-specific) activities or transactions that they take at or near the time the activity or transaction occurs. Each PNC Home Equity employee has an obligation to enter only accurate and truthful information into MSS and only to enter information regarding transactions or activities that they personally conduct. PNC Home Equity depends on the accuracy of the information contained in MSS to conduct its day-to-day business operations.

The Data Contained In MSS Is Trustworthy

14. PNC Home Equity has a robust system of internal controls designed to ensure that MSS is functioning as intended, that automated records are correctly made and maintained, that data is accurate and up-to-date, entered and maintained in the regular course of business, and that the data stored is secure from unauthorized access or manipulation. Among other things,

15. All PNC Home Equity employees who are authorized to enter information into MSS receive training to qualify them to perform the specific tasks to which they are assigned. After completing this training, these employees then are required to follow standardized protocols when inputting information into the system. These protocols are intended to ensure that only accurate information is entered into MSS.

16. Each PNC Home Equity employee has a unique ID and password, and employees are prohibited from sharing password information with each other. For an employee to obtain a password, the employee must submit a formal request to his or her manager, who must approve the request. Depending on the specific PNC Home Equity system, employees must change their passwords every 30 to 60 days, which limits the opportunity for unauthorized access to MSS.

17. PNC Home Equity employees can only update servicing records related to the processes for which they are responsible. These limits are enforced automatically by the MSS

based on access limitations associated with each employees' user ID and password. Depending upon the responsibility assigned and the level of seniority, PNC Home Equity employees may be given "read only" access to certain systems. PNC Home Equity employees may be denied even "read only" access to databases for which they have no assigned responsibility. For example, "read only" access to ACLS, FDR and RMS is strictly limited to those having a need for such access.

18. Each quarter, PNC Home Equity performs security verifications. Each PNC Home Equity department manager receives a list of his or her employees who have access to ACLS, FDR, and RMS. The list identifies the employee and the level of access that the employee is allowed. The manager must affirmatively re-certify that the level of access allowed is correct for each of his or her employees

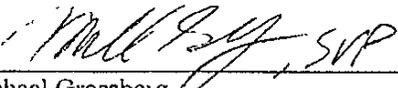
19. Further, as the PNC Senior Manager responsible for the CACS system, I too must certify the PNC employees who are allowed access to that system and approve the level of access that each employee is allowed. Currently, I must re-certify each employee's right and level of access on an annual basis. PNC intends to change its policy in the near future to require that I provide re-certifications on a quarterly basis.

20. When an employee leaves PNC, his or her password for all PNC systems is terminated automatically by the human resources department.

21. When a transaction is recorded in MSS, the system automatically makes a record of the identity of the employee recording the transaction. Once made, a transaction record cannot be deleted. The action taken can be reversed or changed by a new entry but a record of the prior transaction remains in the system such that a log of actions taken with respect to any account can always be viewed.

22. Except as stated herein, PNC Home Equity does not anticipate changing the uses of its MSS.

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.

  
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Michael Grossberg  
Senior Vice President and Default Management  
Executive, Lending Services  
PNC Bank, National Association

**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. Barisonek

**CERTIFICATION OF CYNTHIA DONAHUE  
IN RESPONSE TO REQUEST FOR INFORMATION DATED APRIL 25, 2011**

I, Cynthia Donahue, do hereby certify as follows.

1. I am a Vice President of PNC Bank, National Association ("PNC"). I am the Manager of Centralized Customer Assistance, Account Servicing.

2. I have 17 years experience with PNC. I have held my current position since 2005. Prior to my current position, I was Collections Team Manager and Administrative Services Manager Default Support. Among other things, I have participated in the transition of loans to PNC through the loan boarding process described below and am, therefore, familiar with these processes. As a PNC Vice President, and based on my 17 years of experience, and the several positions that I have held with PNC relating to consumer loans, I am also generally familiar with PNC's processes, procedures and practices related to servicing home equity loans.

3. This Court, in its Request For Information dated April 25, 2011 ("the Request"), directs foreclosure plaintiffs who filed 200 or more residential foreclosure actions in 2010 to respond to a number of questions relating to their foreclosure processes and procedures. I make this Certification to respond, in part, to Question 1(c) on behalf of PNC Home Equity.

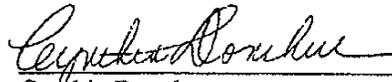
4. In Question 1(c), the Court asked: "State in detail your record keeping system to ensure that there is accurate up-to date entries of payments, loan history, assignments, or of any other transaction involving the mortgage. If you are currently making or anticipate making changes, state the changes to be made and when they will be implemented."

5. When PNC originates loans for servicing, PNC Home Equity boards all loan-level information into PNC Home Equity's mortgage servicing systems ("MSS"), which are described in the Certification of Michael Grossberg. The loan level information is transferred from PNC's loan underwriting systems. PNC Home Equity's MSS, in particular, ACLS and FDR, automatically test the data during the transfer process and reject data that does not accurately transfer. As part of the loan boarding process, PNC Home Equity investigates and resolves such system "edits" so that the loan-level data entered into ACLS and FDR accurately performs

6. When PNC Home Equity acquires loans for servicing from outside of PNC, PNC Home Equity engages in a robust process to ensure that loan data is accurately and completely boarded to its MSS. PNC Home Equity will form a project team, with expertise drawn from all departments as needed for the particular loan boarding project. The project team will meet with the prior loan servicer to plan the transfer of the loans to be boarded. Thereafter, PNC Home Equity engages in extensive procedures to "map" the data provided by the prior loan servicer (usually on data tapes or other electronic media) so that the data accurately translates from the systems used by the prior servicer onto PNC Home Equity's MSS. The project team will also engage in due diligence to ensure that the prior servicer's systems accurately captured the substantive terms of the loans being serviced and that all required data is converted and transferred to PNC Home Equity. Following "conversion" of the loans to PNC Home Equity, the project team, and all departments, will "support" the conversion by identifying and helping to

resolve issues (if any) as they arise, thereby ensuring that the data entered through this loan boarding process accurately performs in the MSS.

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.



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Cynthia Donahue  
Vice President  
PNC Bank, National Association

**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. Barisonek

**CERTIFICATION OF KATHLEEN PROROCK  
IN RESPONSE TO REQUEST FOR INFORMATION DATED APRIL 25, 2011**

I, Kathleen Prorock, do hereby certify as follows:

1. I am a Vice President at PNC Bank, National Association ("PNC"). I am the Real Estate Department Manager for PNC Home Equity. The Real Estate Department is the specific department within the group headed by Steven Cory that is directly responsible for managing PNC Home Equity's mortgage foreclosure process. I report to Steven Cory

2. This Court, in its Request For Information dated April 25, 2011 ("the Request"), directs foreclosure plaintiffs who filed 200 or more residential foreclosure actions in 2010 to respond to a number of questions relating to their foreclosure processes and procedures. I make this Certification to respond to Questions 1(f) and 1(g) on behalf of PNC Home Equity.

3. As Real Estate Department Manager, I have personal knowledge of the processes and procedures employed to ensure that certifications are based on the signer's personal knowledge or review of business records<sup>1</sup>. In particular, I contributed to the development of these processes and procedures, and I manage the Home Equity Foreclosure Specialists who now follow these processes and procedures. I directly supervise PNC Home Equity's foreclosure referrals and its oversight and prosecution of the foreclosure actions brought by PNC Home Equity. I supervise PNC Home Equity's Foreclosure Specialists, all of whom report directly to me.

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<sup>1</sup> PNC Home Equity uses only certifications, not affidavits, in New Jersey

4. For these reasons, I am fully familiar with PNC Home Equity's processes and procedures for ensuring that foreclosure counsel has current accurate information to support preparation of foreclosure-related documents for submission to court in that I am directly responsible for seeing to it that foreclosure counsel have such information. Likewise, I oversee the review process for documents to be submitted to court pursuant to New Jersey Rule 4:64-1 *et seq*. I contributed to the development of the processes and procedures implemented by PNC Home Equity in response to the December 2010 amendments to Rule 4:64 and am responsible for implementing and assuring compliance with those processes and procedures.

5. Finally, as a PNC Bank Vice President, and based on my 15 years of experience, and the several positions I have previously held with PNC Home Equity, I am generally familiar with PNC Home Equity's processes, procedures and practices related to servicing of home equity loans.

**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 the Court pursuant to Court Rule.**

6. Before referring a loan for foreclosure, PNC Home Equity's Pre-Foreclosure Specialists will review the file, prepare the appropriate pre-foreclosure notices, and ensure that the loan is appropriate for referral. In so doing, the Pre-Foreclosure Specialist must complete a checklist documenting that the all of the appropriate information is accurate.

7. At that point, the Pre-Foreclosure Specialist refers the file to a Home Equity Foreclosure Specialist. The Foreclosure Specialist will then complete a separate checklist to review all of the relevant information, including the principal and interest due, the name of the holder of the Note and Mortgage, and any other information necessary for foreclosure.

8. The Foreclosure Specialist then prepares foreclosure instructions and loads the pertinent documents into a document-imaging system called LIS (“Lending Image Source”). All of the necessary information and documentation is loaded including all of the relevant notices, and copies of the Note and Mortgage

9. The Foreclosure Specialist then transmits all of these documents, along with foreclosure instructions, to foreclosure counsel. The documents are transmitted using a proprietary secure online email transmission system.

10. The foreclosure instructions inform foreclosure counsel about Home Equity’s expectations for the foreclosure. These instructions specifically mandate compliance with the SCRA and other mandatory requirements.

11. Foreclosure counsel prepares the Complaint based upon information in the referral and its own due diligence. Foreclosure Counsel then emails the Complaint back to PNC Home Equity, again using a proprietary secure online email transmission system, where it is reviewed in accordance with the procedures outlined in response to Question 1(g), below. If any factual assertion in the complaint under review cannot be verified, the Foreclosure Specialist must return the complaint to foreclosure counsel to be appropriately revised by foreclosure counsel and then returned to PNC Home Equity. Once the corrected complaint is returned to PNC Home Equity, it is reviewed again in the manner described herein to be sure that all required corrections have been made.

12. Judgment packages, certifications of proof of amount due, and certifications of additional sums due are prepared by foreclosure counsel and transmitted to PNC Home Equity for review in the same manner. At each stage of the proceeding, PNC Home Equity Foreclosure Specialists verify the factual assertions set forth in the document being reviewed by comparison

of that document to the information contained in PNC Home Equity's mortgage servicing systems ("MSS") and associated loan documents (collectively, "Business Records") If any factual assertion in the document under review cannot be verified, the Foreclosure Specialist must return the document unsigned to foreclosure counsel to be appropriately revised by foreclosure counsel and then returned to PNC Home Equity. Once the corrected document is returned to PNC Home Equity, it is reviewed again in the manner described herein prior to execution to be sure that all required corrections have been made.

13. PNC Home Equity's MSS are updated daily to incorporate all borrower or loan-related activities or transactions, including approved, stipulated re-payment schedules or other loss mitigation arrangements. My team receives daily notifications of any such activities or transactions and any relevant information is communicated timely to foreclosure counsel as part of the verification process described in PNC Home Equity's responses to Questions 1(a), 1(d), and 1(g) or by direct email or telephone communication. Accordingly, all borrower or loan-related activities or transactions (whether occurring before or after the filing of a foreclosure complaint) are timely communicated to foreclosure counsel, and, documents filed in court are based on the most up-to-date information then available.

14. Compliance with PNC Home Equity's foreclosure-related processes and procedures is reviewed by several methods. As described in the Certification of Steven Cory, PNC Home Equity's Quality Assurance Department reviews *de novo* every attested document prepared for submission to court by a Foreclosure Specialist. In addition, PNC Home Equity conducts quarterly Quality Assurance Audits. PNC corporate level auditors also conduct their own, independent audit of PNC Home Equity's compliance with PNC foreclosure-related

processes and policies. PNC Home Equity is also developing a Quality Control Group that will conduct a Quality Risk audit on a monthly basis.

**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 4:64-1 et seq.**

15. To comply with Rule 4:64-1, PNC Home Equity Foreclosure Specialists are required to review every complaint, every judgment package, and every certification prepared for submission to court (including certifications of proof of amount due, certifications of additional sums due, and lost note certifications).

16. To ensure compliance with Rule 4.64-1, PNC Home Equity caused its national counsel (Dykema Gossett PLLC) to create master checklists for each category of document ("Rule 4:64 Checklists"). Each Rule 4.64 Checklist has been reviewed and approved by each of PNC Home Equity's New Jersey foreclosure counsel.

17. PNC Home Equity uses separate checklists for. (a) the Complaint, (b) the Final Judgment Package, (c) the Certificate of Proof of Amount Due, and (d) the Certificate of Additional Sums Due. Each checklist tracks in detail the information that must be verified.

18. For each document under review for submission to court, the PNC Home Equity Foreclosure Specialist must complete the applicable Rule 4:64 Checklist. The PNC Home Equity Foreclosure Specialist performing the review must record on the checklist his or her name, title, and the date of the review. Each page of the checklist must be initialed by the reviewer. The reviewer must sign the checklist upon completing the review. No document may be submitted to court without completion of the applicable Rule 4:64 Checklist. These Rule 4.64 Checklists are in addition to the Attestation Checklists described by Steve Cory in response to Question 1(a). Foreclosure Specialists must also complete the Attestation Checklists. Both the

Attestation Checklists and the Rule 4:64 Checklists are independently reviewed by the Quality Assurance Department.

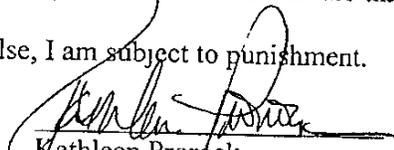
19. After completion, the Rule 4:64 Checklist must be mailed or sent by overnight courier to foreclosure counsel.

20. If any factual assertion contained in the document to be submitted to court cannot be verified by comparison to PNC Home Equity's Business Records, the document may not be submitted to the court. Instead, foreclosure counsel must revise the document using the correct information noted by the Foreclosure Specialist.

21. If revisions are required, the full review process—with a new Rule 4:64 checklist, and, if the document is attested, a new Attestation Checklist —must be repeated after the revisions are completed. Foreclosure counsel may not file any of these documents, or his or her own certification of diligent inquiry, until each and every one of the corrections listed on the original Rule 4:64 checklist has been made and re-verified by PNC Home Equity.

22. By order dated June 9, 2011, the New Jersey Supreme Court adopted further amendments to Rule 4:64-1 *et seq*. PNC Home Equity is in the process of analyzing what changes to its processes and procedures, if any, are required to comply with Rule 4:64-1 *et seq* as amended on June 9, 2011. Any such changes will be adopted and implemented by PNC Home Equity before further filings of foreclosure-related documents.

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.



Kathleen Prorock  
Vice President  
PNC Bank, National Association

**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. Barisonek

**CERTIFICATION OF LAURIE CALDWELL IN RESPONSE  
TO REQUEST FOR INFORMATION DATED APRIL 25, 2011**

I, Laurie Caldwell, do hereby certify as follows:

1. I am a Vice President at PNC University, a division of PNC Bank, National Association ("PNC"). PNC University is a separate division of PNC, with its own personnel and management structure. PNC University personnel do not report to business-line managers. Training Magazine, in its recent ranking of the top 125 training organizations, ranked PNC University as having the fifth best training program in the United States.
2. Since May 2008, I have been the Business Training Manager responsible for providing training services to PNC Lending Services, a group within PNC's Home Equity division ("PNC Home Equity"). In this role, I am responsible for providing training to, among others, PNC Home Equity Foreclosure Specialists that sign attested documents on behalf of PNC. I supervise a staff of instructors who provide the actual classroom instruction to PNC Home Equity Foreclosure Specialists. These instructors report directly to me.
3. As the Business Training Manager responsible for PNC Lending Services, I participated in the development of the curriculum for the training classes taken by PNC Home Equity Foreclosure Specialists. I am responsible for ensuring its proper implementation at the classroom level. Accordingly, I am fully familiar with the training provided by PNC University to PNC Home Equity Foreclosure Specialists and its implementation at the classroom level. In particular, I am familiar with classes taught by Mr. Robert Pierkarczyk, who teaches at PNC

Home Equity's facility in Brecksville, Ohio Mr. Pierkarczyk reports directly to me. I am fully familiar with the classes taught by Mr. Pierkarczyk to PNC Home Equity Foreclosure Specialists and the curriculum and procedures followed by Mr. Pierkarczyk in those classes.

4. This Court, in its Request For Information dated April 25, 2011 ("the Request"), directs foreclosure plaintiffs who filed 200 or more residential foreclosure actions in 2010 to respond to a number of questions relating to their foreclosure processes and procedures. I make this Certification to respond to Question No. 1(e).

5. In Question No. 1(e), the Court asked: "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."

6. PNC Home Equity Foreclosure Specialists first participate in classes taught by PNC University immediately upon beginning their employment Foreclosure Specialists, like all other PNC Home Equity employees, receive initial systems training in a classroom setting This formal systems training takes place over period of approximately 2½ days.

7. This initial systems training includes an overview of all of the computer systems used for Home Equity mortgage servicing including, among other things, PNC Home Equity's Computer Assisted Collections Systems ("CACS"). During initial systems training, Foreclosure Specialists are taught how to access the information they will need on CACS. In addition, they learn how to find and validate loan-specific information.

8. In addition to this systems training, PNC Home Equity Foreclosure Specialists also take courses in PNC's Code of Business Conduct & Ethics, how to treat confidential information, the Service Members Civil Relief Act ("SCRA") and other relevant statutes and

regulations, passwords, and identify theft. As a result of this training and the systems training described above, Foreclosure Specialists learn that PNC Home Equity's systems are both secure and reliable and accurate for purposes of verifying the information in affidavits and certifications.

9. After completing this initial systems training, the Foreclosure Specialist returns to the business unit for on-site, side-by-side training, which lasts approximately 60 days. During this period, the Foreclosure Specialist shadows a more senior Foreclosure Specialist and observes his or her day-to-day activities. During this 60-day period the new Foreclosure Specialist may not execute or sign any factual statements or legal documents.

10. Upon completion of side-by-side training, the new Foreclosure Specialist is selected by his business-line supervisor to return to PNC University for specialized attestation training.

11. The specialized attestation training course covers in detail PNC's attestation, notarization, and Home Equity desktop procedures.

12. Among other things, Foreclosure Specialists are taught that all documents requiring attestation for use by PNC must be verified, executed, and, where required, witnessed and notarized in compliance with all applicable laws and regulations. Foreclosure Specialists are taught what it means to "attest" a document, namely, that attest means to execute a legal document — in the physical presence of a witness and notary public, when required — after obtaining an understanding of the document's function and personally verifying the accuracy of the document's factual assertions. Foreclosure Specialist are informed of their solemn obligation to tell whole the truth in documents that they sign under any and all circumstances. They are taught that verification of a document means, at a minimum, taking the following steps:

- Identifying the parties described in the document
- Reviewing the document to gain an understanding of what it is, what the words mean and why it must be executed.
- Reviewing any exhibits or attachments to the document in order to verify the accuracy of what the document asserts about those exhibits or attachments, or about the contents of those exhibits or attachments.
- Verifying the accuracy of all other factual assertions in the document against the servicing information in the system of record or associated loan documents

13. Foreclosure Specialist are taught that they may not execute a document that is inaccurate in any way, no matter how minor. They are taught that they cannot execute a document (i) that the employee is unable to understand, (ii) that asserts that the employee has specific knowledge that the employee does not have; (iii) that contains an item of information that the employee has been unable to locate in PNC's business records or in any exhibit or attachment to the document, or (iv) that refers to an exhibit or attachment that is not available for review.

14 Foreclosure Specialists receive instructions on how to use PNC's Attestation Checklist and, on a screen-shot by screen-shot basis, are taught where to look for, and how to retrieve, the correct information from PNC Home Equity's mortgage servicing system. The Foreclosure Specialist is then instructed, line-by-line, on how to use the information contained in PNC Home Equity's servicing systems to verify each factual assertion contained in a certification or affidavit.

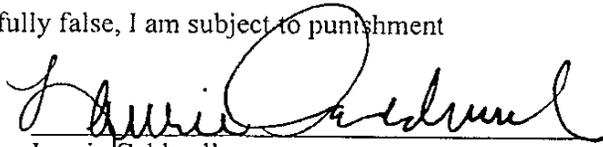
15. At the end of this training program, the Foreclosure Specialist is given a written test that determines whether or not the Foreclosure Specialist fully understands his or her obligations with respect to attestation (and where required, notarization of documents), the proper procedures for executing and notarizing documents, and the proper procedures for accurately verifying the factual assertions contained in every attested document, which includes

New Jersey certifications. The test is scored by PNC University personnel on-site, who notify the appropriate business line of the result.

16. Both Home Equity and PNC University maintain separate records of these results.

17. The Foreclosure Specialist may not execute any factual statements or legal documents until after he or she passes the test, is recommended for approval by the appropriate business line manager, and, in fact, is certified to execute documents by PNC's corporate secretary.

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

A handwritten signature in black ink, appearing to read "Laurie Caldwell", written over a horizontal line.

Laurie Caldwell

Vice President and Business Training Manager  
PNC University, a Division of PNC Bank,  
National Association

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**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. Barisonek

**CERTIFICATION OF PAMELA RICHARDSON IN RESPONSE  
TO REQUEST FOR INFORMATION DATED APRIL 25, 2011**

I, Pamela Richardson, do hereby certify as follows

1. I am a Senior Vice President and Business Training Manager at PNC University, a division of PNC Bank, National Association ("PNC"). PNC University is a separate division of PNC, with its own personnel and management structure. PNC University personnel do not report to business-line managers. Training Magazine, in its recent ranking of the top 125 training organizations, ranked PNC University as having the fifth best training program in the United States

2. I have been employed by PNC for over 19 years, and have worked in PNC University since 2008. I am the Business Training Manager responsible for providing training services to PNC Mortgage employees, including the sales, operations, loan servicing, and default administration departments. In this role, I am responsible for providing training to, among others, PNC Mortgage Attestation Specialists that sign attested documents on behalf of PNC Mortgage for foreclosure and loss mitigation. I supervise Sheila Carmack, who manages the facilitators that provide actual classroom instruction to PNC Mortgage Attestation Specialists. Ms. Carmack reports directly to me.

3. As the Business Training Manager responsible for PNC Mortgage, I participated in the development of the curriculum for the training classes taken by PNC Mortgage Attestation Specialists. I am responsible for ensuring its proper implementation at the classroom level.

Accordingly, I am familiar with the materials covered in training provided by PNC University to PNC Mortgage Attestation Specialists and their implementation at the classroom level. I am familiar with the classes taught by facilitators to PNC Mortgage Attestation Specialists and the curriculum and training in those classes.

4. This Court, in its Request For Information dated April 25, 2011 ("the Request"), directs foreclosure plaintiffs who filed 200 or more residential foreclosure actions in 2010 to respond to a number of questions relating to their foreclosure processes and procedures. I make this Certification to respond to Question No. 1(e).

5. In Question No. 1(e), the Court asked: "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."

6. When first hired by PNC, all PNC Mortgage employees participate in classes taught by PNC University immediately upon beginning their employment. All PNC Mortgage employees responsible for default management, including Attestation Specialists, receive systems and job-specific training in a classroom setting. Newly hired Attestation Specialists are trained for three days.

7. This training for newly-hired Attestation Specialists provides an overview of the mortgage servicer's role, and includes instruction in payments, information pertaining to escrow accounts, and the payoff of a loan. This training also includes an overview of delinquent loan servicing, including collections, workout options, loss mitigation, bankruptcy, property preservation, foreclosure, REO, and compliance with all applicable rules and regulations.

8. Newly-hired Attestation Specialists receive training on the relevant PNC Mortgage servicing systems, including PNC Mortgage's LPS-MSP ("Mortgage Servicing Platform) and LPS-PM ("Process Management") systems, which are licensed by Lender Processing Services, Inc. PNC Mortgage employees are taught how to access and enter the information they need on these systems. These employees also become familiar with PNC Mortgage's data integrity procedures. This training is designed to, and, in my opinion does, permit the employee to form a judgment that system information is accurate for purposes of verifying factual assertions in documents requiring attestation

9. As part of their training, newly-hired Attestation Specialists receive detailed instruction on executing foreclosure-related documents, including affidavits and certifications. The specialized attestation training course covers in detail PNC's Attestation Procedures and PNC's Notarization Procedures

10 Existing PNC employees, who transfer or are promoted to the position of Attestation Specialist also receive attestation training on PNC's Attestation Procedures and PNC's Notarization Procedures. Depending on the experience level of the individual being trained, the attestation course takes between four to eight hours to complete.

11. Among other things, Attestation Specialists are taught that all documents requiring attestation for use by PNC must be verified, executed and, where required, witnessed and notarized in compliance with all applicable laws and regulations. Attestation Specialists are taught what it means to "attest" a document, namely, that attest means to execute a legal document — in the physical presence of a witness and notary public, when required — after obtaining an understanding of the document's function and personally verifying the accuracy of the document's factual assertions. Attestation Specialist are informed of their solemn obligation

to tell whole the truth in documents that they sign under any and all circumstances. They are taught that verification of a document means, at a minimum, taking the following steps:

- Identifying the parties described in the document.
- Reviewing the document to gain an understanding of what it is, what the words mean and why it must be executed.
- Reviewing any exhibits or attachments to the document in order to verify the accuracy of what the document asserts about those exhibits or attachments, or about the contents of those exhibits or attachments.
- Verifying the accuracy of all other factual assertions in the document against the servicing information in the system of record or associated loan documents.

12. Attestation Specialists are taught that they may not execute a document that is inaccurate in any way, no matter how minor. They are taught that they cannot execute a document that (a) the employee is unable to understand; (b) asserts that the employee has specific knowledge that the employee does not have; (c) contains an item of information that the employee has been unable to locate in PNC's Business Records or in any exhibit or attachment to the document, or (d) refers to an exhibit or attachment that is not available for review.

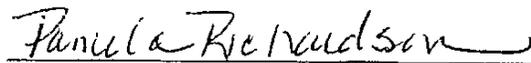
13. Attestation Specialists receive instructions on how to use PNC's Attestation Checklist, and, on a screen-shot by screen-shot basis, are taught where to look for, and how to retrieve, the correct information from PNC Mortgage's servicing systems. The Attestation Specialist is then instructed, line-by-line, on how to use the information contained in PNC Mortgage's servicing systems to verify each factual assertion contained in a certification or affidavit.

14. At the end of this training program, the Attestation Specialist is given a written test that determines whether or not the Specialist fully understands his or her obligations with respect to attestation (and where required, notarization of documents), the proper procedures for executing and notarizing documents, and the proper procedures for accurately verifying the

factual assertions contained in every attested document, which includes New Jersey certifications. The test is scored by PNC University personnel on-site, who notify the appropriate business line of the result. PNC University maintains records of these test results

15. All current Attestation Specialists have completed this training and passed this test.

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.



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Pamela Richardson  
Senior Vice President and Business Training  
Manager  
PNC University, a Division of Bank, National  
Association